

Annual Report 2022



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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.

This work is a product of the staff of The World Bank and the United Nations Office on Drugs and Crime

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Foreword

What was true for much of the Western media writ large in 2022, was true for the environment of AML/CFT professionals and those interested in financial crime: it was dominated by the Russian invasion of Ukraine. Talk to any bank compliance officer about any AML/CFT related matter these days, and they will tell you that they haven't been following the latest on [fill in the blank], because since February 24 last year all they have been dealing with is sanctions imposed by predominantly Western and allied jurisdictions. What, and who do they cover exactly; how do different sanction regimes interact; and how does one determine whether an entity is controlled by a sanctioned person; the list of questions goes on and on. Now, we should be clear about what a financial sanction is and what it is not. The intention of a sanction is to force a change in behavior, it is not the prelude to a criminal confiscation, and any assets frozen do not legally qualify as proceeds of crime or corruption. But the underlying direction of travel is clear: an important part of the international financial community has zeroed in on the assets owned and controlled by those close to power and their families, and every day brings different stories about another villa or yacht owned by an oligarch or his children, as twisted webs of shell companies and trusts spun by unscrupulous legal and

financial professionals are disentangled. Anonymity is being dismantled brick by brick. And it was with Ukraine and other violent conflicts in mind, that the International Anti-Corruption Conference, right at the end of 2022, in its Washington Declaration: Uprooting Corruption, Defending Democratic Values, urged governments to “*end the use of their financial systems as safe havens for the proceeds of corruption to stop kleptocrats and enablers who*

“Transparency is still the name of the game and that must surely be welcome.”

facilitate the flow of dirty and blood tainted money.” Transparency is still the name of the game and that, for all who care about fighting corruption, must surely be welcome.

For StAR it was a year of reconnecting with many of the countries we have been working with, coming out of the COVID fog and venturing into the world again. For all that technology has achieved, there is no substitute for direct personal contact, both to establish a relationship based on trust and to build capacity. The priceless moments happen at the moments in between, during coffee or as you're wrapping up a meeting. Online interaction doesn't allow for those. On the policy front, we saw some progress with the adoption of the new beneficial ownership standard by FATF, the guidance on which was just adopted last month at its plenary. This year will see further changes on that front as FATF tackles beneficial ownership of trusts. Looking further ahead, we intend to wrap up many of our ongoing research and knowledge projects this year, amongst others finally relaunching the long-awaited Asset Recovery Watch Database, and look forward to sharing the results of that work with many of you at the StAR Day during the 10th Conference of the States Parties to the UNCAC in December in Atlanta.

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

The Year in Review

With the ouster of multiple governments across the world amid allegations of corruption, 2022 was not exempt from the disruption caused by those who engage in and prosper from the benefits of illicit activities. During this turbulent period, the Stolen Asset Recovery (StAR) Initiative, a partnership between the World Bank and the United Nations Office on Drugs and Crime (UNODC), continued to follow its mandate of providing support, where formally requested by the government, and maintained its commitment toward the facilitation of asset recovery. The team had a productive year across its three workstreams covering country engagements, knowledge development and policy work, with the StAR Secretariat strongly represented at the International Anti-Corruption Conference (IACC), which was held in-person for the first time since 2018.

- 17

countries received StAR assistance in 2022
- 7

countries received technical assistance on legislative reform
- 4

countries adopted new laws or amendments related to asset recovery with StAR support
- 700+

people trained globally by StAR
- 3

countries receiving StAR assistance opened or concluded at least one new AR case involving proceeds of corruption
- 5

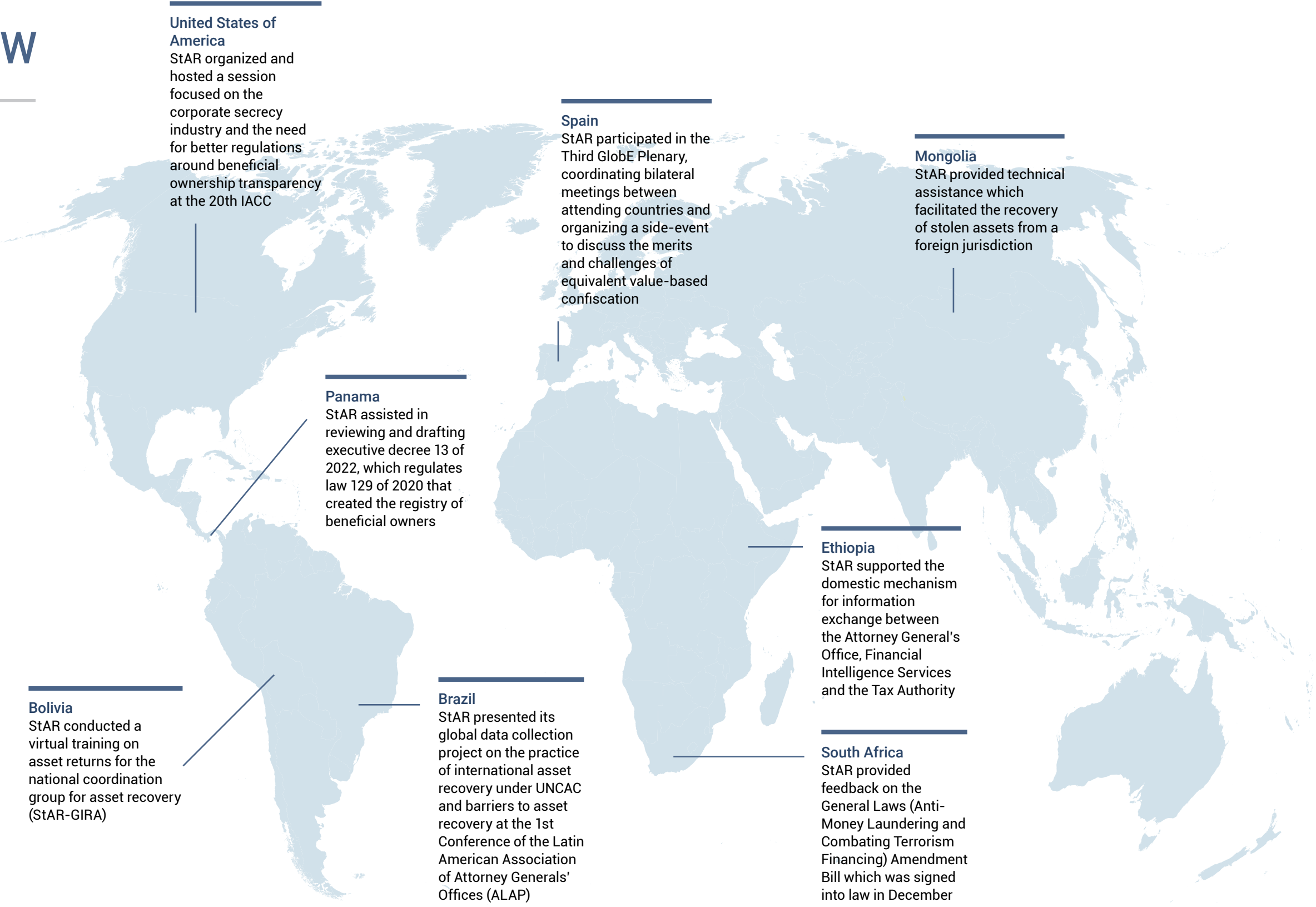
countries received StAR support to improve domestic coordination processes
- 1

country improved domestic coordination mechanisms with StAR support
- 4

countries received StAR support to improve international cooperation processes
- 31

global policy events contributed to by StAR
- 3



knowledge products published by StAR



Country Engagements

Over the years, StAR's engagement has ranged from assistance on legislative reform, regulatory frameworks and capacity building to facilitation with case management and inter-agency cooperation related to asset recovery efforts. In recent years, there has also been a focus on engaging with financial centers to facilitate the asset recovery process.

Legislative Assistance

In 2022, StAR provided technical assistance to seven countries  on proposed amendments and draft bills and four countries  adopted new legislation:



Dominican Republic
Contributed to the drafting process of the non-conviction based asset forfeiture bill which was adopted in July



Ethiopia
Participated in the revision of and proposed amendments to the Anti-Money Laundering Proclamation of 2013 to enhance the ability of law enforcement to combat money laundering



Kazakhstan
Provided feedback on asset recovery law



Moldova
Advised the government on legislation enacted in March related to the integrity requirements for candidates and the process of nominating international experts to the Evaluation Commission. Additionally, provided feedback on draft legislation related to the functioning and supervision of the judiciary



Panama
Reviewed and supported the drafting process for executive decree 13 of 2022, which regulates law 129 of 2020 that mandates a system of registration of beneficial owners. The regulation was passed in March and mandates the Super Intendency of Non-Financial Entities to verify BO information input into the registry on a risk basis



South Africa
Provided comments on the draft definition of beneficial ownership included in the amendments to the Companies Act as part of the General Laws (Anti-Money Laundering and Combating Terrorism Financing) Amendment Bill which was enacted in December, and shared recommendations on how to strengthen the asset and interest declaration form



Uzbekistan
Shared comments on the draft law on asset declaration and the draft declaration form on assets and interests and provided recommendations on strengthening the draft laws on conflict of interest and asset management

Building National Capacity



With wider access to travel after the COVID-19 pandemic, StAR was able to organize and participate in nearly equal numbers of in-person and virtual trainings. In 2022, the team successfully completed 20 trainings; 14 were organized and conducted by the StAR team, 4 workshops with the participation of StAR experts, and 2 regional trainings supported by StAR, including:



Angola
Contributed to a training on risks and challenges of illicit financial flows (IFFs) and efforts to curb them organized by UNECA and UNCTAD with the support of UNODC, UNDP and the Office of the UN Resident Coordinator in the country



Bolivia
Conducted a virtual training on asset returns for the national coordination group for asset recovery (StAR-GIRA)



Ethiopia
Delivered workshops on international asset recovery with a focus on mutual legal assistance and financial investigations



Mexico
Participated in a session organized by the UNODC Anticorruption Hub for Latin America and the Caribbean on asset recovery and the different forms of investigations available to practitioners and conducted a workshop on the same topic for practitioners from the Attorney General's Office



Mongolia
StAR conducted another full year of in-person and virtual trainings for Mongolian authorities, ranging from financial investigations, introduction to management of seized and forfeited assets and cryptocurrency



Moldova
Delivered a training to members of the Selection Commission for the vetting of candidates to the self-governance bodies for prosecutors and judges and its Secretariat. A second workshop focused on the use of Romanian registries for identifying potential undeclared assets in Romania was conducted



Romania
Training on the use of foreign registries for the verification of asset declarations of public officials



United Arab Emirates
StAR led a workshop on risk assessment on legal persons as part of the World Bank's Financial Integrity team's technical support to the Executive Office of Anti-Money Laundering and Counter-Terrorism Financing



Uzbekistan
StAR organized a discussion on the management of seized assets from proceeds of corruption for authorities in Uzbekistan with experts from South Africa and the United Kingdom providing perspectives from their jurisdictions and a training on MLA requests to Swiss authorities

At the **World Bank, IMF, Federal Reserve System “Seminar for Senior Bank Supervisors from Emerging Economies”**: StAR presented a session on FATF requirements on transparency of beneficial ownership

International Expert Forum on Recovering Proceeds of Corruption in Central Asia and Southern Caucasus: StAR, the UNODC Regional Office for Central Asia and the General Prosecutor’s Office of Uzbekistan organized the first large-scale regional event dedicated to asset recovery in the countries of Central Asia and the South Caucasus

Commonwealth Africa Anti-Corruption Centre (CAACC) organized a regional training on asset recovery in Botswana: StAR delivered a session on non-conviction based confiscation, seizure and evidence, international cooperation, civil proceedings and other related topics

15 Years of StAR

Over the past 15 years, StAR has made an influential contribution to the asset recovery capacities of beneficiary countries. It has facilitated cooperation among states and other actors, contributed to knowledge generation in the field, and made progress in raising awareness on the topic at global fora.

Over the years StAR has:

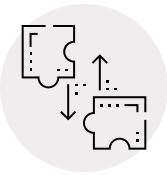
- engaged with more than 40 countries** to promote the recovery of stolen assets
- published 26 StAR-led knowledge products** ranging from technical guides for practitioners to policy papers informing decision making at the international level
- trained over 5,000 people** around the world through its capacity building work
- organized 5 Asset Recovery Forums**: 3 Arab Forums for Asset Recovery (AFAR), 1 Ukraine Forum for Asset Recovery (UFAR), and 1 Global Forum for Asset Recovery (GFAR)
- facilitated the recovery, seizure or confiscation of approximately USD1.9 billion stolen assets** in a number of cases by various requesting jurisdictions.¹





The UNODC Director, Division for Treaty Affairs addressing participants at the Global Forum on Asset Recovery, December 2017

¹ StAR Initiative cannot claim exact amounts or direct attribution in all cases. In some cases, StAR support was explicitly acknowledged by countries and in others, StAR’s role was limited to providing the platform through which an agreement was reached with requested jurisdictions.

Facilitating Domestic Coordination



National authorities often work in silos, which limits information exchange and can lead to delays and setbacks in investigations. StAR assists requesting countries to develop a clear, well-defined structure to enable domestic coordination. In 2022, StAR provided technical support to five countries  to improve domestic coordination on asset recovery measures, out of which one  adopted new mechanisms to that end:



Colombia
Continued to provide support to the country on the design of a national asset recovery strategy which includes a robust domestic coordination mechanism



Lebanon
Discussed avenues for effective domestic coordination with the newly established National Anti-Corruption Commission



Ethiopia
Facilitated the establishment of mechanisms to exchange information on a bi-monthly basis between the Attorney General’s Office, Financial Intelligence Services and the Tax Authority



Mexico
Delivered a diagnostic of Asset Recovery including improved coordination for six Mexican states



Uzbekistan
Provided advice on domestic coordination mechanisms in the context of asset management

Case Support



StAR’s distinct role in supporting requesting countries and engaging with financial centers, alongside its established reputation as a trusted facilitator, positions it effectively to facilitate international cooperation by establishing direct communication between pertinent jurisdictions.² Technical support in this area can range from informal introductions through bilateral side-meetings at global events, such as the UNCAC CoSP or GlobE Network meetings, to facilitating channels for formal cooperation. In 2022, StAR supported four countries in their efforts to advance international cooperation on existing asset recovery cases:



Algeria



Kazakhstan



Ethiopia



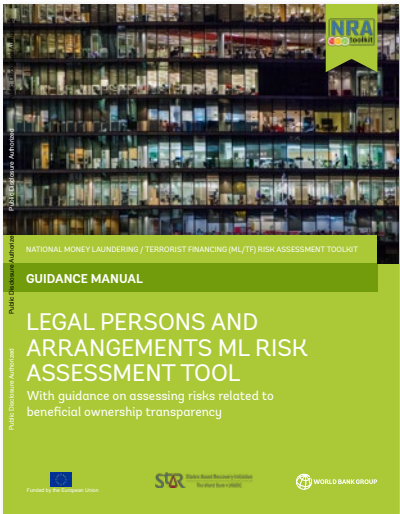
Moldova

² The level of detail that can be provided regarding these country engagements is limited due to client confidentiality requirements.

Knowledge & Innovation

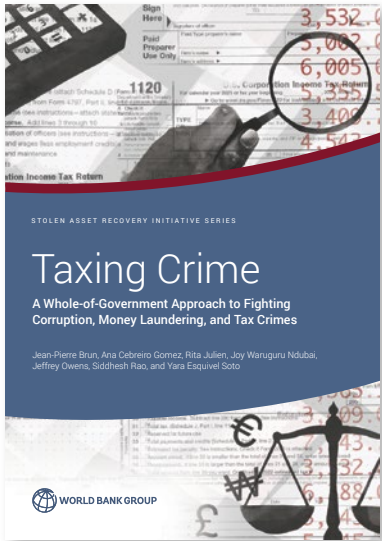


In early March, the Financial Action Task Force (FATF) adopted changes to its rule on beneficial ownership of legal persons, Recommendation 24; a process the StAR team was heavily involved in (see Policy & Partnerships section). In a timely publication underscoring the importance of the topic, StAR released its report [Signatures for Sale: How Nominee Services for Shell Companies Are Abused to Conceal Beneficial Owners](#) written by Daniel Nielson and Jason Sharman in April. The report analyzes a family of related corporate arrangements in which nominees act as agents of principals in control of shell companies. It focuses on how nominee arrangements can be abused to facilitate financial crime by obscuring the identity of those in control of shell companies and on policies designed to counter such abuses. The report presents brand new data on this topic from a global “mystery shopping exercise” based on thousands of solicitations for shell companies, as well as marketing information from shell company providers, and journalistic and policy research on the topic. Responses from more than 7,000 corporate service providers from 2019 to 2021 present the most systematic and direct picture yet of how shell companies are marketed, sold and used.



StAR led the development of [a new module to assess money laundering risks related to legal entities and beneficial ownership-related risks](#), as part of the World Bank’s [National Money Laundering/ Terrorist Financing Risk Assessment \(NRA\) Toolkit](#). Shell companies and other legal structures (such as limited liability partnerships) have emerged as a primary mechanism for moving illicit funds around the world. The module provides a comprehensive methodology for authorities to map out key features of their country’s beneficial ownership framework and assess related ML threats and vulnerabilities. Version 1.0 of the tool was published in June 2022 alongside four other new modules on specific risks: terrorist financing, virtual assets, non-profit organizations, and environmental and natural resources.

The World Bank developed a [National Money Laundering/Terrorist Financing Risk Assessment \(NRA\) Toolkit](#) to support WBG client countries and jurisdictions in self-assessing their money laundering and terrorist financing risks. This approach is in line with the FATF recommendations which require that countries identify and assess ML/TF risks within their jurisdiction and tailor actions to mitigate such risks. The core WB ML/TF risk assessment tool has been used in over 100 countries since 2012.



In collaboration with the Vienna University WU Global Tax Policy Center at the Institute of Austrian and International Tax Law, StAR published [Taxing Crime: A Whole-of-Government Approach to Fighting Corruption, Money Laundering and Tax Crimes](#) in June. This publication focuses on the benefits of interagency cooperation between tax authorities and law enforcement agencies working on preventing, detecting, and recovering the IFFs derived from tax evasion, corruption, and money laundering. Although the magnitude of IFFs is a matter of debate, their implications for economies are widely recognized. Tax evasion and corruption drain limited public resources, and often hurt the most vulnerable populations by depleting the funds for much-needed services. Beyond the budget, tax evasion and corruption harm the social fabric by fueling inequality and eroding trust in public institutions and the rule of law. IFFs are then a major obstacle to resilient and inclusive development. The publication was formally launched by StAR and the WU Global Tax Policy Center during a virtual event in November. The panel discussion included details from practitioners from East Africa where the publication was already being used in the context of the technical assistance project against IFFs conducted by the World Bank.



Forthcoming Publications in 2023

StAR is currently working on several research and knowledge projects including:

- A guide for policymakers and asset recovery practitioners on asset and income disclosure forms and how to make them more robust
- A study that provides an overview of unexplained wealth order regimes as an investigative or legal process, where persons with suspicious wealth in excess of their known lawfully obtained income and assets need to explain how they obtained such assets

Policy & Partnerships

For asset recovery to succeed in individual countries, it requires the foundational support and collective will of the international community to encourage the recovery of stolen assets. StAR therefore works in the global policy arena to influence international standards and strategies related to asset recovery, with the backing of a strong evidence base of knowledge work and data collection, to ensure that asset recovery and anti-corruption remain a priority for decision-makers.

UN and UNCAC-related

The work of StAR was presented to Member States at the session of the **Standing Open-Ended Intergovernmental Working Group on Improving the Governance and Financial Situation** of the United Nations Office on Drugs and Crime (FINGOV) organized to discuss UNODC's anti-corruption work.

The **Third International Expert Meetings on Asset Return and the Agenda 2030 for Sustainable Development** held in Kenya continued the dialogue started during the first and second meetings, Addis I and Addis II, which allowed practitioners to engage on topics ranging from challenges, opportunities and the way forward on asset recovery. StAR presented its work to map international recoveries and returns of stolen assets under UNCAC and provided a look at the practice of cross-border repatriation of proceeds of corruption over the past 10 years.

As in previous years, StAR actively contributed to the annual sessions of the **UNCAC Working Group on Asset Recovery**. The team was heavily involved in both thematic discussions: good practices, challenges and lessons learned with respect to beneficial ownership and collection of information on international asset recoveries and returns. StAR

contributed to the drafting of a [conference room paper](#) for the former theme and to a [background paper](#) with updates to [StAR's 2021 conference room paper](#) for UNCAC CoSP on the data collection study on international asset recovery efforts for the latter. StAR also presented on the technical assistance provided to States parties in 2021.

The **UNODC Global Operational Network of Anti-Corruption Law Enforcement Authorities (GlobE Network)** held its Second and Third Plenary meetings in June and November, 2022 to discuss topics such as secure communication solutions, the role of GlobE contact points and international cooperation through information exchange. In June, StAR presented on a panel related to the lessons learned from other regional and international networks, organizations and bodies in the fight against corruption. In November, StAR coordinated bilateral meetings between attending countries, putting the theme of international cooperation into practice and organized a side-event, where participants discussed the merits and challenges of equivalent-value based confiscation in the recovery of proceeds of corruption and provided initial input for a new StAR knowledge product on the topic.



Top: Presenting at the second UNODC GlobE Network Plenary, June 2022.

Bottom: StAR side-event on equivalent-value based confiscation at the third GlobE Network Plenary, November 2022

FATF-related work

In 2022, the **Financial Action Task Force (FATF)** adopted long-awaited changes to its influential global standard on beneficial ownership transparency, Recommendation 24. Over two years, 2020-22, StAR was heavily involved in the project group that prepared the revisions, including through leadership of the sub-group on obstacles to transparency: nominees and bearer shares. StAR experts also substantially contributed as members of the [Drafting Group of the new FATF Guidance on Beneficial Ownership](#), published in March 2023, especially on sections about nominees, risk assessments, verification, and the definition of beneficial ownership. StAR also moderated consultation sessions with the private sector and civil society. In addition, StAR was part of the working group discussions at the **FATF Plenary** meetings on the revisions for Recommendations 4 and 38 on confiscation and asset recovery.

In addition to StAR's ongoing engagement with FATF on the revision of its standards, the team also participated in a webinar discussion on the revision of Recommendation 24 on beneficial ownership and legal persons. The panel focused on the changes made and the implementation of the new standard on beneficial ownership and how the private sector can contribute by providing timely and accurate information. The session was attended by over 3000 online participants and the [video link](#) had over 11,000 views since its release in September.

Last year, StAR contributed to various high-level events and sought to underscore, among other topics, the importance of action on beneficial ownership transparency, the advantages of interagency cooperation between tax authorities and law enforcement agencies and the need for strong data collection of international recoveries of stolen assets under UNCAC:

Global and regional multilateral organizations

- Presented at the **G20 Anti-Corruption Working Group** on the importance of strengthening cooperation in asset recovery and StAR's work in the area
- Discussed StAR's work program including upcoming knowledge products at the **Egmont Working Group** and presented the StAR Award of Excellence to the Nigerian Financial Intelligence Unit in the Best Egmont Group Case Competition at the **28th Annual Egmont Group Plenary**
- StAR's assistance also interacts in important ways with the work of the World Bank, laying the foundation for substantive conditions under its development policy operations. For instance in Panama, StAR's work on beneficial ownership featured as one of the conditions in a **World Bank policy loan**.
- At the **Malta Workshops II Edition**, organized by the Malta Ministry for Foreign and European Affairs and Trade and Financial Transparency Advisors, StAR joined panel discussions on the legal challenges in investigating and prosecuting tax related money laundering offenses and the process of designing and implementing a beneficial ownership registry for legal entities
- Participated at the **6th Meeting of the Punta del Este Declaration (OECD Global Forum)** on the topic of creating effective legal frameworks for beneficial ownership in Latin America
- 1st Conference of the Latin American Association of Attorney Generals' Offices (ALAP)** presenting StAR's data collection work on the practice of international asset recovery under UNCAC and the associated challenges and barriers
- Panel discussion on StAR's support to groups or networks of practitioners to facilitate international cooperation and support for national coordination processes for asset recovery at the **Meeting of the Heads of Anti-Corruption Agencies in the Southern African Development Community (SADC)**
- During a focus group discussion organized by **Vienna University WU Global Tax Policy Center**, StAR detailed revisions to FATF's recommendation on beneficial ownership and discussed its work in the area including updating and producing new beneficial ownership guides
- Explored with the **International Anti-Corruption Coordination Center** areas of collaboration in the provision of technical assistance to countries



Top: Nigerian FIU presented the StAR Award of Excellence at the Egmont Group Plenary, July 2022.
Bottom: 1st Conference of the ALAP, November 2022

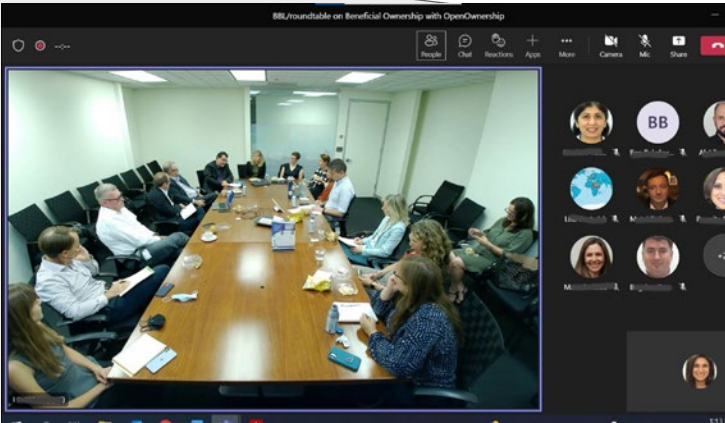
- Presented on common typologies and risks of abuse of shell companies and findings from StAR's new report on beneficial ownership transparency at a webinar hosted by the **FIU of Ecuador, Egmont Group's Technical Assistance & Training Working Group (TATWG)** and the **Latin American Financial Action Task Force (GAFILAT)**
- Participated at the **4th Summit of the National Convention of Anti-Corruption Prosecutors** organized by the Office of the Special Prosecutor for Combating Corruption of the State of Quintana Roo, Mexico explaining the importance of international cooperation in asset recovery
- Presented at a regional conference organized by the **Eastern and Southern African Anti-Money Laundering Group (ESAAMLG)**, the **Financial Intelligence Centre (FIC)** and the **EU AML/CFT Global Facility** on the new risk assessment module of legal persons and beneficial ownership-related risks and how countries can prepare for an assessment
- Co-moderated a session during the **Open Government Partnership (OGP) Strategy Community Conversation** to develop the new OGP Strategy

Inter-agency networks and civil society organizations

- Participated in the annual meetings of the **Camden Asset Recovery Inter-Agency Network (CARIN) Plenary** and conducted bilateral engagements with attending beneficiaries and donors
- Provided information on IFFs and transparency in asset returns to participants at a meeting of the NGO Committee on Financing Development, a substantive committee of the Conference of Non-Governmental Organizations (CoNGO)

StAR events

In collaboration with the World Bank's Community of Practice for Anti-Corruption, StAR organized a hybrid Brown Bag Lunch event titled **What's next in Beneficial Ownership Transparency? Progress, long-term opportunities and challenges**. During the session, the Executive Director and the Director of Policy and Advocacy from Open Ownership, a non-profit organization that specializes in the implementation of beneficial ownership reforms around the world, discussed the progress on delivering such reforms, the challenges associated with them; and the range of implementation opportunities that will best advance sustainable reforms to increase corporate transparency and curb the use of untraceable shell companies in financial crime.





International Anti-Corruption Conference

Transparency International and the United States Department of State hosted the 20th International Anti-Corruption Conference (IACC) in Washington, D.C. in December. This event is considered the biggest civil society forum in the fight against corruption and had over 2,000 participants in attendance, sharing ideas on how to uproot corruption and defend democratic values.

“ This year marks the 15th anniversary of StAR, the Stolen Asset Recovery Initiative. In partnership with the United Nations, this initiative assists countries to achieve accountability, recover stolen public assets, and repair the damage from corruption.”

—David Malpass
President, World Bank

During the opening plenary, World Bank President, David Malpass and UNODC Executive Director, Ghada Waly, spoke about StAR’s

continued efforts in fighting corruption and assisting countries in the recovery of stolen assets. One of the first sessions of the IACC was organized and hosted by StAR and focused on the corporate secrecy industry and the need for better regulations around beneficial ownership transparency. The panelists from StAR Initiative, Finance Uncovered, and TI Canada discussed the different ways in which companies can evade corporate transparency rules and brought focus to the weaknesses in the UK’s and Canada’s beneficial ownership frameworks showcasing how the issue is not limited to ‘offshore secrecy’ in small island nations.

The discussion highlighted the need to strengthen regulation of corporate service providers, nominee arrangements and to monitor beneficial ownership registries through more rigorous verification checks. Given the growing trend towards establishing beneficial ownership registries and the continued challenges to enforcing data accuracy in such registries and cross-border cooperation between law enforcement agencies, these measures are critical for the overall success of transparency reforms.

During the session, StAR presented five draft policy recommendations that were prepared together with the speakers and discussed with the audience. After the IACC, the [panel revised the recommendations and released them in a joint statement](#), developed by StAR Initiative, Finance Uncovered and Transparency International Canada.





Stolen Asset Recovery Initiative
The World Bank • UNODC



TRANSPARENCY
INTERNATIONAL
CANADA



Finance
Uncovered

Joint statement by the StAR Initiative, Transparency International Canada,
and Finance Uncovered

Signatures for Sale:
A Look Inside the Corporate Secrecy Industry

Our session at IACC 2022 shed light on questionable practices of the corporate secrecy industry and highlighted mechanisms designed to evade corporate transparency rules. In particular, nominees are a major but underappreciated point of vulnerability in efforts to increase corporate transparency. Measures to address misuse of nominees need to be a core part of policy efforts to improve transparency of corporate entities.

POLICY RECOMMENDATIONS

1. Countries should step up AML regulation and supervision of corporate service providers, and crack down on frequently implicated enablers of corruption, money laundering, and kleptocracy by enforcing sanctions. This includes strengthening the regulation of nominee services, for example through transparency requirements, licensing requirements, or through a register of nominees.
2. Beneficial ownership registries should develop mechanisms to detect undisclosed nominee relationships and adopt other verification checks using a risk-based approach.
3. Registries should place greater emphasis on applying sanctions for false declarations of beneficial ownership to enforce compliance with beneficial ownership rules, while distinguishing between inadvertent and administrative errors and deliberate falsehoods.
4. Countries should adopt anti-SLAPP laws and whistleblower protection laws to protect journalists and their sources and foster a healthy, competitive media environment for exposing corruption, kleptocracy, and their enablers.
5. Governments and bar associations should clarify that the provision of company formation, administration and related corporate services by legal professionals is not covered by attorney-client privilege protections.
6. Countries should use multiple policy objectives of beneficial ownership registries when considering an appropriate balance between rights to privacy and corporate transparency, including anti-money laundering, anti-corruption, anti-fraud, prevention of conflicts of interest, and business integrity.



Top left: Panelists at the StAR-organized session on corporate secrecy at the IACC. Middle: Engagement with attendees during the StAR session. Top right: WB President, David Malpass and UNODC Executive Director, Ghada Waly at the opening plenary of the IACC. Bottom: StAR Secretariat at the IACC

Management, Staffing & Funding

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 in the UNODC field offices in Bogota and Tashkent, as well as expert 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 and IFFs activities and UNODC's work in support of the implementation of the United Nations Convention against Corruption.

The StAR Secretariat is based in the Finance, Competitiveness and Innovation Global Practice of the World Bank and comprises World Bank and UNODC staff and consultants. The core team manages the Trust Fund's workplans and management of the StAR program and strategy related to the Initiative, with the World Bank team members also overseeing management of the Multi-Donor Trust Fund.

StAR Initiative Secretariat Team



Emile Van Der Does De Willebois
Coordinator
Lead Financial Sector Specialist,
World Bank



Roberta Solis Ribeiro Martins
Crime Prevention and Criminal
Justice Officer, UNODC



Sol Krause
Crime Prevention and Criminal
Justice Officer, UNODC



Neha Maryam Zaigham
Communications and Monitoring
and Evaluation Officer, World Bank

Website

2022 statistics



141,395
page views

16,785
file downloads

83,137
unique visitors

2022 saw a 140% increase
in monthly visitors to the
StAR website from 2021

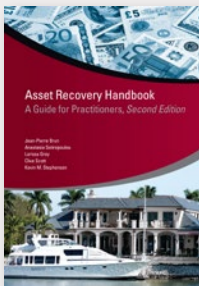
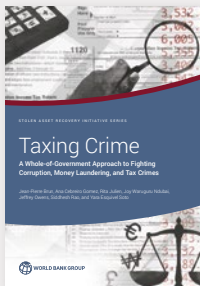
Top 5 countries

- United States
- Sri Lanka
- United Kingdom
- India
- Philippines

Top 3 downloads

Rank	Downloaded File	Downloads
1	StAR Asset Recovery Watch Database file	16,785
2	Asset Recovery Handbook	10,000
3	Taxing Crime	8,000

*StAR Asset
Recovery Watch
Database file*



Twitter

2022 statistics



1,300+
new followers

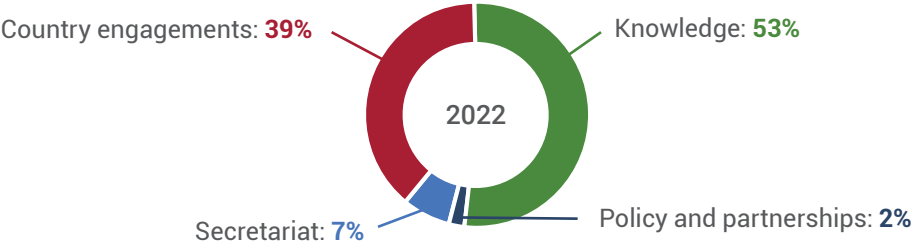
80,000+
impressions

StAR's funding derives from the Multi Donor Trust Fund (MDTF) and the World Bank global engagement budget as well as the UNODC Global Program to Prevent and Combat Corruption. The MDTF covers a portion of fixed costs (World Bank staff), a range of variable costs (travel, meetings, workshops, communications, and consultants) and the production of StAR material. UNODC's Global Program contributes to the costs of seconded UNODC staff, other UNODC staff time and selected StAR activities. In 2022, the MDTF had contributions from Switzerland, while Germany, Luxembourg,

Norway, Switzerland and the United States contributed to the UNODC budget for StAR activities.

In June, StAR reached the end disbursement date of its old MDTF and switched operations to a fresh Multi-Donor Trust Fund with a new governance structure in line with changes made to Trust Fund policies at the World Bank in 2021. The new StAR II MDTF was established with legacy funds from the previous financing instrument and contributions from Switzerland as the first development partner.

World Bank MDTF Disbursement Breakdown by work pillar, Jan–Dec 2022



Total expenditures from the MDTF in CY2022: **\$973,910**

Our sincere gratitude goes out to our donors



Federal Ministry of Economic Cooperation and Development (BMZ)*; Government of Luxembourg*; Norwegian Agency for Development Cooperation (Norad)*; Swiss Agency for Development and Cooperation (SDC); U.S. State Department Bureau of Narcotics and Law Enforcement Affairs (INL)*

*Contribution only through UNODC



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