

Expert Analysis

# New Interpol Silver Notice Could Be Tool For Justice Or Abuse

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In January, [Interpol](#) debuted a new tool to target financial crime: the Silver Notice, which aims to trace and recover assets linked to criminal activity.[1]

In the past few months, Interpol has confirmed that more than 50 Silver Notices have been issued — with "'astounding' results," according to an Interpol criminal intelligence officer[2] — and that the pilot program will likely be extended.

As with Interpol's Red Notice, which is designed to facilitate the arrest and extradition of a target, we expect that the Silver Notice will prove to be a powerful mechanism for both justice and injustice, depending upon who is wielding it and for what end.[3]

In the past decade, both the misuse of Interpol's Red Notice system and concerns about its exploitation have grown. Legal experts and human rights advocates continue to sound the alarm about abusive Red Notices lodged by countries seeking to persecute, extort or otherwise undermine their targets beyond national borders.[4]

The victims of abusive Red Notices are not limited to political dissidents and former

government officials. Increasingly, victims include entrepreneurs, investors and board members ensnared in commercial disputes that have been arbitrarily criminalized through corruption.

Although these Red Notices clearly violate Interpol's Constitution and rules, the requests often contain allegations of financial crimes, such as money laundering, fraud, embezzlement or tax evasion.[5]

Unlike manifestly political offenses, such as treason or sedition, fabricated and persecutory allegations of financial crime can appear facially compliant and thereby evade Interpol's compliance review[6] — a fact that has been exploited for many years by countries including Russia[7] and China.[8]

The potential for abuse of the new Silver Notice, predicated on allegations of financial crime, is thus cause for serious concern. So what do we know about the Silver Notice, and what can be done to protect against its misuse?

What is Interpol?

Interpol is an intergovernmental organization made up of 196 member countries, whose mission is to help police throughout the world collaborate to promote safety and fight crime.

Interpol provides a platform for its member countries to request cooperation or share critical information about criminal activity through its color-coded notice system.[9]

Red Notices seek the location and arrest of individuals wanted for prosecution or to serve a sentence.[10] There are also other notice types designed to serve different law enforcement objectives, including Yellow Notices to locate missing persons and Blue Notices to collect additional information for a criminal investigation.[11] Silver Notices are the latest addition to the Interpol tool kit.

What does the new Silver Notice do, and who can be targeted?

The Silver Notice pilot program aims to locate, identify and discreetly monitor financial assets. Member countries can request a Silver Notice to target individuals who are subject to a criminal investigation relating to a crime punishable by at least four years' incarceration

or a more serious penalty.

The request must include (1) a factual summary, (2) a reference to a valid judicial decision indicating that the individual's assets are subject to restraint, and (3) the charges or laws covering the offense.

The first Silver Notice was requested in January by Italy, targeting "assets belonging to a senior member of the mafia," according to the press release.[12] In April, the U.K. followed suit and [published](#) the second-known Silver Notice,[13] targeting the assets of Anopkumar Maudhoo, who had been convicted in March of fraud and money laundering.[14] Details of the nearly 50 additional notices that have since been issued are, as yet, unknown.

As noted, neither convictions nor criminal charges are necessary to meet the Silver Notice criteria. An individual could be under investigation and subject to civil asset restraints — typically requiring a lower burden of proof — and be targeted. These new rules specific to Silver Notices provide a legal framework that is arguably broader than Red Notice criteria, and potentially even more vulnerable to misuse.[15]

How does the Silver Notice change illicit asset recovery?

The goal of the Silver Notice is to better enable jurisdictions to expeditiously recover stolen assets and thereby make whole victims of financial crimes — whether a state, a corporation or an individual.

In theory, jurisdictions could now have a more streamlined path to sharing information about assets that have been secreted in other jurisdictions, facilitating direct cooperation between law enforcement officials across participating countries.

To that end, in lieu of initiating efforts to recover assets in a foreign jurisdiction through cumbersome bilateral agreements, participating countries can share information and more quickly identify targeted assets, with the aim of preventing bad actors from moving those assets somewhere outside of the jurisdiction.

For example, utilizing a Silver Notice, law enforcement in the U.K. could share information regarding the types of assets that might be hidden in the U.S. in connection with a Ponzi scheme that was disrupted in the U.K.

U.S. law enforcement, through various agencies — including the U.S.' [Financial Crimes Enforcement Network](#) — may search for and identify the referenced assets and then notify the requesting country.

The requesting country, armed with the relevant information from the receiving country, could then utilize existing bilateral mechanisms to pursue seizure and forfeiture of the identified assets, including existing mutual legal assistance treaties and other bilateral agreements.

Asset recovery professionals are keenly aware that speed in the identification and seizure process is paramount, as bad actors are constantly moving assets, changing ownership structures, and using nominees to open bank and brokerage accounts. Silver Notices are poised to enhance the speed of asset recovery efforts through, for example, quick confirmation that a sought-after asset exists, improving the odds of a successful asset recovery.

How can I protect against being wrongfully targeted by a Silver Notice?

Like Red Notices, the Silver Notice pilot program is governed by Interpol's Constitution and Rules on the Processing of Data, which prohibit the use of Interpol for political, military, religious or racial purposes.

Silver Notice guidelines indicate that the same mechanism to request the deletion of illegitimate Red Notices — review before the Commission for the Control of Interpol's Files, or CCF — will be available for illegitimate Silver Notice. The CCF is tasked with adjudicating requests for deletion based on violations of Interpol's Constitution and rules.

But the deletion process typically takes a year or more, during which time individuals or companies wrongfully targeted can face irreparable harm.

One underutilized strategy is the filing of a preemptive request with the CCF, with the aim of preventing publication of an illegitimate Silver Notice in the first place.[16] The CCF details this procedure: "An individual may submit information to the Commission, which the Commission will forward to the Interpol General Secretariat for its information and appropriate action if a request for police cooperation is received at a later stage concerning

the individual."

A preemptive request should detail how a Silver Notice targeting a certain individual would violate Interpol's Constitution and rules and should provide supporting documentation to substantiate these claims.

It has been said that with great power comes great responsibility. This is particularly true with respect to Interpol Silver Notices. The Silver Notice has the potential to serve as a catalyst to disrupt organized crime and terrorist financing, and it will hopefully achieve that objective. But we must also anticipate — and protect against — the potential for corrupt and persecutory misuse of this new tool of international law enforcement.

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[1] <https://www.interpol.int/en/News-and-Events/News/2025/INTERPOL-publishes-first-Silver-Notice-targeting-criminal-assets>.

[2] <https://www.amlintelligence.com/2025/05/news-interpol-expects-to-extend-silver-notice-pilot-for-another-year-official-tells-eafcs2025/>.

[3] <https://www.interpol.int/en/How-we-work/Notices/Red-Notices>.

[4] <https://hir.harvard.edu/weaponizing-the-police-authoritarian-abuse-of-interpol/>.

[5] <https://traccc.gmu.edu/wp-content/uploads/2022/03/Reiderstvo-2.0-The-illegal-raiding-pandemic-in-Russia-1.pdf>.

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[9] <https://www.interpol.int/en/How-we-work/Notices/About-Notices>.

[10] <https://www.interpol.int/en/How-we-work/Notices/Red-Notices>.

[11] <https://www.interpol.int/en/How-we-work/Notices/About-Notices>.

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[13] <https://www.nationalcrimeagency.gov.uk/news/uks-first-interpol-silver-notice-secured-against-fraudster>.

[14] <https://www.rocu.police.uk/news/2025/March/london-fraudster-convicted-of-31-charges-linked-to-8.5m-conveyancing-scams/>.

[15] <https://www.interpol.int/content/download/22463/file/EN%20Legal%20Framework%20Governing%20the%202025%20Silver%20Notice%20and%20Diffusion%20Pilot.pdf>.

[16] <https://www.interpol.int/en/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/How-to-submit-a-request>.