

ERASING THE ‘CULTURE OF IMPUNITY’¹ – UNCOVERING THE HIDDEN NATURE AND CRIMINAL POTENTIAL OF RELATIONSHIPS OF CONVENIENCE*

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According to the available data, the phenomenon of marriages and other relationships of convenience is a significant problem at the EU level, as evidenced by the European Union’s emphasis since 2012 on the importance of effective cooperation in addressing these relationships (Eurojust 2020). Moreover, the EU has recently identified the arrangement of marriages of convenience as one of the main forms of facilitating irregular migration flowing in its direction (Commission 2020a). However, controversially, the primary characteristic of this phenomenon is its hidden nature, which is also the most telling aspect of it. The European Union Agency for Law Enforcement Cooperation (hereinafter Europol) has played a pivotal role in resolving this issue, having previously identified the correlation between relationships of convenience and organised criminal groups, as well as the commercial exploitation of migration, in 2011 (OCTA 2011, 21).³

This finding may also provide an explanation for the fact that, for the period between 2012 and 2020, the European Union Agency for Criminal Justice Cooperation (hereinafter Eurojust) reports that only 39 cases came to the Agency’s attention, which were otherwise distributed very unevenly over time, as the substantial impact of successful, large-scale operations on the Eurojust’s experts was such that it resulted in a multiplication of new cases. For instance, in 2017, thirteen such cases were initiated, although the low statistical presence does not correlate with the significance of the actions (Eurojust 2021, 12). The fundamental reason for the low identifiability of relationships of convenience, therefore, lies in their close association with relatively minor crimes, in contrast to the complex structures and substantial profits generated by organised criminal groups operating in the realm of shadows. Consequently, the phenomenon under investigation has been linked to crimes such as human trafficking, human smuggling, and pandering. The complex and multifaceted picture that has emerged is further enriched by the sexual abuse and exploitation of the so-called

* DOI 10.21868/PGnG.2026.1.1.

¹ Windt 2022, 114.

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SUPPORTED BY THE EKÖP-24-0 UNIVERSITY RESEARCH SCHOLARSHIP PROGRAM OF THE MINISTRY FOR CULTURE AND INNOVATION FROM THE SOURCE OF THE NATIONAL RESEARCH, DEVELOPMENT AND INNOVATION FUND.

³ In order to provide a quantitative perspective on the magnitude of this phenomenon, it is noteworthy that, according to the extant data, in 2019 a total revenue of approximately 190 million euros was generated from human smuggling activities related to migration in the European Union, see Europol 2019.

'wives', as well as the significant connection between relationships of convenience and prostitution.

In this context, the present paper examines how the ostensibly minor conduct associated with relationships of convenience can, through their embeddedness in organised criminal structures, evolve into a covert yet highly profitable 'modus operandi', thereby necessitating an analytical approach that moves beyond what the phenomenon's measurable dimensions alone are able to reveal.

Keywords

relationships of convenience, migration, European Union, interconnection, hidden nature, serious crimes

Introduction

There is an increasing level of concern regarding cases in which third-country nationals gain unlawful access to the European Union via marriages and other relationships of convenience, a practice which constitutes a *direct infringement* of the fundamental right of *free movement and residence* within the EU. This phenomenon also results in unjustified access to the European labour market and social security benefits in Member States. It has also been observed that such relationships are increasingly being used as part of sophisticated fraud schemes that are being arranged by organised crime groups. These illicit activities include, but are not limited to, serious crimes such as human trafficking and human smuggling. Accordingly, the present scenario must be regarded as *exceptionally dangerous*, as stated in the 2021 Eurojust report. This conclusion is now indisputable, precisely as it is reflected only in minor crimes such as those against public trust and public administration, upon closer inspection, a highly complex system with strong links to organised crime becomes apparent. This system is characterised by a low level of risk and the possibility of significant financial gain for organised criminal groups. The 'modus operandi' is characterised by the exploitation of vulnerable individuals in precarious circumstances, often under the premise of providing 'easy money' (Eurojust 2021, 1).

In light of these considerations, the present paper aims to shed light on the hidden mechanisms through which relationships of convenience become embedded in organised criminal structures, to explore the specific vulnerabilities and exploitation patterns arising within this context, and to identify those structural factors that contribute to the persistence of this phenomenon despite its low statistical visibility.

1. Relationships of convenience – conceptual and statistical foundations

As set out in the European Union's instruments to combat marriages of convenience, a *marriage of convenience* means a marriage concluded between a national of a Member State or a third-country national legally resident in a Member State and a third-country national, with the sole aim of circumventing the rules on entry and residence of third-country nationals and obtaining for the third-country national a residence permit or authority to reside in a Member State (Council 1997, Article 1.).

The existence of this phenomenon at the EU level is well illustrated by the fact that the *Free Movement Directive* specifically – and only – mentions marriage of convenience as an example of abuse of rights or fraud (Directive 2004/38/EC, Article 35.). Regarding the evolution of the discussed concept, it is noteworthy that the comprehensive Communication (Commission 2009, 15) on better implementation and application of the Free Movement Directive has made progress in establishing that the definition of marriages of convenience can be *extended by analogy* to other forms of relationships contracted for the sole purpose of enjoying the right of free movement and residence,⁴ such as (registered) partnership of convenience, nominal adoption or where an EU citizen declares to be a father of a third country child to convey nationality and a right of residence on the child and its mother, knowing that he is not the father and not willing to assume parental responsibilities (Commission 2009, 16).

Concerning the *hidden nature* of the phenomenon mentioned above, it should be noted that it is indeed impossible to determine its extent with any degree of accuracy (Bojčev 2012, 339–340). In an effort to ascertain its prevalence, the marriages of convenience identified by individual Member States present a distinctly heterogeneous picture. In response to a call from the European Council, *twelve Member States provided information* in 2013, through the European Commission, on abuses of the right of free movement and residence in this manner (Commission 2013, 9). The diversity of the picture is shown by the fact that the Netherlands (out of 550 marriages examined in three pilot projects) has identified 368 marriages of convenience since 2007. Between May and October 2011 alone, the UK rejected 176 European Economic Area applications for family licences due to concerns about the validity of the marriages. Estonia and Romania indicated that no marriages of convenience had been identified between January 2011 and July 2013 for the former and since January 2007 for the latter.

The figures obtained may seem relatively low in some cases, but it should be noted that there has not been a recent EU-wide data request similar to the one mentioned above. Consequently, given the more sophisticated practices applied by the authorities over time, and especially with the *increasing migratory pressure*, higher numbers would certainly be observed in this issue today, which is difficult to measure in any case. To illustrate the importance of the latter factor, it is worth noting that, according to the United Nations, the number of people who left their country of origin or usual residence permanently increased from 173 million in 2000 to 244 million in 2015 (until the start of the extraordinary migration crisis) (UN 2016, 5). This number has already exceeded 271 million in mid-2019, with an increase from 56 million in 2000 to 82 million in mid-2019 as regards the European continent. As a percentage of the total population, this represents 11% for Europe and 3,5% for the world as a whole in mid-2019 (UN 2019). According to the latest statistics, in 2024, the number of international migrants worldwide stood at 304 million and Europe hosted more international migrants than any other region with 94 million (UN 2024).

⁴ In the context of this paper, the term ‘relationship of convenience’ will be employed for the majority of the study, with its most common form, ‘marriage of convenience’, being utilised to facilitate the discussion of the topic.

2. Relationships of convenience – ‘modus operandi’ of the organised crime groups

In addition to the relatively low figures for relationships of convenience mentioned above, the fact that new elements have been added to the changing picture over time is a matter of concern and presumably also a response to the low level of these indicators. As already mentioned above, Europol reported in its 2011 and 2013 *EU Threat Assessments* (OCTA 2011, 23; SOCTA 2013, 16) that there was a direct link between relationships of convenience and organised crime groups, a finding that was further crystallised in its so-called *Early Warning Notification* issued in 2014 (Europol 2014) and referring to reports received from several EU Member States.

In addition to the emphasised interconnection in the context of relationships of convenience, the *exploitation of vulnerable parties* is of paramount importance. In evaluating this matter, the aforementioned 2014 Notification made significant observations. It is acknowledged that marriages and other relationships of convenience are not typically concluded directly between the parties but usually involve a third party (or group) acting as an organiser, who (or whose members) thus provide the background that may be considered a means of supporting irregular migration or a sub-phenomenon thereof. However, a considerable qualitative distinction emerges in instances where the role of the ‘bride’ is altered, *transitioning from a position of perpetrator to victim*. This transformation is delineated in the referred Notification as an emergent trend.

The starting point regarding the cases is basically the same: women who are typically vulnerable for social or mental health reasons are lured abroad by organised crime groups from their countries of origin, mostly in Eastern Europe, in the false hope of a lucrative marriage (in many cases with the added bonus of a job or special business opportunity). However, the situation is then reversed, as the bride-to-be is ‘sold’ to (mostly) third-country citizens, with whom she is forced to get married, and by withholding her documents, she is deprived of the possibility of returning home. Nonetheless, as the aforementioned Notification highlights, in the majority of cases, the assessment is not so straightforward. During the course of investigations, it is not uncommon for investigators to lack the necessary information to obtain a comprehensive understanding of the role of the so-called ‘wife’ (Dingelstad-Frankova 2014). The 2021 Eurojust report offers a noteworthy observation on this matter, asserting that if marriages and other relationships of convenience, in conjunction with organised crime groups, evolve into a recurrent ‘modus operandi’ within a sophisticated scheme encompassing more serious crimes, they may readily assume an ‘exploitative’ character, thereby positioning the individuals – especially women – enlisted into these relationships as *victims* who require protection. The report cites the Dutch and Czech perspectives as explicit examples, which recognise that relationships of convenience – especially when linked to serious crimes such as human trafficking and human smuggling – result in victims. (Eurojust 2021, 26). It is therefore essential to exercise greater caution when investigating other criminal elements behind acts that facilitate irregular migration.

Unfortunately, the warning about the new characteristics of the phenomenon was later confirmed by the practice itself: 20 532 victims were reported within the territory of the EU, linked to *human trafficking* reaching record levels in 2015–2016, and the Europol assessment published in 2017 (SOCTA 2017, 53; Europa.eu) – confirming the

relevant forecast (Europol 2016, 4) reported an intensification, specifically, within the context of the increasing migratory pressure. Furthermore, it is essential to acknowledge that the aforementioned depiction, which is unavoidably enriched by new elements, is also being further influenced by the sexual abuse and exploitation of spouses.⁵

3. Relationships of convenience – Hungarian perspective

3.1. Case-study – interconnection between human trafficking and marriages of convenience

The practical significance of the issue is highlighted by the *Hungarian criminal case* initiated in relation to human trafficking, in which the matters of facts established by the court of first instance⁶ were that defendant I., who herself resided abroad, met a person on Facebook with whom she discussed the possibility of the defendant I. – who had travelled to Hungary several times for medical check-ups due to her pregnancy – in exchange for money take women of Hungarian nationality abroad so that these women marry men who had arrived there as refugees or otherwise from various countries outside the European Union (such as Asia and Africa) thereby enabling these persons to avoid expulsion from that Member State or from the territory of the EU. On one such occasion, the first defendant met one of the victims in the case, to whom he said that if she travelled abroad, she could easily obtain a large sum of money without having to work or perform any other service by marrying a wealthy foreign man who would then support her after the marriage, but the marriage was not obligatory and she could return to Hungary at any time. Furthermore, she requested that the victim advise any young women within her network who might have an interest in pursuing this potential financial opportunity abroad. The victim acquiesced to the latter request in relation to an acquaintance of hers, after which both of them were contacted on the aforementioned social networking site by men who did not actually exist, but whose profiles had been created by the first defendant in order to deceive the victims and motivate them to decide to leave the country of their own accord.

Following the events described above, the victims resided in a rented apartment with minimal furnishings, inhabited by individuals whose identities remained a mystery to them. In contrast to their previous interlocutors, these individuals were unable to communicate in Hungarian, either verbally or in written form. Their identity cards were confiscated, and they were assured that their future spouses of Bangladeshi origin were among the wealthiest prospective grooms and would provide them with financial support for a period of five years in exchange for marriage. Thereafter, the victims were sold to other men whose identities remain undisclosed. One of the victims successfully escaped with the assistance of the Hungarian Embassy; however, complications arose in the case of the other victim. The man selected for the woman in question was expelled in the interim period, and the new prospective husband withdrew from the marriage due to the victim's advanced pregnancy. She refused to acquiesce to the third candidate, but

⁵ For a detailed analysis of the European background to this phenomenon and the highly developed American practice, see Territo & Kirkham 2010.

⁶ Balassagyarmat Regional Court 19.B.58/2017/77.

was informed that this represented her only opportunity to return home. Finally, she managed to return to Hungary with the help of the local police.

In its reasoning, the court of first instance stated that the *transportation of victims* living in extreme poverty in Hungary, who did not speak the language and had no professional qualifications, to a country with which they were unfamiliar – through deception – and then their subsequent transfer to third parties in exchange for financial compensation for the purpose of marriage, constitutes the *selling of the victims*, especially in view of the fact that changing the opportunity for them to return home and arbitrarily changing the identity of the husband without their will created a feeling of vulnerability in them. Supported by the established matters of fact, the victims perceived their situation as having been sold by defendant I., who was consequently convicted of human trafficking by the court of first instance. It is also noteworthy that, during the public hearing conducted by the Budapest-Capital Regional Court of Appeal as the court of second instance, the defence counsel for defendant I. expressed the legal position that the victims were aware that their departure was for the purpose of marriage, thereby rendering the intermediary's actions not constituting a criminal offence.⁷

3.2. Complex approach – statistical and legislative reflections

It is evident that the case under discussion exhibits characteristics that diverge from the broadly interpreted 'classic' model, yet its origins were rooted in a marriage of convenience, and ultimately, the defendants' conduct was aimed at achieving just such a result. In this regard, it should be noted that the intertwining of new elements embodied in serious crimes with the phenomenon of relationships of convenience naturally occurs not only in the European Union, as previously highlighted, but also in the *domestic context*. A reflection of this may be seen in the relatively stable yet fluctuating *statistical presence* of pandering (Section 200 of Act C of 2012 on the Criminal Code, hereinafter the Criminal Code) and human trafficking (Section 192 of the Criminal Code) in comparison to the total number of registered crimes, which has remained essentially stagnant in recent years. In 2019, consistent with the downward trend, the total number of criminal offences fell from 199 830 in the previous year to 165 648. In 2021, the total number was 154 012, and in 2023, the discussed number was 178 172. By way of comparison, the number of registered offences of *pandering* in 2019 was 45, in 2021 it was 53, and in 2023 it was 54 (Office of the Prosecutor's General 2023, 2024).

⁷ Budapest-Capital Regional Court of Appeal 4.Bf.247/2018/8. In the presentation of the case, the conduct and assessment of the other defendants, who were in a family relationship with defendant I., was not addressed. The Court of Appeal, in agreement with the findings of the Court of first instance, stated that defendant II. had assisted in the transportation of the victims and had therefore engaged in *sui generis* preparatory and auxiliary conduct in connection with human trafficking. The court of second instance provided further clarification on the initial decision of the court of first instance to acquit the defendant III. and IV. of the crime of human trafficking, citing the lack of substantiating evidence. The only thing that could be proven with a high degree of certainty was that they were motivated by the fulfilment of a request from a family member. However, it could not be reasonably concluded that their actions had deliberately assisted the crime of human trafficking committed by the defendants.

The statistical data on *human trafficking* is characterised by a more complex background. For an extended period, the number of cases involving this crime was extremely low, a circumstance that was regrettable and which tended to ‘let down’ those affected by the phenomenon. However, recent actions taken by the European Union and Hungary have precipitated a marked change in this dynamic. In an effort to adopt a *more complex approach*, a range of domestic laws have undergone amendments since 2020 in the spirit of combating human trafficking.⁸ Meanwhile, in the same year, the European Commission published its 2020–2025 strategy for combating the sexual exploitation of children (Commission 2020b), and released its third progress report on the situation of human trafficking in Europe, which has since been supplemented by a fourth and a fifth report (see Europa.eu 2025). The necessity for more extensive action – and the topical nature of the subject under discussion – is further reinforced by the fact that on 27 May 2024, the Council of the European Union decided to strengthen Directive 2011/36/EU on combating human trafficking. In addition to establishing a renewed approach, this reinterprets the concepts of vulnerability and exploitation, placing emphasis on the protection of victims and drawing attention to phenomena such as forced marriage and surrogacy (European Council 2024, Directive 2011/36/EU).

The clarification of conceptual ambiguities and dogmatic questions of demarcation⁹ also appears to be reflected in the increasing number of registered criminal cases. While there were 4 registered human trafficking in 2018, there were already 57 in 2020. Following the reinterpretation of the criminal offence of *human trafficking and forced labour* that came into effect in July 2020, the previously effective offence was ‘renewed’ and, along with the currently effective criminal offence, resulted in 95 registered offences in 2021. By 2023, the number had risen to 131, as shown in crime statistics (Office of the Prosecutor’s General 2023, 2024). As indicated above, another significant factor contributing to these highlighted crimes is the *migration pressure* currently exerted on Hungary. However, as relevant research points out, the statistical manifestations of these waves of migration often fail to fully reflect reality, given that the associated criminality may only be detected at a later point in time, or at different times for each crimes (Barabás 2016, 43–55).

Closing remarks

The analysis has shown that relationships of convenience cannot be understood solely through the lens of the seemingly minor offences in which they typically manifest, nor merely as an expression of abuse of the right to free movement and residence within the European Union. Beneath this surface, a far more complex reality lies: the gradual transformation of supposed facilitators of irregular migration into victims exposed to coercion, sexual abuse, and other forms of exploitation. As these practices become interconnected with organised criminal groups, relationships of convenience increasingly serve as an *entry point into more serious criminal activities*, such as human

⁸ Act V of 2020 on the amendment of certain Acts with a view to combating the exploitation of victims of human trafficking amended, among others, Act XXXI of 1997 on the Protection of Children and Guardianship Administration, and certain provisions of Act C of 2012 on the Criminal Code.

⁹ In this regard, the guidelines issued by the Prosecutor General’s Office in 2018, numbered KSB 3771/2018/5-I-NF. 3889/2014/11, cannot go unmentioned.

trafficking and human smuggling, thereby revealing a depth and gravity that their outward appearance fails to convey.

Recognising this hidden dimension requires careful, nuanced assessment of the factors shaping the phenomenon. It also demands sustained attention to the victims, whose roles and vulnerabilities often also remain obscured. In this regard, Windt Szandra's formulation, cited in the title of the present paper and originally articulated in the context of combating human trafficking, captures a broader challenge that is also relevant here: the *need to gradually dismantle* what she describes as a '*culture of impunity*'. The present study, in its scope and intention, seeks to form a small yet deliberate contribution to that wider effort, aligning with the ongoing attempts within both the European Union and Hungary to better understand, uncover and correctly interpret the *concealed nature of relationships of convenience*. By doing so, it aspires to support a more accurate understanding of the phenomenon and, in turn, to reinforce the broader commitment to erasing the conditions under which such concealed harms may continue to persist.

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