



AROs' Activities and Pre-evaluation of the Opportunity of Mutual Recognition Procedure Country profile: Spain

I.- USEFUL BACKGROUND INFORMATION

i.1.- Spain is one of the most requested States in Europe concerning the identification and tracing of criminal assets

i.2.- EU Decision 2007/845/JHA, of 6 December 2007 was initially implemented in March 2009 following a twofold model with the designation of both the National Intelligence Centre against Terrorism and Organised Crime (CICO) as police contact point and the Special Anti-drug Prosecution Office (Fiscalía Especial Antidroga) as the judicial contact point. The CICO (Ministry of Interior) has an administrative nature, while the Special Antidrug Prosecution Office has a judicial one.

i.3.- CICO as police cp was under the umbrella of the Secretary of State for Security at the Ministry of the Interior, with the operational support of LEAs. Namely, within the CICO there were two asset tracing offices:

- Asset Tracing Office of the National Police Force (*Oficina de Localización de Activos*, OLA), an operative group which belongs to the 1st Section of the Money Laundering Squad, within the Central Economic Crime Unit of the Spanish National Police Force and

- the so-called Technical Unit of Judicial Police of the Civil Guard (Unidad Técnica de Policía Judicial, UTPJ).

CICO operated as an active intermediary allocating requests for information between these two offices, which are the ones in charge of identifying and tracing the assets. After gathering this information the reply was sent to the CICO, which finally forward it to the requesting State.

While CICO used SIENA to exchange information the Special Anti-drug Prosecution Office used e-mail.

i.4.- This initial twofold model provisionally performed the task of tracing criminal assets without any specialised management body in place. So when criminal assets were confiscated they remained at the disposal of the Courts/PPOs and generally were sold at the sentence execution phase of criminal proceedings by means of public auctions.



This mechanism has proved to be inefficient in proceedings with greater complexity where the need of asset management usually exceeds the resources available for judicial authorities. These circumstances lead to reaffirming the need to put a fully-fledge ARO and AMO into operation.

i.5.- To complete this scenario, we have to mention the experience built up by the Governmental *Delegation for the National Plan on Drugs* (Plan Nacional de Drogas) ruled by Act 17/2003 of 29 May, which regulates the *Special National Fund from Confiscated Assets arising from illegal trafficking in drugs and other related crimes*. This is a body that was set up at the end of the eighties aimed at facing the serious problem of hard drug consumption hitting Spain at that time. This office was conceived as a response to the problems of addiction and rehabilitation that is why it is under the structure of the Ministry of Public Health. Although related to the disposal of confiscated assets subject to a final conviction sentence it set out a precedent that has been taken into account both for improving management efficiency as well as to avoid duplicities and encourage pro the necessary coordination between both institutions. Noteworthy that assets or proceeds that owned by this Special National Drug related crimes Fund are not under the remit of the Spanish AROs.

So, the Spanish courts can handle frozen assets regardless of the crime from which the ill-gotten gains derived but can only dispose then if the final judgment doesn't have anything to do with drug trafficking. If there is a final conviction sentence on a drug trafficking or any crime related to drug trafficking, the body entitled is the Special National Drug related crimes Fund.

i.6.- Last but not least, the FIU (Servicio Ejecutivo de la Comisión de Prevención de Blanqueo de Capitales e Infracciones Monetarias, SEPBLAC) is another administrative institution with a role in this assets tracing field which depends on the Ministry of Economy and Competitiveness.

II.- POST-DECISION 2007 SCENARIO: SETTING UP an ASSET RECOVERY and MANAGEMENT OFFICE IN SPAIN: OFICINA DE RECUPERACIÓN Y GESTIÓN DE ACTIVOS (ORGA)

ii.1.- As mentioned before Spanish investigating courts typically were in charge of upkeeping frozen assets regardless of the crime from which the ill-gotten gains derived (except drug trafficking related offences) until the final judgment entitled the trial court to star the disposal phase of the confiscation life-cycle. If there is a final conviction sentence on a drug trafficking or any crime related to drug trafficking, the body in charge is the National Plan on Drugs.

ii.2.- The pre-ORGA scenario above mentioned where the Courts were in charge of the asset management gave rise to a number of bottlenecks due to the:

- Lack of supporting staff with financial or economic skills/expertise within the Courts,



- Was time-consuming due to the existing judicial workload and Complexity and length of criminal proceedings, as well as the need to prioritize and deal with urgent cases,
- Risk of confusion: there is a twofold competence for Investigating courts and first instance trial courts when dealing with freezing and confiscation orders,...

The setting up of a Spanish AMO was really timely however this respect, but the office is not yet well known. One of the AMO's tasks is to raise awareness of its work and added value in order to relieve the courts of this cumbersome and time-consuming task.

ii.3.- In Spain the 1st final provision of the Organic Act 5/2010 of 22 June amending the Criminal Code, added Article 367 septies to the Criminal Procedure Act, legally provided the creation of an Office for the Recovery of Assets for the first time without any detailed outlook.

ii.4.- Article 10(1) in Directive 2014/42/EU on the freezing and confiscation of instrumentalities and proceeds of crime, aimed at a greater specialization for the management of seized assets to provide a more efficient response to the challenge of the crime doesn't pay approach.

In line with the 2014 Directive, Spain set up a body gathering both assets tracing and freezing as well as assets management Offices to trace, seize manage and confiscated criminal assets.

In 2015 article 10 of Directive 2014/42/EU was implemented in Spain by the Sixth Additional Provision of the Criminal Procedure Act enabling the Spanish Government to adopt a legislation to define the structure, organization and functioning of the Office for Asset Recovery and Management (ORGA) within the Ministry of Justice. The same legislative package introduced relevant modifications to the confiscation legal framework introducing NCBC, extended confiscation and third-party confiscation.

III.- ORGA: STRUCTURE AND ACTIVITIES

iii.1.- So, nowadays there is one single agency as Asset Recovery and Management Office in Spain ("ORGA", as per its Spanish acronym). ORGA was set up as an demand-driven auxiliary administrative body within the Ministry of Justice, aimed at fulfilling a significant role in tracing and managing assets derived from crime, with the support of the institutional structure and the necessary financial and human resources, in order to support the freezing and confiscation powers of judicial authorities (namely judges and courts and PPs) within the framework of criminal proceedings.

iii.2.- Art. 4 of the Royal Decree 948/2015 of 23 October, regulating the Office for Asset Recovery and Management, establishes that "The Office for Asset



Recovery and Management is an agency in the Ministry of Justice organization under the line of command of the State Secretariat for Justice”.

Royal Decree 948/2015 of 23 October on the Office for Asset Recovery and Management is completed with Order JUS/188/2016 of 18 February, where the scope of action of this body was implemented operationally implemented by deploying the ORGA in the Spanish Territory as well as well as the opening of its Deposits and Consignments bank account.

As a judicial supporting body ORGA greatest challenge is to provide a quick response to any national or cross-border judicial request for assistance upon the request of domestic courts (mainly in the active approach) and Public Prosecutors dealing with incoming EIOs aimed at requesting financial/banking information or even a entire patrimonial report. In these cases, ORGA could be commissioned by the International Cooperation Public Prosecutors or by the centralised International Cooperation Unit at the General Prosecutor’s Office (UCIF). Actually, available figures show how UCIF is one of the most relevant requesting judicial authority at a national level.

iii.3.- Structure of the Spanish ORGA:

Internally, the Office is divided into two Subdirectorates General:

- a) The Subdirectorate General for tracing and recovering assets, which is charged with the functions of identifying and tracing of items, assets, instruments and proceeds from crime that are located within or outside the national territory and with placing these assets before the legal authorities.

To carry out these functions and within the mandate of the court’s or the Public Prosecutors’ production orders, this Subdirectorate works in coordination with the law enforcement agencies and may ask for the support of any other public or private bodies.

It is also responsible for the exchange of patrimonial information with similar offices at international level.

- b) The General Subdirectorate for the upkeeping, management and disposal of assets, which is assigned the following functions:



1. Safekeeping and managing items, assets, instruments and proceeds of crime, whenever seized, frozen or confiscated by the court, irrespective of their nature, along with the profits, proceeds of crime.

Its functions also include the destruction of assets when ordered by the competent judicial authority, in the terms legally provided. The Office shall manage assets in any of the forms provided for in the legislation applicable to Public Administrations, without prejudice to be subject to other applicable regulation.

2. Briefing on the status and circumstances of the managed assets, which shall be forwarded to the competent authority, ex officio or upon request in order to avoid uneconomical actions and to ensure the maximum possible economic benefit, whilst sticking to the law and complying with all procedural guarantees.
3. Interlocutory sales, management of those goods commended by the court to the Office, subsequent to their seizure. Likewise, whenever entrusted by a judicial body, it shall be responsible for the disposal of confiscated assets assigned to the State, unless these assets are recorded in the name of the State in the corresponding Property Register or in the Moveable Property Registry. This function also includes selling in advance of seized or confiscated assets, subsequent to judicial authorisation within the scope of action of the Office.
4. Provisional use of seized and frozen items and assets when it has been previously authorised by a judicial authority.
5. supporting the Committee for the allocation of the Proceeds of Crime.
6. The management of the Deposits and Consignments Account hold by the Office for Asset Recovery and Management.

In addition ORGA may sign working agreements with competent bodies within the Ministry of Interior. Such agreements include a clause for the secondment of personnel on a pro tempore basis.



iii.3.- International inputs: International good practice guidelines and the different existing models in European countries, have been taken into account in the regulation provided for in Royal Decree 2015.

Among the existing different agency models in the European Judicial Area specialised offices with a multidisciplinary staff coming from the areas of the administration, justice, and customs, as well as from the tax agencies and the judicial police was the role model for us. In particular, French AGRASC had a prominent influence in the ORGA as its experience meant a radical change in the way confiscation was understood by French courts, directing it towards a more efficient assets management. Furthermore, the ill-gotten gains are used to fulfil civil responsibilities, for the self-financing of the Office and to support the fight against organised crime with further resources.

iii.4.- In any case, ORGA is a demand-driven body and shall always act under the request of a competent judicial authority, meaning a Judge or Court or the Public Prosecutor, within the framework of its competences in the framework of a criminal proceedings, an international cooperation file or an autonomous confiscation proceedings or in whatever other actions within the terms provided by criminal or procedural law. In turn, when necessary, the ORGA may request the collaboration of any public and private entities, which will be obliged to cooperate in accordance with its specific regulations.

iii.5.- So, the mission of ORGA is threefold:

- first, it is a tool an institutional brick for the tracing of assets related to criminal activity;
- secondly, it has the necessary technical and legal means to manage and realise the seized assets; and



- Last and mostly, it constitutes the appropriate channel for international cooperation with similar entities in other jurisdictions, so as to ensure asset tracing and recovery, regardless of where the offenders may have placed/concealed those assets.

The outcome of the disposal of confiscated assets in the last phase of the assets recover cycle will be applied to cover the costs and expenses caused in the upkeeping of the frozen assets and in the given public auctions. The remaining part will be affected to the payment of civil liabilities and legal costs declared in the procedure.

4. What are the *biggest challenges ORGA faces* in the application of the Regulation 2018, and how are these addressed?

ORGA is not a judicial authority (nor as issuing neither as executing) As a judicial supporting body ORGA greatest challenge is to provide a quick response to any national or cross-border judicial request for assistance on upon the request of domestic courts (mainly in the active approach) and PPOs re incoming EIOs aimed at requesting financial/banking information or a whole patrimonial report. In these cases ORGA could be commissioned by the PPOs/UCIF

5. What *tools and databases does ORGA most commonly use* when applying the REG, especially for asset tracing (e.g., accessing public records, utilizing professional services or software)?

It should be noted that there are numerous public and private institutions to be consulted when executing confiscations or financial penalties according to the Spanish Law. Namely:

- The Spanish Confederation of Savings Banks (CECA);
- The Spanish Banking Association (AEB);
- The Tax Agency Centralized Data Base (BDC AEAT)
- The General Treasury of the Social Security;
- The Chamber of Commerce Register;
- The vehicle and drivers register within the General Directorate of Traffic;
- The Vessel and Ships register within the General Directorate of the Merchant Marine;
- The Aircrafts register within the State Aviation Safety Agency;
- The Registry of Movable Property;
- The Land and Cadastre register.
- The Single Computerized Notarial Index;
- The Financial ownership Register (FTF) at the Spanish FIU



- The brand-new *Beneficial Ownership Central Register* hosted at the Spanish FIU (set up by Royal Decree 609/2023, of 11 July, and so-called *Registro Central de Titularidades Reales* implementing Directive 2015/849 and Directive 2018/843 on the prevention of the use of the financial system for the purposes of money laundering or terrorist financing).

This database holds adequate, accurate and current information on corporate's beneficial ownership and trustees, in addition to basic information such as the company name and address and legal ownership in full compliance with Union law. This central database collects beneficial ownership information, or the business register, or another central register and obliged entities are responsible for filling in the register. As Spanish authorities should provide rapidly, constructively and effectively the widest range of cross-border cooperation for the purposes of the above mentioned Directives, this is without prejudice to any rules or procedures applicable to judicial cooperation in criminal matters. So this information would be also available to foreign judicial authorities in relation to money laundering, terrorist financing, and the associated predicate offences, such as corruption, tax crimes and fraud cases even during the executing phase.

Last but not least in this regard, ORGA is currently developing an stand-alone research tool, that will be fully operative in the future.

iii.6.- International cooperation: How does ORGA collaborate with AROs from other EU member states in applying the REG? Please provide examples and data if available.

Setting up an ARO + AMO Offices equivalent to those of our neighbouring countries certainly has contributed to enhance international cooperation in freezing and confiscation matters which shall in turn be for the greater benefit of the Spanish Treasury, since Act 23/2014 of 20 November on the mutual recognition of judicial decision in criminal matters in the EU generalised the rule of the disposal and sharing of 50% of the proceeds obtained between the issuing and the executing Members States (and far beyond to third countries in a later reform).

Therefore ORGA is deeply involved on search and location of assets and proceeds of crime for the purpose of freezing and confiscation using cross-border/international exchanges of information within the several networks where ORGA is a contact point (CARIN/ARINs).



Figures? In 2023 ORGA sent 94 international requests of information to EU member states and third countries and received 21 incoming requests for information.

ORGA exchanges information at an international level via SIENA Platform, at EU level, CARIN Network, mainly with non-European countries, and RRAG Platform, for Latin American countries.

IV.- ORGA as AMO

1. Can you provide statistics on the types and values of assets currently managed by authorities responsible for frozen and confiscated assets? How many of these assets result from the application of the REG?

ORGA does not have global statistics as we only handle cases that are voluntarily referred to us by the courts.

2. How do competent authorities maintain the value of confiscated and frozen assets, especially for items requiring specific measures to prevent degradation?

In situations where it is reasonably assumed that the property frozen is perishable or rapidly depreciating with disproportionate maintenance costs in relation to the expected value at the time of confiscation, Spanish legal system foreseen the direct delivery of perishable goods to NGOs, charity entities or Local Administrations with social services and for disposal of such property during the pre-trial phase before a final confiscation is finally decided by mean of a sentence via interlocutory sales of the already frozen assets and goods. Though the benefits of Interlocutory sales of rapidly depreciating property or when there are expensive storage costs (e.g.: car and vessels) are quite obvious, Spanish Courts are still reluctance to authorise this measure on regular basis. Even if the suspect is finally acquitted, he or she would better be paid back with the money obtained after selling such property instead of a useless and depreciated car/vessel that has been deposited in a warehouse for years with an expensive invoice to be paid by the Justice Administration.



3. What are the main challenges that competent authorities in your country face in managing confiscated and frozen assets, and how do they tackle them? If possible, make specific reference to goods frozen and confiscated under the REG.

The main problem is the judicial workload as Investigating courts are overloaded with criminal investigations, which means that asset managing is not priority and typically takes a back seat.

The AMO was set up to help in this respect, but the office is not yet well known. One of the AMO's tasks is to raise awareness of its work and added value in order to relieve the courts of this cumbersome and time-consuming task.

In addition Spanish AMO within the ORGA is in the best position to deal with cases when the management of the property requires special conditions and expertise which is not easily available. E.g. fossil fuel products taking into account their huge warehousing costs

4. What procedures are followed for the sale or disposal of frozen and confiscated assets? What criteria are used to decide whether to sell or reuse an asset?

Frozen and confiscated assets are always sold by public auction with a price established by an expert



Provisional use of seized and frozen items and assets by Law enforcement authorities when it has been previously authorised by a judicial authority in the pre-trial phase is legally provided but it has to be justified. Reuse could be also an option when the selling is expected to be uneconomical. AMO can give the assets to be used provisionally by Local Administration NGOs, Charity and religious entities,...before the trial phase. Typically, computers, mobiles, use of vehicles by the Law enforcement agents. As mentioned before direct delivery of perishable goods is possible with a previous judicial authorisation and the Spanish law allows the authorisation of property to non-profit entities or public administrations when it is perishable of very low-value, or its sale is expected to be wasteful.

5. What is the average time between the confiscation of an asset and its sale?

It depends on too many factors (time used in the courts to speed up the process, repetition of auctions due to lack of successful bidders...). It is impossible to predict but normally takes too long because delays is a recurrent problem in the Spanish Legal System

6. How are the proceeds from the sale of confiscated assets managed? If possible, make specific reference to goods frozen and confiscated under the REG.

In general cases, the proceeds from the sale of confiscated assets are transferred on the basis of a Court decision to the Public Treasury for general purposes. In cases where the ORGA is involved 50% for the same general purpose, but the other 50% for crime prevention and victim assistance projects. Last but not least, when the NDP is involved 100% for projects related to the prevention of drug-related crime.



Reuse of confiscated assets: There is not direct reuse, it has to be authorised by the Board for the allocation of property set up within the ORGA. This is the body that decides which projects are to be financially supported is composed of representatives from different ministries, the public prosecutor's Office and the judiciary. This committee authorise oversight and control that assets are used appropriately and effectively once assigned for social reuse. The domestic transposition of the new Directive 2024/1260 would also have an impact in this issue

7. Post-conviction final disposal phase

Whenever there is a final judgment issued in a criminal proceedings and there is a victim: COMPENSATION TO VICTIMS is always preferent both in domestic and cross-border cases. So when the convicted person does not have sufficient incomes, this payment is to be covered by the confiscated assets and could be directly transferred to them from the Deposit and Consignment Account hold by the AMO with the timely judicial authorisation.

When there are no victims confiscated assets are managed by the AMO there is a Committee for the allocation and disposal of confiscated property or money obtained after selling such property.

In domestic cases Upon the request of the Court AMO shall dispose of the money obtained as a result of the execution of a confiscation decision.

In general cases, the proceeds from the sale of confiscated assets are transferred on the basis of a Court decision to the Public Treasury for general purposes. In cases where the ORGA is involved 50% for the same general purpose, but the other 50% for crime prevention and victim assistance projects. However, when the National Drug Fund is involved 100% for projects related to the prevention of drug-related crime.



Reuse of confiscated assets: There is not direct reuse, but the Board/Committee for allocation that decides which projects are to be financially supported is composed of representatives from different ministries, Public prosecutor's Office (PPS) and the judiciary. This committee authorise oversight and control that assets are used appropriately and effectively once assigned for social reuse. Transposition of the new Directive would have also an impact in this issue

In cross-border confiscation cases, when the Court is acting as executing authority, AMO can dispose the money obtained after selling the confiscated property as follows:

- if the amount obtained from the execution of the confiscation order is equal to or less than EUR 10 000, the amount shall correspond to the executing State;
- If the amount obtained from the execution of the confiscation order is more than EUR 10 000, 50 % of the amount shall be transferred by the executing State to the issuing State.

In relation to the enforcement of EIO with financial investigations ORGA effectively supported the execution of EIOs under the coordination and supervision of different Specialised and local PPOs and the International Cooperation Unit of the General Prosecutor's Office of Spain (UCIF) (up to 19 orders from UCIF in the last couple of years). These orders relate to the tracing, identification, freezing, confiscation, and management of criminal property across the EU.

7. Could you provide examples of best practices in collaborating with the ARO?

There is an Agreement between the GPO and the ORGA signed in 2022 and to be revised next 2026 though it may redrafted before taking into account the pending transposition of Directive 2024.



In relation to the enforcement of EIO with financial investigations ORGA effectively supported the execution of EIOs under the coordination and supervision of different Specialised and local PPOs and the International Cooperation Unit of the General Prosecutor's Office of Spain (UCIF) (up to 19 orders from UCIF in the last couple of years). These orders relate to the tracing, identification, freezing, confiscation, and management of criminal property across the EU.

8. Do you have any proposals for the harmonization of EU MS legislation on the structure and the activities of AROs?

Directive 2024/1260, of 24 April 2024, on asset recovery and confiscation is a good way forward and we hope that it will soon be fully implemented in all the Member States.

We would also like to enhance the exchange of information available at an international level to be as wide as possible, providing the same information that is available at the national level.

We would propose a further strengthening of the international exchanges with non-EU countries.

9. Do you have any further reform proposals, at a national or international level, concerning the structure and the activities of AROs?

There is room for improvement in certain areas:

- All AROs, both national and international should be perfectly coordinated, with a clear and accessible contact point for each of them.
- Legal frameworks should be standardized, at least at the European level, and the information obtained should be extensively shared between AROs.
- There is a need to increase investment in IT tools and training, due to the complexity of the tasks involved.

To achieve all objectives, it is required a political support accompanied by sufficient resources and means, recognizing the importance of these policies in the fight against organized crime.



10. In light of the new Directive (EU) 2024/1260 on “asset recovery and confiscation”, do you consider the changes proposed for the functioning and composition of AROs to be effective? Please explain your reasoning and any anticipated impacts on your operations.

ORGA is convinced that the new Directive will improve its work and results.

We believe that it will increase its role and visibility in domestic criminal proceedings and it would facilitate ad extra greater collaboration with both private and public entities. As a result, it will improve both the quality and the speed of obtaining information.

At the same time, the new Directive is more demanding in the mandatory response within shorter time-limits and, on the other hand, imposes the obligation to open financial investigations in cases of profitable offences

The most impacting reform would be the possibility of immediate measures prior to the freezing judicial order where there is an imminent risk of the disappearance of the property that ORGA have traced and identified in the exercise of their tasks and how to coordinate this power with the role of the PPs who have already trace and identified assets in the execution of EIOs

11.- Progression of ORGA deposit account balance in figures:

2017	2018	2019	2020	2021	2022
18.212.997,52	22.548.676,69	36.563.753,68	45.875.545,69	63.426.406,42	92.956.508,06

Last available figures (2023): 106.427.550,29 euros

V.- Way forward: Assets tracing in the sentence execution phase

Effective execution of confiscation decision/orders in the course of a criminal conviction or at the end of a non-conviction based forfeiture proceeding is crucial to fill the existing gap/breach between freezing and confiscation of asses within the EU. The economic interest for the national authorities to improve the current deficit of assets recovered in the execution phase should be encouraged through pre-existing asset sharing legal frameworks.

Spanish Public Prosecutors should internally develop its own process to map up, evaluate and identify existing unpaid domestic confiscation orders and promote the opening of financial investigations capable of satisfying these decisions within the execution phase of the ongoing criminal proceedings, enlarging the tracing of assets available overseas with the support of the ORGA and informal law enforcement networks (e.g. CARIN).



Where links (such as the criminal conviction of a citizen of a foreign country) have been identified, Public Prosecutors should be proactive in reporting these unpaid confiscation decisions (judgments) in a joint effort to identify, and where legally permitted, freeze or restrain, potential assets of the criminal that can be used to satisfy the confiscation order. While the methods employed may vary across the different member states successful results may be reached by assigning a financial analyst or an *asset tracer* to support judicial authorities in collection of unpaid confiscation orders.

From the cross-border viewpoint Spanish Public Prosecutors are entitled to execute all incoming EIOs comprising non-intrusive financial investigative measures even when the EIO was issued in the execution/enforcement phase. However, taking into account the lack of domestic legal certainty in relation to the possibility of executing *intrusive financial investigation measures* (like the monitoring of bank accounts) or *intrusive measures aimed at a financial investigation purpose* (wiretappings, house searches,...) during the execution phase, it seems to be difficult to recognise the execution of these type of EIOs in accordance with the *share proportionality test* provided for in art. 9 (3) of the Directive 2014/41

Furthermore, the coordination between the EIO and the subsequent freezing and confiscation certificates in the execution phase is not clearly provided in the current domestic legal framework and should be legally clarified or at least clear guidelines should be put in place in a Handbook or any other soft-law documents aimed at harmonising the practical application of transposing domestic implementation of Directives 2014/41 and 42 (plus new Directive 2024/1260) with Regulation 2018/1005, which is directly applicable.

I would like to end up by giving a few brief thoughts on the subject of international cooperation. We already know that international cooperation is very important in the field of assets recovery, including assets management as an important part of the assets recovery cycle. Each state has its own regulations and it is important to improve the contacts, exchange of information and effective assistance to apply the existing legal framework in the best way possible.

Managing assets that are located in foreign countries is a challenging task and can be almost impossible without international cooperation. The Spanish AMO is aware of this aspect and is making more and more efforts to increase the number of international files.

Madrid, 18th July 2024
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