

2012
CONFERENCE
REPORT



**International Corruption
Hunters Alliance**



LEADING WITH INTEGRITY
INNOVATIONS AND NEW FRONTIERS

FOREWORD

The World Bank Group's International Corruption Hunters Alliance (ICHA) is an initiative I have happily inherited, and one that I intend the Bank to continue nurturing. If corruption exists, then so will poverty and from our perspective, corruption amounts to stealing from the poor.

This Alliance mirrors what we are striving to accomplish across the spectrum of our work at the Bank: to focus on solutions while moving away from acquiring knowledge for its own sake. This initiative brings together the toughest advocates, those who have chosen to fight corruption as their lifelong work even as they sail against the tide. No doubt the knowledge within ICHA is there, as is the determination to conquer this all-too-persistent problem. Unfortunately, practical solutions for how we can stop corruption have always been more difficult to come by. With its focus on leveraging technology, fostering greater cooperation among anti-corruption entities, and strengthening enforcement efforts at the national level, the second meeting of ICHA propels us in the right direction.

Everyone who has a stake in development should support an aggressive approach to anti-corruption. Humanity as a whole cannot afford the long-term monetary or moral loss. We have to remember this when we are faced with the formidable short-term consequences of clamping down on corruption. The World Bank Group will continue to act decisively. We will suspend funding whenever warranted, we will publicly name offenders, and we will always consider the best interests of those whose voices have been muted by poverty.



Jim Yong Kim, President, World Bank

Still, our impatience to see corruption defeated and the need to remain vigilant cannot tempt us to act haphazardly. Our approach must be informed by substance and logic so that we are always at our most effective. Wherever we can bring a scientific approach to anti-corruption, we will be more likely to succeed. ICHA can show governments, institutions, corporations, and other entities that there is a path that they can follow to avoid the pitfalls of corruption. From a global viewpoint, our attempts to stamp out corruption, recover stolen assets, and interdict illicit financial flows have produced mixed results. Some countries have been able to vigilantly pursue these agendas, while others remain overwhelmed by weak institutions or lack of political will. I hope the Alliance becomes an ever more effective coalition that consistently delivers meaningful results on this front.

When ICHA next convenes, I look forward to meeting the men and women who are a driving force in the fight against corruption. Until then, let us continue to champion transparency and accountability through our efforts worldwide.

Jim Yong Kim,
World Bank Group President

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Welcome Speech

Leonard McCarthy, Integrity Vice President, World Bank

Good morning everyone. Welcome to all of you. Also to our distinguished guests: the Dean of the Board, the Chair and other member of the Independent Advisory Board, a number of Vice Presidents and Executive Directors present. And especially to the many heads of investigating authorities, attorneys general and anti-corruption commissioners. Most of all, our special appreciation to the President of the World Bank Group, Robert Zoellick who came out to be with us. Today is special. On this day in 1783, the Montgolfier brothers in France launched the first public balloon flight. On 5 June 1977, the first personal computer—the Apple II went on sale. So if you came here through air-travel or on a balloon—and you have your iPad with you, we are in good company.

On 5 June in the year 1947, history books tell us that US Secretary of State, George Marshall, outlined the Marshall Plan. It was a bold and visionary move to stem the impending famine and economic crisis in war-torn Europe. So, today is an auspicious day. Eighteen months ago, when we launched this Alliance, Mr. Zoellick said we should ignite a chain of crime fighting reactions. Some security experts in the room at the time looked a bit uncomfortable. Last night I spoke to the Ombudsman of the Philippines, Madam Conchita Morales. She told me that she has tried to ignite a chain of crime fighting reactions in her country. As a result, on a morning last week, she found a hand-grenade on her doorstep. They were sending her a message, trying to intimidate her. But she is tough.

There are no grenades, guns or hand-cuffs in this room. Just numbers—and I sense—a passion to be on the right side of history. One man in this room whose daily actions put him on the right side of history is Robert Zoellick. I spent many mornings the last four years listening to the wisdoms he conveys to the Bank's senior management.

Here at the World Bank he has moved the zeitgeist of the institution by fusing high performance with integrity, and he has truly made this a flagship organization. The World Bank is now producing four times as many sanctions, investigations and criminal



Leonard McCarthy, Vice President, Integrity Vice Presidency, World Bank

referrals as in 2008, when Mr. Zoellick first shaped the new INT-ship.

The Independent Advisory Board, which was Chairman Paul Volcker's and Mr. Zoellick's genius, gives us wise counsel about how to run a top notch anti-corruption office.

We innovate here. Mr. Zoellick paved the way for the World Bank to put in place a system to cross debar guilty entities, sharpen our integrity due diligence and use sanctions, settlements and other tools, as creative mechanisms to bring mettle and equity to punishment.

Under his watchful eye, the World Bank now publishes the findings of all its investigations. The judges of our Sanctions Board report their judgments, just like in any open court where the rule of law is paramount.

Yesterday I screened the Bank's press releases for the major high-impact interventions made on the anti-corruption side in recent years. I could mention many, but the record speaks for itself. These successes are all associated with Mr. Zoellick's astuteness and gravitas.

From the very beginning Robert Zoellick was this Alliance's staunchest supporter. We joked at the time about calling it CSI World Bank, but he was absolutely serious about the importance of establishing such a group of anti-corruption heavyweights. We thank you Mr. Zoellick for your inspiring leadership and support.

Opening Address

Robert Zoellick, President, World Bank

It's a great pleasure to welcome you back to the World Bank for this second meeting of the World Bank's International Corruption Hunters Alliance. This group first began to come together three years ago in Botswana. At that time, it was made up of only a handful of like-minded corruption fighters. We've come a long way since then. As I look around this room today, I see that there is strength in numbers.

This alliance now has around 250 members, representing six regions across the globe as well as international development organizations, multilateral development banks, and international enforcement entities. I'm particularly pleased that so many chiefs of law enforcement bodies and heads of international anti-corruption agencies are with us today.

So I'd like to thank all of you for your commitment and dedication to rooting out corruption.

I'd also like to thank the governments of Australia and Denmark, who have recognized the potential of this initiative and provided generous support to help sustain it. I hope other governments will be motivated by the outcomes of this year's meeting to lend their support as well.

I especially want to thank Leonard McCarthy. When I asked Leonard to head up the World Bank Group's Vice Presidency for Institutional Integrity, we were seeking to get beyond some difficult days. I knew we needed a leader who was recognized globally for his integrity, independence, and effectiveness in fighting corruption and strengthening good governance.

I also hoped for someone who could speak from the developing world's perspective; who recognizes that stealing from the poor is an outrage; that undermining the public trust in new governments, often in fragile situations, is a terrible breach of duty; who could speak in plain language from the heart about the importance of honesty, fair dealing, taking responsibility...and attacking corruption, crime, and cartels.

Leonard has been a true leader – protecting the Bank's assets; holding people, businesses, and gov-



Robert B. Zoellick, World Bank President, delivers the opening address at ICHA 2012

ernments responsible if they steal or cheat; and driving efforts like this one, which make our network of partners stronger and more effective. It has been a privilege to work with Leonard, and I want to take this opportunity to thank him publicly.

At the inaugural meeting of this Alliance, in December 2010, you agreed on priority actions. I'm pleased to say we've made good on our promises.

First, we pledged to step up criminal action against corrupt officials – and we achieved significant results:

- Indonesia's anti-corruption commission, the KPK, secured jail terms against thirty-nine people; seized one billion rupiahs of bribe money in a sting operation; and is now using a new National Integrity Index to track the performance of government officials. Working with Interpol, the KPK successfully extradited two corrupt fugitives, both of whom have been tried and sentenced.
- The UK's Serious Fraud Office efforts led to a court order for Macmillan Publishers to pay more than £11 million for its unlawful conduct in a World Bank education project in South Sudan.
- And a prosecution by Norwegian authorities led to the bribery conviction of three individuals connected to a World Bank-financed project in Tanzania.

Second, the Alliance pledged to improve the quality, amount, and speed of our information sharing.

Our Integrity Vice Presidency, INT, is formalizing information sharing through parallel investigations and memoranda of understanding with national authorities. We've seen how these steps give national law enforcement authorities the power and legitimacy to share critical information with the Bank.

For example, INT is currently working with several European prosecuting offices on a corruption investigation that has touched a number of countries around the world. Through close coordination, exchange of information, and trust, these joint efforts have led to arrests and seizure of ill-gotten gains. In a separate case, a national authority conducted an investigation based on our referral, leading to arrests that will be critical in helping the World Bank address a major infrastructure project.

Third, in 2010 the Alliance determined to figure out how best to share restitution payments and fines with countries that have been the victims of corruption. The World Bank estimates that \$20 to \$40 billion is stolen every year from developing countries.

Soon after I arrived at the World Bank Group, we created the Stolen Asset Recovery initiative, or StAR – a partnership between the World Bank Group and the UN Office on Drugs and Crime, that supports international efforts to end safe havens for corrupt funds.

In 2009, StAR provided instrumental support to the governments of Haiti and Switzerland, leading the Swiss to order \$6 million in assets – allegedly plundered by former Haitian President Jean-Claude Duvalier and his associates —to be returned to Haiti.

This year, StAR helped Tunisia secure the return of two jets that had been hidden in Europe, worth an estimated \$30 million. These are important first steps, as well as a demonstration of international commitment and cooperation toward asset recovery.

One of the studies StAR released this year asked investigators in a number of different jurisdictions why the intermediaries who provide the front for

shell companies are so rarely prosecuted. The answer was that no one could prove these intermediaries' involvement, and investigators were under no obligation to conduct proper due diligence on their clients. StAR's research and training work in Afghanistan, Bolivia, Colombia, and Egypt aims to mitigate this willful blindness on the part of the financial service providers.

Greater training on asset recovery – to share expertise and hone operational skills – would help secure even more results. That's why, at the end of the week, 100 of you will have the opportunity to learn more about evidence gathering, mutual legal assistance, and asset recovery from a program StAR is co-hosting with George Washington University.

Innovation: Using Technology to Get Ahead

We need to keep up the progress in these priority areas. But we need to go further, too. So today I want to focus on how we can be more creative and innovative in the global fight against fraud and corruption.

Technology enables us to gather, analyze, and share information at a rapid pace. The more information we can make available to the general public about how funds are spent – whether it's public funds managed by governments or transactions involving World Bank money – the more we ease the burden on corruption hunters. Citizens are the best people to hold governments and institutions accountable. This is the first step in reducing opportunities to engage in or be tempted by corruption.

The World Bank Group is already sharing information through our Open Data initiative, which makes thousands of datasets freely available to anyone with an Internet connection. Based on the success of this initiative, we have supported similar programs in Kenya, Moldova, Mongolia, and other countries. The message to our clients is clear: We are open about what we do and what we know. You can do the same.

But we also know that today we're only touching the tip of the technological iceberg. After sharing information, the second step is to start using it in interac-

tive and innovative ways to outsmart corruption and criminality. At the International Corruption Hunters Technology Expo in the Bank's atrium, you will see the World Bank's new Integrity App, which will facilitate reporting on fraud and corruption.

A large number of our investigations are driven by information we receive from observant individuals working on Bank-funded projects. Citizen involvement can be powerful – if we empower people. They know when something isn't right. The World Bank Integrity app will give them instant access to project information, so they can easily send information and photos to INT. It will help speed up and broaden the reach of the complaints handling process.

Interpol has approached the World Bank about another innovative use of technology: an international drive to get key countries to produce national electronic ID cards for migrant workers, whose vulnerable status often makes them easy prey for organized crime. These ID cards will be globally verifiable by Interpol and can be used for the receipt and transfer of electronic remittances. This excellent idea will give migrant workers greater security at the same time it helps law enforcement agencies crack down on human trafficking, money laundering, and other forms of smuggling.

Innovation: Understanding Corruption

Technology can help us move faster and with greater accuracy to detect and catch fraud and corruption. But we need to learn more about the cancer of corruption.

This April, government ministers, private sector executives, and World Bank experts met for a frank analysis of corruption in infrastructure projects. One of the executives from a private bank suggested that governments could reduce the incidence of corruption by conferring more prestige upon the work of public procurement officials. Tougher qualifications would attract better candidates. Higher salaries would reduce the likelihood officials will solicit bribes and that they will be tempted.

“Knowing thy enemy” is good advice. Harvard professor Matthew Stephenson has examined the psychology of corruption, and found that the

probability that punishment will be imposed in a timely fashion is more important than the severity of punishment.

Criminal organizations are attracted to places where formal controls from the criminal justice system don't operate; where informal controls from neighbors or citizens aren't working; where institutions are weak. In Guatemala, for example, only 3.5 percent of murder cases end up in a trial. That sends a clear message to the criminals.

How can we do better?

Strong legal frameworks are fundamental – and in the past year we've seen the enactment of two powerful new anti-corruption laws:

Canada is now able to seize, freeze, or sequester the assets of officials or former officials of foreign states, as well as their family members, where these assets had been inappropriately obtained or misappropriated from the foreign state.

In China, it's now a crime to pay bribes to foreign government officials and officials of international public organizations. The law covers Chinese citizens and legal entities organized under Chinese law, including foreign invested enterprises established in China that engage in bribery anywhere in the world.

Strong institutions are also important – because recovered funds can't be repatriated to countries where institutions fail to manage them properly. Where the proper mechanisms exist to manage such funds, we need to take advantage of them. Where they don't exist, we need to create them.

We also should be innovative in how we pursue investigations of corrupt or fraudulent behavior. It must be crystal clear that corrupt behavior has real costs and consequences.

The Bank Group has had success in using negotiated resolutions or settlements. Firms that enter into settlements don't escape punishment – in fact, in almost every settlement, the firm has been debarred and subjected to cross debarment. In every settlement – as for any case resolved by our Sanctions Board – the nature of the charges and the sanction

applied is made public and the findings are shared with relevant government authorities so they may take action under their national legislations.

Settlements have, however, proven to be an invaluable tool – not only for resolving cases quickly, but also providing a way for firms to acknowledge their misconduct and clean up or build their own internal integrity programs.

In 2010, for example, the engineering firm Lotti acknowledged its misconduct in a World Bank-financed water project in Indonesia. As part of its agreement with the Bank, Lotti repaid \$350,000 to the Indonesian government as restitution for fraudulent invoicing.

As another example, Siemens AG has completely reworked its approach to integrity due diligence in response to investigations by, and settlements with, the World Bank Group, as well as the US Department of Justice and German authorities.

Our investigations and debarments have bite.

Since mid-2007, the Bank Group has sanctioned 167 entities while closing more than 600 cases. Private banks and firms are factoring our debarment decisions into their own due diligence. Leonard recently related to me a conversation with the General Counsel of a major Canadian mining firm, who told him: If the World Bank says it's OK to work with a company, then we say it's OK too. Private companies will sometimes call INT looking for guidance about the firms that appear on the World Bank's debarment list.

By reaching out and working with national authorities on investigations, audit, and risk management efforts, the Bank is also helping strengthen in-country capacity and systems.

For example, the World Bank recently conducted a health sector review with the Global Fund to Fight AIDS, Tuberculosis, and Malaria and USAID, and found that Nigeria had nearly \$300,000 worth of fraudulent expenses. As a result, Nigeria removed the implicated officials and its Ministry of Finance then used the Bank's methodology and findings to inform its own review which found almost \$1 million in fraudulent expenses.

Yet there's so much more that needs to be done to promote and support financial integrity.

A 2011 study from the UK's Financial Services Authority illustrates some of the challenges. The study describes how British banks are faring in managing money laundering risk in high-risk situations. The report notes that some banks were unwilling to turn away very profitable business, even if there was a high level of risk that they would be handling the proceeds of crime. Over half the banks surveyed failed to apply meaningful enhanced due diligence. Around a third failed to put in place mechanisms to identify customers who might be more susceptible to corruption.



We need to insist on greater integrity in financial institutions.

Last year, enforcement authorities from around the globe came together to endorse a World Bank-sponsored Declaration of Principles. The declaration emphasized the need for investigative and enforcement institutions to work together to better assess and track money flows in and out of key jurisdictions, and report on suspicious transactions – exactly the kind of action we need to reduce dangers in high-risk environments.

We need to use the International Corruption Hunters Alliance to give these ideas more bite and make the most of our collective influence. Each of you has the power to effect change in your own country. The Alliance can give you the technical resources and moral support to keep up the hard fight.

Looking Ahead

The aim of this Alliance was – above all else – to be useful: to provide effective tools and information so all of us can successfully prevent and attack corruption.

So I'd like to suggest three ideas for your meetings this week that can help support the work that you do every day.

First: We could develop a compendium of resources, examples of cases, draft laws, and regulations that support integrity in financial centers; this project could serve as a useful informational resource for all members of the Alliance.

Second: Coming out of the discussions in the 2010 meeting, we came up with a list of criteria for measuring the effectiveness of anti-corruption authorities – such as turn-around time for investigations, successful outcomes, and level of autonomy. We need to make this more concrete. We suggest developing a set of recommendations for how members could use these standards to improve anti-corruption efforts – to speed up investigations, prosecute them successfully, and operate without being influenced by political concerns.

Third: we recommend developing a practitioner's toolkit for using evidence to show the impact of corruption on the intended beneficiaries of public services. A toolkit would support prosecutions and policy work by suggesting how to use this kind of evidence in trials, support mutual legal assistance requests, drive policy change domestically, and build political and public support.

Over the next few days, I hope that you will come up with other ideas on how we can support one another.

Many of the people in this room have great courage. They run risks. We need to stand by one another. We need to succeed.

I want to thank you again for your fortitude and your commitment, and for joining us as part of this important network. My hat is off to you all. And I look forward to hearing the results of your discussions.

TAKING ICHA TO THE NEXT LEVEL

When it was first conceived, two of the primary objectives of the World Bank's International Corruption Hunters Alliance (ICHA) were to support the creation of global enforcement mechanisms to fight corruption and increase action on the World Bank's referrals to national authorities. In 2010, ICHA members agreed on priority actions that went even further. They agreed to step-up criminal action against corrupt officials; pursue multi-jurisdictional prosecutions; track and return illegal proceeds; provide effective tools and information to prevent and combat corruption; and monitor and disclose investigative results.

The 2012 ICHA meeting took this work to the next level, providing a mix of technical workshops and global policy discussions; regional meetings that enabled a focus on more local challenges and priorities; and an International Corruption Hunters' Technology Expo which provided a forum for the World Bank, our international partners, vendors and other exhibitors to showcase innovative tools, platforms and apps that are transforming the fight against corruption. The World Bank and the Stolen Asset Recovery Initiative (StAR) also partnered with the George Washington University Law School to deliver a two-day training on financial investigations and mutual legal assistance (MLA) to 90 ICHA delegates.¹

For the World Bank, the past two years have been a testament to the positive impacts of building international alliances against corruption. A functional



Steve Zimmermann, Director of Operations, Integrity Vice Presidency, The World Bank

cross debarment agreement among multilateral development banks tripling the number of cross-debarred companies in less than three years; **successful investigative outcomes** as a result of bilateral and international cooperation and rising numbers of cases around the globe are clear evidence of the impact of our collective action. **National and international enforcement action** against those stealing development resources is gaining pace.

This publication provides a summary of the policy discussions, regional meetings, technical workshops, and Technology Expo of ICHA 2012. The proposed outcomes of the Second Biennial Meeting of the ICHA are summarized in the following section. The World Bank will work with ICHA members to cement these outcomes and to continue to leverage anti-corruption efforts around the globe to produce greater tangible results in the fight against corruption.

Stephen Zimmermann, Director of Operations,
Integrity Vice Presidency, The World Bank

¹ Special thanks to Dean Paul Schiff Berman and Susan L. Karamanian, Associate Dean for International and Comparative Legal Studies, of the George Washington University Law School.

PROPOSED OUTCOMES

Over the course of two days, members of the International Corruption Hunters Alliance participated in policy discussions, regional meetings, technical workshops, and gathered for informal conversations. The following is a compendium of conclusions and proposals for concrete action to follow up on these discussions. The World Bank will work with members of the Alliance to achieve progress on these proposed outcomes.

Outcome 1: Raising the bar and shaping the policy agenda

1. At ICHA 2010 members requested a **study on settlements in foreign bribery cases and asset recovery** to assess the effects of the increasing trend towards settlements on international cooperation and the recovery of assets. A colloquium on the findings of the study at ICHA 2012 has provided a basis for evidence-based policy dialogue on this important and sensitive issue. The recommendations and proposed actions by members will be reflected in a final edition of the study.
2. Large-scale corruption and related money laundering requires company formation and administration services to conceal transactions and the identities of the principal actors. ICHA 2012 will raise the volume on the policy dialogue in this area to voice a collective call for action. **A compendium of resources, case examples, draft laws and regulations that support integrity in financial centers** and the recommendations by ICHA members will be given a broad forum through blogging of the discussion by ICHA members and other communication channels. This output will help sharpen the global spotlight on integrity in financial centers.
3. **Advancing the definition and adoption of standards for measuring the effectiveness of anti-corruption authorities** was a goal expressed at the ICHA meeting in 2010. The 2010 conference resulted in an agreement to develop a Results Matrix: Measuring Activities of Anti-Corruption Authorities, which was

subsequently shared with members in a draft format (see pp. 8–9.) At ICHA 2012 members were invited to identify follow-up actions for implementing the matrix and for sharing information about results. Given that there is no one-size-fits-all template or standardized performance monitoring methodology applicable to all anti-corruption authorities, a broad logical performance monitoring and evaluation framework has been developed. The framework and a companion note will be circulated for comments and feedback among the ICHA members and through the ACA Portal.

Outcome 2: Scaling up capacity and results for ICHA

4. **A Practitioner's Toolkit on how to visualize the impact of corruption on the intended beneficiaries of public services.** ICHA 2012 drew on international expertise to draw up recommendations for using this kind of evidence in trials, to support mutual legal assistance (MLA) requests, to drive policy change domestically, and build political cover or public support.
5. The ICHA 2012 event has enabled the compilation of a **catalogue of resources and information on the most useful technology for investigators and prosecutors**, including forensic software, resources for using open source information in corruption cases; case management systems; software to detect collusive bidding patterns, and extract, organize and analyze electronic evidence from computers, servers, email, mobile phones and other devices. At ICHA 2012 participants took away knowledge and skills to address the new challenges in the age of digital information. This catalogue of resources – of which an initial compendium is provided in this volume – will be updated and disseminated among ICHA members.
6. Crowd sourcing and citizen engagement techniques have typically been used by civil society to raise awareness about corrupt behaviors and to deter wrong-doers. ICHA 2012

raised awareness of crowdsourcing techniques among Alliance members and provided practical advice for enforcement officials about the potential of these tools for gathering evidence for investigations, as a red flag mechanism for targeting anti-corruption efforts, and for raising credibility and citizen engagement. ICHA will **support the dissemination of crowdsourcing tools and techniques for fighting corruption.**

7. Government expenditures are coming under increasing scrutiny by parliaments and the public to ensure that funds are spent with due consideration for economy and efficiency and that officials act with integrity. Anti-corruption agencies and audit institutions have amassed considerable experience in how fraud and corruption undermine the public sector, and are well positioned to engage line ministries to ensure that these insights are reflected in management, control systems, tools, and training. At ICHA 2012 a **Corruption Prevention Workshop** gathered experiences and insights from ICHA members to provide initial direction for generating **technical notes on preventive measures in public and private sector activities**, including due diligence and control measures, tools, and training. Some initial areas of focus have been identified for this work based on requests and feedback from ICHA members: technical advice on the design and implementation of financial disclosure and conflict of interest systems; review and guidance on the development of a curriculum for youth on anti-corruption and ethics; the introduction of monitoring systems for anti-corruption authorities and other public agencies.
8. Anti-corruption authorities are increasingly focusing attention on the need for effective corruption complaint mechanisms as a source of information for investigations and prosecutions, to help detect red flags, and to provide avenues for confidential whistleblowers to come forward. For ICHA 2012 a series of case studies were drafted on public interest whistleblower laws and corruption complaint handling mechanisms in India, Peru, UK, Morocco, ICGLR, and Bhutan. These were shared and discussed with ICHA members

at the June meeting. The case studies are a product of a partnership between ICHA and the Harvard Law and International Development Society (LIDS); the final publication – a **report on whistleblower laws and public interest corruption complaint mechanisms** will reflect the discussion among ICHA members at the June meeting.

9. The fight against corruption necessitates an integral approach that considers not only the importance on enhancing capacity of anti-corruption authorities but also of the many complementary institutions and agencies that can make their work successful, such as the judiciary and the police. For ICHA 2012 a special session for the Africa region discussed the issue of police corruption and how to discourage it. Police corruption plays a significant role in allowing the transfer of illegal assets across borders in Africa and attacking this problem is a central aspect of the fight against corruption. A **mechanism for sharing experiences on what works best in fighting police corruption and taking a more integral approach in institution and capacity building among practitioners** will be further discussed with participants to be set up in the next months.

Outcome 3: Strengthening coordination and communication for improved anti-corruption results

10. At ICHA 2010 members requested a study on the quantification of bribery. The findings of this study, a joint project by the OECD and StAR, were presented in a workshop at ICHA 2012. StAR and the OECD will develop (i) **training modules for practitioners on the quantification of bribery** and (ii) will explore with participants how a **working group** may be set up to meet or communicate periodically, to discuss and refine advice about good practices and tools, and to identify training needs in the area of quantification of the proceeds of active bribery.
11. ICHA members are familiar with the challenges of working across legal systems, and have experiences to share about successful

collaborative actions that overcame impediments to transnational investigations. Through two separate sessions on international cooperation, ICHA 2012 collected insights to help document **case studies of successful experiences in overcoming challenges in transnational corruption cases**. Focus will be given to both formal and informal mechanisms for collaboration and how such collaboration can expedite the investigative process for both parties, whether working on cases that involve multiple jurisdictions or between national authorities and the World Bank.

12. Many new web sites and portals have emerged since 2005 about anti-corruption initiatives and tools, and a large amount of resources has been dedicated to design and maintain them. Their impact and effectiveness remain unclear however. ICHA 2012 brought together practitioners from civil society, the donor community and the private sector who have been involved in such virtual initiatives to promote discussion of the needs of practitioners when it comes to information about anti-corruption and to help improve global cooperation on fighting corruption. To capture the impact of and experiences with

new technologies a survey will be conducted among various anti anti-corruption authorities. The results, along with the discussion among ICHA members, will be documented **with recommendations for enhancing information sharing and communication for corruption fighting officials**.

13. ICHA members shared the experience of Nigeria, which in collaboration with the UK prosecuted and convicted a former Delta State governor. The Nigerian experience shows a successful collaboration with the UK relating to the investigation, prosecution and conviction of a case of grand corruption. Practitioners from different African countries working on corruption agreed that collaboration among African countries is still very weak and should be strengthened, as more illegal assets are being transferred across African borders and deposited in banks within the continent. One of the impediments of such collaboration is the lack of domestication of country laws to the UN convention against corruption, which has been signed by many countries. Full legal collaboration is impeded by the incompatibility of national legal frameworks in this area. A **mechanism for sharing experiences among practitioners will be a first step in improving collaboration among countries**. Participants and the WB staff will continue communication to set up such mechanism.

Draft results matrix: Measuring selected activities of anti-corruption authorities (ACA)

	Category	Indicator	Process Methods and Challenges
1	Complaints: Number of valid complaints about corruptly-influenced conduct ¹ that result in preliminary and/or full criminal investigations.	Number of complaints as a percentage of corruption investigations initiated. Existence of "hotline" and measures of use (frequency, response time and quality).	Manifested in crime information systems and monitored at least bi-annually.
2	Investigations: Number/type of/disposal rate and outcome of investigations of corruptly-influenced allegations.	Percentage of investigations that mature into full prosecutions; percentage of completed cases/opened cases in a year or set period; percentage of completed cases/total cases (carryover + new) in a year or set period; and establishing turnaround time of investigations.	Data captured by ACA and report to Parliamentary/Executive/or Prosecutorial oversight bodies. Data may not be comparable across countries because of definitional differences.
3	Prosecutions: Total number of prosecutions of corruptly-influenced charges completed annually, average trial time, outcome and conviction rate.	As a percentage of overall criminal conviction rates; average trial time; and number and percentage of corruption prosecutions completed annually, relative to number of prosecutions generally.	Data captured by prosecution systems and reported publicly. (Case management system should be designed to encompass these performance indicators.) Include any consequences of not meeting the objectives. Data may not be comparable across countries because of definitional differences.
4	Reasons why full investigations are terminated without prosecutions; and why prosecutions result in discharge, acquittal or non-guilty verdict.	List of common causes could include: lack of sufficient evidence; fickle witnesses, intimidation of witnesses or prosecution; incompetence of prosecution, etc.	Will require public right of access to information regarding termination of investigations and right to request reasons. Court judgments should be publicly available.
5	Investigations and prosecutions resulting from income and asset disclosure and conflict of interest provisions in national law.	Number of investigations and prosecutions based on or accessing disclosure information. Effective cross-verification and management of disclosed information, including agreements for effective sharing of information across agencies/institutions.	Sufficient resources and capacity available to review and cross-verify disclosures. Access to a range of financial information across agencies and outside the country (as needed).

¹ The definition of crimes of "corruption" will vary by country. "Corruptly-influenced conduct" includes these specific crimes, but also tries to capture other illicit conduct that is caused or influenced by corrupt conduct.

Draft results matrix: Measuring selected activities of anti-corruption authorities (ACA)

	Category	Indicator	Process Methods and Challenges
6	Functional autonomy of investigation and/or prosecuting body and extent to which independent functioning is secured under local law.	Statutory powers that reflect independent operation, including: right to subpoena, inspect, interrogate, search and ancillary powers. Description of oversight/supervision by outside authority.	Self-assessment and/or external evaluation of degree of independence of the investigating or prosecuting authority and the functioning of an external oversight authority, in addition to the courts.
7	Reliance on and accession to International Instruments, i.e. UNCAC, the Palermo Convention and Foreign Bribery legislation in major corruption cases.	Adoption of legislation criminalizing foreign corrupt practices and efficiency of mutual legal assistance and parliamentary processes relating to international cooperation in criminal matters.	Who makes the final decision; the head of the Anti-Corruption Unit/Prosecution Service, the Attorney General or the Minister of Justice.
8	Monies/assets recovered and deposited; compensation awarded to harmed or interested parties, arising from proceedings against corruptly-influenced-behavior.	Percentage of recovery from corruption cases versus total amount in a criminal asset recovery account or assets under restraint or preserved; amount of compensation awarded.	Threshold of countries active in asset recovery and forfeiture; and governments' resilience to take the profit out of crime and report outcomes.
9	Frequency and impact of focused opinion and assessment surveys, measuring public trust and confidence in and outputs of ACAs; and the criminal justice system generally.	Percentage of respondents with confidence and trust in criminal system, investigating/prosecuting body, etc. Percentage of respondents reporting decrease in frequency of bribe payments, perceived nepotism, decrease in corruption in public procurement, etc.	Credibility of evaluation structures, impact studies, and format and extent of public discourse.
10	Preventive mandate: quality and impact of preventive actions by authority in addressing symptoms of corruptly-influence behavior.	Evaluation of institutional framework; integration and extent to which roles of private sector and civil society are recognized. Examples of preventive measures: existence and effectiveness of audit mechanisms and merit-based system for HRM; number of training and outreach activities on AC; number of transparency sites and portal visits; existence and effective use of access to information procedures (FOIA), etc.	Need for access and reconciliation of information from multiple sources, inside and outside ACA. Efficiency of third party accountability monitoring and the inclusion of decentralized data.

World Bank's International Corruption Hunters Alliance: Participant Polling Exercise

The World Bank conducted an interactive polling exercise to gauge perceptions of corruption among ICHA members. The following is a summary of the results of the polling exercise:²

- Participants were asked: "In your opinion, what is the main challenge to the effectiveness of your agency / organization?" As shown in figure 1, "political interference" is perceived as the biggest challenge among ICHA participants (25 percent). This figure is higher than in 2010 when 23 percent of respondents reported political interference as the main challenge for their agency.
- To gauge whether concerns regarding fraud and corruption have grown, participants were asked: "How concerned are you about fraud and corruption in your country today compared to a year ago?" As shown in figure 2, more than 50 percent of the delegates from South Asia, Latin America and the Caribbean and Sub-Saharan Africa reported that their concern has increased over the past twelve months. Delegates from North America and East Asia and Pacific instead reported the level of corruption is about the same today compared to a year ago. Breaking down the answer by type of agency, it appears that this concern has increased among representatives from the private sector, civil society and check and balance institutions. Representatives from development agencies and police agencies report that the level of corruption today is the same as a year ago.



Sri Mulyani Indrawati, Managing Director, World Bank

Figure 1: In your opinion, what is the main challenge to the effectiveness of your agency / organization?

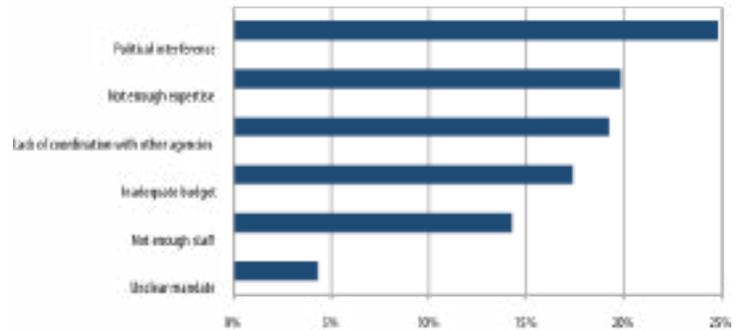


Figure 2: How concerned are you about fraud and corruption in your country today compared to a year ago?

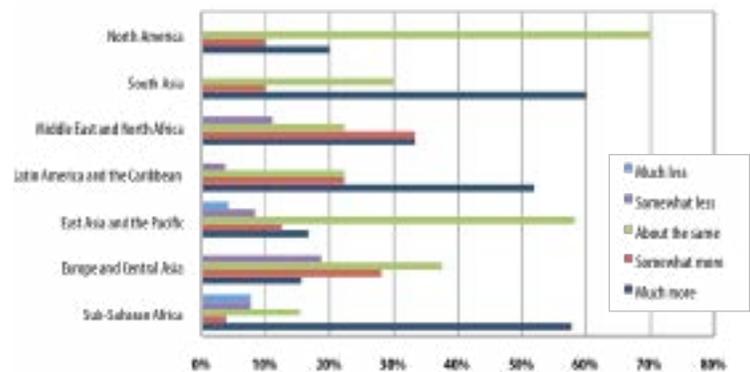
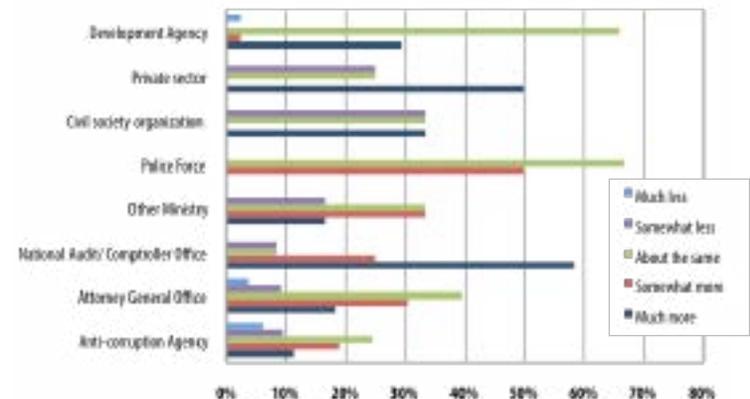


Figure 3: How concerned are you about fraud and corruption in your country today compared to a year ago?



² This polling exercise was prepared by the World Bank's Poverty Reduction and Economic Management Group. For more information see <http://www.acauthorities.org/aca>.

- Participants were also asked the following question: “Regarding corruption risks in your country, where do you see the most significant vulnerabilities?” As shown in figure 4, most of the respondents representing check and balance institutions, anti-corruption authorities (ACAs), police and development agencies responded that “public procurement,” “political corruption” and “judicial system” are the most significant vulnerabilities. Campaign financing is more of a concern to civil society and the private sector. As shown in figure 5, the most significant vulnerabilities for all regions are “political corruption”, “public procurement” and “delivery of goods/works/services”.
- Participants were asked “What support would you want ICHA to provide to your agency/ organization over the next 18-24 months?” 27 percent of the participants responded that they would like support in collaborating with other members of ICHA. While, 13 percent opted for support in preventive initiatives and 19.1 percent for investigative and forensic advice and for sharing knowledge and experience with ACAs and other partners. 17.1 percent of participants chose support in the introduction and use of information technology tools.



Francesca Recanatini, leader of the World Bank's Anti-corruption Thematic Group, runs the polling exercise.

Figure 4: Regarding corruption risks in your country, where do you see the most significant vulnerabilities (reponses by government offices and development agency)?

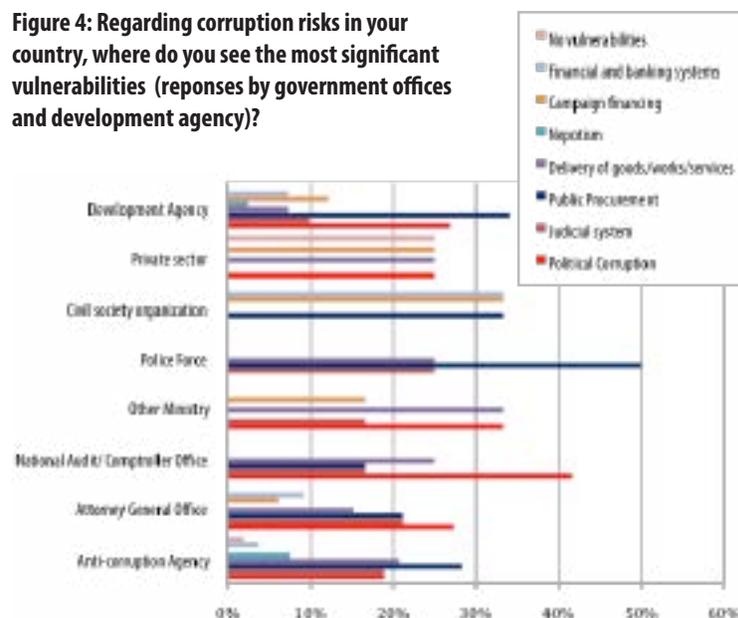


Figure 5: Regarding corruption risks in your country, where do you see the most significant vulnerabilities (reponses by region)?

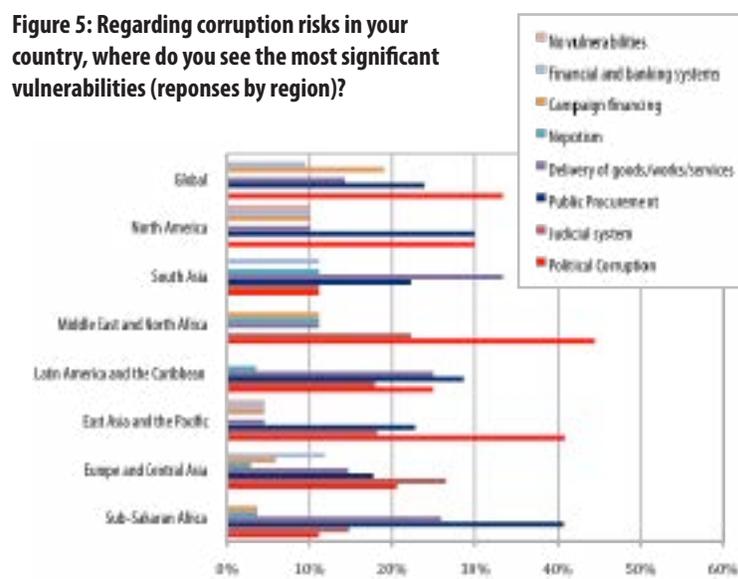
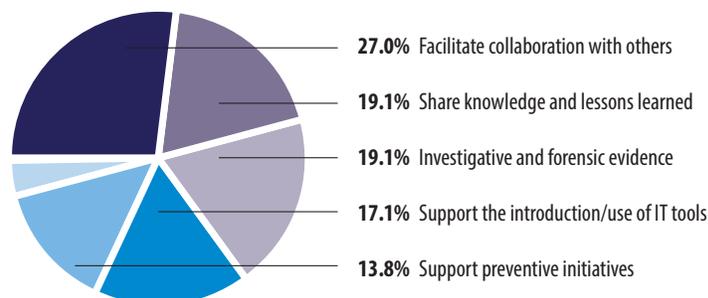


Figure 6: What support would you want ICHA to provide to your agency / organization over the next 18-24 months?



ICHA 2012 HIGHLIGHTS

THEME 1: NATIONAL ENFORCEMENT

Measuring the Results of Anti-Corruption Authorities: An Expert Panel by the World Bank's Independent Advisory Board

Established in September 2008, the Independent Advisory Board (IAB) provides advice to the World Bank Group on a range of governance and anti-corruption measures, fulfilling a recommendation made by the Independent Review of the World Bank's Integrity Vice-Presidency (INT), led by former U.S. Federal Reserve Chairman Paul Volcker.

The IAB helps protect the independence and strengthens the accountability of INT by giving advice on policies and procedures and on the department's interactions within the World Bank Group. It also provides advice to the President of the World Bank Group and the Audit Committee on the performance of INT and the implementation of the related Volcker Panel report recommendations.

Independent Advisory Board (IAB) Members

- **Peter Costello** was Australia's Treasurer from 1996 to 2007 and chaired the APEC and G-20 Group of Finance Ministers;
- **Chester Crocker** was U.S. Assistant Secretary of State for African Affairs from 1981-89 and also chaired the board of the United States Institute of Peace;
- **Simeon Marcelo** served the Philippines as Ombudsman and as a prosecutor in the impeachment of former President Joseph Estrada;
- **Mark Pieth** chairs the OECD Working Group on Bribery in International Business Transactions and is a professor at Basel University.

Session Coordinator:

Anders Agerkov, Lead Specialist, Integrity Vice Presidency, The World Bank

The 2010 ICHA conference resulted in an agreement to develop a Results Matrix: Measuring

Activities of Anti-Corruption Authorities, which was subsequently shared with members in a draft format. The purpose of this session was to validate the matrix; discuss how ICHA members could adopt this standard; and what kind of follow-up arrangements could be developed to monitor the results. The session also touched on the crucial issue of swift follow-up on referrals among international and national authorities, and how such collaboration can be used as a lever to increase effectiveness in transnational matters, also in environments where political support to the anti-corruption agenda is nascent. This session was organized as a dialogue between national authorities and a panel of IAB members bringing an international perspective. The IAB led and facilitated a discussion on how to create synergies between ICHA and national authorities for improved investigation and prosecution results.



A Colloquium of Prosecution Experts

Speakers:

- James Hamilton, President, International Association of Prosecutors
- Professor Githu Muigai, Attorney General, Kenya
- Charles Leacock, Director of Public Prosecutions, Barbados
- William Jacobson, Chief Compliance Officer, Weatherford, USA;

Moderator:

Nancy Boswell, former President and CEO, Transparency International, USA

Session Coordinator:

El Cid Butuyan, Senior Litigation Specialist, Integrity Vice Presidency, The World Bank

The fight against corruption is a global law enforcement challenge involving multi-jurisdictional issues and multinational actors. In this session, heads of prosecution agencies and other experts shared recent success stories and challenges in transnational anti-corruption cases.

Panelists and participants raised the following **key challenges in law enforcement and transnational prosecution**:

- Delays in the execution of Mutual Legal Assistance (MLA) requests;
- Anti-corruption laws do not always reach key stakeholders in the private sector, e.g., media, banks, and business owners;
- In many countries, there is widespread corruption and selective prosecution; this reality makes cooperation particularly difficult (and perhaps undesirable) in transnational cases;
- The difficulty of following the money trail in certain jurisdictions (the so-called “safe havens” like Liechtenstein and the Isle of Mann);
- Corruption problems within anti-corruption authorities and the judiciary; and/or their lack of financial or political independence;
- The undermining of criminal justice systems by organized crime networks;
- The legality of “facilitation payments” through political campaign contributions.

Participants discussed a variety of anti-corruption tools and approaches and stressed the need for multilateral and proactive law enforcement, corporate self-regulation, and the enforcement of international treaties and conventions through domestic legislation. Participants raised the questions of whether there is an excessive emphasis on and preoccupation with prosecution as the remedy for corruption.

The broadening of focus from prosecution to other approaches, such as naming and shaming and asset recovery was hailed as a positive development. Some of the alternative approaches raised in the discussion are included in Figure 1.

Figure 1. Proposed alternative approaches to overcoming challenges in transnational corruption prosecutions

Panelists and participants put forward the following proposed alternative approaches to overcoming challenges in transnational prosecutions:

- Shift to non-prosecutorial strategies such as ‘naming and shaming,’ asset recovery, travel visa bans, and other measures;
- Proactive law enforcement, e.g., undercover operations and wire taps (although there are constitutional or statutory prohibitions against these measures in some countries);
- Deferred / non-prosecution agreements with corporations;
- Corporate self-regulation, e.g., internal compliance procedures, use of socially responsible investment indices, etc.;
- Collective agreements and action, e.g., OECD (Anti-Bribery Convention), World Economic Forum (Partnership Against Corruption Initiative);
- Legislation, e.g., whistleblower protection acts (to incentivize disclosure and protect informants), conflict of interest laws;
- Developing a political culture of accountability through, for example, prosecution of prominent public officials;
- Actively engaging civil society groups as stakeholders in these efforts.

Measuring the success of such approaches is difficult, but an important area for further development, given that tallying numbers of prosecutions alone is recognized as an unreliable measure. It was also noted that public perception of anti-corruption enforcement may not always be accurate, and often distorted by media coverage.



Conchita Carpio Morales, Ombudsman, Office of the Ombudsman, Philippines

Corruption Prevention Workshop

Speakers:

- R. B. Domah, Board Member of ICAC, Mauritius
- A. K. Ujoodha, Director-General and Chairman of ICAC, Mauritius
- Mr. Gyeltshen, Deputy Chief of Investigation, Bhutan
- Conchita Carpio Morales, Ombudsman, Office of the Ombudsman, Philippines
- Phil Matsheza, Lead Anti-Corruption Policy Advisor in Democratic Governance Group of the Bureau for Development Policy, UNDP
- Barbara Fredericks, Assistant General Counsel for Administration, Department of Commerce, USA
- M. Rohil Hafeez, Chief Risk Officer, CRV-Investment and Credit Risk (IFC), The World Bank
- Judith Pearce, Corporate Reputational Risk Advisor, MIGA, The World Bank

Moderator:

Galina J. Mikhlin-Oliver, Director of INTSC, The World Bank

Session Coordinators:

- Steve Burgess, Senior Operations Officer, Integrity Vice Presidency, The World Bank
- Francesca Recanatini, Senior Public Sector Specialist, Public Sector & Governance, The World Bank

Government expenditures are coming under increasing scrutiny by parliaments and the public to ensure that funds are spent with due consideration for economy and efficiency and that officials act with integrity. Anti-corruption agencies, audit institutions, and private investors have amassed considerable experience in how fraud and corruption undermine the public sector and private investments in development projects, and are well positioned to engage line ministries to ensure that these insights are reflected in management, control systems, tools, and training.

The session gave participants a better practical understanding of a range of corruption prevention efforts from across the world. To set the scene, each of the panelists gave short summaries of why preventive efforts were carried out, how they were designed and delivered, what they accomplished, and what challenges they faced.

Figure 2. Corruption prevention interventions that might be applied in different settings

The Panel discussion touched on a long list of possible interventions that might be applied in different settings, including:

- Risk assessments/risk mapping
- Public advocacy programs
- Governance workshops
- Codes of ethics for civil servants and contractors
- Income and asset disclosure declarations for civil servants
- Transparency/freedom of information
- Training of civil society monitors/observers
- Coordination of agencies
- Multi-stakeholder governance coalitions
- Competition for best firms in the private sector
- The use of integrity due diligence by the private sector as a preventive tool
- Systems audits/technical audits
- Measurement of impacts
- Media outreach

Questions and comments from the floor confirmed that these and other forms of preventative measures are being tried, with mixed levels of success, in many other countries. There is a real interest in the ICHA membership for more information, analysis of experiences and results, and practical guidance about initiatives and programs aimed at the prevention of corruption. The ICHA network will facilitate continued communication between session participants and other interested members on developments in corruption prevention and will follow up with concrete proposals between now and the next ICHA conference.

Visualizing and Using the Impacts of Corruption as Evidence: Expert Round-Table

Speakers:

- Maria Schnebli, Federal Prosecutor, Switzerland,
- Cecilia Hinojosa, Head, International Judicial Cooperation Unit and Extraditions, Attorney General's Office, Peru
- Juan Ronderos, Case Officer, Inter-American Development Bank

Coordinator:

David Hawkes, Head, Special Litigation Unit, World Bank Integrity Vice Presidency

This session analyzed the impact of fraud and corruption beyond the money flow. Speakers presented cases in which fraud and corruption reached far beyond the direct impact of a particular scheme. Ms. Hinojosa introduced the Fujimori case which involved a large number of officials in several parts of the Peruvian Government and military, and exposed tainted networks that exerted influence far beyond individual transactions. One of the tools used extensively in this investigation relied on graphic visualization of the corrupt relationships to make the large amount of evidence and its implications accessible. In addition, the panel discussed the use of traditional and innovative evidence for mutual legal assistance and transnational cooperation. An area for further research will be to visualize the impact of corruption on designated beneficiaries especially in a development context.



Dr. Julio Vitobello, Head, Anti-Corruption Office, Ministry of Justice, Argentina

Managing for Internal Integrity — Good practice for Investigative and Prosecution Agencies

Speakers:

- Dr. Julio Vitobello, Head, Anti Corruption Office, Ministry of Justice, Argentina
- Karyn Kenny, International Advisor for Asset Forfeiture and Money Laundering, Department of Justice, USA
- Hans Jakob Folker, Deputy State Prosecutor, Denmark

Chair:

Heike Gramckow, Ph.D., Senior Counsel, Legal Vice Presidency, Justice Reform Group, The World Bank

Session Coordinator:

Agustin Flah, Legal Consultant, Legal Vice Presidency, The World Bank

Considering the essential role of prosecutors in upholding the rule of law and pursuing government accountability, the integrity of prosecutorial operations is of special importance. At the same time, this critical role also exposes prosecutors to certain pressures and can make them vulnerable to corruption. Delegates from Argentina, Denmark and the USA

presented a range of measures to detect, remedy, and prevent corruption within prosecution offices.

Anti-Corruption Office, Argentina: Dr. Julio Vitobello outlined the main functions of the Anti-Corruption Office (AO) of the Ministry of Justice of Argentina. The AO is located under the jurisdiction of the Ministry of Justice and Human Rights. The office has two divisions: one in charge of Transparency and Prevention Policies and one in charge of Investigations.

The Division of Investigations is responsible for the receipt of complaints, conducts investigations into offences against the state such as illicit enrichment, fraud and bribery, and can intervene at the judicial level acting as a plaintiff. The Division of Transparency is responsible for the ethical oversight of public officials and is the responsible body for the administration of financial disclosures. The AO also plays an international role with the Mechanism for Follow-Up on the Implementation of the Inter-American Convention against Corruption (MESICIC) and at the Implementation Mechanism of the United Nations Convention against Corruption (UNCAC).

Figure 3. Measures for managing internal integrity in investigative and prosecution agencies

The following is a selection of measures presented by panelists from Argentina, the USA and Denmark for preventing and detecting internal integrity issues in investigative and prosecution agencies

- Annual audits
- An IT system that tracks processes, decisions and other information
- A framework of standard operating procedures to guide operations and limit discretion
- Vertical control structures
- Regular publication of public reports
- Web publication of decisions
- An internal peer control approach
- Conflict of interest prevention and control mechanisms
- Policies that regulate the receipt of gifts
- Pre-employment background screening
- Post-employment controls

Department of Justice, USA. Ms. Karyn Kenny outlined the General Ethics Principles of the US Department of Justice (DOJ). The DOJ uses pre-employment principles such as a rigorous background screening, drug screening, limited hiring directly from law schools, and institutional reputation. Post-employment controls prohibit USDOJ employees from participating in certain activities with their former agency in case of undue or unfair influence. The Standards of Conduct of the USDOJ has provisions limiting the political involvement of USDOJ employees, and also specifies USDOJ policies in relation to gifts. USDOJ employees may not accept gifts from anyone doing business, seeking to do business or regulated by the DOJ, with the exception of gifts of a value of less than \$20.

The Office of Professional Responsibility (OPR), which reports directly to the Attorney General, investigates allegations of misconduct involving Department attorneys that relate to the exercise of their authority to investigate, litigate or provide legal advice.

Police and Prosecution Service, Denmark. Mr. Hans Jacob Folker outlined the core values and decorum requirements of the Danish Police and Prosecution Service, the strict rules on gifts, and the prevention of conflicts of interest.

- **Decorum Requirements:** Due to the nature of police and prosecutorial work there is a rigorous requirement that police officers and prosecutors conduct themselves in a way as to uphold the dignity of the office.
- **Acceptance of Gifts:** Police officers must abstain from accepting a gift if it has any bearing on their official duties.



Carmen Lapointe, Under-Secretary-General, United Nations Office of Internal Oversight, signs a memorandum of understanding with Leonard McCarthy, Vice President for Integrity at the World Bank Group.

- **Conflict of Interest:** Rules on impartiality are vital, both to protect the official and to ensure the public's confidence in police and prosecution services. A police officer or prosecutor may not take part in the investigation of a case if, for example, the police officer– or his or her family members – are parties to the case or, in other respects, have special personal or financial interests in the outcome.

Participants in the session proposed the development of a good practice note on approaches for managing internal integrity in agencies responsible for handling corruption cases. Such a note would outline the different elements of good management and practical examples from different agencies. The development of such note would ideally include a survey of ICHA participants and others who could provide good practice examples, such as the International Association of Prosecutors or the International Association of Anti-Corruption Agencies. Responses would be compiled and summarized in a good practice note for dissemination.

THEME 2: INTERNATIONAL COOPERATION

Sharing Strategies and Success Stories for facing the Challenges in International Anti-Corruption Cooperation Efforts

Speakers:

- Eric Tan, Director, Corrupt Practices Investigation Bureau, Singapore
- Aderito de Jesus Soares, Commissioner, Anti-Corruption Commission, Timor Leste
- Ali Sulaiman, Commissioner, Investigation and Prosecution Directorate, Federal Ethics and Anti-Corruption Commission, Ethiopia
- Andhi Nirwanto, Deputy Attorney General for Special Crimes, Office of the Attorney General, Indonesia

Session Coordinator:

Merly Khouw, Lead Investigator, Integrity Vice Presidency, The World Bank

There are legal, institutional and many other obstacles to effective international cooperation in corruption cases. From information sharing protocols, evidentiary requirement differences, the actual conduct of enforcement actions and actors, to institutional and jurisdictional limits. Knowing how to handle the expected and sometimes unanticipated challenges that arise in cases of international cooperation have a significant impact on case outcomes. One of the priority actions from the 2010 ICHA meeting — fostering international cooperation in the fight against corruption — led to the signing of Memoranda of Understanding (MOUs) between the World Bank and authorities in a number of partner countries. Parallel investigations with national authorities have also ensued, as well as follow up on possible referral actions. This session provided an opportunity for a candid discussion of what has been the impact of these efforts.

Senior practitioners from Singapore, Timor Leste, Indonesia and Ethiopia discussed the challenges encountered from their experiences in recent international anti-corruption cooperation efforts. Panelists also shared actual case outcomes to illustrate how

international cooperation has produced successful enforcement outcomes. As national laws differ and each case presents different facts and circumstances, participants took away lessons learned to apply to their respective situations.



Eric Tan, Director, Corrupt Practices Investigation Bureau, Singapore

Lifting the Corporate Veil: A panel discussion on transparency in financial centers (on-shore and off-shore)

Speakers:

- Frederic Raffray, Crown Advocate, Crown Office, Guernsey
- Brian Grow, Enterprise Correspondent, Thomson Reuters
- Elise Bean, Staff Director and Chief Counsel, United States Senate Permanent Subcommittee on Investigations

Chair:

Emile Van Der Does, Senior Financial Sector Specialist, Stolen Asset Recovery (StAR) Initiative

Session Coordinators:

- Emile Van Der Does, Senior Financial Sector Specialist, StAR;
- Larissa Gray, Senior Financial Sector Specialist, StAR

Large-scale corruption and related money laundering require company formation and administration services to conceal transactions and the involvement of the principal actors – “the beneficial owners”. Cor-

rupt actors typically don't do business in their own name but will use shell companies, trusts or foundations to hide from the prying eyes of law enforcement and to shield their assets. Secrecy provisions and lack of transparency can make it hard for those investigating corruption to obtain relevant information on the companies or other entities established for those purposes.

This session illustrated the problem from three different perspectives: a journalist, an on-shore policy-maker, and an off-shore prosecutor. While some jurisdictions have developed laws and regulations to collect beneficial ownership information, other jurisdictions refuse to collect such information and have become an open playing field for misuse. In the United States alone, nearly two million new corporations and LLCs are formed each year, with often limited information publicly accessible on who owns them – the same number of companies per year as the rest of the world combined. The discussion revealed that the lack of transparency in corporate ownership is a very real, concrete problem, with very real consequences.

Investigative efforts are impeded by the lack of complete beneficial ownership information, thus facilitating money laundering and other crimes. Fortunately there are efforts being undertaken to increase transparency in many jurisdictions (e.g., the United States proposed legislation attempts to have beneficial ownership information collected by service providers and government authorities). However, there are many opponents – business societies, state governments, bar associations – that continue to stymie these efforts. More support and pressure is needed, not only from domestic law enforcement and federal government, but also from the international community.

Policy-makers and relevant government agencies should be encouraged to ensure there are national legislative initiatives to collect beneficial ownership information and call for legislative reform in countries where the necessary controls are not in place. Practitioners need to continue to be resourceful in pursuing all available avenues to obtain the missing information. A list of available resources, reports and news by the World Bank and other organizations

will be compiled and made available to ICHA members. Examples of national efforts to increase transparency (e.g., reports of government committees, draft laws or regulations) will also be included.



From left to right: Frederic Raffray, Elise Bean, Brian Grow

Settlements in Foreign Bribery Cases and Asset Recovery

Speakers:

- Maria Schnebli, Federal Prosecutor, Office of the Attorney General, Switzerland
- Ibrahim Lamorde, Executive Chairman, Economic and Financial Crimes Commission, Nigeria
- Juan Carlos Cubillo, Public Prosecutor, Public Prosecutor's Office, Costa Rica
- Olaf Meyer, Senior Research Fellow, Center for European Law and Politics, University of Bremen, Germany
- Oliver Stolpe, Ph.D., Senior Advisor, Stolen Asset Recovery (StAR) Initiative

Moderators and Session Coordinators:

- Jacinta Oduor, Senior Public Sector Specialist, Stolen Asset Recovery (StAR) Initiative
- Oliver Stolpe, Ph.D., Senior Advisor, Stolen Asset Recovery (StAR) Initiative

At the inaugural meeting of the International Corruption Hunters Alliance (ICHA), a request was made to the Stolen Asset Recovery Initiative (StAR) to undertake a study on settlements in foreign bribery cases and their implications for the return of

assets. StAR undertook the study and presented to the conference a paper titled, '*Left Out of the Bargain, Enforcing Foreign Bribery Laws and Implications for Asset Recovery*'. These findings were discussed by a panel of prosecutors, investigators and an academic, who shared their own experiences with settlement cases in Switzerland, Nigeria, the United States, Costa Rica and Germany.

The study finds that there has been an increasing trend of settlements in enforcement actions involving foreign bribery, resulting in large monetary sanctions (a total of more than US \$ 6.2 billion) ordered against bribe payers. Analyzing a dataset of 366 settled cases over the last thirteen years, the study finds that only three percent of the monetary sanctions imposed have been returned to countries whose officials have been bribed. Reviewing the different types of settlements in civil and common law jurisdictions, the study concludes that settlements do not normally create legal impediments to international cooperation or to Mutual Legal Assistance requests, nor do they normally preclude cases from being brought in other jurisdictions. However, the study identifies some practical barriers to international cooperation that are specific to settlements and presents a number of best practices to mitigate these barriers.

One key conclusion of the panel discussion was the need to suggest a set of guidelines on settlements, focusing on increased transparency, sharing of information and proactively informing affected countries of the existence of a settlement process and available legal avenues for redress. Participants welcomed the recent trend towards multi-jurisdictional settlements, which they encouraged, so that affected countries could get more involved in the negotiation process.

StAR plans to make use of the ICHA network to seek further information pertaining to some of the cases referenced in the study, to be included in the final edition in Spring 2013.

Figure 4. Highlights of discussion on settlements in foreign bribery cases and asset recovery

The discussion highlighted the following issues:

- Is the increase in settlements a negative or positive development for enforcement in foreign bribery cases? Panelists from Nigeria, Costa Rica and the US were of the opinion that settlements were effective and in some cases, the only viable option. Other speakers argued that increased transparency in settlements and increased involvement of affected countries would be necessary to ensure the maximum effectiveness of settlements.
- Several speakers recommended caution on the conclusion that settlements do not negatively affect international cooperation and mutual legal assistance. While noting that this case is rather unique, some speakers considered the BAE case a good illustration of how settlements could be an impediment to international cooperation.
- Some speakers stressed the need to further evaluate the link between settlements and the return of assets to affected countries. They argued that this analysis should review whether all monetary sanctions from settlements are "eligible" for asset return, as well as how affected countries may take action themselves against parties to a settlement; an area which it was recommended the study should further explore.

Quantification of the Proceeds of Bribery

Speakers:

- France Chain, Principal Analyst, Anticorruption Division, Organisation for Economic Cooperation and Development (OECD)
- Jeanne Hauch, Consultant, Stolen Asset Recovery (StAR) Initiative
- Miguel Cortes, Procurador de Ética Pública, Costa Rica
- Olaf Meyer, Senior Research Fellow, Center for European Law and Politics, University of Bremen
- Jacinta Oduor, Senior public Sector Specialist, Stolen Asset Recovery (StAR) Initiative

Session Chair and Coordinator:

Jean-Pierre Brun, Senior Financial Sector Specialist, Financial Market Integrity, The World Bank

In bribery cases, illicit proceeds are not only the bribes paid to dishonest officials. These proceeds also include revenues, profits or benefits earned by a company as the result of a business authorization or a contract obtained by bribing an official. Prosecutors, law enforcement agencies and courts can seek the confiscation or the recovery of these proceeds of active bribery. Quantification is the first step in confiscating and recovering ill-gotten gains. At the inaugural meeting of the International Corruption Hunters Alliance (ICHA) in December 2010, a request was made to undertake a study on the quantification of the proceeds of bribery. The OECD and StAR have developed a joint publication, the “Identification and Quantification of the Proceeds of Bribery.” This session shared the results of the study and presented the various methods that are or can be used to calculate ill-gotten gains. (http://www1.worldbank.org/finance/star_site/publications/Quantification.html)

Mr. Brun highlighted the significance of this topic in corruption and asset recovery cases and provided an overview of the legal remedies that support the confiscation or recovery of the profits from bribery. The study gives examples of how to identify and calculate bribery’s gains using methods such as the gross revenue method and the net revenue method in cases of contracts won, business authorizations obtained and other common corruption practices.

Ms. Chain explained that remedies vary across jurisdictions and include: confiscation, repayment of profits, fines, and compensation. She stressed the importance of challenges related to confiscation in the context of the implementation of the OECD Convention on Foreign Bribery.

Ms. Hauch presented the main findings of the OECD-StAR study on existing methods for calculating the gains made by companies that pay bribes to win contracts or gain unfair advantages. Countries are using methods including the gross revenue method, the net revenue method and additional profit method to accurately calculate ill-gotten gains in the five major types of active bribery (see Figure 5).

Figure 5. Five major types of active bribery

- (i) Securing contracts;
- (ii) Obtaining business authorizations (including permits and licenses);
- (iii) Avoiding expenses or other costs (such as by paying bribes to enable a company to import or export equipment without the proper licenses);
- (iv) Expediting red tape (such as by paying bribes to customs officials to expedite shipping), and
- (v) Gains derived from lax internal controls and inaccurate books and records.

Mr. Meyer described the various civil remedies used to recover proceeds of corruption, particularly compensation and contractual restitution, and explained that quantification methods used by practitioners in court proceedings may be similar as those used in confiscation cases.

Mr. Cortes made a presentation of accounting and statistical methods used in Costa Rica to quantify the “social damage” caused by corruption cases and obtain compensation for the State.

Figure 6. Examples of two methods for quantifying bribery

Examples of methods examined in the study "Identification and Quantification of the Proceeds of Bribery."

- **The net revenue method (United States).** A company paid bribes of \$5 million to third parties who delivered the money to the foreign officials. In return, the company obtained \$100 million dollars' worth of contracts to build communications networks for state-owned enterprises in the foreign country. The company paid \$25 million for the cost of goods sold for the projects. Using the "net revenues" or "net profits" method, the total penalty that the company was ordered to pay was calculated as: gross revenues from contracts (\$100 million) minus the cost of goods sold (\$25 million) plus the amount of bribes paid (\$5 million), resulting in the net revenue of \$80 million as the amount subject to confiscation or repayment.
- **The gross revenue method (United Kingdom).** Using an agent, a company paid bribes of £1.1 million to secure contracts to supply prefabricated housing worth £9.1 million. Using the gross revenue method to calculate the ill-gotten gains, the court ordered the confiscation of £9.1 million. Under the gross revenue method, the amount to be confiscated is not adjusted based on costs or expenses incurred by the briber in obtaining or executing the contract.

Source: http://www1.worldbank.org/finance/star_site/publications/Quantification.html

In conclusion, Jacinta Oduor stressed the need for training for practitioners, based on her experience as a former Prosecutor in Kenya. Jean-Pierre Brun confirmed that the StAR initiative and the OECD will develop training sessions for interested jurisdictions to equip practitioners with a working understanding of legal and financial concepts needed to identify and quantify proceeds of active bribery.



Open Forum on Tools and Resources for Sharing Anti-Corruption Information and Knowledge

Speakers:

- Panagiotis Papadimitriou, Associate Crime Prevention and Criminal Justice Officer, United Nations Office on Drugs and Crime (UNODC)
- Jeffrey Kwaterski, Knowledge and Stakeholder Services Director, Transparency International
- Alexandra Wrage, President, TRACE International
- Francesca Recanatini, Senior Public Sector Specialist, The World Bank

Chair:

Vice-Minister Luiz Navarro, Office of the Comptroller General, Brazil

Session Coordinator: Francesca Recanatini, Senior Public Sector Specialist, The World Bank

Web sites and portals play a central role in combating corruption in the twenty-first century. Such technologies have enabled a sudden increase in the quantity, quality and speed of communication, as their widespread use has given political voice to millions, motivated masses and revived efforts to fight corruption. However, their impact and effectiveness remain unclear. This session brought together practitioners from civil society, the donor community and the private sector that have been involved in such virtual initiatives to promote a global and open discussion of the real needs of practitioners when it comes to the type of information that practitioners and experts from different sectors and with differ-

ent roles may require and the most effective way to deliver it to them.

The panelists shared with the participants a number of tools and resources that have been developed recently to promote information and knowledge about anti-corruption (see Figure 7). Panelists also highlighted the innovative features of these tools and approaches.

The panelists highlighted the importance of coordinating the many initiatives that have emerged in the past decade to avoid duplication and to promote synergy. The Chair suggested the potential role of the ICHA and of the International Association of ACAs as coordinators and facilitators of the many on-going and emerging initiatives.

Actions to Overcome Impediments to Transnational Investigations and Prosecutions: Active Case Discussions in Collaboration with the World Bank's Integrity Vice Presidency

Speakers:

- Paul Haynes, Senior Investigator, Integrity Vice Presidency, The World Bank
- Kathleen M. Hammann, Special Assistant United States Attorney, Department of Justice, USA
- Christopher Kim, Senior Investigator, Integrity Vice Presidency, The World Bank
- Walter Maeder, Chief Federal Attorney, Office of the Attorney General of Switzerland
- Peter Slort, Commissioner, Royal Netherlands Embassy
- Gianpiero Antonazzo, Senior Investigator, Integrity Vice Presidency, The World Bank
- Martin Moreno, Head, Anti-corruption Prosecutor's Office, Colombia
- Monica Jimenez, Prosecutor, Anti-corruption Prosecutor's Office, Colombia

Session Chair and Coordinator:

Mamta Kaushal, Advisor to the Director of Operations, Integrity Vice Presidency, The World Bank

The session aimed to equip participants with an understanding of the benefits and challenges of working across legal systems and with international organizations. The World Bank has made significant progress in its efforts to work more closely with national investigative and prosecutorial authorities. These collaborations have highlighted both the benefits and limitations of working across different criminal and administrative frameworks. This session brought representatives of the American, Colombian, Dutch and Swiss systems together with the INT staff with whom they have worked closely on specific cases. The panelists shared their experiences—both the positive and negative, and how they overcame certain unforeseen impediments to this new collaboration.

Panelists discussed the benefits of their collaborative efforts—including the complementary nature of their various investigative mandates and how such collaboration can expedite the investigative process for both parties. Panelists also discussed the challenges they have faced in these collaborative efforts—including legal and policy limitations on sharing of information; diverging interests of the different systems—and how they have been able to overcome some of these challenges. The discussion drew on the panelists' actual experience from three active cases that are in various stages.

Figure 7. Examples of tools and resources for sharing anti-corruption information

Brazil – Office of the Comptroller General

Luiz Navarro de Baritto Filho (Vice-Minister, Office of the Comptroller General, Brazil) set the stage for the panel discussion by presenting the different technological initiatives and instruments that have been introduced and used to promote transparency, access to information, and to lower corruption by the Brazilian government. www.transparencia.gov.br

UNODC- TRACK

Panagiotis Papadimitriou (Associate Crime Prevention and Criminal Justice Officer, United Nations Office on Drugs and Crime) introduced UNODC's collaborative web-based platform called Tools and Resources for Anti-Corruption Knowledge (TRACK). TRACK creates a single site where such knowledge can be accessed, including case studies, best practices and policy analyses. The key objective of TRACK is to provide a web-based portal and collaborative forum to facilitate the collection and dissemination of knowledge related to the United Nations Convention against Corruption (UNCAC), and serves as a platform for legal and non-legal knowledge on anti-corruption and asset recovery matters generated by regional and international institutions. This platform enables Member States, the anti-corruption community, and the general public to access the anti-corruption and asset recovery knowledge generated by such institutions in a central location. www.track.unodc.org

Trace International

Alexandra Wrage (President, TRACE International) introduced the TRACE Registered Access Code (TRAC) initiative, which is offered by TRACE Inc. TRAC is a single, globally accepted identification number for businesses, individuals, charities and trusts. The mission of TRAC is to provide a secure platform for companies and individuals who are committed to transparency to share certain key information with their personal and professional networks. www.traceinternational.org

In order to generate a TRAC, TRACE collects personal information about TRAC Applicants (e.g., those who have submitted an application for a TRAC that is currently in process), TRAC Holders (e.g., those to whom a TRAC is issued), and their respective owners and authorized representatives, when applicable.

Transparency International

Jeffrey Kwaterski (Knowledge and Stakeholder Services Director, Transparency International) provided an overview of the multiple tools and resources that Transparency International has developed since the mid-1990's. Part of Transparency International's work has been to develop and promote practical tools that reduce the opportunities

for corruption and enhance the ability of people and organizations to counter it. TI works with experts from companies, universities and other NGOs to create tools suited to a range of situations in many sectors of society.

From monitoring public procurement processes, to concrete guidance for companies on avoiding extortion and curtailing bribery, to reliable diagnostics for measuring and mapping corruption, TI tools give individuals and institutions creative solutions to some of the most common challenges in countering corruption. Over the years, TI tools have been adopted by governments, businesses, researchers and civil society groups in a wide range of fields. www.transparency.org

Four sets of tools were discussed in the panel:

- Private sector tools, which include the *Business Principles for Countering Bribery*
- Public sector tools, which include *Integrity Pacts*
- Tools for corruption researchers, which include the *GATEway Toolbox*
- Tools for activists, educators and other members of civil society, which include the *Corruption Fighters' Toolkits*

The GATEWAY ToolBox, in particular, aims at collecting, sharing and expanding knowledge on corruption assessment. The toolbox allows those who wish to measure corruption to match their needs with existing diagnostic tools.

The toolbox provides access to both a database of existing diagnostic tools, searchable by key criteria and updated at regular intervals; and an accompanying set of topic guides on how to select and use diagnostic tools.

Anti-Corruption Authorities (ACAs) Portal

Francesca Recanatini (Senior Public Sector Specialist, The World Bank) presented the Anti Corruption Authorities (ACAs) portal. This Initiative is a virtual platform that offers the opportunity to ACAs staff and practitioners to connect, collaborate and articulate new ideas to collectively address common challenges. The information and tools provided help ACAs understand (a) how they can become more effective to address corruption and (b) which factors can help reinforce their ability to resist efforts to undercut effectiveness.

The information is provided directly by ACAs' staff through the use of surveys and interviews. At this stage more than 60 agencies have responded and shared their experiences and lessons learnt, while implementing an AC Strategy in their country.

www.acauthorities.org

THEME 3: LEVERAGING TECHNOLOGY IN THE FIGHT AGAINST CORRUPTION

Most Useful Forensic IT Programs for Fraud and Corruption Investigators

Speakers:

- Aaron Philipp, Manager, PwC
- Hany Farid, Professor, Department of Computer Science, Dartmouth College

Session Coordinator:

Michael Kramer, Consultant, Integrity Vice Presidency, The World Bank

Much of the evidence in fraud and corruption cases is located on computer hard-drives, in email correspondence, and other electronic devices. In many cases the subjects of the investigation attempt to conceal or delete this information, requiring sophisticated tools to find, recover and re-assemble the evidence. In some cases, it may be necessary to recover or analyze digital images to identify fraudulent or forged documents. This session presented some of the most useful forensic tools to accomplish these tasks.

Mr. Philipp discussed useful technology and software to recover electronic evidence from computer hard drives, cell phones and other mobile devices; and from social networks and cloud computing. He demonstrated several forensic IT tools that are of particular interest to fraud and corruption investigators.

Professor Farid, who leads the image science and digital forensics group at Dartmouth College illustrated some of the technology available to determine whether photographs or documents have been forged or altered. He displayed examples of digitally altered photographs and documents, with examples from his own case work and research along with tools for assessing the reliability of images. www.hanyfarid.org or www.fourandsix.com.

Figure 8. Useful forensic tools for extracting evidence from electronic devices

1. Extracting evidence from computer hard drives. Useful forensic tools include:

- EnCase, www.guidancesoftware.com/encase-forensic.htm
- Forensic Tool kit (FTK), <http://accessdata.com/products/computer-forensics/ftk>
- Open source (free) tools, e.g., <http://penguinsleuth.org>

2. Extracting evidence from cell phones and other mobile devices. Useful forensic tools include:

- Cellebrite, www.cellebrite.com
- Oxygen, www.oxygensoftware.com
- Paraben Seizure Device, <http://www.paraben.com/device-seizure.html>

3. Extracting evidence from social networks and cloud computing.

Few off-the-shelf products exist for this sector. Investigators must contact the provider, e.g., Facebook or Twitter, to learn how to collect the desired data.

Source: http://www1.worldbank.org/finance/star_site/publications/Quantification.html

Whistleblower Laws and Corruption Complaint Handling Mechanisms

Speakers:

- Carla Salazar, Secretaria General, Controlaría, Peru
- Sri Kumar, Commissioner, Central Vigilance Commission, India
- K. Subramaniam, Officer on Special Duty, Central Vigilance Commission, India
- Hari Mulukutla, Technical Advisor, Regional Resource Governance Project West Africa, GIZ
- Gisela Mation, Team Lead, Harvard Law and International Development Society (LIDS)

Chair:

Lisa Bhansali, LCR, Regional Governance and Anti-Corruption Adviser, The World Bank

Discussant and Session Coordinator:

Alexandra Habershon, Coordinator, the World Bank's International Corruption Hunters Alliance, Integrity Vice-Presidency

Anti-corruption authorities are increasingly focusing attention on the need for effective corruption complaint mechanisms as a source of information for investigations and prosecutions, to help detect red flags, and to provide avenues for confidential whistleblowers to come forward. Public complaints about corruption are an important source of information for corruption investigations, and can provide valuable evidence and witnesses for prosecutions. The analysis of corruption complaints can also assist authorities in directing their resources more effectively for prevention purposes. While the need for effective corruption complaint mechanisms is gaining increasing attention, there are many questions about how best to design and implement such systems in different contexts, particularly when leveraging information technologies (IT) for that purpose.

This session presented the preliminary findings of a series of case studies on Whistleblower Laws and Public Interest Corruption Complaint Handling Mechanisms, a project undertaken for ICHA 2012 in partnership with the Harvard Law and International Development Society (LIDS). After a brief introduction to the case studies project, representatives of the responsible agencies from a selection of the case studies were invited to present the legal framework and implementation mechanisms for handling corruption complaints in their jurisdiction and to answer questions from ICHA members about their experiences.

- Peru's Controller General's Office presented its *Sistema Nacional de Atención de Denuncias* (SINAD) www.contraloria.gob.pe;
- India's Central Vigilance Commission (www.cvc.nic.in) presented its VIGEYE project <http://cvc.vigeyegpms.org>;
- The German Agency for International Cooperation (GIZ) presented a project it is supporting under the auspices of the International Conference of the Great Lakes Region (ICGLR) to develop a regional whistleblower mechanism for the extractive industries, with a regional focus on

the eastern provinces of the Democratic Republic of Congo (https://cirgl.org/IMG/pdf/Projet_2-1-3-Initiative_sur_la_Prevention_des_Crimes4-10-06.pdf)

Participant questions and discussions centered on the following topics: mechanisms for protecting complainant confidentiality and continued communication with complainants to assist investigations; strategies for deterring or identifying politically motivated or frivolous complaints; the use of incentives for whistleblowers; IT challenges in the use of mobile reporting mechanisms (low connectivity areas, literacy, multilingual populations); public outreach, education and mobilization; challenges associated with the use of complaints as evidence in corruption prosecutions.

The final case studies report will reflect the discussion at the ICHA meeting. By examining practices in different jurisdictions, the report seeks to contribute to a better understanding of the legal and regulatory framework for public interest corruption complaint systems, and of practical challenges faced by authorities in implementing these systems in a variety of contexts. The report addresses questions such as how best to leverage technology for maximum public outreach? How to collect, classify and manage the data? How to manage confidentiality? What protections are afforded to whistleblowers in different jurisdictions? How to follow-up on complaints? How to report to complainants and the public about results? Particular focus is given to the use of technology to facilitate corruption complaint handling and reporting.

Using Open Source Information in Fraud and Corruption Investigations**Speakers:**

- Elisabeth Wiramidjaja, Investigator, Integrity Vice Presidency, The World Bank
- Peter Dulvy, Director, James Mintz Group
- Rex van der Riet, Consultant, Integrity Vice Presidency, The World Bank

Chair:

Michael Kramer, Consultant, Integrity Vice Presidency, The World Bank

Research is an integral and often overlooked and under-funded aspect of investigative work. Research in open source materials (and commercial databases) can provide inexpensive, unique information that might be otherwise unavailable to investigators. Open source materials allow researchers to easily “cross” borders, explore theories, vet witnesses, profile subjects, and identify evidence. All of this can be done while maintaining the confidentiality of the investigation.

The presenters of this session concentrated on practical information for investigators regarding best practices for investigative researchers. Topics that were covered include the most important types of records to focus on, the value of some commercial sources and case examples where research has proved especially helpful.

Private sector investigators, often working on the defense of corruption targets, are adept at using open source information and rely on thorough research in all aspects of their work. Prosecutors and public sector investigators need to take advantage of the same resources.

Open source information can now often be tied seamlessly with link analysis and visual analysis software such as i2 Analyst Notebook. Attendees were shown how a case could be presented visually. They were also shown how information from social networks could be analyzed with the same software.

See Annex 1, Figure 9 for a list of frequently used commercial and free online sources useful to investigators.

Crowd Sourcing and Citizen Engagement: Tools, Tales and Tech for Corruption Hunters

Speakers:

- Rob Baker, Founder, Ushahidi, USA
- Omoyele Sowore, Founder, Sahara Reporters, Nigeria
- Hazel Feigenblatt, Managing Director, Global Integrity, and Founder of Quien Paga Manda, Costa Rica

Chair & Session Coordinator:

Tariq Khokhar, Open Data Evangelist, DECDG, The World Bank

This session familiarized participants with the principles of crowd sourcing for citizen engagement and the role technology can play in such work, and presented examples and strategies for applying these tools and principles for anti-corruption work. Crowd sourcing technologies have typically been used by civil society to raise awareness and deter wrong-doers. This session provided practical advice for enforcement officials about the potential of these tools for gathering evidence for investigations, as a red flag mechanism for targeting anti-corruption efforts, and for raising credibility and citizen engagement.

The session started with a panel discussion that offered a background to and general principles of citizen engagement and crowd sourcing. Expert panelists then presented tools, technologies, and communities from a number of countries and highlighted their anti-corruption efforts, challenges they have faced, lessons they have learned and advice for attendees wishing to further explore or implement any of the work they have seen. The session finished with a discussion to put together the “Top 5 tips on crowdsourcing for anti-corruption results” (see Figure 10).

Figure 10. Top 5 tips on crowdsourcing for anti-corruption results

1. Define your crowd and your objective.

Crowdsourcing is about harnessing distributed knowledge and capabilities. Before you start an anti corruption crowdsourcing initiative, identify your crowd. Is it everybody or just some groups? Where are they and how can you reach them? Are parts of this crowd already connected in existing communities or social networks? Leverage existing resources to quickly reach the people you want to and make it very clear what you're trying to achieve, why and what specific actions individuals can take to help. Be transparent about everything you're doing and make it easy for people to get involved.

2. It's not all about technology, but do chose technology strategically

There are several available tools, technologies and platforms that have been successfully used for crowdsourcing in anti-corruption work, but the choice of technology is far less important than good project planning, with some relevant performance indicators. While tools specifically designed for crowdsourcing exist, as Sahara Reporters demonstrates – mainstream technology, popular in a local context – a blog and a YouTube channel, can also be leveraged successfully.

3. Understand the “mobilization of shame” to get citizens engaged

Reports of corruption will often come in as fragments so invest in verifying the veracity and quality of claims. To solicit action, build a narrative that people can relate to. If a report of corruption is centered around an individual or a company – think like a tabloid newspaper – people will engage with the story of bad behavior and are more likely to take action or speak out. These are the stories that are most likely to be picked up and amplified by other channels such as the media and official bodies. If this happens, highlight these results and praise your community.

4. Return value to the community

Working with the community to understand the problem as well as how to collect information from them is one part of the challenge, but understanding how to regularly update them and with what information is part of retaining the incentive to participate. This could mean working with your data to create digestible reports or crafting stories so that the community remains involved and invested, and able to see the impact their participation is having on the anti-corruption initiative. Invest up-front in keeping your platform current and active so users have an incentive to return and participate.

5. Promote security, explain risk, don't forget the “offline” world

If monitoring corruption in a certain community comes with a higher level of risk, making sure the community understands that risk is paramount. One report of personal attack or a rumor of hacked software could undermine the means of sourcing data as well as the results of an anti-corruption initiative. Consider working closely enough with communities that they understand security both online and offline.

Survey of the Most Useful Technology for Fraud and Corruption Investigators

Speakers:

- Sanjay Subramanian, Partner, PwC
- Heidi Hennrich-Hanson, CIO, Corporate Line of Business, The World Bank
- Carlos Cortez, Information Officer, COIMT/INT, The World Bank

Coordinator:

Michael Kramer, Consultant, Integrity Vice-Presidency, The World Bank

New and inexpensive software programs and other technologies that can greatly assist the investigative process are entering the market at a rapid pace. Many investigators, however, are not aware of such products or how to apply them effectively in their cases. This session addressed these issues.

Mr. Subramanian presented technology and software that is useful at each of the major stages of an investigation, including programs to (i) detect potential fraud and bid rigging, (ii) extract and analyze evidence from computers, cell phones and other electronic devices, (iii) exploit on-line information sources, and (iv) organize and analyze large data and text files.

The session included a presentation of the following software programs:

1. Programs to detect fraud and bid rigging:
 - a. A new, inexpensive and easy to use Excel-based software developed by the International Anti-Corruption Resource Center (IACRC), <http://iacrc.org>, to analyze bids for indicators of bid rigging and fraud, as well as an online guide to such information <http://guide.iacrc.org>;
 - b. Google Refine 2.5, <http://code.google.com/p/google-refine>, a free tool to clean data, such as bidding or procurement files, to assist in the analysis of such data for indicators of fraud and other misconduct.
2. Programs to extract and analyze electronic

evidence from computers, cell phones and other electronic devices, including primarily:

- a. “EnCase,” a product of Guidance Technologies www.guidancesoftware.com/encase-forensic.htm, and Forensic Tool Kit (FTK), <http://accessdata.com/products/computer-forensics/ftk>, which are widely-used tools to extract electronic evidence from computer hard drives and email files;
- b. Cellebrite, <http://www.cellebrite.com>, a popular program used to obtain evidence from cell phones and other mobile devices.

The above products were not discussed at great length, as another ICHA Session, “Forensic IT Tools for Fraud and Corruption Investigators,” was devoted exclusively to this topic.

3. On-line sources of information, including a powerful new research tool, www.arachnys.com to obtain business and other information from developing countries, as well as number of other sources of interest to investigators. This topic was also covered in depth in another Session on “Open Source Information for Investigators.”
4. Programs to convert large volumes of complex information into visual presentations including i2, <http://www.i2group.com>, and “Tableau,” www.tableausoftware.com,

Ms. Hennrich-Hanson and Mr. Cortez presented the new Case Management System for the World Bank’s Integrity Vice-Presidency, developed in collaboration with GoPro, an Icelandic software provider, www.gopro.net.

Figure 11. Survey of useful software and technology for corruption and fraud investigators

Detection stage:

Software to detect fraud, corruption and bid rigging in development projects, to assist in the evaluation of complaints, or to continuously monitor business transactions for indicators of fraud.

IACRC collusion detection software

www.iacrc.org

SAS collusion detection software

<http://www.sas.com/solutions/fraud/index.html>

Picalo data analysis software

www.picalo.org

ACL; ACL Acerno

<http://www.acl.com>

Idea

<http://www.audimation.com>

Active Data for Excel

<http://www.informationactive.com>

Benford's law

http://en.wikipedia.org/wiki/Benford%27s_law

Computer Forensics:

Software to extract relevant data from laptops, hard drives, cell phones, etc., including data that the subject has attempted to delete. Below is only a small sample of the many programs.

EnCase

www.guidancesoftware.com

Forensic Tool Kit (FTK)

<http://accessdata.com/products/computer-forensics/ftk>

I-look forensics

<http://ilook-forensics.org>

Knoppix- Penguin Sleuth

<http://www.penguinsleuth.org/linuxforensics/pensleuth.html>

Other forensic programs are listed in the following websites:

http://en.wikipedia.org/wiki/Computer_forensics

http://en.wikipedia.org/wiki/List_of_digital_forensics_tools

<http://www.digitalintelligence.com/forensicsoftware.php>

www.tucofs.com

Internet resources:

Many on-line databases in the categories below can be useful in fraud and corruption cases. See <http://guide.iacrc.org/free-and-subscription-internet-sites> for a comprehensive listing of websites in the following categories:

- Address, map and satellite photo sites
- Compliance sites
- Corporate registries
- Business reports
- Debarment and suspension lists
- General information sites on the internet
- Information on agents
- Media reports
- US and international court records
- US and international public records
- US and international telephone directories
- Sites to verify educational credentials

Data analysis software:

Actionable Intelligence Technologies (Financial Investigation Software):

<http://aitfis.com>

i2 Analysts Notebook

www.i2group.com

Xanalysis

<http://www.xanalys.com>

Text mining software:

Polyanalyst

<http://www.megaputer.com/polyanalyst.php>

Case organization software:

CaseSoft suite of products

<http://www.casesoft.com>

E-discovery

<http://www.ediscoverytools.com/products.html>

<http://ftitechnology.com/default.aspx>

<http://www.vound-software.com/home> (Intella)

REGIONAL MEETINGS

Regional meetings at ICHA 2012 offered participants an opportunity to meet regional counterparts, discuss local priorities, and identify ways of improving regional collaboration. Although a global Alliance, one of the strengths of the ICHA is the opportunity it provides to bring together practitioners from a single region who may otherwise rarely have occasion to meet. For the 2012 ICHA meeting, regional sessions were intended to be both closed and informal conversations. For a full summary of the regional meetings, please consult the ICHA 2012 Regional Meetings report.

Africa Regional Meeting. Practitioners from across the region agreed that collaboration between African countries remains weak and discussed the need for information sharing mechanisms, particularly informal mechanisms between law enforcement authorities across jurisdictions. The transfer of stolen assets across borders for deposit in banks within the Continent makes this all the more relevant and urgent. Combating police corruption, particularly at the borders, was discussed as a priority, with a need for a multi-pronged approach in terms of civil service administration reform, monitoring and accountability mechanisms and the sharing of innovative approaches that have been tested in the region and elsewhere.

East Asia Pacific Regional Meeting. Improving information sharing between law enforcement offices in the region was highlighted as a priority, along with specialized training for anti-corruption officials. A lack of understanding of the legal systems of other jurisdictions and unfamiliarity with drafting mutual legal assistance requests and pursuing asset recovery cases were cited as major obstacles. Calls were also made for training in forensic auditing; the use of open source information; and financial investigations. Participants also explored the use of public-private collaborations to fight corruption.

Eastern Europe and Central Asia Regional Meeting. Representatives from anti-corruption and prosecution authorities across the region shared recent developments in their jurisdictions. Poland's Central Anti-Corruption Bureau (CBA) presented some of

its investigative results and international cooperation efforts. Romania's National Integrity Agency (ANI) presented the institution's program for transitioning its income and asset disclosure administration to a new technological platform that will facilitate compliance, verification and investigations. Recent legal initiatives in Albania include the creation of "Joint Investigative Units" under the Prosecutor General's Office to improve collaboration in fighting corruption, the adoption of a law against organized crime and trafficking, and amendments to the Criminal Code on money laundering.

Latin America and the Caribbean Regional Meeting. Participants were given a presentation of the World Bank's Governance and Anti-Corruption (GAC) Strategy, and the Stolen Asset Recovery (StAR) Initiative. Staff from the Integrity Vice Presidency shared experiences of collaborative investigations with national authorities in the region. Improving information sharing across jurisdictions, and the need to strengthen the capacity of corruption fighting institutions were highlights of the discussion. Specific requests included the development of a case management model that could be tailored to different institutional requirements, and data analysis tools to strengthen control systems. Strengthening cooperation between institutions tasked with combating corruption domestically was also highlighted as a priority.

Middle East and North Africa Regional Meeting. Anti-corruption officials from Jordan, Morocco and Saudi Arabia launched the dialogue by sharing some of their experiences in designing and implementing anti-corruption programs. Participants heard about milestones achieved by the Jordan Anti-Corruption Commission (JACC), including recent amendments to the legal framework giving the JACC authority to freeze and seize assets, freeze tainted contracts and establish a whistle-blower program. Morocco's Central Authority for Corruption Prevention (ACPC) shared recent developments including its constitutionally endowed investigative powers, and its efforts to coordinate with civil society and the private sector. Saudi Arabia shared its road map for the creation of the Anti-Corruption Commission (SAACC),

its institutional structure and mandate. Discussion centered on the importance of national coordination in the development of anti-corruption strategies and the need for improved international cooperation.

South Asia Regional Meeting. Participants recognized the recent outpouring of public demands in the region for greater accountability in public administration. The importance of developing the various building blocks of transparency was discussed, including right-to-information laws and whistleblower systems. Participants called for better information sharing to leverage some of the creative solutions that have emerged in the region and beyond, many of them embedded in new technologies. They underscored the fact that enhancing anti-corruption institutions is a long-term effort that requires ongoing collaboration and support between donors and partners.

The regional meetings were facilitated by the following World Bank coordinators:

Africa Region (AFR) – Regional Meeting Coordinators

- Howard Dean, Senior Investigator and Regional Team Leader, Integrity Vice Presidency
- Sahr Kpundeh, Governance and Anti-Corruption Adviser, Africa Region, Core Operations Services
- Wolfgang K.C. Koehling, Operations Officer, Integrity Vice Presidency

East Asia and Pacific Region (EAP) – Regional Meeting Coordinators

- Achim Gutschera, Senior Investigator and Regional Team Leader, Integrity Vice Presidency
- David S. Bernstein (INTSC), Senior Operations Officer, Integrity Vice Presidency
- Samia Msadek (EAPFM), Manager, Financial Management, East Asia and Pacific Region

Eastern Europe and Central Asia (ECA) – Regional Meeting Coordinators

- Vyacheslav Anfinogenov, Senior Investigator and Regional Team Leader, Integrity Vice Presidency

- Maria Del Carmen Minoso, Senior Operations Officer, Operational Services and Quality, Europe and Central Asia
- Steve Burgess, Senior Operations Officer, Integrity Vice Presidency

Latin America and the Caribbean (LCR) – Regional Meeting Coordinators

- Gianpiero Antonazzo, Senior Investigator and Regional Team Leader, Integrity Vice Presidency
- Lisa Bhansali, LCR Regional Governance and Anti-Corruption Adviser
- Anders Hjorth Agerskov, Lead Specialist, Integrity Vice Presidency
- Virginia Papanikolaou, Fraud Prevention Specialist, Integrity Vice Presidency
- Joscelyn O'Rell Truitt, Junior Professional Associate, Latin America and the Caribbean, Operational Services
- Rosmary Marcela Cornejo Valdivia, Consultant

Middle East and North Africa (MNA) – Regional Meeting Coordinators

- Yannick Stephant, Senior Investigator and Regional Team Leader, Integrity Vice Presidency
- Guenter Heidenhof, Sector Manager, Middle East and North Africa
- Rima Al-Azar, Senior Operations Officer, Integrity Vice Presidency
- Paul Scott Prettitore, Senior Public Sector Specialist, Public Sector and Governance, Middle East and North Africa
- Behdad M. H. Nowroozi, Senior Financial Management Specialist, Middle East and North Africa

South Asia Region (SAR) – Regional Meeting Coordinators

- Christina Ashton-Lewis, Senior Investigator and Regional Team Leader, Integrity Vice Presidency
- Anna Pinto Hebert, Senior Operations Officer, Integrity Vice Presidency
- Nadjib Sefta, Regional Procurement Manager, Regional Procurement Services Unit

INTERNATIONAL CORRUPTION HUNTERS' TECHNOLOGY EXPO: LEVERAGING INFORMATION TECHNOLOGY IN THE FIGHT AGAINST CORRUPTION

Much about the global environment has changed since the inaugural meeting of the ICHA in December 2010. Rapid developments in digital and social media and the globalization of information are changing the landscape for fighting corruption, presenting new challenges, as well as new opportunities, and a need for new skills for investigators, prosecutors and other anti-corruption experts. The conference agenda included a number of sessions in which participants enhanced their operational skills relating to new technologies, including how to use open source information in transnational corruption investigations, and surveys of the best software for forensic analysis, fraud detection, and data mining; and case management systems.

In conjunction with the ICHA 2012 conference, the World Bank Group's Information Management and Technology (IMT) department and Integrity Vice Presidency (INT) co-hosted an International Corruption Hunter's Technology Expo. ICHA members and partners showcased innovations in the uses of information technology:



- relevant to an audience of international corruption investigators and prosecutors;
- supportive of anti-corruption efforts;
- technologically compatible with international audiences representing anti-corruption enforcement authorities, and/or demonstrate potential relevance to a developing country context.

Figure 12. Exhibitors at the International Corruption Hunters' Technology Expo

World Bank Group Internal Exhibitors	International Partners	Other External Exhibitors
<ul style="list-style-type: none"> • Information Management and Technology • Integrity Vice Presidency • The International Finance Corporation (IFC) • Poverty Reduction and Economic Management (PREM)-Anti-Corruption Authorities (ACAs) Portal • Social Development — Open Development Technology Alliance (ODTA) • World Bank Finances 	<ul style="list-style-type: none"> • United Nations Office of Drugs and Crime (UNODC) • The Basel Institute on Governance • The Organization for Economic Cooperation and Development (OECD): CleanGovBiz - Integrity in Practice • Stolen Asset Recovery Initiative (StAR) and The World Bank / United Nations Office on Drugs and Crime 	<ul style="list-style-type: none"> • IBM Financial Crimes Solutions • GoPro — Advanced Fraud Investigation and Prevention Case Management • KYC 360 — The Anti Money-Laundering Community • Thomson Reuters — Open Calais • Practitioner Demonstrations— James Mintz Group • Arachnys • Open Corporates

Special thanks to World Bank staff Sana Al-Hajj, Manager, IMT; Andrea James, Information Officer, IMT; and Andres McAlister, Consultant for organizing the Tech Expo.

World Bank Group Internal Exhibitors

Information Management and Technology (IMT) provides and develops many of the key tools which the World Bank Group relies on to operate, including leveraging technology, such as information security services, to protect the institution's information.

Integrity Vice Presidency (INT) demonstrated the World Bank Integrity App. The Integrity App enables users to report concerns of fraud or corruption in World Bank financed projects directly to the World Bank Hotline using mobile devices. The App enables users to (i) identify and obtain information about World Bank financed projects based on location, type of activity or keyword, (ii) submit a report detailing concerns of fraud or corruption; (iii) upload photographs in connection with that concern. Users can choose to be identified or remain confidential. The Integrity App is currently available for Apple devices. Versions of the App for other platforms, and a web-based mechanism are under development (See a blog post on the app launch at <https://blogs.worldbank.org/publicsphere/team/stephen-zimmermann>).

The International Finance Corporation (IFC) is the private arm of the World Bank Group. IFC provides both investment and advisory services to clients in over 100 countries to promote private sector development. The IFC presented some of the technology it uses to mitigate corruption risks within operations, including:

1. Client Screening Application - Part of Due Diligence on IFC clients
2. Case Management System - Case tracking and repository tool
3. E-Learning Modules - (Anti-Corruption, AML/CFT, and Integrity Due Diligence)

Poverty Reduction and Economic Management (PREM)- Anti-Corruption Authorities (ACAs) Portal is an open platform for sharing ideas and experiences between ACAs, practitioners and international actors. This web based platform allows ACAs to articulate new ideas, collaborate with other practitioners and international actors and collectively address common challenges. The information provided is validated by ACAs staff through the use

of surveys and interviews. Each ACA has its own country profile page and can incorporate relevant materials on the site. The site is constantly updated to include additional information as it becomes available (<http://www.acauthorities.org/aca>).

Stolen Asset Recovery Initiative (StAR)- The World Bank / United Nations Office on Drugs and Crime. StAR supports international efforts to end safe havens for proceeds of corruption. StAR works with our partners and stakeholders in developing countries and financial centers around the globe for the systematic and timely return of stolen assets. StAR is a partnership between the World Bank and the United Nations Office on Drugs and Crime (UNODC). StAR presented 1) its country engagement and technical assistance work, 2) policy advocacy in international fora, and 3) innovation & knowledge products, including demonstration of the StAR Asset Recovery Watch cases database (www.worldbank.org/star)

Social Development - Open Development Technology Alliance (ODTA) is an initiative led by the World Bank Institute (WBI) and the World Bank's ICT unit (TWICT) in partnership with the Social Development Department (SDV). It aims to bring together communities within and outside of the World Bank Group interested in technology-enabled interventions for social accountability by improving transparency, accountability, and citizen engagement. The SDV-ODTA booth showcased projects and activities being carried out by the Bank's ICT for social accountability practitioners (<http://www.opendta.org>)

World Bank Finances. As part of the World Bank's larger Open Data Initiative, the World Bank Finances open data platform and mobile application focus on sharing financial data about what the World Bank is doing through current and historical loan, credit, grant, fund, budget, and expenditure information. Beyond transparency and serving as a resource for one-stop answers about the Bank's financial activities, the project also seeks to make World Bank financial data re-useable to the public. Anyone can sort, filter, visualize, and share (through social media & via embed) the data, which is also available through an API.



International Partners

The United Nations Office of Drugs and Crime-

UNODC is mandated to assist Member States in their efforts to fight illicit drugs, crime and terrorism. The three pillars of UNODC's work are: i) field-based technical cooperation projects to enhance the capacity of Member States to counter illicit drugs, crime and terrorism; ii) research and analytical work to increase knowledge and understanding of drugs and crime issues and expand the evidence base for policy and operational decisions; and iii) normative work to assist States in the ratification and implementation of the relevant international treaties, the development of domestic legislation on drugs, crime and terrorism, and the provision of secretariat and substantive services to the treaty-based and governing bodies. Headquartered in Vienna, UNODC operates more than 50 field offices around the world, covering over 150 countries. For more information, please refer to <http://www.unodc.org/mla/en/index.html>

UNODC presented:

1. The **Tools and Resources for Anti-Corruption Knowledge (TRACK) portal** brings together knowledge on anti-corruption and asset recovery allowing access to this information in a central location. The portal features the Legal Library on the United Nations Convention against Corruption (UNCAC), an electronic database of legislation and jurisprudence relevant to UNCAC from over 175 States. (www.track.unodc.org)

2. The **Mutual Legal Assistance Request Writer Tool (MLA Tool)** has been developed by UNODC as a software application aimed at providing guidance to practitioners through each step of the drafting process of a mutual legal assistance request. The MLA tool is being expanded to include additional asset recovery features (<http://www.unodc.org/mla/en/index.html>).

Organisation for Economic Co-operation and Development (OECD)- CleanGovBiz Initiative

supports governments to reinforce their fight against corruption and engage with civil society and the private sector to promote real change towards integrity. The initiative draws together existing tools, provides user-friendly guidance to strengthen their implementation, improves coordination among relevant players and monitors progress towards integrity (www.oecd.org/cleangovbiz).

The Basel Institute on Governance is an independent and non-profit think-tank based in Switzerland conducting research and offering policy advice and capacity building support in public, global and corporate governance/compliance. Through the International Centre for Asset Recovery, the Basel Institute provides training and advisory services in the field of asset recovery. The Institute combines scientific methodology with practical experience and seeks to engage partners from all concerned stakeholder groups (www.baselgovernance.org).

The Basel Institute on Governance presented:

- ARIS: an investigation tool to screen suspects for links to corruption, money-laundering and terrorist financial using open-source information; and
- the Basel AML Index: a country-risk ranking based on money-laundering/terrorist financial, financial standards and transparency indicators. The AR Campus is an e-learning platform for Asset Recovery practitioners.

Other External Exhibitors

IBM. I2 Investigative Software. IBM i2's Fraud solution helps stop internal and external fraudsters in their tracks by empowering analysts to search multiple data sources simultaneously, find hidden links and entities, and visualize transactions and timelines. Investigators and analysts face tremendous volumes of data which they must correlate in a rapidly shifting environment where the evidence can vanish before anyone is aware a crime has occurred. SPSS finds hidden patterns and relationships in large data sets, or big data, that would otherwise be undetectable through other analysis. Models can be employed looking at past behaviors to determine likelihood of future events or actions (www.i2group.com).

GoPro. GoPro presented its Fraud Investigation and Prevention case management solution, which delivers targeted support for professional, transparent and compliant methods of managing complex investigatory cases. GoPro's advanced case management framework is used to securely manage the process of gathering, reviewing, and acting on information and evidence concerning persons and organizations related to identified and potentially fraudulent activities. From the point of notification through to prosecution, GoPro manages the case integrity and its compliance with internal processes and deadlines, while keeping track of all participants in the case, their roles, responsibilities, activities, evidence and correspondence, escalation and enforcement procedures, and overall case status, ensuring that a complete and comprehensive electronic file is always immediately available; clear, accurate and up-to-date, with nothing left to chance when dealing with such complex and potentially high profile situations. Advanced statistical analysis throughout the case enables informed decisions based on real time information, whilst integration with in-house systems facilitates ease of use (www.gopro.net).

KYC360 Online Anti-Money Laundering (AML) Community, www.kyc360.com provides helpful AML resources for compliance, anti-money laundering and counter-corruption professionals. KYC360's internet due diligence search tool, **RiskScreen** supports customer investigation processes in a secure

environment. The site offers Forums, Articles, Hot Topics, Videos and free due diligence search tool and country risk profiles.

RiskScreen uses five-step work flow:

- Step 1, searches US OFAC and UK HMT sanctions lists (note the UK list includes the UN and EU lists too);
- Step 2 searches Google and adds in 'key words' to help identify political exposure (politically exposed persons);
- Step 3 adds in criminal 'key words' to focus on any negative information on the search subject;
- Step 4 is a neutral search of the internet with no added key words, and
- Step 5 produces a report of all the results that have been viewed, providing a useful audit trail and record of your search.

RiskScreen was designed to assist users in focusing their internet searches securely.

KYC360's **Factbook** provides unique geographic data, and holds legislation, reports, treaties, guidance and information on sanctions and AML/ CFT compliance along with Freedom House and Transparency International Corruption Perceptions Indices (www.kyc360.com).

Thomas Reuters-Open Calais. Thomson Reuters combines industry expertise with innovative technology to deliver critical information for leading decision makers in the financial, legal, tax and accounting, scientific and healthcare markets. The Thomson Reuters Accelus™ suite of products offers solutions to highly regulated industries to support their Governance, Risk and Compliance efforts (www.opencalais.com).

Practitioner Demonstrations-The Mintz Group
The Mintz Group is an investigation and advisory services firm that gathers business facts all over the world for international organizations, corporations, law firms, financial institutions, government agencies and NGO's, and uses cutting edge investigative technology in international investigations.

Other external vendors:

OpenCorporates, the open database of the corporate world (<http://opencorporates.com>) has over 40 million companies in 50 jurisdictions (including over 20 US states), and is increasingly working with governments and intergovernmental bodies to improve access to company information.

A number of key features include:

- It's free. Anyone can use OpenCorporates without fee or even registration;
- You can search for company names and (where published by the company register) previous company names in all 50+ jurisdictions simultaneously;
- It focuses on legal entities, sourced from the official company registers, rather than vague ideas of company names, and has provenance for all the information, meaning it can be checked for accuracy and providing a route for additional information;
- It provides IDs for the companies based solely on the jurisdiction and company number, meaning OpenCorporates has no embedded IP rights, allowing unrestricted use;
- It provides an API allowing access to the information as data under the same share-alike attribution licence as the rest of OpenCorporates;
- Rather than charging for access to the data, OpenCorporates charges for waiving the share-alike restriction, allowing the community to use the data for free and giving proprietary users a highly cost-effective way of benefiting from the open data community's work.
- It is increasingly matching other data to the legal entities, from trademarks, to official gazette notices, to US central contractor register.

Arachnys (<https://www.arachnys.com/>)

Arachnys provides a specialized platform to enable data searches regardless of information source, language or format. Much of the data it offers is not searchable except through the Arachnys system. This includes corporate records in a growing number of jurisdictions, litigation information across the globe and the widest range of local-language business news available from any source.

- Arachnys mines and refines what's beneath the surface of the internet in over sixty different languages, across all emerging markets. Everything from Albanian corporate records to Vietnamese local news is instantly accessible.
- Arachnys software filters information to highlight only the most relevant information from reliable sources.
- Arachnys's human analysts independently research each resource for trustworthiness..

As a result of their interactions with the World Bank's Integrity Vice Presidency and the Stolen Asset Recovery Initiative (StAR) following the 2012 ICHA meeting, Arachnys have incorporated access to data from the financial disclosures of public officials in over 30 jurisdictions where these are publicly accessible online.

OPERATIONAL SKILLS FOR INTERNATIONAL CORRUPTION HUNTERS: WORKSHOP AT THE GEORGE WASHINGTON UNIVERSITY LAW SCHOOL JUNE 7-8, 2012

On June 7 and 8 the Second Biennial Meeting of the World Bank's International Corruption Hunters Alliance (ICHA) welcomed 90 ICHA members for a 2-day training workshop, co-hosted by the George Washington University (GWU) Law School. The GWU Law School and the Stolen Asset Recovery Initiative (StAR) each delivered a one-day workshop, repeated on June 7 and 8. Conference participants were assigned to two groups of 45 and attended both workshops.



Workshop I: International Corruption Investigations

Presenters:

- Jack D Smith, Professorial Lecturer, George Washington University Law School
- Thomas Lasich, Professorial Lecturer, George Washington University Law School
- Hari Mulukutla, Anti-Corruption Consultant

The GW Law School workshop was an “active learning” exercise that required participants to trace the money trail and outline a criminal case for trial against a corrupt official in a hypothetical country. Participants worked together in groups of 4 - 6 with the help of 10 facilitators provided by GW Law School. The evidence trail consisted of 22 documents preloaded on laptop computers. Participants found clues from interviews, bank records and other financial documents, and chose from an array of anticorruption tools, including interviews, subpoenas and mutual legal assistance requests to solve the case.

At the end of the day, teams made 10-minute presentations on the following three points:

- Identification of the criminal violation, the elements of the crime and proof for each element.
- Identification of the assets to be recovered and the linkage to the underlying offense.

- A plan for obtaining mutual legal assistance and the proper procedure for recovering the proceeds of crime.



Jean Pesme, Manager, Financial Market Integrity and Coordinator, StAR Initiative



Workshop II: Mutual Legal Assistance

Presenters:

- Jean Pesme, Manager, Financial Market Integrity & StAR Initiative
- Larissa Gray, Sr. Financial Sector Specialist, StAR Initiative
- Oliver Stolpe, Sr. Adviser, StAR Initiative
- Jacinta Oduor, Sr. Public Sector Specialist, StAR Initiative
- David Hawkes, Lead Specialist, Integrity Vice Presidency, The World Bank
- Yves Aeschlimann, Sr. Financial Sector Specialist, StAR Initiative
- Frederic Raffray, Crown Advocate, Law Officers of the Crown, Guernsey
- Jeanne Hauch, Consultant, StAR Initiative
- Lindy Muzila, Public Sector Specialist, StAR Initiative

The goal of this workshop was to give participants a deeper understanding of the legal framework which underpins the Mutual Legal Assistance (MLA) process, an appreciation of the requirements when seeking assistance and the opportunity to apply this knowledge through practical exercises. It offered an interactive combination of instruction, exchange of good practices among the participants, simulated case scenarios and networking.

ANNEX 1: FIGURES

Figure 9. Useful resources for open source information

Resources for Researching Individuals

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Clear	clear.thomsonreuters.com	US	Address histories; personal identifying information; US public records
SmartLinx (Lexis Nexis)	http://www.lexisnexis.com/smartlinx-info/	US	Address histories; personal identifying information; US public records
TLO	www.tlo.com	US	Address histories; personal identifying information; US public records
Monster.com	www.monster.com	US	CV database; requires subscription
Linked In	www.linkedin.com	Worldwide	Professional social networking; requires subscription to see full profiles
192	www.192.com	UK	British public records: births, deaths, electoral; requires sign-up and credit card payment online
Zoom Info	www.zoominfo.com	Worldwide	Biographical and web references to company executives
PIPL	www.pipl.com	Worldwide	"Deep web" search of person names
Devex	www.devex.com	Worldwide	CV database of development specialists; requires free registration

Company Information

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Arachnys	www.arachnys.co.uk	Emerging Markets	Company registries and in-depth local press coverage of emerging markets. Financial disclosures of public officials (where published online).
Dun & Bradstreet	https://solutions.dnb.com/grs	Worldwide	Global Reference Service. 200+ million companies worldwide. Abbreviated information
Kompass	www.kompass.com	World	Company information. Competitor to D&B (subscription)
TLO	www.tlo.com	Worldwide	World Companies database contains abbreviated identifier, executives and family tree information
Westlaw	www.westlaw.com	US+	State Incorporation records
Central Contractor Registry	www.ccr.gov	US+	Central registry for contractors to US government
Devex	www.devex.com	Worldwide	Listings of development consulting companies
Edgar	http://www.sec.gov/edgar.shtml	US	Searchable SEC filings for all publicly traded companies. This is the official US government site.
European Business Registry	www.ebr.org	EU	Links to European business registries
Guidestar	www.guidestar.org	US	
Companies House	www.companieshouse.gov.uk	UK	All registered and defunct UK companies (public and private); Webcheck is free; additional searches require payment or Direct account
Financial Services Authority	www.fsa.gov.uk	UK	Registry of all publicly traded companies in the UK
Corporate Information	www.corporateinformation.com	World	Company info
Ministry of Corporate Affairs, Govt of India	http://www.mca.gov.in/DCAPortalWeb/dca/MyMCALogin.do?method=setDefaultProperty&mode=12	India	National company registry
Piers	www.piers.com	US+	Database of customs and ship manifest information (subscription)
Securities & Exchange Commission Edgar	www.sec.gov	US	Database of filings of companies traded on US markets; "EDGAR"
USA Spending	www.usaspending.gov	US	US federal contract awards

Figure 9. Useful resources for open source information

Property / Assets

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Clear	www.westlaw.com	US	Deed transfer and assessment records for various states and counties
Smartlinx (Lexis Nexis)	www.lexisnexis.com	US	Deed transfer and assessment records for various states and counties
TLO	www.tlo.com	US	Deed transfer and assessment records for various states and counties
Search Systems	www.searchsystems.net	World	Meta search engine that links to state and county records sites
Zillow	www.zillow.com	US	Current market values, satellite and ground level photos
UK Land Registry	http://www.landregistry.gov.uk/wps/portal/Property_Search	UK	Land records for the UK

Locator

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Fonefind	http://www.fonefinder.net/	World	Area code and prefix look up. Can identify a land line, cell phone, pager, etc.
International White & Yellow Pages	http://www.wayp.com/	World	International White and Yellow Pages
TelDir	http://www.infobel.com/telDir/	World	International phone directories
Superpages	www.superpages.co	US	Person locator
Switchboard	www.switchboard.com	US	Telephone directory
Yellow Pages.com	www.yellowpages.com	US	Person locator
British Telecom	www.bt.com	UK	British directory assistance
Canada 411	www.canada411.ca	Canada	Canadian phone directory for individuals and business; includes a reverse number search

Legal / Litigation

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Westlaw	www.westlaw.com	US	Combined Judgment and Liens, National Financial Institution Sanctions and Legal Actions, Combined State Civil and Criminal, Federal and State Cases, Combined Jury Verdicts, Criminal Records
Martindale Hubble	www.martindale.com	World	Comprehensive directory of attorney bios
Search Systems	www.searchsystems.net	US	Links to state and local courts

News

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Arachnys	www.arachnys.co.uk	Emerging Markets	Company registries and in-depth local press coverage of emerging markets. Financial disclosures of public officials (where published online).
Factiva	www.factiva.com	Worldwide	International press, specializing in financial and industry news.
Nexis	www.lexis.com or www.nexis.com	Worldwide	International press, specializes in legal coverage
Westlaw (Allnewsplus)	www.westlaw.com	Worldwide	Includes World News Connection

Figure 9. Useful resources for open source information

Internet Research

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Network Solutions	http://www.networksolutions.com/whois/index.jhtml	US+	Look up registrant information for Internet address. Coverage includes .com, .org, .co.uk and other country designations.
Whois	http://domains.whois.com/domain.php?action=whois	US+	Look up registrant information for Internet address. Coverage includes .com, .org, .co.uk and other country designations.
Way Back Machine	www.archive.org	Worldwide	Contains historical snapshots of websites.
Domain Tools	www.whois.domaintools.com	US+	Look up registrant information for Internet address. Coverage includes .com, .org, .co.uk and other country designations.
Yahoo Directory of Internet Domains	dir.yahoo.com/Computers_and_Internet/Internet/Domain_Name_Registration/Top_Level_Domains_TLDs_/Registry_Operators/International_Country_Codes/	Worldwide	List of country-specific domain registrars
Find IP Address	www.find-ip-address.org/reverse_lookup	Worldwide	Identify websites sharing an IP address
Self SEO	www.selfseo.com/find_ip_address_of_a_website.php	Worldwide	Identify the IP address of a website

Credentials Verification

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Student Clearing House	www.studentclearinghouse.com	US	Education Verification at specific participating US schools (not a universal search); requires having signed consent of file.
The Work Number	www.theworknumber.com	US	Employment verification in the US based on name and SSN match. Requires having signed consent on file.
Devex	www.devex.com	Worldwide	CV database of development specialists; requires free registration
Dissertation Express (ProQuest)	http://disexpress.umi.com/dxweb	US+	Search nearly all North American dissertations to verify PhD credential.

Maps / Satellite Images

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
Google Maps	www.maps.google.com	Worldwide	Map source
Maps Live	maps.live.com		Map source
Google Earth	earth.google.com	Worldwide	Satellite images
Zillow	www.zillow.com	US	For US residential property views, description and property values
Spatial Energy	www.spatialenergy.com		Satellite images
Digital Globe	www.digitalglobe.com		Satellite images
Sat Imaging	www.satimagingcorp.com		Satellite images

Figure 9. Useful resources for open source information

Compliance / Politically Exposed Persons

DATABASE NAME	WEBSITE	COVERAGE	PURPOSE
ethiXbase	www.ethixbase.com	US+	Monitoring of SEC filings for FCPA issues; monitoring of international press for FCPA cases; compendium in international corruption statutes
Regulatory Data Corp	www.rdc.com https://grid.rdc.com/wss/security/login.html	Worldwide	PEP database, drawing largely on open source material such as press and court cases.
Arachnys	www.arachnys.co.uk	Emerging Markets	Company registries and in-depth local press coverage of emerging markets. Financial disclosures of public officials (where published online).
World-Check	www.world-check.com	Worldwide	PEP database, drawing largely on open source material such as press and court cases
World Compliance	www.worldcompliance.com	Worldwide	PEP database, drawing largely on open source material such as press and court cases
Excluded Parties List System	https://www.epls.gov/	US	Current combined US government sanction and debarred lists
FCPA Blog	www.fcpcablog.com	NA	Source of current awareness regarding FCPA and related cases.
Trace International	www.traceinternational.org/compendium	Worldwide	International list of corruption cases.

Meta-databases

DATABASE NAME	WEBSITE	COUNTRY	PURPOSE
Searchsystems	www.searchsystems.net	Worldwide	Database of databases in the US and internationally
BRB	www.brpub.com	Worldwide	Database finder and local record retriever locator
Virtual Chase	www.virtualchase.com	Worldwide	Links to legal, company and other public information source
Doing Business	www.doingbusiness.org	Worldwide	Information on company registry authorities, tax authorities, property registrars, etc.

Key

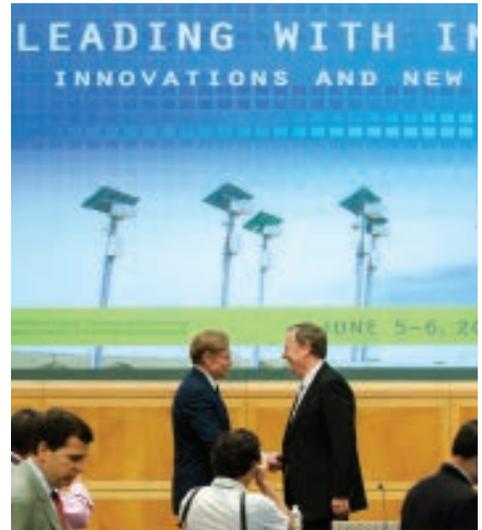
Commercial sites (partly or wholly subscription based)
Non-commercial sites (no subscription required)

Source: Elizabeth Wiramidjaja. To help expand or update the resources list please contact ewiramidjaja@worldbank.org

ANNEX 2: PHOTO GALLERY



Otaviano Canuto, Vice President, PREM, World Bank





ANNEX 3: WORLD BANK ICHA PLANNING TEAM



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Thank you to all volunteers who made ICHA 2012 possible.

Integrity App »

How can I use the new Integrity App to fight fraud and corruption?

- ✓ **Identify** World Bank financed projects
- ✓ **Report** concerns of fraud or corruption in World Bank financed projects
- ✓ **Send** images related to those concerns
- ✓ **Access** information about the World Bank's integrity program
- ✓ **View** the World Bank list of debarred firms and individuals

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**International Corruption
Hunters Alliance**

A World Bank Group initiative sponsored by the Governments of
Australia and Denmark, StAR, and the Governance Partnership Facility

www.worldbank.org/icha