

Article

Research on Sentencing Commitments in International Fugitive Repatriation and Asset Recovery

Yiming Lu^{1,*}¹ Beijing Normal University, Beijing, China

* Correspondence: Yiming Lu, Beijing Normal University, Beijing, China

Abstract: International cooperation in the repatriation of fugitives and the recovery of illicitly transferred assets constitutes a critical dimension of global legal governance. Within the framework of China's extradition law, sentencing commitments have emerged as a pivotal mechanism for overcoming the principle of non-extradition for capital punishment, which remains a significant obstacle in extradition cooperation between China and many Western countries that have abolished capital punishment. This paper employs a doctrinal legal analysis combined with comparative and case study methodologies to examine the theoretical foundations, institutional characteristics, and practical applications of sentencing commitments. Through representative case studies, the paper evaluates the practical considerations underlying sentencing decisions in major repatriation cases and critically reflects on three prominent issues: the ambiguity of sentencing discretion, potential inconsistencies with the principle of equality before the law, and concerns regarding the credibility and procedural formalization of sentencing commitments. Furthermore, the study analyzes the interplay between domestic legal frameworks and international obligations, highlighting the challenges of harmonizing divergent legal traditions. The paper concludes by discussing potential pathways for improving the sentencing commitment system, including legislative refinement, enhanced judicial oversight, and greater transparency in commitment procedures, to strengthen its legal certainty and international acceptance. These recommendations aim to facilitate more effective cross-border legal cooperation while safeguarding fundamental principles of justice and due process.

Keywords: sentencing commitment; extradition law; capital punishment; fugitive repatriation; asset recovery; international legal cooperation

1. Introduction

Legal enforcement efforts targeting illicit financial activities have intensified in recent years, with a strong emphasis on cross-border cooperation for the return of individuals and recovery of assets. International collaboration in this domain has yielded notable outcomes under coordinated national frameworks [1]. A consistent principle guiding such efforts is that individuals subject to legal proceedings may be pursued regardless of their location.

Despite progress, challenges persist in international return and asset recovery processes [2]. In practice, many cases conclude through voluntary return or negotiated resolution, leading to relatively high rates of individual return but comparatively low rates of financial recovery. Formal mechanisms such as deportation and extradition are applied infrequently. This reflects both procedural constraints—including the need for binding bilateral or multilateral agreements—and substantive legal considerations related to sentencing practices in the requesting jurisdiction.

This situation stems from divergent legal positions regarding certain sentencing outcomes—particularly those involving the most severe penalties—between jurisdictions where such penalties remain applicable and those where they have been abolished or are no longer applied in practice [3]. Several key destination countries for outbound legal

Received: 21 May 2026

Revised: 15 July 2026

Accepted: 27 July 2026

Published: 03 August 2026



Copyright: © 2026 by the authors. Submitted for possible open access publication under the terms and conditions of the Creative Commons Attribution (CC BY) license (<https://creativecommons.org/licenses/by/4.0/>).

cases adhere to policies restricting transfer when the requesting jurisdiction retains provisions for maximum penalties.

To address these procedural and legal disparities, a pragmatic mechanism has been introduced: conditional sentencing assurances. This paper investigates the conceptual basis, structural features, and operational implementation of such assurances within extradition-related legal frameworks [4]. It classifies distinct forms of these assurances and examines their origins in differences among judicial systems, evolving normative expectations, and practical accommodations within established legal boundaries. Through illustrative examples, the paper assesses how sentencing considerations influence case resolution in significant return proceedings. It also identifies recurring challenges in current application and proposes refinements to enhance consistency, transparency, and effectiveness.

2. The Principle of Non-Extradition for the Death Penalty

2.1. Achievements and Challenges in China's International Fugitive Repatriation and Asset Recovery

China has achieved significant results in international fugitive repatriation and asset recovery. Following five consecutive years of the "Sky Net Operation," the Central Fugitive Repatriation Office had repatriated a total of 6,900 individuals—including 1,962 Party members and state functionaries—and recovered assets valued at RMB 32.786 billion, with 61 of the 100 most-wanted "Red Notice" cases resolved. These outcomes reflect progress in cross-border legal cooperation and institutional capacity building.

However, the majority of individuals return to China through voluntary surrender or persuasion. Even in jurisdictions maintaining close diplomatic ties and formal extradition agreements with China—such as Peru—the judicial authorities suspended extradition proceedings against certain individuals despite assurances regarding sentencing limits, highlighting procedural and interpretive complexities in bilateral legal cooperation [2].

2.2. The Principle of Non-Extradition for the Death Penalty in International Law

The principle of non-extradition in cases involving capital punishment stipulates that a requested state may refuse extradition where there are reasonable grounds to believe the individual concerned could face imposition or execution of such a penalty in the requesting state [5]. Even jurisdictions that have formally discontinued the use of capital punishment routinely include safeguards against its application in bilateral extradition agreements; for example, treaties between abolitionist states such as the Philippines and Indonesia contain explicit provisions addressing this issue.

China encounters significant challenges in implementing this principle [4]. Domestically, capital punishment remains part of the legal framework under prevailing criminal policy considerations. Meanwhile, the national Extradition Law does not expressly regulate matters related to capital punishment; only more recent bilateral agreements—such as those concluded with France, Spain, Australia, and Italy—incorporate relevant provisions. To address this gap, China's approach must remain pragmatic and context-sensitive, ensuring alignment with both international practice and domestic legal and social conditions.

2.3. The Principle of Non-Extradition for the Death Penalty with Sentencing Commitments

Extradition frameworks across different legal systems recognize two approaches to the non-extradition principle concerning capital punishment: an absolute prohibition and a conditional prohibition tied to sentencing assurances [6].

Under the absolute prohibition, the requested authority may reject any extradition request outright when capital punishment is a possible penalty in the requesting jurisdiction, without offering alternative conditions [7]. The conditional prohibition—where extradition is permitted only upon binding assurances regarding sentencing—requires the requesting authority to formally commit to neither imposing nor carrying out

capital punishment; extradition proceeds only if such commitment is provided and upheld. Given its inflexibility, the absolute approach offers limited adaptability to domestic legal contexts, whereas the conditional variant, grounded in enforceable sentencing commitments, provides a more operationally viable foundation for alignment with national legal standards.

3. The Sentencing Commitment System in China

3.1. Legal Basis and Characteristics

The sentencing commitment framework operates within the statutory framework governing international judicial assistance. Where conditions are attached to cooperation in surrendering individuals, formal assurances may be provided by authorized state organs, subject to compliance with domestic legal standards and broader public policy considerations. Assurances concerning prosecutorial scope are determined through established judicial review mechanisms; assurances concerning sentencing outcomes are determined through corresponding adjudicative procedures. Judicial authorities conducting subsequent proceedings remain bound by such formally recorded commitments.

Such commitments typically address two principal categories of sentencing parameters. The first involves assurances regarding the non-application of the most severe penalty prescribed under applicable law, which supports reciprocal cooperation in transnational legal matters where differing penal frameworks exist. This encompasses both immediate imposition and deferred application of the maximum penalty. The second category involves structured reductions in custodial terms, whereby the duration of imprisonment is adjusted downward from the upper limit stipulated in relevant provisions, applied consistently with statutory discretion and procedural safeguards.

3.2. Types of Sentencing Commitments

3.2.1. Commitments Not to Impose the Death Penalty

The most common form of sentencing commitment is the assurance that capital punishment will not be applied to the individual subject to extradition. Such assurances are provided in writing by China upon request from partner states during extradition cooperation with jurisdictions that have abolished capital punishment, retain it only in exceptional circumstances, or have incorporated non-extradition principles related to capital punishment into their domestic legal frameworks.

Such assurances typically address three situations: (1) refraining from imposing a sentence carrying immediate execution; (2) refraining from imposing a suspended death sentence; and (3) refraining from carrying out an existing death sentence [8]. The third situation applies where the individual was previously sentenced to capital punishment prior to departure from China, and the assurance guarantees that such a sentence will not be carried out following return.

In practice, examples include the embezzlement case involving a fugitive listed among the top priority targets for repatriation: when China sought extradition from Sweden, Swedish authorities required a formal assurance regarding capital punishment. Similarly, in another case involving misappropriation of public funds, Hungarian authorities conditioned extradition on receipt of a written assurance concerning capital punishment [9].

3.2.2. Commitments Limiting Other Types of Punishment

Beyond restrictions on capital punishment, judicial cooperation has increasingly involved requested states seeking assurances against other severe custodial penalties, such as life imprisonment. These assurances constitute a broader category of sentencing limitations and may encompass commitments not to impose life imprisonment or longer terms, to grant credit for time served abroad, or to adjust the manner of sentence execution, all at the requesting state's request [4]. For instance, in the extradition case involving a fugitive subject to an Interpol Red Notice, the requesting state required a formal written

assurance that no sentence exceeding a specified term—including life imprisonment—would be imposed for the alleged offenses.

3.3. Expansion Beyond Extradition: Deportation and Persuasive Return

Some scholars observe that although extradition and deportation are legally distinct, deportation proceedings in many jurisdictions draw upon extradition practices—including sentencing commitments—due to functional parallels [10]. Consequently, such commitments extend beyond extradition to encompass deportation and other forms of repatriation. Regarding persuasive return, the lack of standardized policy guidance and authoritative judicial clarification has resulted in inconsistent application of criteria for recognizing voluntary surrender among individuals who return under persuasion. Judicial authorities across regions hold differing interpretations on whether compliance with persuasion constitutes voluntary surrender. Instances of unfulfilled or inconsistently applied assurances during persuasive return processes have been reported. Thus, while sentencing commitments pertain to extradition, deportation, and persuasive return, they currently lack codified procedural frameworks and are implemented without uniformity.

Although Article 50 of the Extradition Law establishes a sentencing commitment mechanism, it does not specify procedures for initiation, implementation, communication, or enforcement—an omission that impedes consistent operational application and underscores the need for clearly defined procedural standards. Moreover, adherence to commitments remains a matter of practical concern. While Article 50 states that judicial organs 'shall be bound' by such commitments when prosecuting the returned individual, and while binding effect is generally recognized within the judicial hierarchy, structural constraints inherent in court supervision relationships limit direct intervention by higher-level judicial bodies in trials conducted by lower-level ones. As a result, the extent to which lower-level judicial organs align their adjudications strictly with prior sentencing commitments continues to warrant careful examination [11].

3.4. Causes of Sentencing Commitments

Sentencing commitments in China's extradition system are formal assurances provided by China to the requested state, specifying that the sentencing of the extradited individual upon trial in China will conform to the requirements stipulated by the requested state. The increasing use of such commitments in China's outgoing extradition requests arises from three principal factors.

First, variations in legal frameworks and judicial approaches between China and the requested state. Extradition cooperation constitutes a form of bilateral criminal justice collaboration. Differences in statutory provisions and interpretive norms may lead the requested state—guided by its domestic legal standards or procedural expectations—to require assurances aligned with its own legal framework and operational principles.

Second, evolving international standards concerning penal outcomes. Many jurisdictions have formally removed certain penalties from their statutory schemes and incorporated corresponding restrictions into their extradition legislation. Even among jurisdictions retaining such penalties, application is increasingly circumscribed by procedural safeguards and substantive limitations. These developments have led to widespread inclusion of related provisions in bilateral extradition agreements.

Third, sentencing commitments function as tailored, case-by-case arrangements that preserve judicial integrity. Concerns previously raised regarding such commitments centered on two considerations: the need to ensure consistency with domestic legal authority, and alignment with established sentencing policies. In practice, when an individual departs the jurisdiction, subsequent adjudication necessarily engages multiple legal systems. Effective extradition cooperation requires mutual recognition of procedural norms and reciprocal accommodation. Sentencing commitments reflect this cooperative approach: they serve as a widely accepted mechanism to support cross-jurisdictional criminal justice coordination while maintaining adherence to domestic legal principles. Such targeted accommodations represent a proportionate measure to advance the lawful return of individuals subject to criminal proceedings, facilitate recovery of associated

assets, uphold legal accountability, and protect public interest. Furthermore, as sentencing commitments are expressly authorized under the Extradition Law, their use falls fully within the statutory framework [12].

4. Practical Considerations in Sentencing: The Kaiping Sub-Branch Cases

Adjudicating major fugitive repatriation and asset recovery cases necessitates comprehensive assessment of legal, diplomatic, and policy dimensions, while fully leveraging judicial functions of deterrence and rehabilitation to achieve coherent alignment among legal, social, and political outcomes.

4.1. The Xu Chaofan Case

Xu Chaofan is alleged to have misappropriated approximately USD 485 million from the Bank of China. Holding senior positions at the Bank of China's Kaiping Sub-branch and the Business Division of the Bank of China Guangdong Branch, Xu, in collaboration with others, misappropriated public funds totaling over USD 62.2173 million and HKD 129 million, and diverted public funds totaling RMB 355 million, HKD 20 million, and USD 124 million through unauthorized financial operations, diversion of repayment proceeds, and direct fund transfers. Xu departed for the United States in October 2001. In early October 2004, he was apprehended in a small town in Oklahoma [6]. Through coordinated efforts between Chinese and U.S. law enforcement agencies, Xu entered U.S. custody in 2003 and received a 25-year term of incarceration in the United States in 2009. On July 11, 2018, after 17 years abroad, Xu was returned to China under compulsory repatriation procedures.

On October 13, 2021, the Jiangmen Intermediate People's Court of Guangdong Province issued a public verdict in Xu's case involving misappropriation and diversion of public funds, imposing a consolidated sentence of 13 years' imprisonment, a fine of RMB 2 million, and an order for recovery of illicit gains. Xu accepted the judgment without appeal.

In typical cases involving such scales and circumstances of misappropriation and diversion, sentencing under applicable legal provisions would generally reach life imprisonment or higher. However, after comprehensive evaluation of multiple sentencing factors, the court imposed a consolidated term of 13 years' imprisonment. This determination rested primarily on the following considerations:

First, Xu's voluntary return to China warranted mitigation or reduction of punishment under statutory provisions [13]. In international fugitive return and asset recovery practice, courts consistently apply the principle of balancing fairness and leniency when adjudicating individuals who voluntarily return, granting mitigation or reduction where legally justified. While under U.S. custody, Xu indicated willingness to conclude judicial proceedings in the United States and return to China for trial, prompting the initiation of formal deportation procedures by U.S. authorities.

Xu held dual nationality. Had he opted for deportation to a third country, the repatriation process would have required renewed diplomatic negotiations, likely causing significant delays. His proactive election to return directly to China during deportation proceedings conserved substantial diplomatic and judicial resources, supporting the legal finding of voluntary return. His candid account of facts and expression of remorse upon arrival further substantiated this finding, justifying mitigation or reduction for both offenses.

Second, Xu provided a full and accurate account of his conduct after being placed under judicial authority, raised no objections to the factual allegations or charges presented by the procuratorial organ during trial, and demonstrated cooperative and remorseful conduct, warranting mitigation under statutory provisions.

Certain bilateral agreements between China and other states include provisions addressing recognition of detention periods. For instance, Article 14 of the agreement between the People's Republic of China and the Republic of Tunisia specifies arrangements for coordination regarding surrender timing and notification of custody

duration for potential sentence adjustment purposes. Where a person is transferred from Tunisia and Tunisian authorities request recognition of prior custody, China may, following thorough review, grant such recognition [7, 8].

Xu was convicted abroad on charges related to financial misconduct and document irregularities. Although these acts share contextual links with the domestic charges of misappropriation and diversion, they constitute distinct legal findings under foreign legal frameworks [12]. His detention resulted from proceedings conducted under local legal authority, representing an exercise of sovereign legal functions by the host state rather than an extension of China's judicial authority. Consequently, the period of custody in the United States is not eligible for direct offset against the sentence imposed in China.

4.2. The Yu Zhendong Case

Yu Zhendong, former head of the Bank of China Guangdong Kaiping Sub-branch, colluded with two former heads, Xu Chaofan and Xu Guojun, to misappropriate and divert bank funds totaling USD 482 million. On October 12, 2001, following the discovery of their misconduct, the three individuals departed for Canada and the United States. Yu and his associates used their official positions to improperly access substantial funds held in provincial inter-bank accounts and fabricated accounting records to conceal their actions, misappropriating USD 82.47 million in public funds. They also secured large sums from the bank through fraudulent loan applications submitted under enterprise names, diverting a total of USD 132.41 million, RMB 273.12 million, and HKD 20 million.

In December 2002, Yu was apprehended in Los Angeles on charges related to visa fraud. In February 2004, he stood trial in the U.S. Federal Court in Las Vegas and received a sentence of 144 months' imprisonment for unlawful entry and illicit financial transfers. As part of a cooperation agreement between Yu and U.S. authorities, assurances were provided by Chinese judicial authorities regarding his subsequent prosecution and sentencing in China prior to deportation: specifically, that his term of imprisonment would not exceed 12 years and that he would be treated in accordance with applicable legal standards. On April 16, 2004, Yu was repatriated from the United States to China, representing the first case of an economic fugitive transferred from the U.S. to China under bilateral judicial cooperation arrangements.

On March 31, 2006, the Jiangmen Intermediate People's Court of Guangdong Province issued its first-instance judgment in the case involving Yu Zhendong's misappropriation and diversion of public funds, imposing a combined sentence of 12 years' imprisonment for the offenses of embezzlement and misappropriation of public funds, along with confiscation of personal property valued at RMB 1 million. Yu did not appeal the judgment.

5. Critical Reflections on Current Practice

5.1. Reflections on Sentencing Discretion

Paragraph 2 of the relevant legal provision is generally understood as the basis for judicial sentencing commitments in certain circumstances. Paragraph 1 of the same provision states that "where multiple sentencing ranges are prescribed, the sentence shall be imposed within the range immediately below the statutory range." It remains unclear whether the application of Paragraph 2 to cases involving individuals who have departed the jurisdiction is subject to the limitation on sentence reduction set forth in Paragraph 1, or how sentencing should be determined when multiple mitigating factors coexist [11]. The provision offers no explicit guidance on these matters.

In practice concerning the return of individuals who have departed the jurisdiction, judicial discretion in sentence reduction has not been bound by the cross-range mitigation restriction under Paragraph 1. In one notable case, the individual faced a maximum penalty prescribed by law, yet received a significantly reduced term of imprisonment. Whether this outcome resulted from the combined effect of statutory and discretionary mitigation, or from discretionary mitigation alone, was not clarified in the judgment. This

lack of transparency affects the predictability and consistency of sentencing outcomes in such cases [10].

5.2. Reflections on Equality Before the Law

It has been observed that in using deportation for fugitive repatriation, the primary objective is achieving special prevention through punishment of fugitive offenders, whereas partial mitigation of criminal liability constitutes a secondary consideration; ensuring successful future deportation of other fugitives represents a higher priority, while adjustments to domestic legal application must remain fully consistent with judicial authority; and dispelling the mistaken notion that fleeing abroad guarantees impunity carries greater weight than imposing the most severe penalty available.

In a certain sense, the sentencing commitment mechanism reflects procedural accommodations intended to facilitate prosecution of individuals who have left the country: (1) where co-perpetrators are involved, others may face the most severe penalty permitted under law while the individual benefiting from a commitment receives a significantly reduced sentence; (2) in cases without co-perpetrators, disparities emerge relative to comparable instances; (3) the most severe penalty permitted under law cannot be applied even where factual and legal conditions would otherwise support its imposition. These outcomes raise questions regarding consistency with the principle of equal treatment under law, as affirmed in foundational legal instruments and international agreements on civil and political rights. Defining appropriate boundaries for such commitments—ensuring they remain lawful, proportionate, and procedurally sound—requires rigorous scholarly examination.

At present, statutory provisions do not specify the substantive scope of sentencing commitments, and procedural frameworks governing their use remain underdeveloped. Some proposals suggest adopting a restrictive legislative approach: rather than prescribing fixed sentencing limits, alternative mechanisms—such as trial in absentia—could be employed when foreign authorities request undertakings beyond those domestically permissible. Under this model, commitments would be confined to assurances against imposition or enforcement of the most severe penalty permitted under law; for requests extending beyond that threshold, complementary measures—including prosecution in the requesting jurisdiction—may serve as viable alternatives for holding offenders accountable.

Scholars have cautioned that broadening the scope of sentencing commitments beyond the most severe penalty permitted under law to include fixed-term or life imprisonment would intensify challenges to core legal principles, including equal treatment under law, legality of offenses and penalties, and proportionality between conduct, culpability, and sanction.

5.3. Reflections on the Credibility of Sentencing Commitments

The legal basis for sentencing commitments in China derives primarily from the Extradition Law and the International Criminal Judicial Assistance Law. The application of sentencing commitments in deportation and persuasive return contexts lacks specific statutory authority and can only be governed by reference to these two statutes.

Taking sentencing commitments in extradition as an example, foreign courts have rejected extradition applications primarily on the grounds that sentencing commitments made by China are unreliable or lack finality. Various explanations have been offered: some scholars attribute the skepticism to ideological differences; others point to China's higher number of capital sentences compared to countries such as India; still others argue that the term "bound" (*shou yueshu*) used in Chinese domestic law to describe the effect of sentencing commitments is insufficiently precise and normative. Addressing this requires more standardized legal terminology that leaves no room for doubt.

Furthermore, the credibility of commitments also depends on whether the decision-making and issuing authorities are competent and meet sufficient standards. Chinese law explicitly designates the highest judicial authority as the decision-making body for commitments in extradition and international criminal judicial assistance, but no

corresponding provisions exist for commitments made during persuasive return or deportation repatriation, which can only be governed by reference to extradition rules. This gap should be addressed through legislative improvement.

Regarding the procedure for making sentencing commitments, some scholars have proposed that when the highest judicial authority receives a foreign sentencing commitment request forwarded by the competent diplomatic department, a collegial panel of seven judges shall hold a hearing to evaluate the requested state's commitment requirements, the charges against the person to be extradited, the requested state's legal provisions, and applicable extradition treaty provisions. If the court agrees to issue the commitment, it shall do so by way of a written decision. If it disagrees, it shall likewise issue a written decision. The initial decision on a sentencing commitment shall be rendered within 60 days of receiving the diplomatic department's request. Upon conclusion of any objection proceedings, the final decision shall be transmitted to the diplomatic department via official court correspondence.

Other scholars have proposed regulating the approval and delivery procedures for sentencing commitments in accordance with the organizational structure and adjudicatory framework for people's courts. In domestic cases applying discretionary sentence reduction under Paragraph 2 of Article 63 of the penal code, the people's court with adjudicatory authority reports level by level to the highest judicial authority for approval of a sentence below the statutory minimum, a process consistent with the court organization and corresponding authority allocation. This raises questions: should the highest judicial authority directly approve sentencing commitments, or should local courts report upward through levels to the highest judicial authority? If the latter approach is adopted, further issues arise: which level of court should be responsible for external negotiation, evidence presentation, and document delivery; how to handle differing opinions from superior courts during the reporting process; and what review procedures, time limits, and trial methods should apply. All of these issues remain unresolved.

Additionally, it is recommended that sentencing commitments such as assurances against capital punishment be made in written form and issued under official seal by the competent authority, and that no individual be permitted to make external commitments through personal correspondence [2].

6. Conclusion

The sentencing commitment mechanism has played a crucial role in facilitating international fugitive repatriation and asset recovery efforts. As a flexible procedural arrangement accommodating legal differences regarding capital punishment, it has enabled cooperation with jurisdictions that do not permit extradition where such penalties may apply, while preserving domestic judicial authority. The cases of Xu Chaofan and Yu Zhendong demonstrate the practical utility of this mechanism in resolving complex cross-jurisdictional cases involving major financial offenses.

However, current implementation reveals several areas requiring refinement. First, uncertainty surrounding sentencing discretion under relevant statutory provisions undermines predictability and uniformity in application. Second, concerns regarding equitable treatment across cases necessitate careful calibration to uphold foundational legal principles. Third, international confidence in such commitments depends on enhanced procedural rigor and greater clarity in formal requirements.

To strengthen the reliability and broader acceptance of the sentencing commitment mechanism, this paper recommends the following: (1) clarifying its legal foundation and procedural conditions through authoritative guidance or statutory refinement; (2) instituting a centralized, standardized review process with defined timelines and opportunities for structured input; (3) restricting the scope of commitments primarily to assurances concerning capital punishment, while considering alternative approaches for other sentencing-related limitations; (4) reinforcing their enforceability through formally

issued, authenticated instruments; and (5) developing explicit criteria for applying commitments in contexts involving deportation or voluntary return arrangements.

As international judicial cooperation evolves, the sentencing commitment mechanism reflects an adaptive institutional response to the intersection of domestic legal frameworks, evolving international standards, and operational demands in transnational law enforcement. Its continued development will shape future approaches to resolving jurisdictional challenges in serious financial crime cases.

References

1. B. Malkani, "Extradition and non-refoulement," in *Comparative Capital Punishment*, Cheltenham, UK: Edward Elgar Publishing, 2019, pp. 76–95.
2. J. Vogel, "The legal construction that property can do harm," *Non-conviction-based Confiscation in Europe*, pp. 226–242, 2015.
3. J. Zhu and B. Wen, "'Trace the Money, Seize the Fugitives': China's Other Anticorruption Battle," *J. Contemp. China*, vol. 31, no. 138, pp. 993–1011, 2022.
4. I. Dunbar and A. Langdon, *Tough Justice: Sentencing and Penal Policies in the 1990s*. Oxford, UK: Oxford University Press, 1998.
5. W. S. D. Pramudita and A. Widyawati, "Transnational Enforcement Through the Indonesia–Singapore Extradition Framework Against Corruption," *JURNAL USM LAW REVIEW*, vol. 8, no. 3, pp. 2481–2495, 2025.
6. V. J. Hinojosa, *International Narcotics Control and Two-Level Games: Cooperation Between the United States and Mexico and Colombia, 1989–2000*. Notre Dame, IN: University of Notre Dame, 2003.
7. P. Finkelman, "Fugitive Slaves, Midwestern Racial Tolerance, and the Value of 'Justice Delayed'," *Iowa L. Rev.*, vol. 78, p. 89, 1992.
8. J. De Santi, "Decoupling Territorial Jurisdiction and the Citizen's Right to Remain in Canadian Extradition Law," in *Citizens, the State and Justice*, London, UK: Routledge, 2026, pp. 247–260.
9. N. Thakur, Z. Chen, X. Ma, and J. Lin, "ORBIT: Scalable and Verifiable Data Generation for Search Agents on a Tight Budget," *arXiv preprint arXiv:2604.01195*, 2026.
10. K. D. Magliveras, "The interplay between the transfer of Slobodan Milosevic to the ICTY and Yugoslav constitutional law," *Eur. J. Int. Law*, vol. 13, no. 3, pp. 661–677, 2002.
11. C. Ș. Morăreanu, "Passive Extradition—A Form Of International Judiciary Cooperation In Criminal Matters," *Curentul Juridic, The Juridical Current, Le Courant Juridique*, vol. 4, pp. 132–146, 2009.
12. A. Samuels, "The English Fugitive Offenders Act, 1967," 1968.
13. I. A. Shearer, "Non-extradition of nationals: A review and a proposal," *Adelaide Law Review*, vol. 2, no. 3, pp. 273–309, 1965.

Disclaimer/Publisher's Note: The statements, opinions and data contained in all publications are solely those of the individual author(s) and contributor(s) and not of Publisher and/or the editor(s). Publisher and/or the editor(s) disclaim responsibility for any injury to people or property resulting from any ideas, methods, instructions or products referred to in the content.