

Britain as Kazakhstan's Laundromat: The Architecture of Kleptocracy**Abdurrahkim Almat**

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Abstract: A fuel price increase in Kazakhstan, along with the deaths of 227 people caused by protests, exposed the secret system in which 162 individuals linked to former President Nursultan Nazarbayev controlled half of the nation's wealth. The causes of these deaths extend beyond domestic corruption to Britain's strategic construction and maintenance of the financial architecture through which the wealth of the Kazakhstani people was stolen, hidden, and laundered. Golden visas, shell companies, offshore concealment, and a professional class of enablers - lawyers, accountants, bankers, and property agents - allowed the Nazarbayev family and their associates to move hundreds of millions of pounds into London real estate and UK-registered holding companies. Applying Thomas Pogge's distinction between positive and negative duties, Britain did not merely fail to help Kazakhstan; it violated its negative duty not to cause harm, since the harm was both foreseeable and avoidable. Responsibility is not reduced by Nazarbayev's actions or by the existence of alternative safe havens; rather, culpability is multiplicative and shared among many actors. Because Britain caused the harm, it owes not charity but correction. What Britain built, Britain can dismantle.

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1. Introduction: The Catalyst of January 2022*"Shal Ket!" - "old man, get out!"*

a saying that angry Kazakhstani protestors came up with while under the shadow of a system Nursultan Nazarbayev, the first President of Kazakhstan, spent thirty years building. Nazarbayev had formally stepped down in 2019, handing the presidency to Kassym-Jomart Tokayev, a loyalist he had personally chosen, while keeping real power as head of the Security Council (NPR, 2022; UK Parliament, 2022). The protestors took to the streets on January 2, 2022, after the government raised the price of petroleum fuel to nearly double (Duggal & Chughtai, 2022). Most of the citizens who had to accept these prices earned no more than 50,000 tenge (\$140) per month (VOA, 2022). The scale of this inequality was truly seen when President Tokayev admitted that 162 individuals - members of Nazarbayev's inner circle and network - owned half the entire country's wealth (The Diplomat, 2022). In Almaty, protestors stormed the airport and set fire to

the mayor's office, and Tokayev called in Russian-led troops and ordered security forces to shoot to kill without warning (NPR, 2022; UK Parliament, 2022). The protests themselves were spreading rapidly and eventually resulted in the deaths of 227 people and the arrests of over 9,900 civilians (Duggal & Chughtai, 2022). Pushed by the unrest, Tokayev turned against his patron: he removed Nazarbayev from the Security Council, took full control of the security services, and began purging Nazarbayev's family network (NPR, 2022; Atlantic Council, 2022). This break exposed the family's fortune abroad. Within a month, a British Member of Parliament linked the January bloodshed to Britain's role in sheltering Kazakh elite wealth and called for sanctions on Nazarbayev's relatives and associates, reviving scrutiny that had stalled after a failed 2020 court case (UK Parliament, 2022). Without Tokayev's turn, this pressure on the UK would likely never have emerged. But to understand how Kazakhstan arrived at this moment, one must first reckon with the man who built it - not only as a predator of his country's wealth, but as its architect. Across three decades, Nazarbayev and his inner circle used their positions to benefit themselves by exploiting the nation's oil and mineral wealth. They redirected the money into private hands rather than back to the hospitals, schools, and citizens it should have served. The question is not why Nazarbayev stole. The question is where he put it - and who built the vault. The deaths of January 2022 are traceable not only to Nazarbayev's corruption but to Britain's deliberate construction and maintenance of the financial architecture through which that corruption was made possible, permanent, and profitable. Britain's role here was not merely a failure to help. It actively harmed Kazakhstan by designing and maintaining the financial systems through which its wealth was stolen.

2. Historical Context: Economic Transition and Oil Boom

As the very first president of a nation that had separated from the Soviet Union, Nazarbayev carried tremendous weight on his shoulders to bring this country to greatness. Kazakhstan gained its independence on December 16, 1991, making it the last Soviet republic to declare independence (Bertelsmann Stiftung, 2026). Having risen through the ranks of the Soviet Communist Party as a regional chief, Nazarbayev understood the machinery of centralised power – and, upon independence, he set about dismantling it. As president, he had goals to liberalise the economy and bring peace and unity among the Central Asian nations.

The same year Kazakhstan declared independence, Nazarbayev sought to secure Kazakhstan's membership in the Commonwealth of Independent States (CIS). His ambition to place Kazakhstan on the global stage was evident from the start. He made efforts to promote Kazakh culture - language, arts, and practices. By setting aside regional tensions, Nazarbayev forged strategic alliances to foster a more peaceful and interconnected Central Asia. In 2006, he also came up with the idea of unifying Turkic-speaking nations and promoting cooperation to create the Council of Turkic-Speaking States (CCTS) three years later, alongside Azerbaijan, Turkey, and Kyrgyzstan. Nazarbayev didn't stop there in his efforts to increase Kazakhstan's global visibility - under his leadership, the country joined several major international organisations: the World Trade Organization (WTO), the Organization of Islamic Cooperation (OIC), the Euro-Atlantic Partnership Council, and the Organization for Security and Co-operation in Europe (OSCE). Nazarbayev valued cooperation between his country and neighbouring nations to benefit both parties. Kazakhstan introduced the Green Bridge and the Green Bridge Partnership Program - an initiative designed to strengthen cooperation between developed and developing countries through the exchange of green technologies, investment incentives, sustainable economic growth, and the creation of long-term jobs.

As the world's largest land-locked country, Kazakhstan was economically heavily reliant on its natural resources, oil and minerals. Nazarbayev wanted to change this and have 50% of the electricity be produced from renewable energy. Kazakhstan first experienced economic growth in 1996, and it continued to grow for a decade. The nation was among the most successful former Soviet republics in transitioning from a centrally planned to a market-based economy (Bertelsmann Stiftung, 2026). The nation's economy began a major transformation after the discovery of the Kashagan oilfield in July 2000. The following year, Kazakhstan created a national oil fund - an effort to reduce the country's dependence on unpredictable global energy prices and secure resources for future generations. This discovery helped transform Kazakhstan into a leading Central Asian power, as the nation repaid its debts to the IMF and became the first post-Soviet republic to receive a positive global investment ranking in 2002.

But economic success alone was not enough for Nazarbayev. His ambitions extended further - not just to stability, but to transformation. In 2012, Nazarbayev introduced a new goal: the 2050 Strategy. He planned to place Kazakhstan among the top 30 most developed countries worldwide. Under his leadership, GDP per capita grew from roughly \$1,500 in 1999 to over \$13,000 by 2013 - a growth rate matched by only a handful of other post-Soviet states (Turp-Balazs, 2024).

Following his 2050 strategy, Nazarbayev launched the Nurly Zhol plan in 2014, a multibillion-dollar modernisation program focused on roads, rail, and energy infrastructure across the country. That same year, he helped establish the Eurasian Economic Union alongside Russia and Belarus - positioning Kazakhstan as a bridge between the growing economies of Europe and Asia (European Institute for Asian Studies, n.d.).

3. Autocratic Consolidation and Domestic Kleptocratic Architecture

Nazarbayev's commitment to elevating Kazakhstan onto the world stage was genuine and, by many measures, successful. Yet the same man who picked up this fragile nation after its separation and brought it to greatness was simultaneously building a parallel system - one that funnelled the nation's wealth into private hands and into the financial architecture of a country thousands of miles away: Britain (Cooley & Heathershaw, 2017).

As the first president of a rising nation, Nazarbayev was able to manipulate Kazakhstan's laws and institutions to benefit himself and those closest to him. Before the looting could begin, he first had to make himself untouchable. He amended the Constitution multiple times to expand his presidential powers, ensuring that he alone could run for reelection indefinitely. Having eliminated all meaningful political competition, he bestowed upon himself the title of "Elbasy" - Leader of the Nation - in 2010. He introduced Article 373 into the Kazakhstani criminal code, making it illegal to publicly criticise or insult him - an offence carrying a penalty of up to three years imprisonment - effectively silencing journalists and critics alike, a pattern of repression that defined his human rights record throughout his tenure (OCCRP, 2022). He also granted himself full immunity from scrutiny or prosecution, extending to all property he owned, his family members, his vehicles, correspondence, documents, and any legal entities he established. By fusing his own identity with Kazakhstan's national image, Nazarbayev was able to reframe his abuses as acts of patriotism (Khar Center, 2025). Following the logic of "I am the state," he justified keeping the public's money - accumulated through the privatisation of state assets and the exploitation of offshore banking during the financial liberalisation of the 1990s - in his own private accounts. His inner circle - above all, his own family - were among the primary beneficiaries of this system. His daughters were handed control over the telecommunications, oil and gas, and banking sectors, either directly or through proxies. The fortune of his eldest daughter, Dariga, was estimated at \$595 million in 2013; his middle daughter, Dinara, along with

her husband, Timur Kulibayev, appeared on the Forbes billionaires list in 2021 (Foreign Affairs, 2022). His authoritarian grip was largely tolerated by Western governments under the justification of regional stability; rather than hold him accountable, Western institutions accepted Kazakhstani funding and designated the regime a "strategic partner," while downplaying its record on human rights.

To legitimise this system domestically, Nazarbayev established four ostensibly charitable foundations - the Nazarbayev Foundation, the Nursultan Nazarbayev Foundation, Demeu, and Elbasy - presented to the public as institutions created to serve the Kazakhstani people (OCCRP, 2022). These foundations were deliberately structured to obscure their true financial activities: most did not maintain public websites or publish annual reports. Since the foundations were registered as non-profits, Nazarbayev did not formally own their assets - yet under Kazakhstani law, the founder of a private foundation retains ultimate control over its holdings. To maintain the appearance of distance, he chaired the Supreme Board of Trustees of the Nazarbayev Foundation, ensuring control over all decisions and all assets while preserving a veneer of separation. These assets were accumulated through acquiring stakes in private companies - banks, mobile operators, shopping malls, warehouses, hotels, and a pasta factory - into which the Kazakhstani government had previously channelled public funds, effectively transferring public wealth into private hands. One of the most egregious examples involved the Development Bank of Kazakhstan, which provided an \$85 million loan to construct the St. Regis Astana hotel. The hotel was subsequently connected to Nazarbayev's son-in-law Timur Kulibayev and eventually transferred to Nazarbayev's Demeu Foundation. President Tokayev acknowledged on January 11, 2022, that the Development Bank had "turned into the personal bank of a select group of people" (OCCRP, 2022). The foundations' principal investment vehicle, Pioneer Capital Invest, accumulated a total portfolio valued at \$7.8 billion - including US Treasury bills, Kazakhstani and Kyrgyzstani bonds, and \$3.4 billion in cash.

4. The UK Professional and Financial Infrastructure of Enablement

According to a 2019 KPMG report, the 162 wealthiest Kazakhstanis control half of the country's total wealth - the vast majority of which is now held offshore in London, Geneva, New York, and other global financial centres, beyond the reach of Kazakhstani authorities (Foreign Affairs, 2022). In London alone, Kazakhstani oligarchs own more than £500 million (approximately \$628 million) of central London real estate, the majority of which was acquired through offshore companies (University of Helsinki, 2023). Over £330 million (\$414 million) of those properties - including the address made famous by fictional detective Sherlock Holmes, 221B Baker Street - are believed to belong to the Nazarbayev family itself (Foreign Affairs, 2022). In 2007, Kulibayev purchased the Duke of York's Sunninghill estate for £15 million - £3 million above the asking price. In 2020, the foundations' banks, shopping malls, and remaining assets were consolidated into a new UK-registered holding company called Jusan Technologies. A UK corporate filing subsequently revealed that a mysterious entity called QAZ42 Investment acquired a 3% stake in Jusan Technologies - valued at over \$200 million - for just \$20 million, with its country of incorporation remaining unknown. Beyond Britain, the foundations deployed assets through offshore structures in Luxembourg - through which they covertly acquired a 24% stake in a major Kazakhstani mobile operator - as well as entities registered in the Czech Republic, France, Spain, Switzerland, and the United States.

The full scale of this extraction remains unknown. Neither President Tokayev, nor the Ministry of Finance, nor the central bank, nor the prosecutor general's office has been able to determine the true extent of the Nazarbayev family's global holdings; and locating and

recovering these assets would take years, if not decades. Tokayev has nonetheless begun purging Nazarbayev's family from senior positions and announced a major audit of the sovereign wealth fund, believed to control 55% of the country's total assets - wealth that, by rights, belongs to the Kazakhstani people.

Britain did not passively receive this stolen wealth - it built the very systems that enabled the theft. The growth of London as a global centre for financial and professional services coincided directly with the collapse of the Soviet Union and the emergence of post-Soviet kleptocracies in the 1990s, transforming Britain into a primary destination for illicitly accumulated wealth (Heathershaw, Prelec, & Mayne, 2025). Between 2008 and 2015, Britain issued 205 Kazakhstani kleptocrats the UK's Tier 1 (Investor) Visa - commonly known as the golden visa - without scrutinising the origins of their funds (UK Parliament, 2022). Ostensibly designed to attract legitimate foreign investment and entrepreneurship, the program required a minimum investment of £2 million (approximately \$2.5 million). However, firms like Dolfin Financial - a City of London wealth management company specialising in visas for the ultra-wealthy - engineered systems allowing investors to contribute as little as £400,000 (approximately \$500,000) through networks of interconnected shell companies, a loophole the Kazakhstani elite readily exploited.

Anti-corruption campaigners described London's visa regime as offering "red-carpet treatment" for Kazakhstani oligarchs seeking a haven for suspect money - a characterisation that was well founded (OpenDemocracy/SourceMaterial, 2022). The visa was processed faster than almost any other route to UK residency. The Home Office relied heavily on financial intermediaries to conduct background checks on applicants, creating an inherent conflict of interest. Most critically, the government imposed no meaningful scrutiny on the origins of applicants' wealth. Once granted residency, kleptocrats gained unrestricted access to the full suite of British legal and financial services - lawyers, accountants, private banks, and property agents - all of whom could engage with them as legitimate clients, providing both financial infrastructure and legal protection (Cooley, Heathershaw, & Sharman, 2018).

Much of the UK-based property acquired by the Nazarbayev family and their associates was purchased through firms registered in the British Virgin Islands, a jurisdiction long recognised as a haven for offshore secrecy. Nazarbayev's youngest daughter, Aliya, transferred \$300 million out of Kazakhstan in 2006 through a series of London acquisitions - including a private jet and a \$12.5 million mansion - facilitated by a complex offshore structure created specifically to "hide and protect" her fortune on the grounds that she was a "politically exposed person." Her elder sister Dariga was separately identified as the covert owner of additional prominent properties on London's Baker Street valued at £140 million - distinct from the family's broader UK holdings (Atlantic Council, 2022).

The Dolfin case illustrates how deeply this network of enablement penetrated Britain's financial establishment. The Financial Conduct Authority - Britain's primary financial regulator - banned Dolfin from regulated activities after finding it had "dishonestly or recklessly provided misleading information" about its visa schemes (OpenDemocracy/SourceMaterial, 2022). At the centre of the firm's collapse was Nurali Aliyev, Nazarbayev's grandson, who had been served with an Unexplained Wealth Order - a legal mechanism requiring individuals to demonstrate the legitimate origins of their assets. When the FCA began its investigation, Dolfin was evasive, initially denying that it had dealt with Aliyev in the preceding year to conceal the relationship. The firm's founder, Roman Joukovski, had previously served as a financial adviser to Aliya Nazarbayeva, demonstrating that the network of British professionals serving the Nazarbayev family extended well beyond a single firm and well before its eventual exposure.

Financial institutions were not the only entities implicated. Western corporations were also drawn into the web of enablement. Glencore, a multinational mining conglomerate, allegedly transferred ownership of an exclusive private school and two gold mines to a billionaire associate of Nazarbayev. In 2003, American businessman James Giffen was charged with diverting \$78 million in bribes from oil companies to the Kazakhstani government – and released only after claiming he had been operating in cooperation with the CIA. Both American and British authorities had long been aware of the scale of Nazarbayev's corruption. A former US Deputy Assistant Secretary of State declared: "I can't think of a leader in the free world as notoriously corrupt as Nazarbayev. We've known about his corruption for at least 15 years" (UK Parliament, 2022) - yet Britain continued issuing golden visas and receiving Kazakhstani wealth throughout this period. As the Chatham House report concluded, failures of enforcement and the systematic exploitation of loopholes by professional enablers meant that, even where the law technically prohibited such conduct, little was done in practice to prevent kleptocratic wealth from entering Britain (Chatham House, 2021).

5. Geopolitical Shifts and Parliamentary Scrutiny

London had long overlooked these flows of illicit capital, and the political landscape only began to shift following Russia's invasion of Ukraine, which drew broader international attention to the mechanics of post-Soviet kleptocracy. It was not until the January 2022 protests - triggered by rising fuel prices but rooted in decades of entrenched wealth inequality - that Britain began publicly confronting its own institutional failures. The protests resulted in at least 227 deaths, 4,500 injuries, and over 9,900 arrests. President Tokayev issued a "shoot to kill without warning" order against largely peaceful demonstrators. The same week Kazakhstanis were being killed in the streets, hundreds of millions of dollars of their country's wealth sat undisturbed in London properties. UK Member of Parliament Dame Margaret Hodge addressed Parliament directly: "We have opened our borders, our property market and our financial structures to the Kazakh ruling class, enabling them to launder their illicit wealth and spend it. Worse, we do not even enforce our existing laws against any of this wrongdoing." (UK Parliament, 2022)

She continued: "We are complicit in what is happening in Kazakhstan. Our lack of transparency over foreign property ownership, our lax regulatory regime and our weak enforcement agencies have all aided and abetted the Kazakh elite." Of the violence itself, Hodge stated: "that terrible loss of life in Kazakhstan should lead to a moment of reflection for us in Britain." The Chatham House report echoed this assessment, raising the question of whether illiberal globalisation had come to dominate UK-Eurasian economic relations - with kleptocratic wealth entering the British economy with deeply corrosive effects on the rule of law.

UK-listed companies were further implicated in major bribery scandals involving figures such as Karim Massimov, former Prime Minister of Kazakhstan, including allegations against Airbus and Swedish telecoms company Telia totalling \$64 million. As Tokayev moved to dismantle the remnants of the Nazarbayev regime, British authorities were afforded critical time to act before another surge of illicit capital entered UK accounts. MP Hodge's demands of the British government were clear: impose anti-corruption sanctions on Kazakhstani oligarchs and enforce the laws already on the books that had been systematically disregarded. The problem, as Chatham House identified, was never an absence of law - it was an absence of will. Britain's entire professional and regulatory architecture had been structured in ways that foreseeably enabled kleptocracy. Reforming it would require confronting not rogue individuals but the institutional design of the system itself.

6. The Failures of Legal Enforcement: The Unexplained Wealth Order Debacle

Britain's response was to introduce the Criminal Finances Act 2017, which created Unexplained Wealth Orders (UWOs), flipping the burden of proof so that wealthy individuals had to explain their assets rather than the government having to prove criminality. In May 2019, the National Crime Agency (NCA) issued three UWOs against £80 million of Kazakhstan-linked London properties - including a "super apartment" in Chelsea worth £40 million, a Hampstead mansion on "Billionaires' Row," and a luxury apartment in Brompton (Chatham House, 2021).

These estates were owned by Dariga Nazarbayeva and her son Nurali Aliyev, daughter and grandson of Nazarbayev. They had been purchased through companies registered in three offshore secrecy jurisdictions: Panama, Anguilla, and Curaçao. The NCA believed these assets were bought using funds belonging to Dariga's former husband and Nurali's father, Rakhat Aliyev, who died in an Austrian prison in 2015 while awaiting trial for two murders allegedly committed in Kazakhstan. All three UWOs were overturned by Mrs Justice Lang on April 8, 2020. She ruled that the NCA's assumption that Rakhat Aliyev was the source of the funds was "unreliable," finding that the agency had conducted an inadequate investigation into obvious lines of enquiry - including a failure to properly examine Nazarbayeva's independent sources of wealth and Nurali Aliyev's estrangement from his father (Eurasianet, n.d.).

The ruling cost the NCA £1.5 million in legal fees, a significant setback. The agency was vastly outmatched by the defence mounted by Mishcon de Reya, one of Britain's most prestigious law firms, which possessed far greater resources, expertise, and manpower than the NCA could bring to a prosecution. Firms of this calibre understood offshore structures intimately, in part because they had helped design similar ones themselves (Prelec, Barrington, Garrod, & Tonin, 2025).

The evidence presented in the family's defence included documents from Kazakhstan's own prosecutor general's office affirming the legitimacy of their wealth. At the time these documents were produced, that office remained under the control of the Nazarbayev government - the very family under investigation - meaning the evidence was inherently compromised. The British judge nonetheless accepted it. Britain's own transparency framework drew criticism as well; Duncan Hames, Director of Policy at Transparency International UK, observed that secretive corporate ownership remained pervasive across the country, with tens of thousands of properties still held through opaque offshore vehicles (Transparency International UK, n.d.).

Researchers at the University of Exeter raised a further criticism - that the NCA had failed to adequately investigate the Nazarbayev family's alleged corrupt wealth, overlooking evidence that was already available in public records (University of Exeter, 2022). Despite mounting criticism, £137 million worth of additional Nazarbayeva properties on Baker Street were never even issued with UWOs. The investigations were not unsuccessful for a lack of effort, but rather because the financial secrecy architecture Britain had built and maintained made successful prosecution nearly impossible (Heathershaw, Mayne, Prelec, & Tokubayev, 2025).

Britain's broader anti-kleptocracy strategy suffered from a similar tunnel vision. In 2022, Britain rushed through the Economic Crime Act, introducing new tools including a Register of Overseas Entities and strengthened UWO powers - but only after Russia's invasion of Ukraine, and with a focus squarely on Russian oligarchs, leaving Kazakhstani and other post-Soviet kleptocrats largely untouched (Royal United Services Institute, 2023).

The wealth being extracted through these networks was never exclusive to Russia - funds that should have supported healthcare, education, and public infrastructure across the developing world continued to flow into British real estate regardless of their origin. Britain's own Anti-Corruption Strategy was delayed by three years despite being repeatedly described as "upcoming," only materializing in 2025.

7. Theoretical and Ethical Analysis of Complicity and Negative Duties

Britain's repeated failure to confront illicit finance and kleptocracy was not accidental - it was of its own making. Maintaining institutional structures that predictably enable harm, while knowing they do so, and then failing to effectively dismantle them even when supposedly attempting to, constitutes a negative duty violation of the most evident kind.

Moral philosophy generally distinguishes between two kinds of obligations. A positive duty requires us to actively help others to the extent of our ability - a strong swimmer, for instance, is expected to save a drowning stranger. A negative duty asks less of us in scope: rather than requiring us to avert any harm we are able to avert, it requires only that we not be the one who pushes the stranger into the water (Pogge, 2002). Yet despite asking less of us, violations of negative duties are generally judged far more harshly than failures of positive ones. Negative duties, in other words, are less demanding but more stringent – so long as other things, in particular the harm at stake and the cost to the agent – are held fixed¹.

The conventional account of Kazakhstan's crisis draws entirely on the language of positive duty, asking whether wealthy nations have done enough to help. This account is incomplete and poses the wrong question. Britain did not simply fail to help Kazakhstan escape corruption. It actively constructed and maintained the financial systems - golden visas, shell company laws, offshore secrecy - that made Nazarbayev's theft possible in the first place. This is not a failure of generosity. It is a violation of Britain's negative duty not to cause harm (Pogge, 2005).

For such a violation to hold, two conditions must be satisfied: the harm must be both foreseeable and avoidable. Was it foreseeable? Margaret Hodge's parliamentary address, alongside a former U.S. Deputy Assistant Secretary of State, both confirmed that Britain had been aware of Nazarbayev's corruption for at least fifteen years (UK Parliament, 2022).

Was it avoidable? Britain could have required financial transparency, closed shell company loopholes, or refused golden visas without proper scrutiny. It chose not to, for years.

A natural objection follows: Nazarbayev is the one who stole the money, so isn't Kazakhstan the party truly at fault? The objection assumes that responsibility is a fixed quantity to be divided - that the more blame assigned to one party, the less remains for another. This assumption is mistaken. Consider a case of murder for hire: person A hires person B to kill person C, and B carries out the killing. B's guilt as the murderer does not lessen A's guilt as the one who commissioned the act. Both bear full responsibility for different components of the same harm; culpability here is multiplicative, not additive.

In cases like a group of smokers polluting a shared room, responsibility is additive - each person's share of the harm can be isolated, so that removing one smoker reduces the total harm proportionally. Murder for hire operates differently: the harm depends on both parties acting in concert. Had either A or B failed to act, the harm would not have occurred at all. Responsibility here is not divided between the parties - it is fully borne by each, because each was individually necessary to the outcome (Pogge, personal communication, 2026). Nazarbayev is B - he carried out the theft. Britain is A - it built the infrastructure that made the theft both possible and profitable.

It might be objected that Britain's role made no real difference - that had British institutions refused this wealth, Nazarbayev's inner circle would simply have found another haven among the many tax havens and secrecy jurisdictions that exist worldwide. This objection resembles the reasoning of a concentration camp guard who claims that his individual refusal would have

¹ To be sure, there are some – consequentialists – who reject the moral significance of the distinction and others who argue that some cases defy categorization (Barry & Øverland, 2016).

changed nothing, since the regime would simply have found someone else to take his place. But this reasoning does not dissolve responsibility - it multiplies it. If many jurisdictions stood ready to enable this harm, then many jurisdictions share in the responsibility for it, Britain among them. The availability of alternative enablers does not exculpate any single one; it merely widens the circle of complicity. Britain does not escape its negative duty by pointing to the fact that other states might have failed theirs as well.

Britain's financial architecture did not merely provide a pathway for this corruption after the fact - it actively enticed it beforehand. To offer secrecy jurisdictions, golden visas, and lightly scrutinised financial services is not simply to make a criminal act possible, in the way that any seller of goods makes possible the uses to which those goods are later put. It is to advertise a specific capability: the capacity to make dirty money safe and respectable. This is comparable to an arms dealer who files the serial number off a gun and tells the buyer it is now untraceable - the seller is not merely providing a means to an end but actively signalling that the transaction is suited to criminal purposes. Britain's golden visa scheme and shell company regime functioned the same way: they told the Kazakhstani elite, in effect, that London was a place where questions about the origin of wealth would not be asked. The system did not just enable the crime. It invited it.

8. The Human Cost and Social Breakdown

The consequences of this institutional harm were not abstract. They were traceable, human, and fatal - culminating in the deaths of 227 people during the January 2022 protests. The fuel price increase that triggered the unrest struck oil workers as a particular insult: the very people whose labor generated Kazakhstan's wealth had seen almost none of it return to them (Murtazashvili, as cited in NPR, 2022).

The protests were never truly about the price of gas - they were the eruption of decades of wealth extraction finally reaching its breaking point. Protesters came from every corner of Kazakhstani society - oil workers, miners, activists, and young people - united not by a single grievance but by a shared experience of inequality, corruption, stagnant wages, and political disenfranchisement. That inequality was not incidental; between 2013 and 2021, the wealthiest one percent of Kazakhstanis captured fourteen percent of the nation's income while the poorest half saw their share of it decline (International Crisis Group, 2022).

The 227 deaths are not traceable to a decision about fuel prices. They are traceable to the institutional architecture that drained the wealth those protesters were, in effect, dying to reclaim - an architecture whose costs extend well beyond the dead, to the thousands who were wounded and to the far greater number who endured avoidable poverty both before and after the unrest.

9. Corrective Justice, Policy Reform, and Systemic Remediation

Having caused the harm, Britain now owes not generosity but correction. Correction is not charity or foreign aid - it is Britain fulfilling the compensatory obligation that follows directly from a negative duty violation. The United Kingdom has already implemented several reform measures. The Economic Crime Act of 2022 required offshore company owners to disclose their identities. The Economic Crime and Corporate Transparency Act of 2023 granted Companies House new powers to scrutinise and reject suspicious company registrations (UK Government, 2023). The NCA's Combatting Kleptocracy Cell was established specifically to investigate and freeze assets obtained through corruption. These are genuine tools on paper - but political will and sustained funding do not yet match them.

To fully address this institutional failure, stronger measures are still required. Dangerous loopholes persist - entities like Jusan Technologies and QAZ42 Investment remain anonymous, and foreign governments implicated in the very corruption under investigation, such as Kazakhstan's compromised prosecutor general's office, can still supply evidence that defeats enforcement efforts. Requiring full transparency of beneficial ownership, alongside independent verification of foreign government evidence, would be meaningful steps toward ending the harm Britain has been causing. Holding enablers accountable - the firms that structure kleptocratic wealth, not merely the individuals who benefit from it - would extend legal consequence where it has long been absent. Sustained funding and permanent political commitment to the NCA's Combatting Kleptocracy Cell would ensure enforcement is substantive rather than symbolic.

Beyond these measures, Britain's obligation extends further still. Its negative duty is not satisfied merely by exiting the business of providing a safe haven for dirty money - it also requires dismantling the broader international network of secrecy jurisdictions that Britain was instrumental in constructing over the decades since the Second World War. So long as this network persists, Britain remains responsible for the harm it continues to enable. Consider an energy company that exists in the oil business but never remediates the polluted extraction sites it created and once operated. That company remains responsible for the ongoing harm caused by that pollution - even after it has stopped drilling, and even if it no longer operates in the countries where the damage persists. Britain's position is no different. Having built the infrastructure of global kleptocracy, it cannot claim to have fulfilled its obligations simply by declining to expand it further.

The architecture that enabled Nazarbayev and Kazakhstan's ruling elite to steal from their own people - wealth whose absence contributed directly to the deaths of 227 innocent citizens - was not accidental. It was built. And what was built by Britain can, and must, be dismantled by Britain.

10. Conclusion

While Nazarbayev is the one who built the underground system, appointed his family friends to positions of power, sheltered his fortune behind charitable foundations, and served anyone who doubted him with criminal charges, he's not the only one responsible for the theft of the Kazakhstani wealth. A thief needs somewhere to put what he takes. Nazarbayev found that somewhere in Britain - not by accident, and not because Britain looked away, but because Britain had built, over decades, precisely the machinery a kleptocrat requires: golden visas that asked no questions, shell companies that hid every owner, offshore structures that laundered not just money but reputation, and a professional class prepared to facilitate these activities as though they were routine business.

The positive duty, the question of whether Britain did enough to help, misses the point entirely for this reason. Britain was not a bystander that failed to rescue a drowning man. It was the party that helped push him in. The harm was foreseeable: British officials and their American counterparts had known of Nazarbayev's corruption for at least fifteen years. It was avoidable: at any point, Britain could have demanded transparency, closed the loopholes, and scrutinised the origins of the wealth pouring into London. However, it chose not to. Britain's provided vault does not divide the blame between Astana and London - it doubles it. Nazarbayev carried out the theft; Britain made the theft worth carrying out.

The wealth that flowed into Baker Street, Chelsea, and a Berkshire estate never reached the hospitals, schools, and wages of the people who generated it. The consequences of this failure were real and measurable. When 227 Kazakhstanis died in the streets in January 2022, they

were dying, in effect, to reclaim what had been drained away - and a share of it sat, at that very moment, undisturbed in London property. The violated negative duty cannot be fixed with simple donations and generosity. It leaves behind an obligation of correction. Britain does not owe Kazakhstan charity or foreign aid; it owes the repair of the harm it caused. The UK's architecture extends well beyond Kazakhstan - a whole international network of tax havens assembled since the Second World War - a promise that simply declines to expand it is insufficient. The vault must be eradicated, not merely left unlocked. What Britain built it can, and must, dismantle.

11. Recommendations

Correction requires more than the tools Britain has already placed on the books. The reforms of 2022 and 2023 created powers that remain unfunded, unenforced, or riddled with the very loopholes they were meant to close. The following measures would move enforcement from the symbolic to the substantive and begin to dismantle the architecture Britain built:

11.1. Require full beneficial ownership transparency

Close the loopholes that still allow entities such as Jusan Technologies and QAZ42 Investment to remain anonymous. No company registered in the UK, or holding UK assets, should be permitted to obscure the identity of its true owners.

11.2. Independently verify foreign government evidence

The Unexplained Wealth Order cases collapsed in part because British courts accepted documents from Kazakhstan's own prosecutor general's office - an office then controlled by the family under investigation. Evidence supplied by governments implicated in the corruption at issue must be independently verified before it can defeat an enforcement action.

11.3. Hold the enablers accountable, not only the beneficiaries

Legal consequences must extend to the firms that structure kleptocratic wealth - the lawyers, accountants, bankers, and property agents - and not merely to the individuals who profit from it. The Dolphin case showed how deep this network runs; accountability must run just as deep.

11.4. Fund enforcement permanently, not reactively

The National Crime Agency was outmatched and outspent by a single elite law firm and left £1.5 million out of pocket. The NCA's Combatting Kleptocracy Cell needs sustained funding and permanent political commitment so that enforcement does not depend on the news cycle or on a war in Ukraine to command attention.

11.5. Apply reform beyond Russia

The Economic Crime Act was aimed squarely at Russian oligarchs, leaving Kazakhstani and other post-Soviet kleptocrats largely untouched. Illicit wealth is not defined by its country of origin, and neither should the law be.

11.6. Dismantle the wider secrecy network

Britain's obligation is not satisfied by ceasing to offer a safe haven at home. It extends to the network of secrecy jurisdictions - many tied to British Overseas Territories and Crown Dependencies - that Britain was instrumental in building. So long as this network persists, Britain remains responsible for the harm it continues to enable.

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