

TO:

FATF President

Moneyval Chair

UN Special Rapporteur on Freedom of Association and Assembly

UN Special Rapporteur on Human Rights and Counter Terrorism

Council of Europe Conference of INGOs Expert Panel on NGO Law

Dear Madam/Sir,

We are addressing you regarding the **latest case of misuse of the FATF / MONEYVAL standards for unlawful persecution of nonprofit organizations (NPOs) in Serbia**, namely, abusing the Law on the Prevention of Money Laundering and Financing of Terrorism in Serbia. **Specifically, the Administration for the Prevention of Money Laundering and Financing of Terrorism (AMLU) [has requested](#) from all banks in Serbia data on bank accounts of five NPO employees, citing the provisions of this law.** (details in linked article)

In the letter sent to all banks in Serbia labeled “strictly confidential” by the AMLU, dated December 31, 2024, signed by the Acting Director of the AMLU Željko Radovanović, data, information and documentation were requested regarding the personal bank accounts of Maja Stojanović, Executive Director of [Civic Initiatives](#), Katarina Đukić, Coordinator of [ProGlas](#), and Sofija Todorović, Director of the [Youth Initiative for Human Rights in Serbia](#). Then, on January 16, 2025, a same request was sent for accounts of Predrag Voštinić from the [Local Front](#) in Kraljevo and on January 23 for Nebojša Petković from the "Ne damo Jadar" association. [The Administration for the Prevention of Money Laundering responded to Al Jazeera](#) that they “had checked the data of the activists at the initiative of another state body, due to the suspicion of multiple criminal acts”. They did not clarify which criminal acts or other state body, because, as they stated, it “could jeopardize the detection of a criminal offense or the conduct of pre-investigation proceedings.”

What these five individuals and NPOs have in common is a public critical attitude towards the ruling party-led government. They are organizations that have been long engaged in promoting democratization, upholding the rule of law, improving electoral conditions, and addressing issues related to their country’s wartime history, with international, regional and national recognition. These activists have faced hostility not only from high-ranking state officials but also from tabloid media campaigns aimed at discrediting them. Additionally, they have experienced institutional repression, which reflects the significant challenges and risks associated with their advocacy for democratic principles and accountability.

All this is happening in the context of widespread student and civil protests that have been ongoing for three months in Serbia, centering around demands for action against corruption, The [protests are led by students](#) whereas the authorities, through institutions and pro-regime media, have been trying to put **pressure on those protesting, including NPO sector.**

We would like to highlight that **Serbian AMLU previously misused the AML/CFT Law in the same way** on January 1, 2019, when it requested to scrutinize the bank accounts and transactions individually for 20 journalists, activists and politicians, along with another 37 organizations, including journalistic investigative outlets (so-called [The “List” case](#)). It was then subsequently observed that the data obtained in this way by the AMLU was used for propaganda purposes in pro-regime media. This prompted a response from the [Special Reporters of the United Nations](#) who issued a statement indicating that the authorities in Serbia had misused the law to suppress dissent. We remind that, following “the List” case, the outcome of the [FATF](#) unintended consequences workstream sought to mitigate potential impacts on civic space brought about by improper application of AML-CFT standards. At the [MONEYVAL plenary session](#) on April 28, 2021, Serbia’s handling of the “List” case was a high-priority agenda item. MONEYVAL reiterated that financial intelligence units like Serbia’s AMLU lack the authority to request information without clear suspicion of money laundering or terrorism financing. Serbia was cautioned not to misuse FATF recommendations to target civil society and was urged to implement reforms to prevent future abuses.

In addition, in 2024 we alerted international institutions regarding the **case of publication of confidential financial data**, when private data on all financial transactions for 39 organizations and 11 donors were broadcasted on pro-regime television. Confidential data including individual deposits and withdrawals, employee salaries, and payments to third party services were published and exploited in a campaign by pro-regime and tabloid media to discredit civil society organizations, particularly during the mass environmental protests taking place at that time. **This misuse of sensitive information has once again raised serious concerns regarding the integrity of state institutions and their role in undermining NPOs and legitimate civic engagement.**

The recent targeting of NPOs represents another instance of **legal abuse aimed at silencing critics of the regime.** We believe that the latest misuse of the AML / CFT law will similarly be exploited for malicious interpretation in the tabloid media, as was the case with the previous examples. This situation is again demonstrating a troubling trend in Serbia, where the **AML / CFT standards and rules are being weaponized to intimidate and retaliate against regime opponents.** Such actions not only undermine the FATF and MONEYVAL goals, the rule of law, but also pose a significant threat to civic engagement and the protection of human rights. **We therefore call on your institution to, within your mandate, issue a clear warning to the Serbian government to immediately stop abusing international standards for the attacks on NPOs and civic engagement.**