



Annual Report **2019**



Stolen Asset Recovery Initiative

The World Bank • UNODC

“StAR provides exceptional knowledge. This is a very unique area. They also provide a network of policymakers who have experience in asset recovery.”

—Program Manager & StAR Liaison,
Anti-Corruption Government Agency

Contents

The Year in Review	1
Country Engagements	2
Legislative Assistance	4
Building National Capacity	6
Facilitating Domestic Cooperation	8
Case support	9
Knowledge & Innovation	11
Partnerships & Policy Contributions	13
Management, Staffing & Funding	18

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1818 H Street NW, Washington, DC 20433
Telephone: 202-473-1000; Internet: www.worldbank.org
Email: FMmedia@worldbankgroup.org
Twitter: @returningassets
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StAR—the Stolen Asset Recovery Initiative—is a partnership between the World Bank Group and the United Nations Office on Drugs and Crime (UNODC) that supports international efforts to end safe havens for corrupt funds. StAR works with developing countries and financial centers to prevent the laundering of the proceeds of corruption and to facilitate more systematic and timely return of stolen assets.

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The Year in Review

The past is a foreign country” never felt truer than now, weeks into the COVID-lockdown, at home behind a screen. How far away 2019 feels—the busyness, the travel, the conferences and workshops, all (temporarily, we hope) a thing of the past. Now looking back at the so-called regular times of 2019 what stands out from an anti-corruption perspective?

For years now, anti-corruption and civil society groups have found democracy and freedom to be in retreat and authoritarianism on the rise. Transparency International’s 2019 review found that two thirds of countries were stagnating or backsliding in their anti-corruption efforts. Meanwhile, Freedom House, a Washington DC-based think tank, wrote that 2019 was the 14th consecutive year of decline in global freedom and that the gap between setbacks and gains widened compared with 2018. It will be readily apparent that a decline in rights and freedoms has a

direct and negative correlation upon governments’ willingness to embrace transparency and fight corruption. If 2018, the year in which citizens around the world turned out in large numbers demanding stronger action on corruption, appeared to offer some reprieve, 2019 then saw corruption fight back, a development that continues into 2020. We have seen this in some of our country engagements as well and recognize that as the political tides shift, we need to lower our expectations of what is possible.

But this background narrative should not detract from the bright spots and our achievements in 2019. Alongside new publications, newly forged partnerships, additional country engagements, and the December gathering of the global anti-corruption community with the UNCAC Conference of States Parties in Abu Dhabi, the StAR Initiative was formally evaluated by external experts. Their first conclusion merits full citation: “StAR’s asset recovery mission is and will

remain relevant in a world of evolving technologies, document dumps, and increased global attention to corruption,” and therefore recommends our extension by a further 10 years. We have [published that evaluation](#) and [our positive response](#) to the recommendations. StAR will be adjusting its strategy accordingly in particular when it comes to the exhortation to double down on our mission to “end safe havens for stolen assets” and to conduct more knowledge work.

Against the growing tide to undermine transparency, in no way eased by the current crisis, our mission was independently evaluated, found to be as relevant as ever, and our course now stands charted to where we can make the biggest difference. Please read the recommendations and we look forward to keeping you posted on the course ahead.

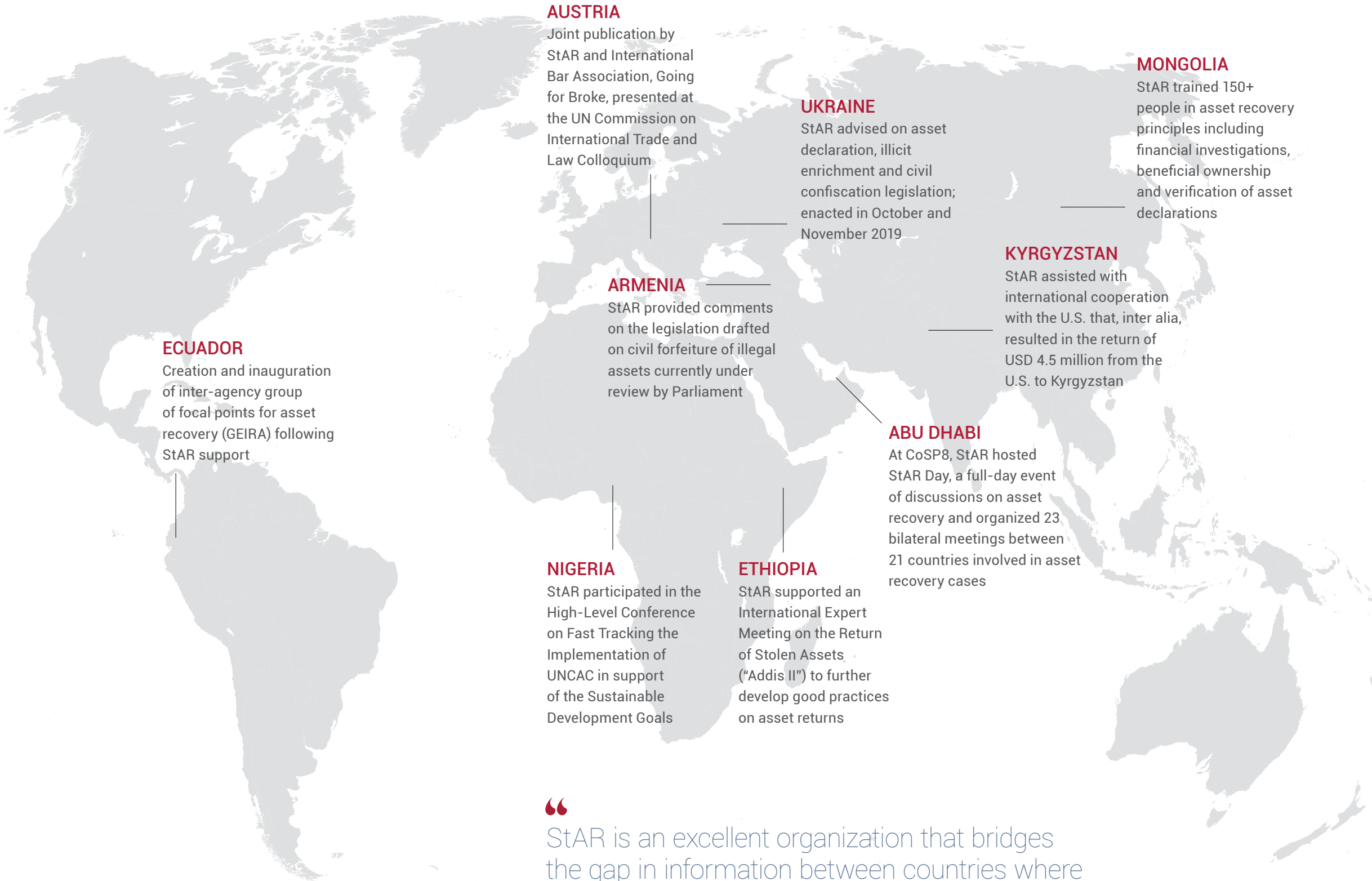
—Emile van der Does de Willebois
on behalf of the StAR team

Country Engagements

With the unique leveraging power bestowed through the World Bank and UNODC, StAR is well placed to intermediate between countries by facilitating multi-jurisdictional dialogue, and to provide practical advice on the strategy and management of asset recovery efforts and a platform for dialogue and collaboration on specific asset recovery cases. In addition, the StAR team's in-depth knowledge of UNCAC and its implementation and StAR's extensive country experience strengthen our role in providing legislative advice and general case support related to asset recovery and anti-corruption measures.

- 19 countries received StAR assistance in 2019
- 2 countries adopted new laws or amendments related to asset recovery with StAR support
- 2 countries receiving StAR assistance opened a new AR case involving proceeds of corruption
- 1 country adopted new domestic coordination mechanisms with StAR support
- 5 scoping missions conducted in response to new requests

- 11 countries received technical assistance on legislative reform
- 5 countries received StAR support to improve domestic coordination processes
- 12 countries received StAR support to improve international coordination processes
- 670+ people trained globally by StAR
- 31 global policy events contributed to by StAR



“StAR is an excellent organization that bridges the gap in information between countries where assets are kept and where they are taken from.”
—Executive Director, Economic Advocacy NGO



Tunisia's Parliament. StAR supported work in Tunisia on a law related to anti-money laundering and combatting the financing of terrorism.

Jessica Mulley/Flickr CC

Legislative Assistance

Country evaluations and practical experience in asset recovery have both shown that many countries still lack some of the fundamental legal building blocks to be able to pursue proceeds of corruption effectively. Many countries are in the process of reviewing existing legislation, and developing new regulations for prevention, identification and prosecution of corruption. There has been a policy shift toward asset recovery measures with more international forums such as the G20, FATF and OECD increasing their efforts in this field, which also serve to highlight StAR's contribution in this area.

To be able to be effective in its quest to recover stolen assets, a robust legal framework is a precondition. That is why we will often start our engagement with a review of the legal framework, and offer assistance in putting in place the necessary legal building blocks to facilitate domestic and international information exchange, proper criminalization of different corrupt behaviors, and laundering of the proceeds thereof, ensure sufficient transparency of the corporate sector or, where feasible, non-conviction based confiscation. In 2019, we provided technical assistance to 11 countries on

proposed amendments, and new drafts of bills:

- **Armenia:** provided comments on the legislation drafted on Civil Forfeiture of Illegal Assets and Reversal of Burden of Proof in Demonstrating the Lawful Origin of Property in Case of Grave and Particularly Grave Crimes which is currently under review
- **Costa Rica:** provided recommendations for draft bill on non-conviction based asset forfeiture
- **Ecuador:** legislative assistance with draft bills on asset recovery,

and non-conviction based asset forfeiture. The former is under review by the National Assembly, and the latter was presented to the President of the National Assembly

- **Ethiopia:** assistance to authorities in drafting of The Whistleblower Award Act & Proceeds of Crime Proclamation, which is currently under discussion
- **Nigeria:** tracking progress on the Proceeds of Crime Bill
- **Romania:** provided advice on amendments to the asset declaration law

- **Sri Lanka:** advised on Asset Recovery Strategy, Proceeds of Crime Act and Asset Declaration Reform, and provided recommendations on the legal framework for asset declarations for public officials, and transitioning to electronic filing of declarations
- **Tunisia:** supported work on a law related to anti-money laundering and combatting the financing of terrorism (AML/CFT) which was adopted last year titled, *loi organique N°28/2018 modifiant et complétant la loi organique*

N°2015-26 du 7 août 2015 relative à la lutte contre le terrorisme et la répression du blanchiment d'argent

- **Uganda:** advised on the legal framework for asset declaration systems and the tools to capture additional data related to illicit enrichment and conflict of interest
- **Uzbekistan:** reviewed and recommended on amendments to the Criminal Code and the Criminal Procedure Code with a focus on asset recovery



Vitalii Biliak/Shutterstock.com

Ukraine

All through 2019, StAR engaged with Ukraine to provide feedback on the legal framework on asset declarations and asset recovery. Our experts provided advice and analysis on the draft legislation on illicit enrichment for which a draft was submitted to Parliament in late May, but not adopted. A modified draft, which also included provisions on civil forfeiture, was submitted in September, and approved by Parliament in October as the Illicit enrichment/Civil confiscation (Law 263-IX): On Amendments to Certain Legislative Acts of Ukraine Concerning the Confiscation of Illegal Assets of Persons Authorized to Perform Functions of the State or Local Self-Government and Penalty for the Acquisition of Such Assets. The law was enacted by the President in November.

In October, Ukraine also passed the NACP Law (Law 140-IX) On Amendment of some Legislative Acts to Ensure Effective Institutional Mechanism of Corruption Prevention. The law overhauled the governance of the institution that manages the asset declaration system and refined the declaration requirements for officials. Our team also provided advice on a draft amendment to the Ukrainian Criminal Code regarding the criminalization of money laundering, which was adopted in December 2019. StAR also provided comments on proposed amendments to the Law on the National Agency of Ukraine for finding, tracing and management of assets derived from corruption and other crimes (ARMA). The latter amendments have not been adopted.

Building National Capacity

Existing gaps in institutional capacity when dealing with corruption cases in general, and asset recovery in particular, are coming to the fore as countries find it necessary to engage in more depth on anti-corruption measures. Building national capacity is a core pillar of StAR's work and aims to build basic skills for those that investigate money laundering and corruption, oversee the declaration of assets and interests, or are involved in international cooperation. To this end we have developed a number of courses, that have both a theoretical element, on the international standards and required legislation, and a practical element, often based on real cases that help participants work with exhibits and pieces of evidence to build a case, and try to confront them with the types of decisions that will have to be made in real cases.

Specifically, we have a course on financial investigations which assists in increasing officials' understanding of money laundering, the use of financial information, and mutual legal assistance for the purpose of identifying, tracing, seizing, freezing, and confiscating proceeds of corruption. Courses focused on beneficial ownership highlight exercises on how to identify the beneficial owner in order to tackle misuse of legal structures to conceal proceeds of corruption. Case studies and best practices on effective implementation of income and asset disclosure systems provides advice on advancing e-verification of declarations and other key reform areas needed to strengthen a country's asset declaration and conflict of interest system,



Top to bottom: Workshop in Armenia to discuss anti-corruption strategy; StAR discussed Costa Rica's Non-Conviction Based forfeiture law with Emilia Navas, Prosecutor General; a brainstorming session with representatives from the Thai government on asset recovery priorities.

and open source investigations courses introducing participants to data mining tools and techniques supporting extraction of information from, and protective measures for using open source data such as

social media, search engines and photo metadata. Our team endeavors to tailor courses to the country context and legislative framework in order to make the courses most useful for the participating authorities.

In 2019, StAR conducted 21 national capacity building exercises and contributed to 2 regional workshops. We engaged with the following countries:

- **Armenia:** on financial investigations and international cooperation
- **Costa Rica:** on non-conviction based asset forfeiture and case studies highlighting the effectiveness of such measures in other countries
- **Ecuador:** on open source investigations, circumstantial evidence, authorship and participation in financial crimes
- **Ethiopia:** on financial investigations
- **North Macedonia:** on financial investigations
- **Romania:** on identifying assets abroad, financial investigations and open source investigations
- **Thailand:** on a multi-agency workshop on asset recovery; legal avenues for asset recovery including available tools and resources
- **Tunisia:** on financial investigations
- **Ukraine:** on open source investigations, informal and formal cooperation, financial investigations, and adjudication of complex corruption cases
- **Uzbekistan:** on main pillars of asset recovery and challenges of pursuing stolen assets

“StAR has incredible convening power in terms of calling experts, countries, and institutions to discuss pressing issues.”

—Anti-Corruption Policy Director, Development Aid Agency



▲ Mongolia

In Mongolia, over the course of the year, StAR trained over 150 participants from the Prosecutor General's Office, FIU, Independent Authority Against Corruption (IAAC), customs and police on financial investigations, e-verification systems and advice on key reform needed to strengthen asset declaration and conflict of interest. Practical examples applying these concepts to concrete cases were shared with the training attendees.

Facilitating Domestic Cooperation

Almost invariably, the one issue that many countries requesting StAR assistance struggle with, is the lack of a clear system for domestic cooperation, ensuring there is a lead agency, and that all those with relevant information can share that with each other. Since asset recovery tends to be a relatively new issue on the agenda of the country in question, likely accompanied by huge political pressure, one of our first tasks is often to help the country identify who should be in the lead, how to share information and under what conditions and put in place the institutional framework, be it an ad-hoc task force, or a more permanent committee to support that. To that end, StAR engaged with the following countries to improve domestic coordination around asset recovery:

- **Colombia:** facilitated authorities in creating an action plan for the development and implementation of the national asset recovery strategy which was submitted for approval from the relevant authorities

- **Ethiopia:** working with the Attorney General's Office and local counterparts to establish an asset recovery unit which would handle all large scale asset recovery cases
- **Sri Lanka:** supported development of an Asset Recovery Strategy/Roadmap and assisted in finalizing a consultation document analyzing strengths and weaknesses of the asset recovery system and outlining strategies, time frames and targets to address these
- **Thailand:** facilitated a multi-agency brainstorming workshop hosted by the Office of the Attorney General (AGO) to identify challenges and solutions for asset recovery and improvement in coordination. It was agreed that the AGO would prepare and present an internal report to the Attorney General for the activation of an Interagency Working Group on Asset Recovery and StAR would continue engagement with other relevant authorities regarding the roles and responsibilities of the working group

“The specific expertise sets and skills of StAR are very important to banks who are concerned about anti-corruption work.”

—Governance Specialist,
International Financial
Institution

▲ Ecuador

In 2019 in Ecuador, following up from a workshop discussion regarding an inter-institutional asset recovery group in 2018, representatives from all institutions involved gathered to sign a Memorandum of Understanding to formalize the creation of the Interinstitutional Links Group for the Recovery of Assets (GEIRA), and held initial coordination meetings. StAR experts played an instrumental role in presenting the initial idea in 2018 and participated at the signing of the MoU as an international partner signatory.



In February 2019, the U.S. Department of Justice returned \$4.5 million in stolen assets to Kyrgyzstan arising from the theft of government funds.

Francisco Anzola/Flickr CC

Case support

Apart from assisting countries in developing the legal and institutional framework and building local capacity, StAR also helps countries with the important task of engaging in international cooperation, namely in establishing direct contact with relevant international partners.

When corrupt assets are moved offshore, asset recovery practitioners must rely on international cooperation to retrieve the funds. Streamlining legal assistance between jurisdictions has therefore been a key element of our country support efforts.¹ In addition to the 23 bilateral meetings organized by StAR on the margins of the Conference of the States Parties to UNCAC (CoSP) in December, ranging from introductory meetings to follow-ups on Mutual Legal Assistance (MLA) requests, StAR engaged with 12 countries in facilitating international cooperation and engagement throughout the past year.

- **Costa Rica:** assisted Costa Rica in making contact with a relevant jurisdiction for bilateral engagement
- **Ethiopia:** facilitated several formal mutual legal assistance (MLA) requests
- **Kazakhstan:** facilitated bilateral discussions and initial contacts between authorities in Kazakhstan and the representatives of multiple countries with regard to asset recovery cases
- **Kyrgyzstan:** the U.S. Department of Justice returned stolen assets to Kyrgyzstan arising from the theft of government funds by the previous regime of Kurmanbek Bakiyev and his son. StAR experts' facilitation of international cooperation between the two countries positively contributed to this return. Thus far, USD4.5 million of the USD6 million

forfeited funds have been approved for repatriation.

- **Malaysia:** assisted with contacts in several countries which later led to cooperation on getting relevant intelligence on asset recovery cases
- **Moldova:** followed up with Moldovan authorities regarding a pending request for information from a financial center to ensure that there were no delays in the communication and the team reached out to the central authorities in two financial centers to inquire about their availability for reviewing draft MLAs from Moldova. The StAR team further reached out to another financial center to facilitate a follow-up to an MLA sent by Moldovan authorities. This facilitation resulted in provision of feedback to Moldovan prosecutors from two financial centers to which Moldova had never sent MLAs before, and

1. The level of detail that can be provided regarding these country engagements is limited due to confidentiality requirements from clients.

- the identification of a contact point for Moldovan authorities

 - **Romania:** facilitated a follow-up connection for an MLA request sent by Romania
 - **Sri Lanka:** provided support on follow-up to connections made during the Global Forum for Asset Recovery (GFAR)
 - **Tunisia:** assisted Tunisia's authorities within the context of their work, to draft a request to France for the extradition of deposed President Zine El Abidine Ben Ali's brother-in-law, Belhassen Trabelsi, who was wanted in Tunisia for alleged fraud
 - **Ukraine:** continued facilitating dialogue and raising awareness with Ukrainian authorities regarding the need to send a notification to the Council of Europe and UNODC by the Ukrainian Ministry of Foreign Affairs on the status of the National Anti-Corruption Bureau (NABU) as the central authority for pre-trial corruption investigations. Last summer, these notifications were sent, which had an immediate impact on NABU's effectiveness in engaging in international cooperation. In conjunction with this support, StAR assisted NABU with the follow-up on MLA requests sent by Ukraine to a number of jurisdictions and advised NABU on strategies of overcoming challenges related to the MLA process.
 - **Uzbekistan:** provided strategic advice on international cooperation and facilitated contacts between Uzbekistan and jurisdictions in Europe and Asia.

“ I would like to once again note that with the assistance of the StAR Initiative, we have been able to significantly advance in terms of establishing direct contacts with the competent authorities of foreign countries...[including] ongoing cooperation between the Prosecutor General's Office of the Kyrgyz Republic and the U.S. Department of Justice in the area of the recovery of criminal proceeds under the UNCAC. ”

—Kyrgyz delegate at 13th session of the Open-ended Intergovernmental Working Group on Asset Recovery (Vienna, 2019)



Central bank of Nigeria, Abuja

Tayyav/Shutterstock.com

▲ Nigeria

In 2019, StAR has continued its engagements with countries that participated in GFAR in 2017, including Nigeria. With the agreement of Nigeria, StAR, along with UNCAC Secretariat staff and peer reviewers, supported Nigeria's second cycle review of UNCAC implementation that includes asset recovery. Our team participated in the high-level conference on fast-tracking UNCAC implementation and moderated a session on new frontiers in asset recovery. Bilateral meetings were also held with government authorities and civil society organizations working on asset recovery, focusing on Nigeria's contribution to StAR's data collection on assets frozen or seized, confiscated, and returned.

Knowledge & Innovation

The development of knowledge products is a core pillar of StAR's work and one that sets it apart from other groups in the field of asset recovery. As highlighted by the external review, our publications, guides and databases are intended to serve practitioners around the world, no longer just to raise awareness of asset recovery, but more crucially, to bring practical solutions to those on the front lines of the global anti-corruption policy agenda. StAR publications

are also geared toward policymakers, international experts, and civil society organizations who rely on credible materials to advance asset recovery in their respective fora. One of the most popular publications of 2019 was one published in the same year titled *International Partnerships on Asset Recovery*, providing recovery practitioners with a consolidated repository of global and regional networks and how to access them.

New publications in 2019

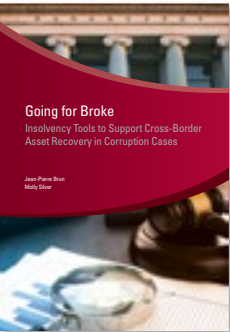
By helping countries to establish systems to obtain information on the source, destination and ultimate beneficiary of proceeds of crime and corruption, asset recovery networks aim to help asset recovery specialists around the world to fight against corruption and money laundering. In January 2019, StAR published a directory titled [International Partnerships on Asset Recovery](#) as a resource to help asset recovery specialists identify and access the appropriate global or regional networks and facilitate international cooperation in the forfeiture of criminal proceeds. The publication briefly examines different strategies for international cooperation and the distinction between formal mutual legal assistance (MLA) requests and informal assistance. It includes a global directory that lists asset recovery networks, along with information about their membership, organizational structure and contact information.



[E-filing Asset Declarations: Benefits and Challenges](#), was published in July for policymakers and practitioners considering the transition to electronic filing of asset declarations. The study shows that the benefits of e-filing outweigh implementation challenges. The recommendations in the paper are supported by the experiences of France, Ukraine and the United States in their respective transitions to a digital solution for asset declarations. The report was launched at a roundtable discussion on international trends in asset declaration regimes in Romania and has been translated into Romanian to support the national dialogue on the transition to electronic filing of asset declarations.



StAR's latest book, [Going for Broke](#), sets out, for the first time, a step-by-step guide for asset recovery practitioners on the use of insolvency proceedings in recovering corruption proceeds. A joint collaboration with the International Bar Association (IBA), the report outlines the procedures and challenges associated with insolvency actions and provides practical methods for various strategic and technical concerns. The book makes particular use of case studies to demonstrate the benefits of cross border insolvency proceedings in international corruption cases, and further elaborate the challenges that practitioners face in this pursuit. The book was jointly presented in December at the United Nations Commission on International Trade Law (UNCITRAL) Colloquium on Civil Tools for Asset Tracing and Recovery. Our publication was featured in a [piece](#) on the Foreign Corrupt Practices Act (FCPA) blog.



Data Collection on International Asset Recovery Efforts in Corruption Cases 2010–2019

In 2019, StAR launched a large-scale effort to collect information on the actual quantities of proceeds of corruption that are frozen, confiscated, and returned globally directly from country authorities. The most recent study on this subject, the StAR/OECD report [Few and Far—The Hard Facts on Stolen Asset Recovery](#), found that between 2006 and June 2012, a total of around US\$2.6 billion of assets were frozen and only around US\$423.5 million were returned by OECD countries. No comparable analysis of international returns of proceeds of corruption since 2012 or for non-OECD countries is available. But there is plenty of anecdotal evidence that since 2012, a lot of progress in international asset recovery has been made, including as a result of the 1MDB investigation into Malaysia’s sovereign wealth fund and several other returns to non-OECD countries. In 2019, we conducted open source research on corruption-related



asset recovery cases for the StAR Asset Recovery Watch database which showed that between 2012–2019 (at least) \$1.4 billion USD in proceeds of corruption were repatriated internationally. The importance of sharing information and best practices on international asset recovery cases has frequently been highlighted, including in GFAR Principle 4 on transparency and accountability. On the margins of the Working Group on Asset Recovery in May 2019, StAR organized a side event to discuss plans for the study and we developed a new questionnaire for authorities in consultations with country representatives and other experts. In December 2019, the CoSP

adopted [Resolution 8/9](#) “Strengthening asset recovery to support the 2030 Agenda for Sustainable Development”, which includes a mandate for StAR to collect information on volumes of assets frozen, seized, confiscated and returned, and encourages all UNCAC States parties to participate in this effort. The questionnaire was translated into French, Spanish, Arabic, and Russian (available [on the StAR website](#)) and was circulated by the UNODC Secretariat to the Permanent Missions of UNCAC States parties. Collection of responses from countries is ongoing and results will be used for a forthcoming report and for updating the StAR Asset Recovery Watch database.



▲ Forthcoming publications

In 2020 and beyond, we will be focusing on issuing an updated version of our flagship 2011 Asset Recovery Handbook publication which is often cited as one of the best references for asset recovery practitioners. In addition, there is ongoing research for reports on benefits and challenges of automation of asset declaration verification, and a report together with the IBA on the role and standing of corruption victims in proceedings and how to determine damages amongst others. Our team is also working on a guide for investigators on investigating wealth to be developed in collaboration with the Camden Asset Recovery Interagency Network (CARIN), and contributing to a policy paper about related party transactions. StAR is working on a paper on issues related to legal professional privilege and how it affects investigators’ ability to ascertain beneficial ownership and discusses measures to prevent the abuse of legal privilege. Finally, StAR will also be publishing a study on the direct enforcement of foreign confiscation orders, covering nearly 30 domestic legal systems.



The StAR Initiative booth at CoSP

Partnerships & Policy Contributions

StAR engages in a variety of global and regional efforts in order to bolster political will for asset recovery at the global level and support networks of practitioners. In particular, StAR has an important role in the implementation and development of the asset recovery principles laid out in UNCAC and is heavily involved in the corresponding UNCAC-related events and policy forums.

UNCAC-related

As a lead up to the Conference of the States Parties to UNCAC (CoSP), StAR participated at the 13th session of the **UNCAC Asset Recovery Working Group (ARWG)** and the 10th session of **UNCAC Implementation Review Group (IRG)**.

The biennial meetings of **Conference of the States Parties to UNCAC (CoSP)** is one of the largest intergovernmental practitioner events on of anti-corruption. The 8th CoSP held in Abu Dhabi last year, featured a full StAR Day, which has become a traditional component of the event. This five-day conference set several records; more than 1500 participants registered and over a dozen resolutions were adopted. Asset recovery was a major theme throughout the proceedings including special events and bilateral meetings.

The StAR team, in coordination with authorities from client countries, organized 23 bilateral case-related meetings between representatives of 21 States parties to UNCAC on the margins of CoSP.



▲ StAR Day

The StAR Day has become a key element of CoSP, with our team and partners coordinating a full day of sessions and dialogue on asset recovery. At this CoSP, the StAR day sessions were attended by over 150 participants. We opened the day with the *High-level Conversation on Asset Recovery: Achievements, Challenges and the Road Ahead for Effective Cooperation*, in which officials from various countries parsed out the contemporary asset recovery landscape, practical challenges in investigations and the inadequacy of classic tools for international cooperation.

This was followed by a panel on *Perspectives on Asset Return: Mechanisms and Monitoring*, which reflected on the specific mechanisms that have been used for returns and highlighted experiences of Kenya and Switzerland. It also analyzed experiences of civil society in Nigeria monitoring returns, and development of a tool assessing implementation of GFAR principles in Sri Lanka.

During the lunchtime session, *Getting the Facts Straight: Why we need better data on international asset recovery and how we can get there*, we highlighted the need for a better evidence base on international asset recovery, presented results from open source research on corruption-related asset recovery cases conducted for the StAR Asset Recovery Watch database, and discussed a new research project aimed at collecting

data on assets frozen, confiscated, and returned internationally directly from countries (see above).

The StAR team also presented the publication “Going for Broke” on how to use Asset Recovery proceedings to recover stolen assets in cross border corruption cases. The publication was welcomed with interest, and the possibility of translations into other languages was discussed with counterparts.

The last session, *Getting Serious About Beneficial Ownership Transparency*, highlighted the use of shell companies as a cross-border getaway vehicle for corruption, and presented perspectives from Slovakia, Indonesia and Uruguay on implementing beneficial ownership reforms. The panelists noted the importance of independent verification of beneficial ownership information in the design of transparency reforms and the setup of registries.

The StAR team, in coordination with authorities from client countries, organized 23 bilateral case-related meetings between representatives of 21 States parties to UNCAC on the margins of CoSP. The goal was to establish contacts between authorities from “requesting” and “requested” countries, to help them better understand the requirements for assistance, and to empower them to address specific pending requests.

Cooperation under UN auspices

At the second **UNODC Expert Group Meeting on the topic of Corruption Involving Vast Quantities of Assets** in Norway, StAR moderated a session on sanctions, victim compensation and social damages, and contributed to discussions and drafting of recommendations related to beneficial ownership, legal professional privilege, related party transactions, and non-trial resolution of corruption cases. Based on discussions, a set of **64 recommendations** were presented and adopted on the final day of the meeting. StAR supported the first meeting in this series, which was held in Peru in 2018, through presenting research on grand corruption case

studies ([meeting documents here](#)).

StAR participated in the **International Cooperation to Combat Illicit Financial Flows and Strengthen Good Practices on Asset Return** organized by President of the UN General Assembly. In addition, StAR presented on stolen asset recovery at an international conference hosted in Armenia by the **United Nations Development Programme (UNDP)**, and participated in an Expert Roundtable on Human Rights Principles and Guidelines for the Repatriation and Use of Stolen Assets organized by the **Office of the United Nations High Commissioner for Human Rights (OHCHR)**.



Top, left and right: UNODC Expert Group Meeting on Corruption Involving Vast Quantities of Assets, June 2019 in Oslo. Bottom: UNGA meeting, September 2019.

▲ Addis II

StAR has also made many policy contributions, including supporting the **International Expert Meeting on the Return of Stolen Assets (“Addis II”)** organized by UNODC and co-hosted by Ethiopia and Switzerland. Building on “Addis I,” the meeting aimed to develop good practices on asset return and experts developed a series of good practices on different UNCAC provisions for further consideration.

The team supported the planning and organization of the Addis II meeting and led discussions on current trends in asset recovery and returns, StAR’s approach, and the Lausanne Guidelines for Efficient Recovery of Stolen Assets. We also moderated sessions and breakout groups to support the development of the meeting’s outcome recommendations.



Inter-agency networks

StAR is also actively engaged with different Asset Recovery Interagency Networks and multiple practitioners' networks with the objective to assist in overcoming operational barriers associated with international cooperation in asset recovery. Our team was part of the **Steering Committee and Annual General Meeting of Asset Recovery Inter-Agency Network Pacific (ARIN-AP)** in Mongolia, and conducted a workshop on regional asset recovery. At the **Camden Asset Recovery Inter-Agency Network (CARIN)** annual meeting in the Hague, StAR contributed to discussions around tracing and recovering criminal assets from corporate entities, and tracing and



recovering virtual currencies. Last summer in the Netherlands, StAR took part in the plenary meetings and working group of the

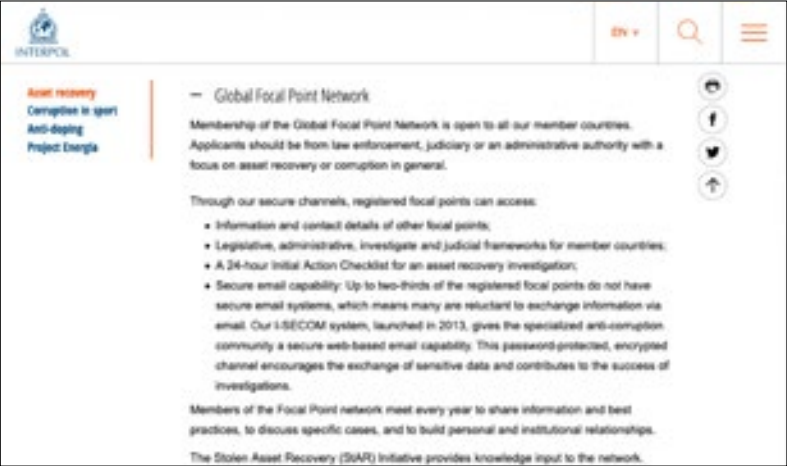
Egmont Group, the worldwide organization of Financial Intelligence Units (FIU). The discussion highlighted the importance of collaboration between law enforcement/FIUs and tax authorities. The StAR Best Case Award was presented to the FIU of Peru for a multi-national corruption case in which assets were recovered from abroad, which also won it the Egmont's Best Case Award.

Civil society and other partners

In its engagement with civil society organizations, StAR delivered a presentation at a meeting organized by **Transparency International** in Belgium, and the **Civil Forum for Asset Recovery (CiFAR)** on what the European Union (EU) can do to improve the fight against grand corruption. StAR also took part in a conference co-organized by **Transparency International France**

and the French Senate. A new draft French law seeks to establish a framework for asset returns in situations where return of proceeds of crime is not requested by the country of origin of the assets. At the **American Bar Association Section of International Law Annual Conference** in D.C., StAR experts presented on a panel focused on the benefits of increased cooperation

between private and-public practitioners to recover assets. StAR presented at the **Global Illicit Trade Summit** in Addis Ababa organized by the Economist magazine, and as part of the **International Law Institute Anti-Corruption Seminar**, held at the World Bank in Washington D.C., StAR led a session on international cooperation in recovering stolen assets.



GFPN

The **Global Focal Points Network on Asset Recovery (GFPN)** by StAR and INTERPOL has 241 members from 136 countries. StAR participated in the **INTERPOL Anti-Corruption and Asset Recovery Global Conference** held in Colombia last year, attended by over 250 participants from over 60 countries.



APEC was held in Puerto Varas, Chile

Global and regional multilateral organizations

StAR has also continued its engagement with global and regional multilateral organizations to foster greater international cooperation on cases, policy, and general approaches to asset recovery, and participated in a range of additional events and networks to encourage connection between practitioners—governmental and non-governmental, private and civil society sectors—sharing similar goals. In the past year, StAR substantively contributed to events organized by the following partners:

- Presentation at the **G20 Anti-Corruption Working Group (ACWG)**. A Chair's summary of a side event on approaches to transparency and accountability organized by the US, with UNODC and StAR support, can be found [here](#).
- Session on the review process and public consultations of the 2009 Anti-Bribery Recommendation at the **OECD Global Anti-Corruption & Integrity Forum**
- Panel at the **Council of Europe Group of States against**

Corruption (GRECO) 20th anniversary on Prevention of Corruption and Promotion of Integrity of Top Executive Functions.

- Presented at the 29th **Asia-Pacific Economic Cooperation (APEC) Anti-Corruption and Transparency Working Group (ACTWG)**
- Symposium for the **Anti-Corruption Network for Eastern Europe and Central Asia (ACN)**
- Regional workshop as part of the **15th Principals Meeting of the South East Asia Parties Against Corruption (SEA-PAC)**
- Expert group on money laundering control at the **Organization of American States (OAS)**
- Panel discussion on asset recovery in Latin America and the Caribbean at the **OAS Policy Dialogue**
- Presentation at the **African Union dialogue** on how Africa can recover proceeds of corruption from offshore jurisdictions and create the necessary frameworks for successful asset recovery

“StAR’s research is substantial and they’re always adding new information. It makes it easy to learn about asset recovery from other countries.”
—Cooperation Specialist, Anti-Corruption Government Agency

- Presentation on IFFs at the **G24 Technical Group Meetings**
- Conducted a beneficial ownership seminar organized under the current Slovak chairmanship of the **Organization for Security and Co-operation in Europe (OSCE)**

Management, Staffing & Funding

The StAR secretariat is based in the Finance Competitiveness and Innovation Global Practice at the World Bank. The StAR program relies on the expertise of an international team of professional and support staff based in its Secretariat in Washington DC, at UNODC's Corruption and Economic Crime Branch in Vienna, and the UNODC field office in Bogota, as well as consultants worldwide. StAR team members work on a full or part time basis on StAR activities, as well as on the World Bank's AML/CFT

activities, on illicit financial flows, and on UNODC's work on the UNCAC Implementation Review Mechanism and technical assistance activities. The StAR Management Committee provides overall guidance to the StAR team and its work. It is chaired by the Global Director of the Practice Group that hosts StAR and includes members from the World Bank and UNODC. StAR also works closely with its Donor Consultative Group and reaches a wide audience through its StAR Quarterly Newsletter, available on its website.

External Review 2019

StAR underwent an external review of its program for the period 2013 to 2018 to inform decisions regarding its strategic direction and implementation arrangements. This review includes ten findings and eight recommendations that are organized under the following headings: strategic relevance, effectiveness, sustainability, partnership, and monitoring and evaluation. The panel of independent experts focused on strategic relevance, effectiveness, and sustainability, while the lead evaluator focused on monitoring and evaluation. Partnership issues cut across other topic areas and were evaluated jointly by the panel and the lead evaluator. The following synopsis provides an overview of the key findings and recommendations for each focus area ([full evaluation report](#) and [StAR response](#)).

StAR's **strategic relevance** is captured in the review's recommendation to extend StAR's term for another ten years and highlighting its comparative advantages in technical expertise, credibility and access to a



Independent Panel of Experts: Roger Miranda, Lead Evaluator; Mary Butler, Chief of International Unit, Money Laundering and Asset Recovery Section, US Department of Justice; Professor Jason Sharman, University of Cambridge; Dr. Juanita Olaya, Independent Expert and former Chair of the UNCAC Coalition

global platform for engagement. The reviewers also suggest a redoubled effort to garner support and build global momentum in the area of denying safe havens. Considering resource constraints, the reviewers recommend a reduction in quantity but not the scope of StAR's work, in order to respect the reinforcing elements of its broad program and ensure **sustainability** of the initiative.

The review reiterates StAR's **effectiveness** lies in producing knowledge products and its ability to broker between countries, where the unique World Bank and UNODC **partnership** can allow for efficient

gains in implementing the work program which can be further augmented through greater advocacy for StAR's work within the partner organizations.

The review also highlights StAR's modest progress in strengthening its **monitoring and evaluation (M&E)** processes during the period under review. StAR has welcomed the review's central findings on StAR's contributions to the field of anti-corruption and asset recovery over the past decade and will continue to work with the Management Committee to address the suggested recommendations.

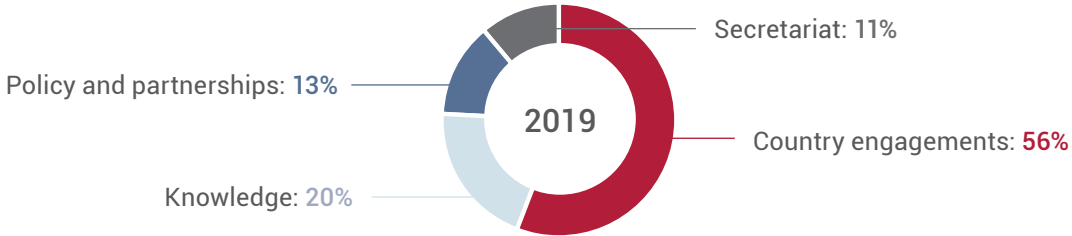


StAR is housed at the World Bank in Washington, DC.

Funding

StAR's funding derives from the Multi Donor Trust Fund (MDTF) and from the World Bank global engagement budget. The MDTF covers a portion of fixed costs and the range of variable costs which includes: activities, travel, staff time and consultants, and production of StAR material. There is also a separate project budget for UNODC's contribution to the work of StAR which covers the costs of seconded UNODC staff, other UNODC staff time and selected activities. A transfer agreement enables ad hoc transfers from the MDTF to the UNODC StAR budget. In 2019, the MDTF received contributions from Australia, Switzerland and the UK (DFID and FCO), while Luxembourg, Norway (NORAD) and the US contributed the UNODC budget for StAR activities.

Disbursement Breakdown per Work Pillar



Total expenditures from the MDTF: \$1,144,545

Our sincere gratitude goes out to our donors





Stolen Asset Recovery Initiative

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