

SOME THOUGHTS ABOUT THE INSURANCE FRAUD AND THE CRIMINAL LAW

Apstrakt

Insurance fraud has evolved into a complex form of economic crime that extends far beyond fraudulent insurance claims. It is increasingly connected with money laundering, organised criminal networks, the unlawful disclosure of insurance secrets, and offences related to narcotic drugs. This paper examines these interrelationships from a criminal law perspective, emphasising the growing importance of financial intelligence, compliance systems, and international cooperation in preventing and detecting such offences. It also highlights the criminological links between drug-related offending and insurance fraud, demonstrating how financial motivations frequently connect these forms of criminality. The study argues that effective criminal justice requires an integrated approach combining criminal law, financial regulation, and risk-based supervisory mechanisms.

Key words: *Insurance fraud, Criminal law, Money laundering, Insurance secrecy, Narcotic drugs, Organised crime, Financial compliance, International cooperation*

Introduction

Insurance is founded on trust, while fraud exploits precisely that trust. In an increasingly globalised financial environment, insurance fraud is no longer an isolated property crime but an integral part of organised economic

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1) The authors used Google Gemini and ChatGPT (OpenAI) solely as supportive tools during the preparation of this manuscript. These AI systems assisted with language editing, stylistic refinement, translation of certain passages, and the identification of potentially relevant literature and publicly available sources for further verification. All legal analyses, interpretations, arguments, conclusions, and the final content of the manuscript were independently reviewed, verified, and approved by the author, who assumes full responsibility for the accuracy, originality, and integrity of the work.

criminality.¹⁾ Fraudulent insurance claims may generate illicit profits, facilitate money laundering, conceal assets of criminal origin and, in certain cases, finance other forms of criminal activity. Consequently, insurance law, criminal law and financial regulation have become closely interconnected. The challenge for contemporary criminal law is not merely to punish individual offenders but to identify complex criminal structures operating behind apparently legitimate insurance transactions. Effective criminal policy therefore requires a combination of traditional criminal law instruments, financial intelligence, international cooperation and risk-based compliance mechanisms. Only this integrated approach is capable of preserving the integrity of insurance markets while maintaining public confidence in one of the fundamental institutions of the modern economy.²⁾

Insurance fraud and money laundering

Insurance undertakings are generally regarded as lower-risk financial institutions than banks; nevertheless, specific insurance products—particularly life insurance and investment-linked policies—may be exploited to disguise the criminal origin of assets. Criminals may use premium payments, early surrender, beneficiary changes or fabricated insurance claims to integrate illicit proceeds into the legitimate financial system. Consequently, insurers have become increasingly important participants in anti-money laundering systems and are expected to apply a genuine risk-based approach to customer due diligence and suspicious transaction reporting.³⁾

Money laundering is the complex entirety of illegal economic transactions pursued under the concealment of legal economic transactions that aim to justify the origin of wealth obtained through criminal act, this way getting rid of its recognisably illegal nature. “Therefore the reason and origin of money laundering is always a crime that becomes unretractable, while its aim is that the fortune obtained this way should be used in the legal economy.”⁴⁾

On the other hand money laundering has become one of the most paying and vast businesses in the world. According to the IMF the volume of money laundering amounts to 2-5% of the unified GDP of all the countries on Earth. Translated to concrete sums this *means* at least *590-1.500 billion USD annually*⁵⁾. John Walker estimates this amount to be 2.850 billion USD annually in his work about modelling the tendencies of money laundering.⁶⁾

2) Financial Action Task Force: The FATF Recommendations. <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html>; United Nations Office on Drugs and Crime: Transnational Organized Crime: The Globalized Illegal Economy. <https://www.unodc.org/toc/en/crimes/organized-crime.html>

3) Financial Action Task Force: *Guidance for a Risk-Based Approach: Life Insurance Sector*. <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/RBA-Life-Insurance-Sector.html>

4) Ferenc Kósa: The criticism of the bill against terrorism and preventing money laundering www.jogiforum.hu/publikaciok/index.php?p=47&print=1

According to the estimations of the FATF the sum of the annually laundered “dirty money” equals to the total annual production of the economy of Spain, that also underlines the largeness of the danger.⁷⁾ This number does not seem to be exaggerated if we take into consideration that behind an important number of crimes committed all over the world there is a motive to gain material benefit. (To the question why he had robbed banks, the notorious American bank robber, Willie Sutton gave the laconic answer: “Because money is there.”⁸⁾) We could almost regard it as logical that perpetrators of a crime try to avoid to raise the attention of the investigating or tax authorities by newer and newer, diverse methods. On the following pages we introduce nineteen such techniques.

Who has money deriving from crime in his possession first has to decide *whether there is need for money laundering*. That is to say up to a certain amount (for an average Hungarian citizen this is about 10 million HUF) the sum can be spent without any problem or it can be used in legal economic activity (this latter is also qualified as money laundering). In cases of financial or bank transactions with the division of the sum (for example 10 million HUF can be divided to five 1.700.000 HUF and one 1.500.000 HUF instalments) the limit of two million can be easily avoided.

If the sum of money of suspicious origin *reaches a certain amount* that can make the “smooth” use risky, then still there is possibility for the perpetrator to account for the origin of the guilty money in case of the danger of being caught: the source is a family gift, succession, loan from a friend. There is no need for anything else just to invent a credible legend (expression used at Secret Service) about the origin of the money. The main point is the adequately worked out strategy for crisis and of course it is advisable to consult a lawyer continually.

If it is about a really *huge sum* (of course it is relative what sum is to be considered “big”) then there might be the need for money laundering. A sum around fifty – hundred million HUF absolutely “claims” laundering. Naturally the amount is very relative: if someone has already have a fortune of some million and pursues legal economic activity (also), for that person not even the spending of some hundred and fifty million HUF of illegal origin means risk. So we can say that “above a certain level”, steered with adequate economic (and political) relations there is no need for the laundering of the money obtained in an illegal way, it can be spent “filthily”...

Moreover if the perpetrator has at least one legally registered firm, then about 30% of the turnover of the firm can be laundered through it annu-

5) Patrick Moulette: Money laundering: staying ahead of the latest trends In: Observer No. 220. April 2000. 28. oldal

6) Peter Lilly Dirty transactions. The world of money laundering Perfekt Economic Consulting, Educational and Publishing Spa., Budapest, 2001 page 39

7) Jackie Johnson: In Pursuit of Dirty Money: Identifying Weaknesses in the Global Financial System (=Journal of Money Laundering Control Henry Stewart Publications London, Autumn 2001. 122. oldal)

8) Steven Mark Levy: Federal Money Laundering Regulation (Banking, Corporate, and Securities Compliance) New York, 2003. Chapter 1 page 3

ally with the help of an accountant with enough expertise (and “venture-some”). The adequate technique for example is fictitious billing. In this sense money laundering is nothing else then *the complementary transaction for tax fraud*. Tax fraud is usually committed by keeping in secret a part of the income or by showing costs bigger than they are in reality. It is a basic economic relation that the profit is the part of the total income decreased by the total costs that is usually indicated with the following formula:

As we define the variant of money laundering with the help of economic activity as the complementary transaction for tax fraud, the logic of the commission of this crime is reversed, that is either the costs should be showed as less than in reality or (and this is more common) income should be showed as more than in reality. It is nearly a well-known fact that in Hungary it is not a serious problem for anyone to decrease his income before taxation by fictitious cost bills. (We could only suppose it with some malice that when creating taxation laws, the tax creator reckons in advance that a lot of people admits a lot less of income than it is really, so the rates of taxes are adjusted to this de facto situation...) The generality of fictitious billing is backed up also by the fact, that so called “bill factories” – that means firms that do not pursue real economic activity and produce bills in unlimited amounts for some percentage of the bills without real economic performance and after a while the actual owners disappear with the money (the registered owners of the firms are either non-existing people or homeless from whom of course the remaining public debts cannot be recovered) – are regularly pinched. After this it is easy to see that if it is relatively easy to get fictitious cost bills, then it is even more easier to get fictitious income bills and for this even some percent of commission can be asked for and not even the tax authority will suspect a thing if someone accepts to pay the rates and taxes after his fictitious incomes. It is conceivable that the cost of money laundering is here the least as the rates and taxes that have to be paid after the fictitious income bills can be decreased by the “commission” received for the bills. Moreover the rates and taxes are to be paid after the income decreased with costs, meanwhile “commission” can be asked for the total value of the bill. This way such a situation can occur that the operation of money laundering will not be loss-making! (Just think it over: 50% of average cost level, 30% of rates and taxes and if the buyer pays 15% of the value of the bill for the fictitious bill then the result of the operation will be 0, so there is not going to be neither profit nor loss.) It is worth for the perpetrators to use this method even if 10-20% loss is formed, furthermore the danger of getting caught is possibly here the least.

Even those might need money laundering who *realise income regularly from crimes* and have no civil job, so who perpetrates crime as a life style. The easiest technique even here is to establish a cover firm.

The enlisting of different methods and techniques of money laundering is impossible, the different procedures improve continually, while in the background of the innovations there are advisors with financial, accountant and legal knowledge. In the following we present some presumed characteristic *techniques of money laundering*.

Most of the life assurances and wealth insurances give the possibility of money laundering. In case of *life assurance* the insurance contract is signed

by a strawman, the beneficiary is the one laundering. The insurance is paid with sums originating from crimes and after a certain period they ask for an early pay out or (in case of wealth insurance) they bring the insurance event about.

Wealth insurance can also be used for money laundering and if they manage to evade the over-insurance prohibition, then the perpetrators can acquire significant profit. They buy some goods from the dirty money that they transport to the destination on ship. They take out an insurance for the ship and the goods of a value much more than in reality and then the ship sinks with its cargo on the open sea. The beneficiary indicted in the insurance contract – who of course is the owner of the money to be laundered – takes the money now already legal. This way they committed also an insurance fraud, which is difficult (or rather impossible) to prove, because the proofs sank to the bottom of the sea and faded away for ever.

Detecting money laundering disguised as insurance fraud remains particularly challenging because individual transactions often appear commercially legitimate when viewed in isolation. Modern compliance therefore increasingly relies on integrated data analysis, behavioural risk indicators, beneficial ownership transparency and close cooperation between insurers, financial intelligence units and law enforcement authorities.⁹⁾

Violation of insurance secrets

“The criminal law protection of economic secrets must be balanced to avoid excessive extension that could threaten the protected legal interest itself and restrict entrepreneurial initiatives. This nuanced approach is crucial when considering the criminal protection of insurance secrets as part of the broader category of business or economic secrets.”¹⁰⁾ One of the most important secrets in the Hungarian legal system are the insurance secrets. “The criminal liability of legal entities, including insurance companies, is essential for effective protection of economic secrets. Without such liability, sanctions imposed on individuals may fail to deter corporate misconduct, as penalties are often paid by the legal entity rather than the individual.”¹¹⁾

Every secret can protect an individual interest (such as a private secret), a group interest (such as the breach of an economy secret and a breach of a business secret¹²⁾) and the overall interest of society (this includes the protection of classified data, which is otherwise called a state secret by many legal systems, including the Serbian legal regulations). In addition to individ-

9) Financial Action Task Force: *Guidance for a Risk-Based Approach: Life Insurance Sector*. <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/RBA-Life-Insurance-Sector.html>

10) Páhi Barbara: *The Limits of Criminal Protection of Economic Secrets**, Budapest, 2020, p. 45

11) Fantoly Zsanett: *Corporate Criminal Liability and Economic Secret Protection*, Szeged, 2007, p. 88

12) Ld. Sántha Ferenc: *Az üzleti titok büntetőjogi védelme a nemzetközi jogfejlődés tükrében* (=Miskolci Jogi Szemle 2019/1. 42-64. o.)

ual interests, data related to farming (if it is not a one-person business) usually protects the legitimate interests of several economic actors. However, among the economic actors, the Hungarian state also appears with special weight. In such cases, it does not exercise its public authority functions, but participates in the functioning of economic and business life. There is, therefore, a part of these two secrecy-violating crimes that is clearly related to the criminal law protection of the secrets of the Hungarian state. The state tries to soften the disruptions of the market mechanism through the management of economic policy. The most important economic policy decisions are protected as classified data for a longer or shorter period of time, since the president of the Hungarian National Bank, which controls the monetary policy, also has the authority to classify the budget policy. In a market economy, the state has three basic functions:

1. Increases efficiency by promoting competition, limits the negative consequences of external economic effects (externalities), such as environmental pollution, and also provides public goods.

2. It promotes equity in the economy through taxation and support programs and favors certain social groups in the redistribution of income.

3. It maintains macroeconomic stability, reduces unemployment and inflation, and stimulates economic growth with the tools of budgetary and monetary policy (that is, economic policy).¹³⁾

In addition to all these roles, the state also participates in the circulation of economic life as an owner, in which case, as the subject of private law legal relations, it is considered an actor associated with other legal entities.

Data related to the possession, management, use, utilization or disposition of state and local government assets are not classified as business secrets and are public according to the main rule. This provision coincides with the guarantee requirement for transparency, that the state cannot basically refer to business secrets as a refusal to request data.¹⁴⁾ By the way, most of the articles published on the issue of economy secrets try to prove that the interest in publicizing data of public interest is generally stronger than the interest in protecting "business secrets". According to the most respected Hungarian criminal lawyer, Mihály Tóth, there is not, and cannot be, any kind of (particular) "commendable interest" where e.g. public funds are being distributed and used.¹⁵⁾

However, in a certain narrow circle, in my opinion, it is permissible to protect information relevant to the Hungarian state even as a business secret, perhaps as an economy secret or in the form of insider information, in which case it would not be appropriate to treat it as classified data or it would conflict with the requirements of necessity and proportionality. This can be the case, for example, with the protection of certain legitimate interests of state-

13) Samuelson, Paul A. – Nordhaus, William D.: Közgazdaságtan KJK-Kerszöv Kiadó, Budapest, 2000. 35. o.

14) Révész Balázs: Adatkezelés, adatbiztonság, adatvédelem NKE 2012. 22. o.

15) Tóth Mihály: Titkokkal átszőtt büntetőjog (=Iustum Aequum Salutare 2005/1. 68. o.)

owned companies, or even the operation of covert state companies that apparently operate in the private sector (such as front companies created by the national security services). The latter are considered a special construction from the point of view of confidentiality: the background of their creation and their real owner, the purpose of their operation, etc. classified data, but of course they may also have "traditional" business secrets.

The general concept of a secret was defined by Mihály Tóth as follows: "a secret is any data, fact, circumstance or thought which, in principle, can be known to anyone - and the embodiment of all this - but which is known only to a limited number of individuals, and whose secrecy is in the legitimate interest of those who know the secret."¹⁶⁾

There are so many kinds of secrets these days, in parallel. Their formation is a consequence of socio-historical processes. According to Béla Révész's position on this, which in my opinion is considered to be the most logical and today accepted view: The primary elements of the traditionally formed types of secrets are the nature of the communicator and the message, and only secondarily are the moments of the recipient and the effect. When war secrets, state secrets, economic or scientific secrets are discriminated against in the literature, it is obvious at first sight that they are grouped according to the content of the non-communicated information. At the same time, it is inseparable from the non-communicating subject, since certain circles of information are related to statuses that can be precisely defined in the structure of the social-power division of labor. Thus, the quality of the secret owner is inseparable from the type of confidential content. The receiving person or group may be related to the typification as an important element in that it responds to the extent of the particularity of the person or group (s) excluded from communication. Finally, the efficiency of the non-communication process is not only a function of the information retention performance of the secret owner, but also an important indicator of whether it can generate spontaneous communication processes such as e.g. the false news, the horror news. "¹⁷⁾

In my view, secrecy, in the broadest sense, is a category inherent in human nature that appears at a certain quality of the process of becoming human. A secret is anything that only a certain number of people know about, and whose secrecy for a specified period of time, regardless of its value, is in the interest of one or more people or society, and the holder of the secret has taken appropriate measures to keep it secret. If we examine the secrecy of secrecy, which is also protected by law, as a kind of special legal relationship, we can make the following conclusions about it: - always present in humans, - an absolute legal relationship (everyone is obliged to tolerate that the secret owner only shares the secret with whom he wishes), - always exists within a specified time frame, - its subject-matter is information of a valuable nature which requires and deserves legal protection, and - the loss, destruction, dis-

16) Tóth Mihály: Titkokkal átszőtt büntetőjog (=Iustum Aequum Salutare 2005/1. · 57. o.)

17) Révész Béla: A titok, mint politika. A titkosszolgálatok politológiai kutatásának lehetőségei SZTE ÁJK Politológiai Tanszék, Szeged, 2007. 9. o.

closure or making available to an unauthorized person of this information has legal consequences governed by different rights. After defining the general concept of secrecy, we turn to the examination of state secrecy, first also in general. The three indispensable components of the concept of state are territory, population, and sovereignty. Preserving the security and integrity of all three essential components today is closely correlated with the ability and efficiency of the state to preserve information whose disclosure or acquisition by unauthorized persons or bodies could harm or jeopardize the legitimate interests of the state. Already Max Weber points out, every bureaucracy strives to strengthen the sense of superiority of its members with professional knowledge by keeping their knowledge and intentions secret. The bureaucratic administration always strives to be the "administration of secret meetings" as much as possible, hiding its knowledge and actual activities from possible criticism. The concept of "official secret" is a specific invention of the bureaucracy, which is why it is also fanatically defended by the bureaucracy.¹⁸⁾ Other types of secrets, such as economic secrets, can be conceived as personal secrets, but one of the distinguishing features of state secrets is that they are of a social nature, directly or indirectly affecting the security of the state, and therefore inconceivable only as personal secrets.

The following is the effective regulation of the crime of breach of economy secrecy:

413. § (1) Any person who has been committed to confidentiality with respect to bank, securities, fund, insurance or occupational retirement secrets, and who makes available any bank, securities, fund, insurance or occupational retirement secret to an unauthorized person for financial gain or advantage, causing financial loss to others is guilty of a misdemeanor punishable by imprisonment not exceeding two years.

Insurance fraud and the possession of narcotic drugs

In order to understand the phenomenon of drug consumption and its intertwining with insurance fraud, it is essential to clarify the mechanism of action of psychoactive substances. According to the definition of the World Health Organization (WHO), drugs are psychoactive substances that exert a direct effect on the central nervous system. Due to their chemical nature, these substances modify the functions of the living organism, which manifests itself primarily in perception, mood, state of consciousness, cognitive processes, or behaviour.¹⁹⁾

From the perspective of criminological analysis, the classification of substances based on their physiological effects is of crucial importance, given that individual types influence perpetrator behaviour in distinct ways. The

18) Max Weber: *Essays in sociology* (Szociológiai tanulmányok) 233-34 (H.H. Gerth & C. Wright Mills trans. and eds., 1946), idézi: Kitrosser, Heidi: *Classified information leaks and free speech*. (Minősített adatok kiszivároztatása és szólásszabadság) *University of Illinois Law Review*, 2008. 3. szám 889. o.)

19) *World Health Organization*: *Drugs* (psychoactive). https://www.who.int/health-topics/drugs-psychoactive#tab=tab_1

primary characteristic of stimulants, which constitute the first group, is that they enhance the activity of the nervous system, thereby inducing alertness and confidence in the user; however, this entails significant physiological risks, such as elevated blood pressure and heart rate, and in higher doses, they may even cause paranoia or seizures.²⁰⁾

In contrast, depressants slow down the functioning of the central nervous system, meaning that their effect is manifested not in hyperactivity, but rather in a kind of introverted, quiet euphoria and detachment from the outside world²¹⁾. Finally, the group of hallucinogens fundamentally alters sensory perception and mental processes, thereby inducing a profound distortion of reality and states of consciousness that differ from everyday experience²²⁾. It is also necessary to note that the quality of intoxication is determined not only by the substance itself, but collectively by the current state of the consumer ("set") and the environmental conditions ("setting"²³⁾).

The physiological effects of narcotic drugs detailed above—whether the heightened state caused by stimulants or the euphoria induced by depressants—do not merely affect the individual's state of health, but fundamentally determine the consumer's social and criminal behaviour as well. The addiction developing through the regular use of psychoactive substances places the user on a forced path where the acquisition of the substance overrides all other social norms. This predicament establishes the direct link between drug consumption and offences against property, particularly specific forms of insurance fraud. This intertwining highlights that the drug problem cannot be treated exclusively as a healthcare or public order issue; due to the complexity of its impacts, it must also be examined within the context of economic criminality:

Although insurance fraud and narcotic drug offences are usually regulated as separate criminal offences, criminological research demonstrates that they frequently overlap in practice. Drug dependence often creates continuous financial pressure that may motivate offenders to stage motor vehicle accidents, fabricate thefts or intentionally damage insured property in order to obtain insurance compensation. Conversely, offenders under the influence of narcotic drugs may intentionally or recklessly create insurance events while later attempting to conceal the real circumstances of the loss. In such

20) Australian Government Department of Health and Aged Care: Types of drugs. Elérhető: <https://www.health.gov.au/topics/drugs/about-drugs/types-of-drugs>

21) Qebir Avziu – Afim Osmani: *DROGAT DHE LLOJET E DROGAVE / DROGI I VIDOVI NA DROGI / DRUGS AND TYPES OF DRUGS*. 2011, 320. https://www.researchgate.net/publication/400224424_DROGAT_DHE_LLOJET_E_DROGAVE_DROGI_I_VIDOVI_NA_DROGI_DRUGS_AND_TYPES_OF_DRUGS.

22) Priyanshu Raj – Shyambabu Rauniyar – Bhagyesh Sapkale: *Psychodelic Drugs or Hallucinogens: Exploring Their Medicinal Potential*. Cureus, 2023/11., 1.

23) Ido Hartogsohn: *Set and Setting, Past, Present and Future: A 50-Year Review*. Journal of Psychopharmacology, 2017/1., 1–2.

cases, insurance fraud serves not only as a property offence but also as an indirect means of financing continued drug consumption or organised criminal activity. These cases require investigators to assess the entire criminal context rather than examining the insurance claim in isolation.²⁴⁾

Some remarks and conclusion

Insurance fraud can no longer be regarded merely as an offence against property or contractual good faith. In contemporary criminality it frequently intersects with money laundering, organised crime, violations of insurance secrecy and, in certain cases, offences connected with narcotic drugs. These links illustrate that isolated legal responses are insufficient. Criminal law must be complemented by effective financial supervision, international information exchange and sophisticated compliance mechanisms capable of identifying suspicious patterns before criminal proceeds are successfully integrated into the legitimate economy. The future effectiveness of criminal justice will therefore depend not only on precise statutory definitions but also on the ability of investigators, insurers and supervisory authorities to cooperate within an increasingly complex financial environment.²⁵⁾

NEKA RAZMIŠLJANJA O PREVARAMA U OSIGURANJU I KRIVIČNOM ZAKONU

Apstrakt

Prevara u osiguranju danas predstavlja složen oblik privrednog kriminaliteta koji daleko prevazilazi lažno podnošenje odštetnih zahteva. Ona je sve češće povezana sa pranjem novca, organizovanim kriminalom, nezakonitim otkrivanjem tajni osiguranja i krivičnim delima u vezi sa opojnim drogama. Rad analizira ove međusobne veze iz ugla krivičnog prava i ukazuje na značaj finansijske obaveštajne delatnosti, sistema usklađenosti poslovanja i međunarodne saradnje u otkrivanju i sprečavanju ovih krivičnih dela. Posebna pažnja posvećena je kriminološkoj povezanosti zloupotrebe narkotika i prevara u osiguranju, pri čemu se ukazuje na ulogu finansijskih motiva u nji-

24) United Nations Office on Drugs and Crime: World Drug Report. <https://www.unodc.org/unodc/en/data-and-analysis/world-drug-report.html>; United Nations Office on Drugs and Crime: Transnational Organized Crime: The Globalized Illegal Economy. <https://www.unodc.org/toc/en/crimes/organized-crime.html>

25) Financial Action Task Force: The FATF Recommendations. <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/Fatf-recommendations.html>; Financial Action Task Force: Guidance for a Risk-Based Approach: Life Insurance Sector. <https://www.fatf-gafi.org/en/publications/Fatfrecommendations/RBA-Life-Insurance-Sector.html>

hovom ispreplitanju. Zaključuje se da efikasna borba protiv ovih oblika kriminaliteta zahteva integrisan pristup koji povezuje krivično pravo, finansijsku regulativu i mehanizme nadzora zasnovane na proceni rizika.

Ključne reči: *Prevara u osiguranju, Krivično pravo, Pranje novca, Tajnost osiguranja, Narkotici, Organizovani kriminal, Finansijska usklađenost, Međunarodna saradnja.*