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The infiltration of organized crime into corporate and state structures

A infiltração do crime organizado nas empresas e estruturas estatais

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Abstract: This article analyzes the dogmatic and operational evolution of criminal organizations in Brazil, highlighting their transition from mere armed territorial dominance to a complex financial and institutional engineering. The main objective is to demonstrate how organized crime currently acts as a corporate holding, infiltrating the State and the formal economy. Using the deductive method alongside bibliographic and documentary research, the study investigates the instrumentalization of Law No. 14,133/2021 (New Bidding Law), emphasizing the fraud in the "lowest price" judgment criterion as a vector for laundering illicit capital under the guise of feasibility. Concurrently, it examines asset shielding in the private sector through massive cash flows, using recent police operations involving the entertainment industry (Operation Narco Fluxo) and the use of corporate proxies as case studies. Finally, it addresses the phenomenon of narco-politics, illustrated by the 2026 indictments within the Rio de Janeiro legislative scenario, exposing state apparatus capture for the obstruction of justice. The article concludes that financial asphyxiation and the integration between police intelligence and administrative control bodies are indispensable prerequisites for neutralizing this new criminal typology.

Keywords: Organized Crime; New Bidding Law; Money Laundering; Police Intelligence; Corruption.

Resumo: O presente artigo analisa a evolução dogmática e operacional das organizações criminosas no Brasil, evidenciando a sua transição do mero domínio territorial armado para uma complexa engenharia financeira e institucional. O objetivo central é demonstrar como o crime organizado atua contemporaneamente como uma holding empresarial, infiltrando-se no Estado e na economia formal. A partir do método dedutivo e de pesquisa bibliográfica e documental, o estudo investiga a instrumentalização da Lei nº 14.133/2021 (Nova Lei de Licitações), destacando a fraude ao critério de julgamento por "menor preço" como vetor para a lavagem de capitais ilícitos sob a fachada de exequibilidade. Paralelamente, examina-se a blindagem patrimonial no setor privado por meio de grandes fluxos de caixa, utilizando como estudos de caso as recentes operações policiais envolvendo a indústria do entretenimento (Operação Narco

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Fluxo) e o uso de interpostas pessoas jurídicas. Por fim, aborda-se o fenômeno da narcopolítica, ilustrado pelas denúncias de 2026 no cenário legislativo fluminense, indicando o aparelhamento estatal para a obstrução da justiça. Conclui-se que a asfixia financeira e a integração entre a inteligência policial e os órgãos de controle administrativo são pressupostos inafastáveis para a neutralização dessa nova tipologia criminal.

Palavras-chave: Organizações Criminosas; Nova Lei de Licitações; Lavagem de Capitais; Inteligência Policial; Corrupção.

1 INTRODUCTION

The phenomenon of organized crime in Brazil is currently undergoing its most profound structural mutation. Over the last few decades, criminal organizations, especially the *Primeiro Comando da Capital* (PCC) and the *Comando Vermelho* (CV), have based their growth on the violent domination of territories, the control of the prison system, and the monopoly of retail drug trafficking. However, the intensification of state repression and the growing need to channel and integrate illicit capital have contributed to a transformation in the operational strategies of these structures. Currently, the country's largest criminal factions have supplemented territorial and armed control with increasingly sophisticated financial, corporate, and institutional strategies, expanding their activities beyond conventional forms of armed territorial domination and, in some cases, adopting structures that resemble complex corporate holdings (Mendroni, 2021).

This corporate evolution of crime has shifted the axis of operation from the peripheries and geographical borders to administrative offices, the financial market, and the chambers of the Legislative Branch. The State, once primarily confronted through overt forms of conflict, may now also be exposed to forms of influence and infiltration operating within its own institutional and administrative structures. In this scenario, the instrumentalization of Law No. 14.133/2021 (the New Law on Bidding and Administrative Contracts) particularly in proceedings in which **lowest price or highest discount** is adopted as the criterion for judgment. By establishing front companies capable of submitting artificially low or economically unsustainable bids, criminal organizations may attempt to manipulate the competitive environment, conceal the origin of illicit assets, and intermingle "dirty" and legitimate capital. The objective, therefore, is not necessarily to obtain profit from the effective performance of the contracted service, but rather to exploit public procurement as a mechanism for asset

laundering, financial integration, and infiltration into the State apparatus. (Cunha, 2021).

Beyond the contamination of Public Administration, the financial engineering of the factions has expanded voraciously into the formal private economy. Sectors that handle extremely high volumes of cash and intangible services, such as the entertainment industry, events, and the management of digital influencers, have become primary vectors for money laundering. As illustrated by recent operations launched by Federal Police intelligence, such as the actions targeting the financial flow of nationally recognized singers and digital influencers, the dividing line between lawful business and the offloading of drug trafficking proceeds has become blurred, requiring a new hermeneutics from control bodies (Hoffmann; Fontes, 2023).

The most harmful consequence of this accumulation of capital cloaked in lawfulness is the so-called "narco-politics". Organized crime, which historically acted as a veiled financier of electoral campaigns, has begun to actively contest mandates to elect its own members and sympathizers. The Risk of Institutional Capture within the Legislative Branch, evidenced by recent indictments in the Rio de Janeiro scenario involving the use of parliamentary immunities and the leaking of confidential operations, demonstrates that factions today seek institutional self-protection and the guarantee of impunity through the direct subversion of the Democratic Rule of Law (Masson; Marçal, 2021).

In light of this context, the central objective of this article is to analyze the transition from violent territorial hegemony to the sophisticated money laundering of Brazilian factions, focusing on the fraud against the bidding process and the infiltration into the private market and the political establishment. The adopted methodology is based on the deductive method, combining robust bibliographic research grounded in penal and administrative doctrine, legislative analysis, and the study of empirical cases substantiated by police inquiries and recent indictments by the Public Prosecutor's Office. Structurally, the work is divided into the analysis of the financial evolution of crime, the vulnerabilities of the New Bidding Law, front entrepreneurship in the private sector, and, finally, the impact of political infiltration on the criminal justice system.

2 METHODOLOGICAL PROCEDURES

This article is developed within the framework of qualitative research, possessing both an exploratory and descriptive character. The choice of this approach is justified by the need to understand the nuances, complexity, and constant structural mutation of criminal organizations in the Brazilian scenario, a phenomenon that cannot be measured exclusively through quantitative data, but rather requires an in-depth interpretation of its legal, economic, and institutional mechanisms. As an approach method, the deductive method was adopted, starting from the analysis of general premises regarding the evolution of macro-crime and money laundering, to subsequently examine the particularities of its infiltration into public bidding processes and partisan politics (Marconi; Lakatos, 2003; Prodanov; Freitas, 2013; Siena et al., 2024).

Regarding the technical procedures, the investigation is structured upon the intersection between bibliographic and documentary research. The bibliographic review was conducted through a survey of books, scientific articles, and manuals by renowned authors in the fields of Criminal Law, Criminal Procedural Law, Police Intelligence, and Sanctioning Administrative Law. Concurrently, the documentary research focused on the dogmatic analysis of Law No. 14.133/2021, in addition to the scrutiny of police inquiry documents, indictments from the Public Prosecutor's Office, and public-domain financial intelligence reports (Ferrer; Dias, 2023).

The documentary corpus was purposively delimited to recent cases selected according to their relevance to the three analytical dimensions examined in the study: the use of public procurement mechanisms, the integration of illicit capital through private corporate structures, and the pursuit of influence within political and institutional structures. The corpus includes recent case studies, notably Operation Narco Fluxo; investigations conducted by the Special Action Group to Combat Organized Crime (GAECO) involving alleged money-laundering activities in the transportation and entertainment sectors; and indictments filed by the Prosecutor General's Office (PGR) in 2026 involving parliamentarians from Rio de Janeiro. These cases were selected for their documentary availability, contemporary relevance, and potential to illustrate the legal, financial, and institutional dimensions analyzed in the study.

The documentary research was based on the systematic review of relevant doctrinal literature and on information retrieved from legal databases and open-source sources. The collected material was subsequently systematized and analyzed through content analysis and legal-dogmatic hermeneutics, enabling the study to examine the relationship between the theory of financial asphyxiation and the alleged criminal practices identified in the selected cases. (Severino, 2013; Siena et al., 2024).

Finally, regarding the ethical issues outlined by scientific research guidelines, it should be clarified that the present study did not involve experimentation, interviews, or any type of direct intervention with human subjects. Because it is a strictly theoretical, bibliographic, and documentary research, grounded in legislation, published literature, and procedural documents of a public or ostensive nature, the study does not appear to fall within the categories requiring prior submission to or review by a Research Ethics Committee (CEP) under Resolutions No. 466/2012 and No. 510/2016 of the National Health Council (CNS). Accordingly, based on the documentary and bibliographic nature of the research, prior ethical review does not appear to be required. The study nevertheless observes appropriate standards of academic integrity, including accurate citation, proper attribution, and respect for the copyright and intellectual property rights associated with the sources consulted.

As a limitation of the present research, it should be acknowledged that some of the case studies analyzed involve ongoing criminal investigations and judicial proceedings. Consequently, the article does not seek to establish definitive criminal liability, but rather to examine the structural mechanisms identified by law enforcement agencies and public prosecutors as potential vectors of organized crime infiltration. For this reason, in observance of the principle of the presumption of innocence, no names will be disclosed.

The article identifies operations, public agencies, criminal organizations as collective phenomena, and official documents, but does not identify by name any individuals who are under investigation, have been charged, or are being prosecuted, nor does it identify legal entities whose identification could directly associate them with criminal allegations that have not yet been finally adjudicated.

3 FROM TERRITORIAL HEGEMONY TO FINANCIAL ENGINEERING

3.1 The monopoly of force as a primary stage

To understand the current institutional sophistication of criminal organizations in Brazil, it is imperative to trace back to their structural formation stage. The genesis of the country's largest factions was intrinsically linked to the failures of the prison system and the subsequent occupation of state voids in urban peripheries. The *CV* emerged in 1979 at the Cândido Mendes Penal Institute in Ilha Grande/RJ, from the coexistence of common and political prisoners, a fact historically documented and consolidated in the seminal work of investigative journalist Carlos Amorim (1993). In turn, the *PCC* originated in 1993 in the annex of the Taubaté Custody House/SP (the "*Piranhão*"), following the Carandiru massacre, an event exhaustively mapped by sociologists and researchers from the USP Center for the Study of Violence, such as Dias (2013).

In this embryonic and consolidation phase, the *modus operandi* of the organizations was based almost exclusively on the belligerent control of territories. According to historical data compiled by the Brazilian Public Security Forum (FBSP, 2023), the survival and expansion of the illicit business, at the time focused primarily on retail drug trafficking depended on the geographical monopoly of sales zones (drugs sales) and border routes. Consequently, the ostensive use of force, the employment of weapons of war, and direct confrontation against public security forces configured the main operational face of these criminal structures (Sarrubbo; Martinelli, 2025).

This pattern of territorial control has not only persisted but grown substantially. A more recent survey by the same institution, carried out jointly with the Institute for Applied Economic Research (IPEA), found that the number of municipalities under some degree of faction influence within the Legal Amazon climbed from 178 in 2023 to 344 in 2025, a 93% increase within just two years. Across the country as a whole, the *PCC* and the *CV* now have a documented foothold in nearly every state (Cortes, 2020; IPEA; FBSP, 2025).

The United Nations Office on Drugs and Crime (UNODC) has identified relevant patterns in the evolution of organized criminal activity. Globally, criminal organizations have increasingly adopted corporate operational models. While immediate financial accumulation remains a primary objective, long-term institutional resilience

has become equally indispensable. The objectives pursued by such organizations may extend beyond immediate financial gain. These organizations may seek to establish durable economic footholds capable of withstanding market fluctuations, while developing political relationships and institutional connections that may persist beyond individual criminal leaders or specific arrangements. This perspective broadens the conventional analytical framework for understanding organized crime. Violence stops being the defining trait; adaptability and business instinct take its place. For over a decade, UNODC reports have consistently emphasized this structural paradigm shift. Contemporary criminal factions have evolved beyond informal street-level associations. Many operate with the trappings of private companies, internal hierarchies, budgeting processes, ways of managing and offsetting risk (UNODC, 2010; UNODC, 2024).

Making sense of this dual nature requires two disciplines working side by side: criminology to explain the behavior and economics to explain the structure. Brazilian organized crime initially diverged from this corporate model. In their formative stages, these factions operated primarily as armed insurgencies driven by immediate financial extraction, lacking the sophisticated architecture characteristic of modern corporate entities.

The hierarchical structuring was militarized, and the accounting was rudimentary. As noted by Lima (2024), there was no systemic concern, until the early 2000s, with the insertion of this capital into the formal economy, since the territorial dynamics themselves consumed a large part of the resources in maintaining the armed logistics of drug trafficking. However, the saturation of this confrontation model, coupled with the intensification of legislation (with the advent of Law No. 12.850/2013) and the tactical improvement of the police, imposed an expansion limit. Territorial dominance remained the foundation, but it no longer guaranteed the continuity of corporate profit.

Recent macro-data published in the 20th Brazilian Yearbook of Public Security (FBSP, 2026) corroborates this structural shift. The report highlights that in 2025, Brazil recorded its lowest rate of Intentional Violent Deaths (MVI) since 2012. From a criminological perspective, this quantitative reduction in lethal violence does not indicate the weakening of organized crime. On the contrary, it paradoxically reinforces the premise of its maturation: by mitigating overt street confrontations and reducing systemic exposure to police lethality, criminal organizations have redirected their

operational focus toward sophisticated avenues of asset integration, financial engineering, and state capture. Belligerence is no longer the sole defining metric of their expansion.

3.2 The need for money laundering and the corporatization of crime

The maturation of illicit activities, with the transition of local factions to the status of transnational cartels, through Brazilian ports, such as the Port of Santos (Manso; Dias, 2018) generated an economic paradox: the rapid accumulation of cash became one of these organizations' greatest vulnerabilities.

Billion-dollar amounts of physical money generated enormous logistical challenges and attracted the attention of agencies such as the Council for Financial Activities Control (COAF) and the Federal Police. The turning point in Brazilian criminology was then identified: the imperative need to launder the capital. For police intelligence doctrine, the effective combat against crime began to require financial asphyxiation, forcing factions to adapt their strategies (Hoffmann; Fontes, 2023).

To circumvent or reduce exposure to state surveillance, organized criminal groups may develop organizational structures that resemble, in certain respects, those employed by large corporations. According to indictments and intelligence reports attributed to the Special Action Group to Combat Organized Crime of the São Paulo Public Prosecutor's Office, the PCC, for example, has been described as maintaining specialized financial structures, reportedly referred to as the "*Sintonia do Progresso*" (Progress Syndicate) and "*Sintonia da Gravata*" (Tie Syndicate), involving professionals such as accountants, lawyers, and individuals engaged in illicit currency-exchange activities. These developments do not necessarily represent a replacement of armed or territorial control, but rather its supplementation by increasingly sophisticated economic and organizational strategies. Accordingly, addressing such forms of financial and corporate organization requires the State to apply the strict dogmatic criteria of the Theory of Crime, including the principles governing objective imputation, in order to individualize criminal responsibility and prevent arbitrary or disproportionate punitive responses (Vilaverde, 2026).

The factions began to diversify their portfolios through money laundering in its three classic phases: placement, layering, and integration (Mendroni, 2021). This engineering included the acquisition of gas stations, supermarket chains, real estate

subdivisions, and the establishment of front companies. Corporatization evidences that crime has understood that real profit lies in the capacity to convert illicit gains into assets integrated into the formal economy, ensuring the enrichment of its leadership without the risk of armed confrontation. It is this sophistication that currently underpins the infiltration into the mechanisms of Administrative Law and public bidding processes.

The contemporary Brazilian criminal organization may therefore be conceptualized as a Criminal Corporate Holding. Under this model, illicit activities such as drug trafficking, smuggling, extortion, and illegal gambling function as primary revenue-generating divisions, while apparently lawful companies operate as mechanisms for asset integration, risk diversification, and institutional penetration. This analytical framework helps explain the migration of organized crime from territorial disputes toward public procurement, private entrepreneurship, and political influence.

3.3 International experiences in organized crime infiltration

Brazil is not an isolated case in this regard. Comparable patterns have been identified in other national contexts. The infiltration of organized crime into public institutions and private markets is a widely documented phenomenon. Italian anti-mafia investigators have demonstrated for decades how organizations such as Cosa Nostra, Camorra, and 'Ndrangheta have penetrated public procurement, utilizing shell companies and bid-rigging schemes to secure administrative contracts. Analogous dynamics are observable in Mexico and Colombia, where drug trafficking cartels have historically penetrated local political systems, electoral processes, and public procurement, exerting covert influence over state decisions. A comparative analysis of these jurisdictions reveals a consistent structural pattern. Once illicit money reaches a certain scale, criminal groups tend to shift away from pure territorial violence and toward something quieter, capturing economic and institutional systems, because that's what large-scale laundering demands. Brazil fits this broader pattern too, though its federal structure and the sheer size of its factions give the process a distinct shape (Frade, 2007; Oliveira Filho, 2012; Anselmo, 2015).

The concept of institutional capture provides a useful analytical framework for examining how criminal organizations may seek to influence or penetrate public institutions, institutional capture. This phenomenon differs substantially from

conventional forms of corruption, particularly in its organizational structure, objectives, and mechanisms of operation. Traditional corruption is generally characterized by isolated illicit transactions involving a direct exchange between a public official and a private actor. Conversely, institutional capture constitutes a broader and structurally systemic phenomenon. It involves the gradual and methodical infiltration of a criminal organization into the state apparatus responsible for decision-making, regulatory frameworks, and the allocation of public resources. From this perspective, the reasons why these organizations seek this type of infiltration are no longer mysterious, as achieving this level of access requires significantly reducing the risk of intervention by law enforcement and criminal prosecution authorities, thereby ensuring a more stable and sustainable source of profit. This is particularly true because illicit proceeds begin to circulate through channels that, to an external observer, appear entirely legitimate and free from any suspicion (Pereira, 2022; Marangoni, 2023; Sarrubbo; Martinelli, 2025).

4 THE BIDDING PARADOX IN LAW NO. 14,133/2021

4.1 The instrumentalization of economicity

Brazilian Administrative Law, guided by the constitutional principles enshrined in Article 37 of the Magna Carta, relies on the public bidding process as the instrument that guarantees impersonality and the pursuit of the most advantageous proposal for the Public Administration (Di Pietro, 2022). With the advent of Law No. 14.133/2021, the legislator was driven by dogmas of efficiency and economicity, consolidating the judgment criteria of "lowest price" or "highest discount" as the fundamental rule for acquiring goods and services (Brasil, 2021; Justen Filho, 2021).

However, the teleology of the norm presupposes a healthy market, composed of lawful companies seeking profit through their commercial operations. The contemporary bidding paradox arises precisely when organized crime, now structured as a corporate holding, subverts this logic to infiltrate the public budget. For the criminal organization, the administrative contract is not an end aimed at obtaining commercial profit, but rather a highly effective state mechanism to promote large-scale money laundering (Sanctis, 2020).

By exploiting the formal requirements governing public procurement, organized crime may seek to instrumentalize the principle of economicity by submitting

artificially low or economically unsustainable bids. Although the adoption of the lowest-price criterion does not, by itself, oblige the public manager to accept an unviable proposal, the competitive dynamics of public procurement may nevertheless be manipulated through bids designed to appear economically advantageous while concealing illicit objectives. In such circumstances, the State, while seeking to preserve public resources, may inadvertently contract with corporate entities infiltrated by organized crime, thereby conferring an appearance of legitimacy upon illicit operations and facilitating the integration of criminal proceeds into the formal economy.

4.2 Unfeasible bids and integrated laundering

The financial engineering for state capture occurs through the creation or acquisition of front companies in strategic sectors, such as the supply of medical inputs, urban transportation, waste collection, and outsourced labor (Masson; Marçal, 2021). These companies enter the bidding events (especially in the electronic auction modality) and offer bids that are deliberately unfeasible for lawful competitors.

The underlying mechanism is relatively straightforward: while a legitimate company must incorporate operational costs, taxes, labor charges, and a reasonable profit margin into its bid, a company allegedly linked to a criminal organization may, under certain circumstances, submit a proposal that does not fully reflect its actual operating costs and may therefore operate at an apparent accounting “loss.” The difference between the negligible value offered in the bidding document and the true cost of service execution is subsidized by illicit capital originating from drug trafficking, extortion, or smuggling.

As pointed out by prosecutor Cunha (2021), in this scenario, the organization fraudulently wins the bid, executes the service using its infrastructure already financed by crime, and begins receiving direct payments from public coffers. The money transferred by the State is clean and traceable, inextricably mixed with the dirty capital that subsidized the operation. This represents the most advanced stage of the “integration” phase of money laundering, as the criminal begins to appear before the internal revenue service and the banking system as a successful entrepreneur and a legitimate supplier to the Public Administration (Badaró; Bottini, 2022).

From an economic perspective, the abnormal sustainability of systematically unfeasible bids may itself constitute a red flag for financial intelligence purposes. While

legitimate competitors depend on operational profitability to remain active in the market, companies financed by illicit capital may tolerate losses over extended periods because their primary objective is not commercial gain but asset legitimization. Such behavior distorts market competition and may indicate the existence of external funding sources incompatible with ordinary business practices.

4.3 Structural risks and the urgency of public compliance

Budgetary infiltration may distort competition, place legitimate businesses at a disadvantage, and, if supported by the evidence, increase the risk that the provision of essential public services may become subject to the influence of organized criminal groups. Given this scenario, the purely formal analysis of qualification documents, as stipulated by Law No. 14.133/2021, proves insufficient to halt the new criminality (Marinela, 2022).

Although Article 59 of the aforementioned legal framework requires the disqualification of proposals whose prices are manifestly unfeasible, verifying this unfeasibility by auctioneers and contracting agents is hindered by the complexity of the factions' accounting engineering, which frequently presents heavily doctored spreadsheets.

The solution to this vulnerability requires a paradigm shift in Sanctioning Administrative Law. It is urgently necessary to implement rigorous compliance programs within public management (pursuant to Art. 25, Paragraph 4, of Law No. 14,133/2021), combined with the cross-sectional integration of data between bidding commissions, Courts of Auditors, and financial intelligence agencies, such as the Council for Financial Activities Control (COAF) (Brasil, 2021; Castro, 2021). This recommendation is not merely doctrinal speculation: in its December 2023 Mutual Evaluation Report, the Financial Action Task Force (FATF/GAFI), in partnership with GAFILAT, identified that, despite coordination initiatives, Brazil still faces challenges in ensuring full transparency of corporate entities, including the swift and effective identification of their ultimate beneficial owners (GAFI/GAFILAT, 2023). The international assessment thus corroborates, from an independent and supranational standpoint, the structural vulnerability this article identifies in the bidding process. Only profound scrutiny to identify the ultimate beneficial owners of bidding companies, cross-referencing economic-financial capacity data with the history of atypical

transactions, will be able to prevent the State from continuing to subsidize the expansion of organized crime with taxpayers' resources.

5 THE ASSET SHIELDING OF CRIME WITH FRONT ENTREPRENEURSHIP AND CORPORATE INFILTRATION

5.1 Emerging sectors for money laundering, intangible economy, and corporate engineering

If the instrumentalization of public bidding represents the capture of the State by organized crime, the infiltration into the private market denotes the sophistication of asset shielding through "front entrepreneurship." The *COAF*, in its annual reports on money laundering typologies, frequently warns that to disguise the billion-dollar volume originating from drug trafficking, criminal factions have abandoned mere physical concealment and begun to invest massively in the share capital of established companies (COAF, 2023).

This infiltration occurs through ingenious corporate engineering: faction leaders do not appear in the articles of incorporation. They use intermediaries ("straw men") or employ Silent Partnerships (*Sociedades em Conta de Participação* - SCP), acting as hidden partners who inject illicit capital into the ostensive company's treasury (Badaró; Bottini, 2022). The objective is to promote the technique of commingling, in which the lawful money from the company's sales and the illicit money from crime are mixed within the same commercial accounting.

For this technique to succeed, organized crime selects sectors characterized by large daily cash flows and the intangible pricing of services. Businesses linked to pop culture, large-scale events, restaurants, digital influencer management, and the sports betting market (*bets*) have consolidated themselves as the organizations' "new laundromat." As noted by jurist Sanctis (2020), the primary difficulty for control bodies lies in the fact that the value of goods and services tied to image and entertainment is highly subjective. It becomes mathematically viable to issue ideologically false tax invoices to justify exorbitant revenues, claiming, for example, record crowds or monetized digital engagement, while these companies actually operate as conduits for dirty capital.

It is important to emphasize that the case studies discussed in this section are analyzed exclusively from the perspective of criminal investigations, indictments, and

publicly available judicial records. The references to individuals and legal entities do not imply a definitive finding of criminal liability, since many proceedings remain subject to ongoing judicial review and the constitutional guarantees of due process and presumption of innocence.

5.2 Case study 1: operation Narco Fluxo, the entertainment industry, and “cold invoices”

The materiality of this corporate dynamic was the subject of the so-called “Operation Narco Fluxo,” launched by the Federal Police on April 15, 2026. The investigation sought to dismantle an alleged criminal organization dedicated to laundering money allegedly derived from drug trafficking and the illegal betting market (bets). Among the targets of the operation were individuals with significant media exposure associated with the music and digital influence sectors. According to the authorities responsible for the investigation, the substantial public visibility and professional activities of some of the individuals under investigation were allegedly used to lend an appearance of economic plausibility to financial transactions considered atypical, as well as to facilitate alleged asset shielding through the use of intermediaries (“straw men”) (Cabrini, 2026; G1, 2026).

According to the investigative hypotheses set forth in the police documents, a commercial establishment operating in the food and entertainment sector was identified as a potentially relevant component of the alleged asset concealment mechanism. The Federal Police reported that the establishment had allegedly handled more than R\$ 30 million between April 2024 and October 2025, an amount considered by the investigating authorities to be potentially incompatible with its operational characteristics and physical size.

These findings, however, should be interpreted with caution, as the evidence gathered during the operation remains subject to judicial scrutiny and adversarial proceedings. On May 14, 2026, the Superior Court of Justice (STJ) reportedly addressed the detention of one of the individuals investigated in connection with the operation, in circumstances involving the expiration of the applicable period of temporary detention. The procedural development is relevant to the analysis developed here, but it should not be interpreted as a judicial determination that the underlying financial evidence was unlawful or that the individual was responsible for money laundering. More broadly, the

case illustrates the need to distinguish between the identification of atypical financial transactions and the establishment of criminal liability. Financial intelligence reports, unusual financial movements, and other indicators may constitute relevant elements for an investigation, but they do not, in isolation, establish the commission of money laundering. Such evidence must be assessed in conjunction with other evidentiary elements and within the guarantees of due process and adversarial proceedings before supporting a definitive finding of criminal liability (Brasil, 2026c).

5.3 Case Study 2: The PCC Axis and Infiltration into the Logistics and Transportation Sector

The complexity of the potential connections between formal business activities, individuals with significant public exposure, and organized crime is illustrated by the indictment filed by the Special Action Group to Combat Organized Crime of the São Paulo Public Prosecutor's Office (GAECO/MPSP) in June 2026, arising from the so-called Operation Vértix. According to the accusatory document, the investigation identified indications of an alleged money laundering system involving individuals associated with the digital influence sector and corporate structures operating in the logistics and transportation industry, allegedly used for the benefit of the PCC (Metrópoles, 2026).

According to the Public Prosecutor's Office, one of the primary mechanisms of the alleged scheme involved a legal entity operating in the transportation and logistics sector. As described in the indictment, the corporate structure was allegedly used to move and transfer funds purportedly derived from illicit activities through the involvement of individuals who, according to the prosecution's allegations, maintained ties with members of the criminal organization.

The investigation also identified the alleged use of fractional deposits (smurfing) originating from activities related to the transportation sector and transferred to accounts associated with an individual under investigation who operated in the digital influence sector. According to the investigative findings, this mechanism was allegedly employed to hinder the identification of the origin of the funds. The investigative documents also indicated possible initiatives involving corporate restructuring and the transfer of capital to investment funds abroad (Metrópoles, 2026). These elements are examined in this study not as evidence of individual criminal liability, which remains subject to judicial

determination, but as examples of financial engineering techniques that, according to the investigative hypothesis, may be employed to hinder asset traceability and circumvent state mechanisms of transparency and oversight.

6 NARCO-POLITICS: DIRECT INFILTRATION INTO THE LEGISLATIVE BRANCH AND STATE CAPTURE

6.1 From illicit financing to "mandated crime"

The corporate evolution of criminal organizations in Brazil has not been limited to the formal economy and public bidding processes. The most acute stage of this metamorphosis is the consolidation of "narco-politics". According to the sociological studies of Manso (2020), historically, the relationship between macro-crime and partisan politics was based on indirect co-optation. Factions and paramilitary groups (militias) functioned as veiled financiers of electoral campaigns, injecting illicit resources via "slush funds" ("*caixa dois*"), and exerted violent coercion over voters in dominated territories to ensure the election of allied candidates. In exchange for this electoral and financial stronghold, elected politicians reciprocated with future favors, such as appointing cronies to commissioned positions and passing lenient legislation (Mingardi, 2007).

However, this dynamic power outsourcing has been surpassed. As pointed out by jurists Masson and Marçal (2021), organized crime realized that relying on political intermediaries generated high bribery costs and operational instability, since the politician could break the agreement once elected. Thus, a transition occurred to what police doctrine terms "mandated crime."

Criminal organizations have also sought more direct forms of political influence, supporting the election of individuals connected to their networks, including members, relatives, and financial operators, to positions in City Councils, State Legislative Assemblies, and even the National Congress. This development is part of a broader phenomenon commonly described as narco-politics, which has been observed in several Latin American countries where criminal groups have accumulated enough economic and territorial power to interfere with electoral processes and public institutions. Similar dynamics can be identified in Brazil, particularly in areas where organized crime has

established a significant presence not only through territorial control, but also through its economic and social influence.

The objective of this direct infiltration is not republican popular representation, but institutional self-protection. Upon ascending to the Legislative Branch, as warned by Lima (2024), these individuals become shielded by parliamentary immunities (material and formal) and the prerogative of forum. Even more gravely, they acquire privileged access to sensitive information from the public security apparatus and seats on budget committees, allowing the criminal organization to act as counterintelligence within the State itself.

6.2 The 2026 scenario: institutional capture in Rio de Janeiro

The State of Rio de Janeiro, historically associated with the emergence of the *Comando Vermelho* (CV) and militia groups, provides a relevant case study for examining the interaction between violent criminality, economic interests, and state institutions. Researcher Alves (2020), when mapping the structure of Rio's crime, previously warned that the dividing line between the State and crime had disappeared. While in previous years the symbiosis was limited to non-confrontation agreements in the slums, the developments observed in 2026 raised concerns about potential forms of institutional capture and undue influence within state structures.

This capture transcends conventional passive corruption (the mere receipt of bribes). It involves the active instrumentalization of the elective mandate to commit crimes against the Administration of Justice, ensuring that judicial police and the Public Prosecutor's Office are sabotaged by State agents before they even launch their field operations. These developments could, if supported by the available evidence, indicate the consolidation of more formalized “parallel State” structures.

6.3 Case study 3: Operation Zargun and the leaking of information (CV)

The allegations examined within Operation Zargun provide a particularly relevant case study for understanding the mechanisms through which organized crime may seek to exert institutional influence. According to the indictment, the case allegedly revealed indications that the purported infiltration of the CV was not confined to the Legislative Branch but may also have reached members of the Judiciary, reinforcing the

hypothesis of a deeper form of institutional capture (Folha de São Paulo, 2026; O Globo, 2026; G1, 2026).

The accusatory document attributed to public officials associated with the Legislative and Judicial Branches, as well as to another individual under investigation, the alleged commission of acts aimed at obstructing justice. According to the PGR, strictly confidential information concerning police operations targeting members of the *CV* was allegedly transmitted by a member of the Judiciary to a political official who, at the time of the events under investigation, held a leadership position within the state Legislative Branch. In the subsequent stage of this alleged chain of disclosure, the information reportedly reached another political official directly affected by the investigative measures.

This structured flow of privileged information, which allegedly originated within the Judiciary, proceeded to the leadership of the Legislative Branch, and subsequently reached an individual potentially affected by the operation, constitutes a relevant element for analyzing mechanisms of institutional capture. According to the prosecution's hypothesis, the premature disclosure of confidential information allegedly compromised the effectiveness of the investigative measures. In this sense, Operation Zargun provides an empirical case for examining how state structures may, in theory, be instrumentalized to perform protective and counterintelligence functions for the benefit of organized crime.

The investigation suggested that the alleged disclosure of confidential information was not confined to the Legislative Branch and may also have involved a member of the Judiciary. The indictment states that a federal judge responsible for authorizing confidential precautionary measures in Operation Zargun allegedly informed a state legislator about those measures before they were carried out. At the time, the legislator held a leadership position in the Legislative Assembly of the State of Rio de Janeiro (Alerj). The accusatory document also referred to the existence of a personal relationship between them. The legislator, in turn, allegedly transmitted the information to another political official whom the prosecution described as purportedly associated with interests of the *CV* and who was directly affected by the investigative measures (O Globo, 2026).

This alleged chain of information disclosure across different institutional levels, encompassing the Judiciary, the leadership of the Legislative Branch, and an individual

directly affected by the investigative measures, could, if confirmed through due process of law, constitute a form of institutional capture more profound than isolated episodes of corruption, insofar as it may indicate the potential use of positions within the state apparatus itself to anticipate or compromise criminal investigations and enforcement actions. Accordingly, the analysis developed in this study is limited to the hypotheses and allegations contained in the accusatory documents and does not express any definitive judgment regarding the individual criminal liability of the persons involved.

6.4 The legislative response: Law No. 15.358/2026 and the typification of “Structured Social Domain”

The empirical findings discussed throughout this article have not gone unanswered by the national legislature. On March 24/2026, the President of the Republic sanctioned Law No. 15,358/2026, officially the "Raul Jungmann Law" and popularly known as the "Anti-Faction Law", instituting the Legal Framework for Combating Organized Crime in Brazil (Brasil, 2026b).

The statute supplements the framework established by Law No. 12,850/2013, whose definition of criminal organization expressly encompasses a structurally ordered association characterized by the division of tasks, even when such division is informal. The new legislation therefore expands the legal framework by addressing forms of territorial, social, and coercive control exercised by highly violent criminal organizations, rather than relying exclusively on the traditional organizational-crime framework.

The new legislation introduces the offense of “structured social domain,” which refers to the violent or coercive control exercised by criminal organizations over territories, communities, or essential public services. It also establishes penalties of up to 40 years of imprisonment for faction leaders and limits access to certain legal benefits, including parole, amnesty, and bail (Brasil, 2026a). Of particular relevance to this study, the statute also introduces changes to the Money Laundering Law (Law No. 9,613/1998) and the Electoral Code (Law No. 4,737/1965). These amendments directly affect two of the three forms of organized crime infiltration discussed throughout this article.

The Anti-Faction Law, however, leaves the public procurement process, which is the focus of Section 4, largely untouched. Its silence regarding the lowest-price

criterion under Law No. 14,133/2021 does not mean that lowest price is the only criterion available under Brazilian procurement law; rather, it reflects the fact that price-based selection remains the predominant model in public procurement, particularly through electronic bidding (*pregão eletrônico*), where the search for the most economically advantageous proposal constitutes a central objective of the procedure. This orientation is consistent with a broader principle of public administration: the State has a duty not only to ensure competitive and impartial procurement, but also to avoid unjustifiably burdensome, disadvantageous, partial, or overpriced contracts and to pursue the best value for public resources. Accordingly, the vulnerability identified in procurement procedures does not arise from the mere existence of the lowest-price criterion, but from the possibility that criminal organizations may manipulate price-based competition through artificially low, economically unviable, or otherwise fraudulent proposals. Although the Anti-Faction Law represents a substantial legislative advance on the criminal and electoral fronts, this specific dimension of public procurement remains insufficiently addressed, reinforcing the relevance of the administrative safeguards proposed in the final considerations below (Brasil, 2021).

Table 1 - The three strategic vectors of organized crime infiltration

Infiltration vector	Primary objective	Mechanism
Public procurement	Money laundering	Artificially low or economically unviable bids
Private companies	Asset integration	Commingling of illicit and legitimate capital
Legislative branch	Institutional protection	Financing, co-optation, political infiltration (Narcopolitics), lobbying

Source: Prepared by the authors based on research data (2026).

The three vectors identified throughout this research reveal a common strategic objective: the progressive conversion of criminal power into economic and institutional power. While the mechanisms differ, all ultimately seek legitimacy, asset protection, and the reduction of criminal exposure.

7 FINAL CONSIDERATIONS

The dogmatic and operational evolution of criminal organizations in Brazil indicates that the State currently faces criminal structures whose strategies extend

beyond the predominantly territorial and armed forms of control that characterized earlier phases of organized criminal activity. This article has sought to demonstrate that these traditional forms of criminal power have not been displaced, but increasingly supplemented by sophisticated financial, corporate, and institutional strategies. Organized crime may therefore be understood as an increasingly complex network of economic and organizational structures whose sustainability may depend, among other factors, on the ability to channel, conceal, launder, and integrate illicit capital into the formal economy.

Within the scope of Public Administration, the so-called “bidding paradox” has become evident. The New Bidding Law (Law No. 14,133/2021), by elevating the principle of economicity and the “lowest price” criterion to central tenets of administrative action, inadvertently created vulnerabilities that may facilitate the capture of public resources. Front companies subsidized by capital derived from drug trafficking may submit bids whose costs can be sustained regardless of profitability, even when the contract results in an apparent commercial profit margin of zero. The actual objective of the infiltrated corporate entity would not be to profit from the provision of services or the supply of goods, unlike legitimate competing companies, because the effective economic gain would already have been generated at the underlying level of its activities through the sale of narcotics and other criminal practices. For the criminal faction, therefore, the bidding procedure could function merely as a state-based mechanism for money laundering, allowing illicit assets to be commingled with fully legitimate and traceable public payments.

At the same time, infiltration into the private market has exposed the vulnerability of the economy of intangible goods and services. Based on the analysis of contemporary cases, such as Operation Narco Fluxo and the indictment arising from Operation Vértix in 2026, police investigations maintain that sectors characterized by high financial flows—such as restaurants, the entertainment industry, digital influence, and transportation logistics—may be used as new mechanisms for money laundering in the country. The allegations suggest that the public visibility of certain individuals and the use of fractional deposits may be employed to commingle illicit capital with apparently lawful revenues. It is essential to emphasize, however, that such operations reflect the State’s investigative perspective, as the underlying facts remain subject to judicial review, a circumstance illustrated by the granting of *habeas corpus* by the STJ,

which recognized the unlawfulness of the detention of one of the targets of Operation Narco Fluxo. This scenario requires academic rigor in distinguishing prosecutorial allegations from a final and unappealable criminal conviction (Brasil, 2026c).

However, the most serious consequence of this metamorphosis lies in the consolidation of so-called narco-politics. The case of Operation Zargun in Rio de Janeiro may indicate that criminal factions have moved beyond the stage of campaign financing through unreported funds (“caixa dois”), seeking more direct means of inserting their interests into political and institutional structures. So-called “mandated crime” may instrumentalize parliamentary prerogatives and access to government information to obstruct justice, protect members of criminal organizations, and perform counterintelligence functions within the state apparatus itself.

It is therefore concluded that police repression based exclusively on armed incursions into conflict-ridden territories has become ineffective and insufficient. Confronting the institutional capture of the State requires a profound paradigm shift in the criminal prosecution system and, above all, in Sanctioning Administrative Law. The mere recommendation of generic compliance programs in public procurement appears palliative and insufficient in light of the current sophistication of criminal engineering.

The findings of this research suggest that future legislative reforms should consider the adoption of enhanced due diligence mechanisms in public procurement procedures, particularly with regard to beneficial ownership transparency, verification of economic and financial capacity, and the integration of financial intelligence data. Such measures may contribute to reducing vulnerabilities susceptible to exploitation by sophisticated criminal organizations seeking forms of institutional penetration.

Current and former partners may be subject to enhanced due diligence through the lawful cross-referencing of relevant information held by the Public Prosecutor’s Office and law enforcement agencies, where legally authorized, subject to data-protection safeguards, confidentiality requirements, proportionality, and due process. Such mechanisms should be designed to identify potential past or present links to illicit activities without allowing unverified intelligence, by itself, to result in the automatic exclusion of bidders from public procurement procedures. Furthermore, it is important to assess the financial capacity and economic background of formally declared corporate administrators, particularly where there are indications that individuals may potentially act as intermediaries or “straw men,” or where their declared assets, income

history, and tax records appear materially inconsistent with the financial scale of multimillion-value contracts. The adoption of such measures may contribute to increasing transparency, reducing vulnerabilities in public procurement, and strengthening institutional capacity to identify potential forms of illicit economic infiltration. Combined with a systemic strategy of financial asphyxiation designed to identify ultimate beneficial owners, these measures may help the Democratic Rule of Law disrupt the economic flows that sustain the expansion of organized crime within Brazilian institutions.

This research sought to contribute to contemporary debates on organized crime by proposing that the principal vulnerability of modern criminal organizations no longer lies in territorial dependence, but rather in their need to rely on mechanisms of institutional and economic integration. Consequently, future public policies should prioritize financial intelligence, beneficial ownership transparency, and interagency cooperation as strategic tools for dismantling corporate structures linked to organized crime.

REFERENCES

ALVES, J. C. S. **Dos barões ao extermínio**: uma história da violência na Baixada Fluminense. 2. ed. Rio de Janeiro: Consequência, 2020.

AMORIM, C. **Comando Vermelho**: a história secreta do crime organizado. Rio de Janeiro: Record, 1993.

ANSELMO, M. A. **O regime internacional de combate à lavagem de dinheiro**: da jurificação à efetividade. 2015. 280 f. Tese (Doutorado em Direito Internacional) - Faculdade de Direito, Universidade de São Paulo, São Paulo, 2015.

BADARÓ, G. H.; BOTTINI, P. C. **Lavagem de dinheiro**: aspectos penais e processuais penais. 5. ed. São Paulo: Thomson Reuters Brasil, 2022.

BRASIL. **Lei nº 14.133, de 1º de abril de 2021**. Lei de Licitações e Contratos Administrativos. Diário Oficial da União: seção 1, Brasília, DF, 1 abr. 2021.

BRASIL. **Lei nº 15.358, de 24 de março de 2026**. Institui o Marco Legal do Combate ao Crime Organizado no Brasil. Diário Oficial da União: seção 1, Brasília, DF, 25 mar. 2026a.

BRASIL. Senado Federal. **Lei Antifacção, de combate ao crime organizado, entra em vigor**. Agência Senado, Brasília, 25 mar. 2026b.

BRASIL. Superior Tribunal de Justiça. **Habeas Corpus nº 1093687**. Relator: Ministro Messod Azulay Neto. Data de julgamento: 14 maio 2026. Data de publicação: DJEN, 15 maio 2026c.

CABRINI, R. **Investigação exclusiva: o esquema milionário por trás da fama**. Câmera Record. São Paulo: Record/SBT, 16 abr. 2026. Documentário jornalístico.

CASTRO, R. P. A. de. **Compliance e gestão de riscos nas empresas estatais e na Administração Pública**. Belo Horizonte: Fórum, 2021.

CONSELHO DE CONTROLE DE ATIVIDADES FINANCEIRAS (COAF). **Relatório de tipologias de lavagem de dinheiro e financiamento do terrorismo**. Brasília, DF: Ministério da Fazenda, 2023.

CORTES, T. U. U. **A economia do crime organizado e mercados ilícitos no Brasil: um estudo de caso sobre o Primeiro Comando da Capital**. 2020. 131 f. Dissertação (Mestrado em Ciências) - Instituto de Relações Internacionais, Universidade de São Paulo, São Paulo, 2020.

CUNHA, R. S. **Nova Lei de Licitações e Contratos Administrativos: aspectos penais**. Salvador: Juspodivm, 2021.

DI PIETRO, M. S. Z. **Direito administrativo**. 35. ed. Rio de Janeiro: Forense, 2022.

DIAS, C. N. **PCC: hegemonia nas prisões e monopólio da violência**. São Paulo: Saraiva, 2013.

FERRER, W. M. H.; DIAS, J. A. **Manual prático de metodologia da pesquisa científica: noções básicas**. Marília: Unimar, 2023.

FOLHA DE S.PAULO. **Deputados são presos por vazamento de operação sigilosa para o Comando Vermelho**. Folha de S.Paulo, São Paulo, 10 mar. 2026.

FÓRUM BRASILEIRO DE SEGURANÇA PÚBLICA (FBSP). **Anuário Brasileiro de Segurança Pública 2023**. São Paulo: FBSP, 2023.

FÓRUM BRASILEIRO DE SEGURANÇA PÚBLICA (FBSP). **20º Anuário Brasileiro de Segurança Pública 2026**. São Paulo: FBSP, 2026.

FRADE, L. **O que o Congresso Nacional brasileiro pensa sobre a criminalidade**. 2007. 271 f. Tese (Doutorado em Sociologia) - Instituto de Ciências Sociais, Departamento de Sociologia, Universidade de Brasília, Brasília, 2007.

G1. **Operação Zargun é alvo de vazamento; parlamentares são investigados por elo com o Comando Vermelho**. G1, Rio de Janeiro, 12 mar. 2026a.

G1. **Polícia Federal investiga cantores de funk e influenciadores em esquema de lavagem de dinheiro milionário**. G1, São Paulo, 15 abr. 2026b.

GRUPO DE AÇÃO FINANCEIRA (GAFI); GRUPO DE AÇÃO FINANCEIRA DA AMÉRICA LATINA (GAFILAT). **Relatório de Avaliação Mútua do Brasil**. Paris: GAFI; GAFILAT, 2023.

HOFFMANN, H.; FONTES, E. **Crime organizado e investigação criminal**. Salvador: Juspodivm, 2023.

INSTITUTO DE PESQUISA ECONÔMICA APLICADA (IPEA); FÓRUM BRASILEIRO DE SEGURANÇA PÚBLICA (FBSP). **Atlas da Violência 2025: retrato dos municípios brasileiros e dinâmica regional do crime organizado**. Brasília, DF: Ipea; FBSP, 2025.

JUSTEN FILHO, M. **Comentários à Lei de Licitações e Contratos Administrativos**. São Paulo: Thomson Reuters Brasil, 2021.

LIMA, R. B. de. **Legislação criminal especial comentada**. 12. ed. Salvador: Juspodivm, 2024.

MANSO, B. P. **A república das milícias: dos esquadrões da morte à era Bolsonaro**. São Paulo: Todavia, 2020.

MANSO, B. P.; DIAS, C. N. **A guerra: a ascensão do PCC e o mundo do crime no Brasil**. São Paulo: Todavia, 2018.

MARANGONI, C. **Domínio da organização criminosa e ônus da prova**. 2023. 249 f. Dissertação (Mestrado em Direito Penal) - Pontifícia Universidade Católica de São Paulo, São Paulo, 2023.

MARCONI, M. de A.; LAKATOS, E. M. **Fundamentos de metodologia científica**. 5. ed. São Paulo: Atlas, 2003.

MARINELA, F. **Direito administrativo**. 16. ed. São Paulo: Saraiva, 2022.

MASSON, C.; MARÇAL, V. **Crime organizado**. 4. ed. Rio de Janeiro: Forense; São Paulo: Método, 2021.

MENDRONI, M. B. **Crime organizado: fases de evolução e lavagem de capitais**. São Paulo: Atlas, 2021.

METRÓPOLES. **GAECO denuncia D. B. e cúpula do PCC por esquema em transportadora e evasão de divisas**. Metrôpoles, Brasília, DF, 10 jun. 2026.

MINGARDI, G. **O Estado e o crime organizado**. São Paulo: IBCCRIM, 2007.

O GLOBO. **Operação Zargun: PGR denuncia parlamentares do RJ por obstrução de justiça e elo com facção criminal**. O Globo, Rio de Janeiro, 13 mar. 2026.

OLIVEIRA FILHO, R. G. de. **O tratamento jurídico penal das organizações criminosas no Brasil**. 2012. 142 f. Dissertação (Mestrado em Direito) - Pontifícia Universidade Católica do Rio de Janeiro, Rio de Janeiro, 2012.

PEREIRA, M. C. H. **Infiltração policial e investigação da criminalidade organizada: garantismo e eficiência**. 2022. 502 f. Dissertação (Mestrado em Direito Processual) - Faculdade de Direito, Universidade de São Paulo, São Paulo, 2022.

PRODANOV, C. C.; FREITAS, E. C. de. **Metodologia do trabalho científico: métodos e técnicas da pesquisa e do trabalho acadêmico**. 2. ed. Novo Hamburgo: Feevale, 2013.

SANCTIS, F. M. de. **Lavagem de dinheiro**. São Paulo: Saraiva, 2020.

SARRUBBO, M. L.; MARTINELLI, J. P. O complexo cenário das organizações criminosas: conceituação, características e o desafio brasileiro em perspectiva comparada. **Revista SUSP**, Brasília, v. 5, n. 2, p. 11-30, jul./dez. 2025.

SEVERINO, A. J. **Metodologia do trabalho científico**. São Paulo: Cortez, 2013.

SIENA, O.; BRAGA, A. A.; OLIVEIRA, C. M. de; CARVALHO, E. M. de. **Metodologia da pesquisa científica e elementos para elaboração e apresentação de trabalhos acadêmicos**. Belo Horizonte: Editora Poisson, 2024.

UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC). **The globalization of crime: a transnational organized crime threat assessment**. Vienna: United Nations, 2010.

UNITED NATIONS OFFICE ON DRUGS AND CRIME (UNODC). **Fraude organizada: documento temático**. Viena: Nações Unidas, 2024.

VILAVERDE, S. S. da S. A teoria do crime no Direito Penal brasileiro: estrutura dogmática e critérios de imputação. **Revista International Integralize Scientific**, Florianópolis, v. 6, n. 56, fev. 2026.

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Foi utilizada ferramenta de IA no desenvolvimento deste trabalho apenas como apoio técnico não criativo: correção gramatical / revisão linguística / organização textual. Declaramos que não houve geração automática integral de conteúdo nem fabricação de dados.

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