



# Annual Report

## January–December 2017



Stolen Asset Recovery Initiative

The World Bank • UNODC

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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 StAR Initiative would not be possible without the generous support of our donors:

- Australian Department of Foreign Affairs and Trade (DFAT)
- Norwegian Ministry of Foreign Affairs
- Swiss Agency for Development and Cooperation
- UK Department for International Development (DFID)
- U.S. Department of State, Bureau of International Narcotics and Law Enforcement Affairs (INL)





***Delegates from 26 countries attending GFAR***

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# Executive Summary

In 2017, StAR celebrated its ten-year anniversary with remarkable progress in the asset recovery realm. StAR organized the first ever **Global Forum on Asset Recovery (GFAR)** where **over 250 participants representing 26 jurisdictions** as well as international organizations, civil society and media expressed renewed commitment to global asset recovery. Cohosted by the United Kingdom and the United States as an outcome of the London Anti-Corruption Summit held in May 2016, this forum allowed nations to share best practices; provide technical training to asset recovery practitioners; support capacity building initiatives; and, most importantly, provided the opportunity for over 100 bilateral and multi-jurisdictional meetings to make progress on significant asset recovery cases. StAR worked closely with GFAR's four focus countries (Nigeria, Sri Lanka, Tunisia, and Ukraine) to prepare the asset recovery case consultation and bilateral meetings that were organized during GFAR.

GFAR also provided a platform for the signing of a new significant MOU between Nigeria, Switzerland, and the World Bank, which set out the return of US\$321m of recovered assets.

Aside from this step in strengthening international asset recovery work, StAR's support to countries led to substantial stolen asset recovery actions. Most notably, StAR's support in facilitating investigations was

formally recognized by the Ukrainian government in the **confiscation of US\$1.3 billion** in proceeds of crime. Encouraging figures also emerged from an engagement with Somalia where the Central Bank of Somalia was able to **recover US\$23 million**. Additionally, StAR carried out dialogues with relevant Moldovan authorities to ensure the **pursuit of US\$1 billion** in assets associated with a high-profile 2014 bank fraud, corruption, and money laundering scheme. This is considered to be the largest bank fraud relative to the size of the economy registered to date globally and is one of the highest profile issues in Moldova given its extraordinary impact on the national budget and repercussions felt across the public and private sector.

Aside from this, StAR built on its asset recovery efforts through a combination of country engagements, policy influence, partnerships and regional activities, knowledge and innovation, as well as through advocacy and communications.

Country engagements, which are a major component of StAR activities, are typically multi-year programs aimed at addressing the basic capability of countries to undertake asset recovery and to provide technical assistance for them to advance cases. In 2017, StAR responded to the needs of countries across five continents by providing technical assistance such as advice to asset recovery practitioners, introducing

## StAR's work is built on five pillars

- 1 Empowering Countries** to trace and recover stolen assets
- 2 Promoting Innovation** and global best practices
- 3 Advocating International Standards** to recover stolen assets
- 4 Fostering Partnerships** among government authorities, private sector and civil society domestically and internationally
- 5 Communicating** StAR's knowledge activities, experience and results and raising awareness about asset recovery issues

new legal tools for asset recovery (e.g. non-conviction based forfeiture), capacity building for financial investigations (e.g. open source investigations, electronic evidence, digital forensics, etc.), building capacity to implement the United Nations Convention against Corruption (UNCAC), and coordinating effective management and disposal of seized and confiscated assets. StAR also helped countries enhance capaci-

ties to UNCAC, while it also arranged several side events and numerous bilateral meetings at these gatherings to provide briefings on StAR work. StAR engaged actively with the G20 Anti-Corruption Working Group (ACWG) and cooperated closely with the G7 countries on financial transparency, asset recovery and beneficial ownership. Additionally, StAR contributed to the Egmont Group, INTERPOL, and UNODC.

Guidelines for Efficient Asset Recovery at the 2017 CoSP in Vienna. This tool offers a step-by-step guide to governments seeking to improve international cooperation and coordination in the fight against funds illicitly acquired by politically exposed persons. StAR maintained its role as a crucial stakeholder resource by updating the extensive asset recovery watch database which include cases from almost 140 countries on completed and active asset recovery efforts as well as the information in the Legal Library on the TRACK website. StAR is currently developing and finalizing other knowledge products which will be launched in 2018.

On the institutional front, StAR team held a retreat at the end of 2017 to follow up on recommendations of the Management Committee to discuss an updated work plan up to end of 2020 with renewed focus on knowledge development alongside StAR's numerous country engagements.

Overall, 2017 was a year of consolidation of previous achievements, growth and expansion for StAR. This report will present the activities, accomplishments, and progress of StAR throughout the year as well as the challenges it encountered.

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## Overall, 2017 was a year of consolidation of previous achievements, growth and expansion for StAR.

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ties to establish effective systems for the recovery of assets via legal advice, leading to the adoption of new laws.

In the policy realm, StAR worked closely with the UNCAC, Implementation Review Group (IRG), and Working Group on Asset Recovery (ARWG). StAR participated in the deliberations of the UNCAC IRG, the annual meeting for the Working Group, and prepared and facilitated a full-day special event at Conference of the States Parties (CoSP)

StAR also worked with regional and multilateral organizations to foster more effective international cooperation, policy, and approaches to asset recovery. In addition to GFAR, StAR also expanded its cooperation with regional practitioner networks such as ARINEA, ARIN-AP, CARIN, and RRAG.

StAR contributed to knowledge and innovation through publications and initiatives, including the launch of an online tool on the Practical

## 10 YEAR ANNIVERSARY

# Global Reach of StAR Initiative:

## Countries participating in StAR Events and Engagements

StAR has made a valuable 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.

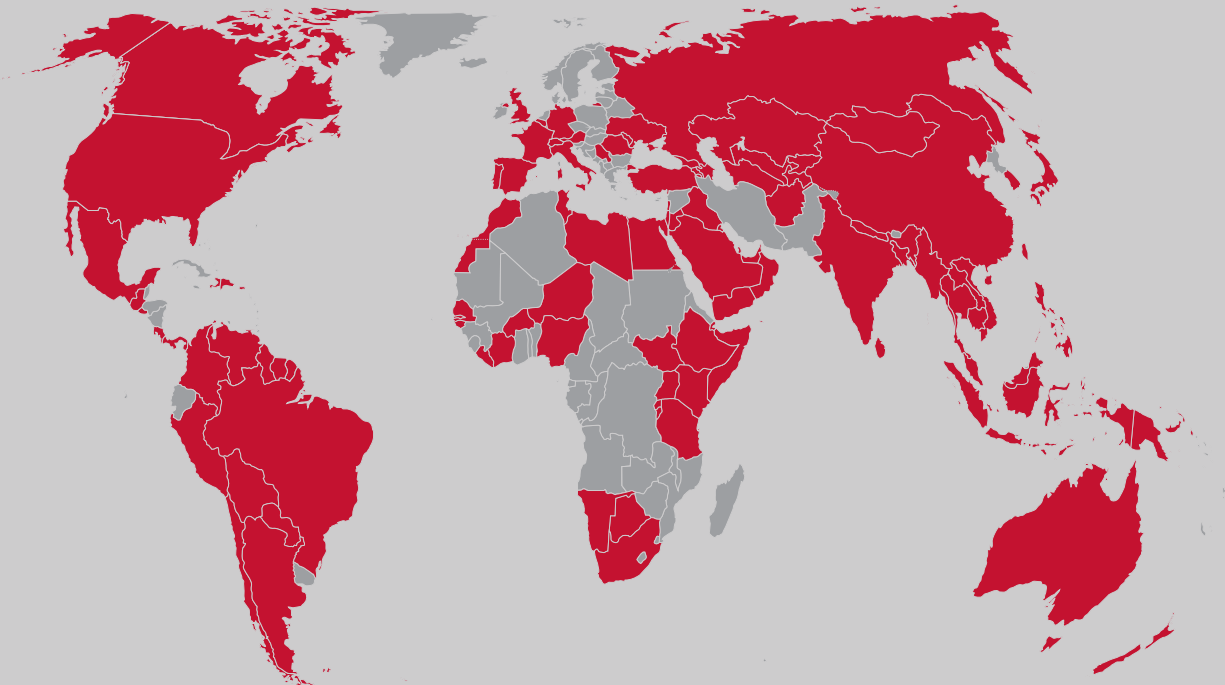
"The training I got [on] tracing hidden assets has helped me in recovery of stolen assets as well as proving offence of illicit enrichment in my country [...]."

*Our stakeholders say...*

"We have recovered stolen funds about US\$200,000 using the training techniques acquired from StAR activities. We have taken two government officials to court for illicit enrichment and living beyond their means."

"Guidance provided by StAR already has [been] placed in some policy papers in my country."

The StAR Initiative has engaged with more than 100 countries to promote the recovery of stolen assets

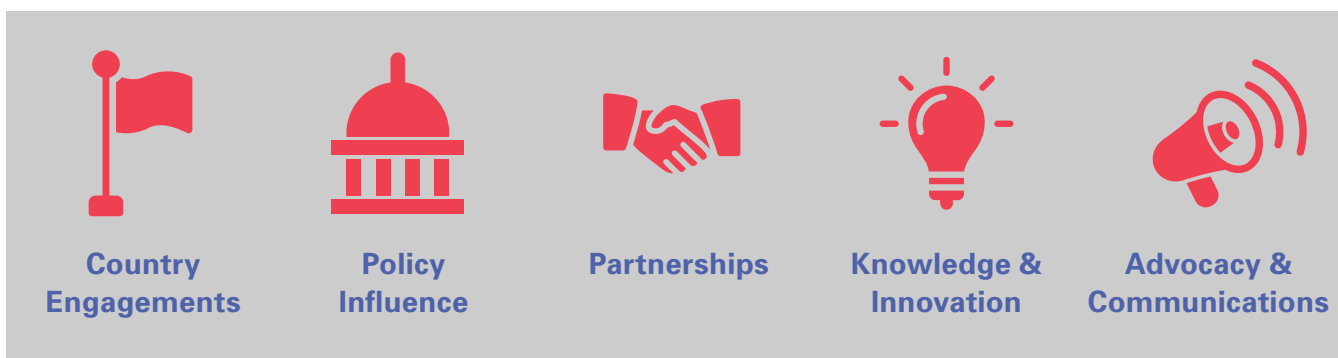






# StAR's Work Streams

StAR's work is divided into different areas:



The StAR work-plan for 2015 to 2018 identified country engagements and policy influence as critical components for ensuring that StAR can effectively support countries in their efforts to recover corrupt assets.

The following sections provide further insight into StAR's work, its activities, and the impact of its work.



# Country Engagements

## BACKGROUND

**C**ountry engagements continued to constitute approximately two thirds of StAR's activities. The team had 20 active country engagements and carried out technical activities in 21 countries. StAR's country engagements include different activities based on the needs of the requesting countries. A multitude of training events were delivered at the international, regional, and national levels on topics such as domestic co-ordination, international cooperation, mutual legal assistance for asset recovery, financial investigations, including the effective use of open source, as well as the prevention of IFFs and the management and disposal of seized and confiscated assets.

StAR works with financial intelligence units, law enforcement, public prosecutors, magistrates, ministries of foreign affairs, finance and justice officials across five continents.

Engagements typically begin with a scoping mission assessing the needs of the requesting country. In 2017, StAR received and followed up on new or updated requests from the following countries: Colombia, The Gambia and Mexico. Based upon the

scoping mission, an assistance plan is then prepared and agreed with the requesting country.

Country engagements are designed as multi-year programs, aimed at both addressing the basic capability of countries to undertake asset recovery and assisting to advance cases. Therefore, they often begin with training and then addressing the needs of the countries. Those needs may include investigative techniques, drafting new legislation, and other requirements.

Engagements cover a range of diverse activities such as:

- tactical analysis and establishing an asset recovery strategy;
- financial investigation techniques, cross jurisdictional investigations, open data investigations;
- asset and income disclosure;
- forensic audits preparatory to cases;
- case management advice (e.g. mutual legal assistance or other international cooperation requests);
- facilitating contacts with other jurisdictions through "quiet diplomacy";
- mentorship on the ground to address specific issues (e.g. placement of a



**UNODC Workshop in Myanmar**

# 20

**active country engagements**



**Muti-year country engagements**



**Generic capacity-building**



**Case-related**

## STAR METHODOLOGIES



**Traditional training workshops**



**Placement of mentors**



**Practical facilitation of coordination and cooperation**

## STAR IN FRAGILE, CONFLICT, AND VIOLENCE (FCV) SETTINGS: SOMALIA

The collapse of national systems and institutions in Somalia in 1991 led to the suspension of operations by the Central Bank of Somalia (CBS) and the loss of control over official Somali accounts held in foreign financial institutions. With the resumption of operations in 2013, the CBS sought to identify and recover these assets with the assistance of StAR.

StAR is currently assisting the CBS in contacting approximately 30 international financial institutions believed to hold or have held legacy CBS accounts, including former World Bank project accounts. In addition to facilitating introductions with appropriate counterparts within the international financial community, StAR is providing guidance to the CBS on ensuring the management of recovered assets is handled with transparency and accountability. To date, over US\$23

million has been added to the Central Bank's reserves with StAR assistance.

StAR assisted Somalia in the development of an asset recovery strategy, including policy considerations on the management of recovered assets. Under the Asset Recovery Guidelines for the CBS (developed with the assistance of StAR and approved by the Financial Governance Committee (FGC), recovered funds are to be held as CBS reserves in designated Asset Recovery accounts with withdrawals only for designated purposes, and with transparent accounting to the FGC. StAR has also provided guidance to Somalia on good practices in engaging private sector entities in asset recovery actions, an area that has raised significant concerns among the international donor community.

mentor in Sri Lanka for financial investigation and preparation of priority cases for GFAR);

- facilitating domestic cooperation.

### ACTIVITY/OUTPUT

Based on the descriptions above, StAR delivered a range of different activities and services to requesting countries in 2017. The following are examples of StAR's activities:

**Case-related, legislative and institutional support in Moldova.** The Moldova StAR engagement in 2017 focused on several dimensions related to asset recovery: First, StAR convened regular meetings with the senior management of key stakeholders (heads of Anti-Corruption Prosecutor's Office (ACPO) and National Agency on the Recovery of Proceeds of Crime (ARPC), and the Central Bank Governor) to ensure the pursuit of assets associated with the 2014 US\$1 billion bank fraud and money laundering scheme through civil and criminal proceedings in foreign jurisdictions. The focus of this dialogue was to follow up on a forensic audit of the fraud, as it presented the greatest opportunity in terms of recovery through criminal and civil means.<sup>1</sup> Second, StAR provided advice to the Moldovan authorities on the draft law establishing the

asset recovery office and subsequent amendment. Once the asset recovery office was set up, StAR started providing detailed advice on drafting the regulation on the management of seized and confiscated assets. StAR also issued multiple rounds of comments to authorities on draft legal initiatives that could affect asset recovery (especially related to the 2014 bank fraud).<sup>2</sup> One other key policy issue on which StAR has worked in Moldova since 2014 was related to the Moldova World Bank development policy operation.<sup>3</sup> As a result of this program, Moldova launched on 1 January 2018 an electronic filing and verification system for asset declaration.

**UNCAC implementation awareness raising on asset recovery in Myanmar.** StAR organized and presented at a UNODC Workshop on Asset Recovery held on 11-12 July 2017. The purpose of the workshop was to increase capacity in Myanmar to implement Chapter V of UNCAC on Asset Recovery and engage in international cooperation relating to asset recovery and prepare for the second cycle of review of implementation of UNCAC. StAR delivered presentations on international asset recovery trends and developments, the asset recovery process and avenues for recovering assets, strategic considerations for developing and managing a case, securing of evidence and tracing

# US\$23 million

added to the Central Bank  
of Somalia's reserves with  
StAR assistance

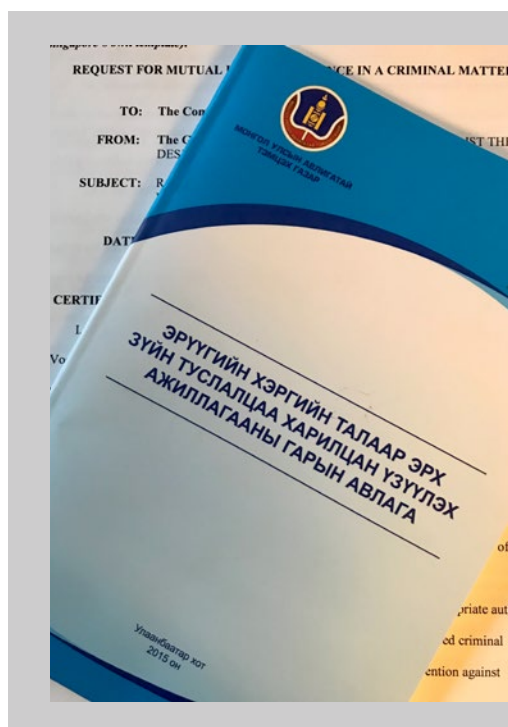
of assets, international cooperation in asset recovery, and management of returned assets. StAR also facilitated a roundtable to discuss actions required for active asset recovery and next steps for development of asset recovery capacity in Myanmar. The workshop built on an earlier workshop held in April 2017, gathering participants from the Union General Attorney's Office, the Anti-Corruption Commission, the Anti-Financial Crime Division and the Division of Transnational Crime of the Myanmar Police Force, the Bureau of Special Investigation, and the Supreme Court to discuss prevention of illicit financial flows and asset recovery.

**Coordination for effective management and disposal of seized and confiscated assets in Nigeria:** The workshop was organized by the Office of the Attorney General on 3-4 July 2017 bringing together the relevant agencies dealing with asset recovery and asset

management. StAR led the workshop discussions based on recently published study on the management and disposal of seized and confiscated assets. StAR held two mentoring sessions on 5-6 July 2017 for staff of the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices and Other Related Offences Commission (ICPC).

Discussions during the workshop addressed the respective roles and experiences of agencies in asset management. The counterparts also presented on the Proceeds of Crime bill currently under review at the National Assembly, as well as the proposed Inter-agency Central Asset Management Committee. The mentoring session for the EFCC focused on the issue of court orders for seizure and confiscation and challenges with regard to interim management of assets. The mentoring session for the ICPC included discussions on record-keeping and drafting of court orders.

**Increasing efficiency of MLA in Guatemala:** StAR conducted a workshop on international cooperation and drafting of requests for MLA to prosecutors. The workshop was requested by Guatemala in the framework of StAR's country engagement to improve international cooperation and their response rate to MLA requests, including using informal



## LEVERAGING MLA GUIDELINE IN MONGOLIA

StAR assisted the authorities in Mongolia through several workshops and consultations in developing a guideline on mutual legal assistance in 2015. 300 copies of the guideline were distributed to practitioners. The Prosecutor General Office used the guideline to organize trainings for 52 prosecutors and law enforcement officials in 2016, and for over 80 prosecutors in different districts and in the capital in 2017.

means of assistance prior to the preparation of a formal request to ensure that all details required to facilitate the provision of assistance are included in the request. It took place in Guatemala City from 31 May–01 June 2017 with participants from anti-corruption prosecution services in Guatemala.

**Support for reform of the financial disclosure and conflict of interest framework in Argentina:** After a scoping mission StAR was involved

**StAR was involved in finalizing a diagnosis of the financial disclosure and conflict of interest framework for Argentina.**



**Effective management and disposal of seized and confiscated assets is a challenge in many countries.**

in finalizing a diagnosis of the financial disclosure and conflict of interest framework to be included in a World Bank Transparency Diagnosis. StAR further supported the reform of the financial disclosure and conflict of interest framework for the Executive by: (i) helping redesign the disclosure form for the new e-filing system, (ii) presenting at Open Government Partnership (OGP) discussions with civil society to gather input for the reform and share international good practices; (iii) supporting a legal review and drafting of new legislation at the anti-corruption office (OA). StAR also conducted a scoping mission with the judiciary to support set up of financial disclosure unit for judges.



## SPOTLIGHT ON SRI LANKA

### WORKING ON LEGAL REFORM, CAPACITY FOR FINANCIAL INVESTIGATIONS AND FACILITATING INTERNATIONAL COOPERATION

In the build up to GFAR, StAR worked closely with Sri Lankan counterparts—primarily through the Presidential Task Force for Recovery of Illegally Acquired State Assets (START)—as one of the four GFAR focus countries.

#### **Assisting to enact sound asset recovery laws:**

StAR started discussions regarding developing a Proceeds of Crimes Act and held preliminary consultations regarding reforming the asset declaration system. The work in these areas started in 2018.

#### **Building capacity to conduct asset recovery cases:**

**Introduction to electronic evidence, and digital forensics Workshop in Sri Lanka:** StAR conducted a workshop in cooperation with the World Bank and the UNODC Cybercrime project, for relevant national authorities in Sri Lanka. The workshop took place in Colombo from 26-27 April 2017 gathering participants from the Commission to Investigate Allegations of Bribery or Corruption (CIABOC), Criminal Investigation Department (CID), Financial Crimes Investigation Division (FCID), and the Financial Intelligence Unit. The workshop built on previous StAR capacity building workshops held in 2016 and participants gained knowledge on open source information, basics of computers and internet, collecting and handling of electronic evidence and digital forensic evidence, procedural, evidentiary and jurisdictional issues related to collecting electronic evidence culminating in a practical training. In July 2017 CID officers who attended the workshop for the first time seized crucial electronic intelligence and evidence from mobile devices in relation to a transnational case of bank e-heist.

StAR also placed a mentor for financial investigations from the Serious Fraud Office of New Zealand in Sri Lanka from October to December 2017 to work primarily with START, CID, FCID and CIABOC and assist in building capacity in preparation for GFAR.

**Facilitating international cooperation:** StAR organized a Workshop on Mutual Legal Assistance (MLA) for Asset Recovery from 18-20 October 2017. Participants came from the Ministry of Justice, Attorney General's Department, CIABOC, CID, FCID and Financial Intelligence Unit. The objectives of the workshop were to improve capacity for drafting MLA



**Digital forensic workshop**



**Officials from Singapore and U.K. explain their mutual legal assistance process during workshop in Sri Lanka (October 2017).**

requests and identify ways of improving formal and informal international cooperation; to enhance domestic inter-agency cooperation and coordination amongst Sri Lankan government officials involved in asset recovery and in formal and informal cooperation with local and foreign counterparts; to provide an opportunity to interact with MLA experts from requested countries (Singapore and UK) and enhance understanding of their requirements for providing MLA.

In addition to the aforementioned examples of StAR country engagements, the initiative has also helped countries enhance capacities to establish effective systems for the recovery of assets. In 2017, two countries adopted laws with StAR support and further legal advice was provided to an additional five countries:

- **Argentina:** StAR provided input and comments to in drafting a new Ethics Law.
- **Colombia:** Following technical advice provided to the draft amendment of the Asset Forfeiture bill (Extinción de Dominio) to the At-

StAR also raised awareness on the legal concepts of the NCB forfeiture law in sectors of the Costa Rican society.

- **Guyana:** New legislation providing for non-conviction based asset recovery and for the establishment of a States Asset Recovery Agency was adopted in April 2017, following StAR support in 2016 for the development of the draft legislation and participation in public hearings.
- **Moldova:** StAR provided advice to the Moldovan authorities that contributed to the law establishing the

## In longer-standing contacts, advances have been possible when StAR's work has coincided with the political will to pursue asset recovery or legislative amendments.

torney General Office of Colombia in November 2016, the draft amendment was adopted by the Colombian Government by means of law No. 1849 on 19 July 2017.

- **Costa Rica:** StAR conducted a mission to Costa Rica in July to provide technical advice on draft of the NCB forfeiture law that was being discussed in the Legislative Assembly.

asset recovery office and continues to provide support in drafting the regulation on the evaluation and management of seized assets and other laws related to asset recovery.

- **Sri Lanka:** During a mission in October 2017, discussions took place and a roadmap was developed for initiating the drafting process in the first quarter of 2018. The selection

## OTHER WORK WITH GFAR FOCUS COUNTRIES

StAR continued to support **Tunisia's** efforts to recover the assets of the Ben Ali regime. In particular, StAR held training workshops with the UNODC country office for the incoming prosecutors and judges of the new financial crimes unit in the Ministry of Justice. StAR also participated in national coordination meetings between the Ministry of Justice and the Ministry of Public Domain, that has taken over the asset recovery mandate. The Minister of Public Domain attended GFAR as head of delegation.

StAR worked closely with **Ukraine** throughout 2017 in preparation of GFAR with the different relevant authorities pursuing cases abroad. In addition, StAR delivered several capacity-building workshops, including sessions on international standards on asset recovery and working with open data at the OECD sponsored program for the Initial Training on Asset Recovery to the newly created Asset Recovery and Management Agency (ARMA).

3

**countries adopted laws with StAR support**

5

**received legal advice during legislative reform process**



process for the recruitment of an adviser to develop a Proceeds of Crimes Act was finalized.

- **Tanzania:** StAR provided comments on the Proposed amendment to the Proceeds of Crimes Act (POCA) Bill to bring in, Non Conviction Based (NCB) regime as well as and asset management provisions.

These short descriptions illustrate the range and success of differing trends in StAR's country engagements in 2017. They demonstrate how in longer-standing contacts, advances have been possible when StAR's work has coincided with the political will to pursue asset recovery or legislative amendments.

## ADDITIONAL ACTIVITIES

International coordination and cooperation is an important aspect of StAR's country engagements. StAR provided guidance and practical advice in developing mechanisms for more efficient domestic and international cooperation in asset recovery. For example:

**Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation (BIMSTEC).** StAR delivered a



**Bay of Bengal Initiative for Multi-Sectoral Technical and Economic Cooperation (BIMSTEC).**

workshop on international cooperation focused on asset recovery for officials of the BIMSTEC Member Countries (Bangladesh, India, Nepal, Sri Lanka, Thailand). The workshop took place in Dhaka, Bangladesh from 30 May to 1 June 2017 and facilitated international cooperation amongst BIMSTEC member countries in accordance with international conventions, enhanced the capacity of domestic inter-agency cooperation and coordination amongst Bangladesh government officials involved in developing asset recovery strategies and avenues of informal cooperation with local and foreign counterparts. The workshop was attended by participants drawn from relevant sectors such as financial intelligence, banking, law enforcement, customs, and anti-corruption authorities.

**APEC Workshop on Enhancing Cooperation Among Law Enforcement Authorities for Effective Asset Recovery.** On 18 August 2017, StAR participated as a co-organizer in the APEC Network on Anti-Corruption Authorities and Law Enforcement Agencies (ACT-NET) Meeting. In addition to being involved in preparations of the APEC Workshop on Enhancing Cooperation

Among Law Enforcement Authorities for Effective Asset Recovery, StAR presented in and moderated different sessions of the meeting and facilitated the discussions in different sessions which focused on national coordination and international cooperation to draw conclusions that were presented to the ACT-NET Meeting on 19 August.

**German Technical Cooperation group (GIZ):** Developing online financial investigation training. The StAR team traveled to Bonn, Germany from 4–7 September, 2017 to participate in a workshop hosted by the German Technical Cooperation group (GIZ) to develop an online financial investigation training. StAR developed an innovative module on using anti-money laundering tools to fight corruption (“follow the money”) to build capacity to prevent, detect, combat and recover assets from these illicit activities. GIZ proposed to facilitate an online transfer of this module to reach a wider audience. The workshop continued with these discussions and focused on the actual design process with the technical team from the GIZ training academy. The StAR role was to provide a substantive contribution to the background documentation and

demonstration of how the module works, including to discussions on the collaboration on the implementation of the online version when complete.

## OUTCOMES

Through its country engagements StAR has helped the asset recovery process of various countries in the following ways:

- Advised and assisted the authorities in several countries with the preparation and adoption of new legislation.
- Provided practical support for countries in setting up effective asset recovery institutions.
- Gave practical help to increase the capability and skills of officials in conducting asset recovery cases.
- Facilitated and fostered international cooperation.

These trainings have led to enhanced capacity of relevant entities in carrying out asset recovery activities. Feedback from counterparts in several countries indicates that technical support from StAR has improved and facilitated their communications with other jurisdictions and increased their chances for asset recovery.



# Policy Influence



**Attorneys general of Guatemala, the Island of Jersey, Sri Lanka, and Ombudsman of the Philippines at StAR Day special event during UNCAC CoSP in November 2017.**

## BACKGROUND

**S**tAR believes that asset recovery can only succeed in individual countries if it is backed up by the collective will and action of the international community to create both domestically and at the international level a legal and policy environment more conducive to the recovery of stolen assets.

StAR therefore works in international fora and with organizations to influence policy. In addition, StAR seeks to affect the attitudes and actions of national governments in the developing and developed world to press for policy changes. StAR has been very involved with the decisive gatherings and forums that are critical in shaping approaches to the fight against corruption such as the Conference of the States Parties to UNCAC (CoSP) and its subsidiary bodies.

StAR has also used its involvement with national authorities and non-governmental organizations to promote action on asset recovery. For example, it continued its cooperation with Switzerland and the International Center for Asset Recovery (ICAR) of the Basel Institute on the development of guidelines for efficient asset recovery in the context of the Lausanne process to prepare the commentaries and an online tool on the Guidelines which was launched in 2017 (see section on CoSP below).

The Sustainable Development Goals and the Addis Ababa Agenda for Action of the 3rd International Conference on Financing for Development also demonstrated how asset recovery is now being considered as part of development and not merely a matter for law enforcement. The Sustainable Development Goals which were adopted by 193 countries of the UN General Assembly in September 2015 included

the commitment to, “strengthen the recovery and return of stolen assets.”<sup>4</sup> The Addis Ababa Action Agenda stated that “we support the Stolen Asset Recovery Initiative of the United Nations and the World Bank, and other international initiatives that support the recovery of stolen assets. We further urge regional conventions against corruption be updated and ratified. We will strive to eliminate safe havens that create incentives for transfer abroad of stolen assets and illicit financial flows.”

## ACTIVITY/OUTPUT

In 2017 StAR worked with the following organizations on international standards and obligations:

### UNCAC

**Conference of the States Parties (CoSP).** The seventh session of the CoSP to UNCAC was held in Vienna

from 6-10 November 2017, and adopted eight resolutions and one decision, including on asset recovery (7/1 Strengthening MLA for international cooperation and asset recovery), as well as on corruption in cases involving vast quantities of assets (7/2 Preventing and combating corruption in all its forms more effectively, including, among others, when it involves vast quantities of assets, based on a comprehensive and multi-disciplinary approach). The Conference

stakeholders to engage in discussions over various topics related to asset recovery, present new tools, studies and solutions and outline the challenges and expectations for the future. The day event included the following sessions:

- A High-level Conversation on Asset Recovery, including attorneys general of Guatemala, Jersey, Sri Lanka, and the Ombudsman of the Philippines, examined the asset re-

and requesting States and international organizations following the Lausanne seminars, will help to overcome difficulties in the asset recovery process.

- A session showcasing ongoing work carried out by StAR, UNODC and other partners on new resources, tools, and knowledge products made available to practitioners and policy-makers, including international and regional practitioner networks which provide platforms that can complement and facilitate cooperation in advance of the MLA process.
- A session on best practices on asset management featuring a panel discussion on good practices states parties have implemented and challenges encountered in the management and disposal of recovered assets.
- A panel discussion looking at the role civil society can play in overcoming challenges in the asset recovery process. Speakers from both government and civil society discussed how CSOs' relationship with government and law enforcement

## The StAR Initiative plays a prominent role in the sessions of the UNCAC Asset Recovery Working Group.

was attended by approximately 1800 participants from 158 States parties and a large number of inter-governmental and non-governmental organizations.<sup>5</sup>

StAR prepared and facilitated a full-day special event on asset recovery on the margins of the CoSP. The special event took place on 7 November 2017 and provided a platform for StAR, its partners, practitioners and other

covery landscape and the lessons learned and discussed policies that can help to overcome the obstacles in the process of tracing and returning proceeds of corruption.

- An interactive panel discussed how the Guidelines for the Efficient Recovery of Stolen Assets, developed by experts from around 30 requested



**International Expert Meeting on the management and disposal of recovered and returned stolen assets, including in support of sustainable development**

can contribute to the flow of relevant information, how CSOs can play a role in highlighting the impact of corruption, and how they can monitor returned assets.

StAR also made presentations and interventions under relevant agenda items on Asset Recovery and Technical Assistance and organized bilateral meetings on the sideline. In addition, StAR held briefings on GFAR preparations for focus countries, invited jurisdictions and civil society and held a consultation meeting on the lessons learned from AFAR.

#### **Working Group on Asset Recovery.**

The StAR Initiative plays a prominent role in the sessions of the UNCAC Working Group on Asset Recovery (ARWG), through substantive contributions to its background documentation, preparations of plenary and side meetings, and a presentation under the relevant thematic item 5 on technical assistance and capacity building. The Eleventh Session of the Working Group (24-25 August 2017 in Vienna) discussed proactive and timely sharing of information, in accordance with article 56 of the Convention, and good practices for identifying victims of corruption and the parameters for compensating them, including as part of the disposal of recovered assets under its agenda item 4(a) and 4(b).

#### **UNCAC Implementation Review Group.**

StAR participated in the Eighth Meeting of the Implementation Review Group of UNCAC, which took place from 19-23 June 2017 in Vienna, and briefed the Group on technical assistance activities in support of the implementation of chapter V (asset recovery) of UNCAC.

#### **Implementation of UNCAC in ASEAN 2016-2020.**

As part of the conference to create a Regional Platform on "Fast-tracking Implementation of UNCAC for Economic and Social Development in Southeast Asia," which was held in Bangkok from 31 January–03 February 2017, StAR facilitated a Working Group discussion focusing on "Preventing money laundering, preventing and detecting transfer of proceeds of

crime and recovering stolen assets." The session led to concrete recommendations which were reflected in the final "Bangkok Statement on Implementation of UNCAC in ASEAN 2016-2020," which captures the commitments of the participants.

#### **SDGs, Illicit Financial Flows and Financing for Development**

##### **International Expert Meeting on the management and disposal of recovered and returned stolen assets, including in support of sustainable development.**

StAR supported the organization of the International Expert Meeting on the management and disposal of recovered and returned stolen assets, including in support of sustainable development, in cooperation with the Governments of Ethiopia and Switzerland, which was held in Addis Ababa, Ethiopia from 14–16 February 2017. The workshop was held pursuant to the 2030 Agenda for Sustainable Development and the Addis Ababa Action Agenda of the 3rd International Conference on Financing for Development (Addis Ababa, 13–16 July 2015), which encourages the international community to develop good practices on asset return. The meeting

of Recovered and Returned Assets at the International Level" and "Use of Settlements and their Implications on the Recovery and Return of Stolen Assets," and also contributed to the preparation of the final report of the workshop.

#### **Conference on Promoting International Co-Operation in Combating IFFs and Enhancing Asset Recovery to Foster Sustainable Development—Abuja IFF/AR.**

StAR provided policy input at the high-level IFF/AR Conference, which took place in Abuja, Nigeria from 5–7 June 2017. Organized by the Presidential Advisory Committee against Corruption, the conference gathered roughly 150 participants from Africa and other parts of the world, with the participation of the Acting President, the Minister of Foreign Affairs, the Attorney General and the Minister of Finance, as well as regional bodies, intergovernmental organizations, UN agencies, financial institutions, academia, the private sector and civil society.

The conference focused on policy measures, tools and strategies to effectively tackle illicit financial flows (IFF), strengthen asset recovery, enhance international cooperation, and to raise the awareness around the use of returned assets for sustainable develop-

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### **UNODC and the World Bank are among the five international organizations (OECD, IMF and FATF) that are invited to participate in the G20 ACWG meetings as observers.**

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brought together for the first time different constituencies working on asset recovery and return from the perspective of the implementation of UNCAC and the Financing for Development angle (89 experts from 34 countries). It was a first step towards developing good practices on seized and confiscated assets and on asset return, in response to the mandates mentioned above. The StAR team, made presentations during sessions on "Current State of the International Debate on the Management

ment, linking to the Addis Ababa Action Agenda, including the International Expert Meeting on the management and disposal of recovered and returned stolen assets, which was held in Addis Ababa in February 2017.

The Abuja Declaration, which was an outcome of the conference, included a set of recommendations for each key topic discussed. Participants called on African Countries and the International Community in general to sustain dialogue and action against IFF.



### Special meeting of ECOSOC on international cooperation in tax matters.

StAR delivered a presentation on asset recovery and illicit financial flows (IFFs) at the Special meeting of ECOSOC on international cooperation in tax matters held in New York on 7 April 2017. The presentation contributed to discussions on IFFs, tax, asset recovery and anti-corruption efforts.

### G20

StAR participated in the G20 Anti-Corruption Working Group (ACWG) held in Berlin, Germany from 23–25 January 2017, and Vienna, Austria from 12–15 September 2017, co-chaired by Germany and Brazil. The meeting addressed seven key issues laid out in the Action Plan and Implementation Plan for 2017-18. UNODC and the World Bank are among the five international organizations (OECD, IMF and FATF) that are invited to participate in the G20 ACWG meetings as observers.

### G7

StAR cooperated closely with G7 countries on issues related to financial transparency, as well as asset recovery and beneficial ownership. In particular, StAR worked with G7 countries to prepare the Global Forum on Asset Recovery, and collected experiences of G7 practitioners on a lessons learned note for the Arab Forum on Asset Recovery.

### Financial Action Task Force in Latin America (GAFILAT).

GAFILAT was created in 2000 as a regionally based intergovernmental organization comprised of 16 countries from South, Central and North America, in order to combat money laundering and terrorist financing through continuous improvement of the national policies against both offenses and the enhancement of different cooperation mechanisms among its member states. StAR participated as observer at the XXXV Plenary Meeting of Representatives and Working Groups of the Financial Action Task Force in Latin America (GAFILAT), which was held in Buenos Aires, Argentina from 24–29 July 2017. StAR work in the region specifically on Non-Conviction Based Forfeiture and strategies for effective



### STAR AWARD OF EXCELLENCE

During The 24th Plenary of the Egmont Group of Financial Intelligence Units (FIUs) which was held in Macao, SAR from 2-7 July 2017 a StAR Award of Excellence was presented for the first time year to a joint case presented by FIUs of Lebanon and Tunisia, for their success in asset recovery in a corruption case. All entries were recognized and all Egmont Group members were encouraged to continue sharing their best cases in future competitions

asset recovery was promoted. Two key outcomes of StAR participation in GAFILAT XXXV were related to next steps, i.e. discussions to define dates on an asset recovery workshop and capacity-building activities, as well as for a financial disclosure workshop with civil society to discuss on-going activities and reform plans.

### OECD and FATF

StAR has developed close working relationships with the OECD and FATF,

reviewed the latest developments on beneficial ownership, in the light of recent developments such as publication of the so-called “Mossack Fonseca and Paradise Papers.” Further work will be ongoing during 2018.

### ADDITIONAL ACTIVITIES

In addition to StAR’s on-going work with the above organizations, it is involved with other international bodies, including:

### StAR has developed close working relationships with the OECD and FATF, contributing to research and publications.

contributing to research and publications through its participation in relevant working groups. Additionally, World Bank and UNODC participate in each organization’s plenary meetings held throughout the year.

### International Expert Group Meeting on Beneficial Ownership Transparency

StAR contributed to and participated in an international expert group meeting on “Beneficial Ownership Transparency,” organized by UNODC and held in Vienna from 3–4 October 2017. Pursuant to a mandate in the St. Petersburg Statement, adopted at the Sixth Session of the UNCAC CoSP, the meeting

- **The Egmont Group.** In 2017, StAR attended the Egmont Plenary from 29 January to 3 February in Doha, Qatar. StAR had an active role in the Information Exchange on ML/TF Working Group (IEWG) meeting, during which, the preliminary report with findings related to the joint WB–UNODC–Egmont Group study on *Financial Intelligence Units Working with Law Enforcement and Prosecutors* was presented and the next steps discussed. The StAR team also held a brief meeting with representatives of the Argentine FIU regarding possible StAR assistance. Further talks with representatives of the StAR Initiative and various



**Opening of ARIN-AP Annual Meeting.**

agencies and ministries in Argentina were scheduled. This report was adopted following 2017 Egmont Group Plenary in Macao. At this plenary, a representative from Namibia informed StAR that, as a result of having used the World Bank methodology to conduct a national risk assessment of money laundering and terrorism financing risks, Namibia uncovered a significant trade-based money laundering scheme. StAR and Namibia are currently discussing technical assistance to support asset recovery related to this case.

- **APEC.** Coordination Meeting with International Organizations Anti-Corruption and Transparency Working Group (ACTWG): On 21 August StAR participated in a Coordination Meeting with International Organizations: Connecting Donors to Anti-Corruption Capacity Building Needs. This meeting was designed to improve the supply and coordination of capacity building assistance

in order to more effectively and efficiently assist countries with their implementation of UNCAC and other regional and international anti-corruption obligations. StAR contributed to discussions including on capacity gaps identified through the UNCAC Implementation Review Mechanism. On 22 August StAR attended and presented at the 25th APEC Anti-Corruption and Transparency Working Group (ACTWG) Meeting. The meeting focused mostly on activities of APEC ACTWG, plans for future activities and deliverables, reports of countries and international organizations. As relevant bilateral meetings with StAR clients and donor countries were also organized.

## OUTCOMES

Due to its work at the international level, StAR has helped secure the following outcomes for policy relating to asset recovery:

- Contributed to policy dialogue at international level, e.g., StAR publications and presentations informed discussions, including on settlement of corruption cases during Asset Recovery Working Group and UNCAC CoSP.
- Gained international recognition through UNCAC CoSP resolution on asset recovery, which specifically recognized the role of StAR and requested StAR to continue to provide and develop capacity-building initiatives on asset recovery, including knowledge products and technical tools.
- Helped to advance high-level political support and commitment to asset recovery (e.g. numerous statements at high level segment of UNCAC CoSP referring to StAR's work as well as during GFAR).

# Partnerships & Regional Activities

## BACKGROUND

In addition to those organizations mentioned in the section “International Standards and Policy Influence,” StAR continued to work with a growing number of regional and multilateral organizations to foster greater international cooperation on cases, policy, and general approaches to asset recovery.

Beyond partnerships with practitioners, StAR has also sought to develop ties with civil society organizations (CSOs) in support of their advocacy objectives (through leverage of policy work, influence and representation), as well as in terms of capacity building.

## ACTIVITY/OUTPUTS

StAR participated in a range of events, networks and organizations to encourage connections between practitioners—governmental and non-governmental, the private sector, civil society organizations and others—sharing similar goals.

### **10th Practitioners’ Workshop on the Return of Illicit Assets of Politically Exposed Persons (Lausanne X)**

In March 2017, StAR contributed to the Lausanne X seminar, organized by the International Center for Asset Recovery, StAR, and the Government of Switzerland.

The Lausanne Process entails seminars particularly addressed to practitioners in the field of asset recovery. They have been hosted regularly in Lausanne/Switzerland since 2001, with the objective of improving international cooperation and coordination in the fight against funds illicitly acquired by

## GLOBAL FORUM ON ASSET RECOVERY

From 4-6 December 2017, the StAR initiative supported the inaugural Global Forum on Asset Recovery (GFAR), co-hosted by the United States and the United Kingdom, gathering over 250 participants representing 26 jurisdictions as well as international organizations, civil society and media.

Organizing an event of this magnitude required significant planning and effort. The GFAR event was the culmination of one year of intense preparations with co-hosts, focus countries as well as invited jurisdictions, and civil society organizations. Apart from all aspects of the meeting itself, StAR team provided technical assistance on asset tracing investigations and asset recovery case preparations for the focus countries Sri Lanka, Tunisia, Nigeria and Ukraine. As the date got closer, for a period of around 6 weeks, virtually the whole StAR team was involved in organizing GFAR.

In addition to providing a venue for over 100 bilateral and multi-jurisdictional meetings to advance case specific efforts, GFAR also provided a forum for training and discussion of emerging topics in the field, such as best practices on the use of technology in asset tracing, while also providing a venue to identify country-specific capacity building needs. GFAR was structured to break down bureaucratic silos. It uniquely brought together policymakers with investigators and prosecutors, as well as high-level political officials responsible

for asset recovery efforts and civil society organizations. GFAR also dispensed with the typical geographic groupings and combined the Group of Seven (G7), financial centers and countries relevant for the asset tracing work necessary to advance specific investigations in the focus countries based on their input and intense dialogue with StAR advisors. The event led to promising results.

Sri Lanka’s Attorney General noted that GFAR allowed his country to advance their asset recovery efforts by fifteen years. For the first time, Sri Lanka held multi-jurisdictional meetings to discuss the movement of stolen assets across borders for specific coordination on investigations.

Thanks to direct engagements through GFAR and the momentum built, Ukrainian officials were able to advance numerous asset tracing investigations with various financial centers and strengthened coordination with the U.S., UK and Switzerland among others. Tunisia also built on previous work done through the Arab Forum on Asset Recovery and followed up on its pending asset recovery cases.

Active civil society involvement from focus countries during GFAR also helped to set a standard for future engagement, as well as for follow up with officials upon returning home. Civil society leaders from Ukraine were instrumental in providing training to ensure that their lessons learned and successes can be replicated.





**250**  
participants

**26**  
jurisdictions represented

**100+**  
bilateral meetings

Efforts to further G20 priorities on transparency and accountability were also incorporated into the GFAR structure. Building on the commitment of G20 members, participating jurisdictions such as Brazil, Italy, Latvia, Nigeria and Ukraine completed and United Kingdom updated guides on transparency of beneficial ownership and other jurisdictions such as Switzerland, Tunisia, India, New Zealand committed to doing so. Similarly, other jurisdictions also published or updated guides clarifying national procedures on mutual legal assistance and asset recovery for publication at GFAR.

All G7 members have expressed a recognition for the unique role that this process plays and the need for such an effort when countries undergo a dramatic change in political leadership and must address longstanding corruption challenges.

All information, including a fact sheet and the final GFAR Communiqué can be found at: <https://star.worldbank.org/star/about-us/global-forum-asset-recovery-gfar>.



**"GFAR allowed Sri Lanka to advance their asset recovery efforts by fifteen years."**  
—Hon. Jayantha Jayasuriya, Attorney General of Sri Lanka

**"It is heartwarming to note that there is evidence of a renewed commitment to collectively identify the most effective ways to overcoming legal hurdles to asset recovery and return, The Global Forum on Asset Recovery (GFAR) in December 2017 is one good example."** —President Muhammadu Buhari of Nigeria

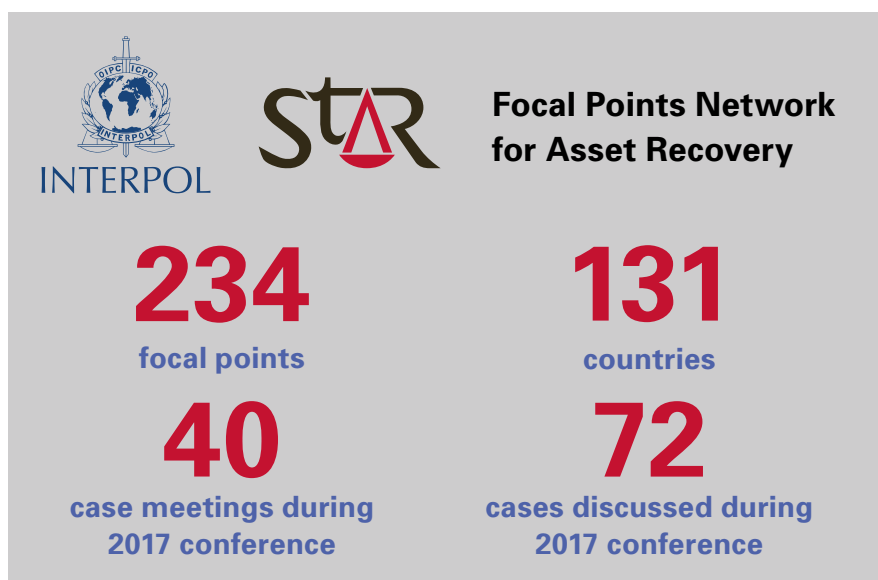
State Department photo/Public Domain



**StAR coordinated case-related meetings at GFAR.**

politically exposed persons. Noting that through the first seven Lausanne seminars, a number of recurring themes had emerged, participants of Lausanne VIII in 2014 (90 experts from 30 countries and from several international organizations) agreed on the “Guidelines for the Efficient Recovery of Stolen Assets” (the Guidelines).

The main goal of the Lausanne X seminar was the finalization of a (step-by-step) guide, as mentioned in the recent UNCAC Conference of the States Parties resolutions, to support the practical application and implementation of the Guidelines. By drawing on global practical experience participants identified single steps of action in the asset recovery process. Lausanne X focused on investigations and communications issues during investigations (Guidelines 3, 5, 6, 7 and 8) and developed the concrete steps for implementation of these guidelines. StAR team members served as facilitators for the workshop and assisted in developing an online tool for the Guidelines (please see below).



### Global and Regional Practitioner Networks

StAR has continued and widened its cooperation with practitioner networks engaged in asset recovery and confiscation:

**The Global Focal Point Network on Asset Recovery (GFPN).** The Global Focal Point Network on Asset Recovery (GFPN) by StAR and INTERPOL was established with the objective of supporting practitioners overcome operational barriers associated with international cooperation in asset recovery. With the

## RETURN OF US\$321 MILLION OF ABACHA LOOT FROM SWITZERLAND TO NIGERIA DURING GFAR

GFAR provided a perfect venue for signing ceremony of a significant new Memorandum of Understanding between Nigeria, Switzerland and the World Bank Group for the return of US\$321 million of stolen assets. The MOU captures the tripartite agreement on the World Bank’s monitoring role and the proposed modalities of the funds repatriation and disbursement, following a December 2014 Swiss court order that the funds be repatriated. The responsibility for the use of the funds is with the Federal Government of Nigeria. The Nigerian authorities requested the funds be used to support a program of targeted cash transfers to poor and vulnerable Nigerians under the National Social Safety Net Project financed by a credit extended by the International Development Association.

The parties have agreed to establish monitoring framework for the use of the repatriated funds that will enhance transparency and accountability. To that end, the Federal Government of Nigeria will engage civil society organizations to help monitor the use of the funds. The transfer is a good practical example of contribution of asset recovery to financing for development.<sup>8</sup>



**Signing the MOU, left to right: Ms. Ceyla Pazarbasioglu, Senior Director, Finance, Competitiveness and Innovation Global Practice, World Bank; H.E. Abubakar Malami, Attorney-General and Minister of Justice, Nigeria; Ambassador Roberto Balzaretti, Secretary of State, Director, Directorate for International Law, Switzerland; Ambassador Pio Wennubst, Assistant Director General, Head of the Global Cooperation Department, Swiss Agency for Development and Cooperation; Rachid Benmessaoud, Country Director for Nigeria.**





**With the Royal Canadian Mounted Police, INTERPOL and StAR hosted the 7th Global Focal Point Conference in Ottawa on 6–8 June 2017.**

INTERPOL Anti-Corruption & Financial Crimes (AFC) Unit and in cooperation with the Royal Canadian Mounted Police, StAR hosted the 7th Global Focal Point Conference in Ottawa on 6–8 June 2017.

The conference provided an opportunity to deliberate on the international developments in asset recovery, as well for the focal points to continue to build trusted relationships to enhance international cooperation in asset recovery and to hold bilateral meetings. The 96 participants were comprised of the network's focal points, anti-corruption authorities, and other law enforcement agencies involved in asset recovery from 45 participating countries and 5 regional networks. 40 bilateral meetings were held.<sup>6</sup>

StAR has supported the Global Focal Point Network on Asset Recovery (GFPN) in establishing a virtual platform hosted on the secure website of INTERPOL and accessible through the secure communication protocols offered by INTERPOL. This enables focal points authorized by their national administration to exchange information and technical knowledge on corruption and asset recovery and to respond to the immediate needs for assistance from any other member country.

#### **ARIN-AP (Asset Recovery Inter-Agency Network- Asia Pacific).**

StAR has observer status at ARIN-AP and was invited to attend and update the Steering Committee and present on emerging issues and on StAR activities at the Annual General Meeting of ARIN-AP held from 26–28 September 2017 in Tokyo, Japan.

**CARIN (Camden Asset Recovery Inter-Agency Network).** StAR also participated in the annual meeting of CARIN held from 11–13 October 2017 in Stockholm Sweden.

#### **RRAG (The Asset Recovery Network established by GAFILAT countries).**

StAR participated in the Fourteenth Meeting of the Asset Recovery Network of the Financial Action Task Force in Latin America (Red de Recuperación de Activos de GAFILAT - RRAG) as an observer and keynote speaker on topics related to the challenges of asset recovery in Latin America and the Caribbean. The meeting took place in Ciudad de Guatemala, Guatemala from 09-11 May 2017, attended by 40 participants involved in non-conviction based confiscation and criminal prosecution cases of RRAG, including investigators, prosecutors, financial intelligence from 19 member states plus 5 international organizations.

These meetings also provided space for bilateral discussions among countries and with StAR clients and donor countries. The meetings provided an opportunity to engage with a network of practitioners in different regions, to disseminate StAR's knowledge products, and raise awareness about StAR's activities.

In addition to the above, StAR partners, UNODC and World Bank are involved with a number of other networks including: The Asset Recovery Inter-Agency Network of Southern Africa (ARINSA); The Group of Experts for the Control of Money Laundering (GELAVEX); The Financial Action Task Force in Latin America (GAFILAT); the Network for Integrity; The Asset Recovery Inter-Agency Network for West Africa (ARIN-WA).

Finally, in order to facilitate contact with various asset recovery networks, StAR compiled a directory of asset recovery networks which will be published in 2018 (see Knowledge and Innovation below).

## **OUTCOMES**

Through its work in forging and nurturing partnerships, StAR has helped asset recovery in the following ways:

- Enabled and eased international cooperation through the provision of “good offices” to bring different parties together (e.g. GFAR).
- Enabled practitioners to identify and exchange good practices.
- Enhanced international cooperation (through involvement in the work of GFAR and the GFPN, in providing guidance and facilitating contacts).
- Maintained and established international networks (e.g. its work in establishing and supporting RRAG).
- Helped countries identify concrete actions to advance specific cases and topics in the international realm through GFAR, and to further maintain momentum for these efforts by supporting the host nations of the US and UK.



# Knowledge & Innovation

**S**tAR has produced a range of publications, policy papers, and guides for those involved in asset recovery. Policy papers are aimed at practitioners from government agencies, CSO's, international organizations and others, to bring about changes in laws and regulations. Guides are designed to offer practical advice and step-by-step instruction in pursuing asset recovery.

In compiling its publications, StAR liaises widely with practitioners from the public and private sector, civil society organizations and others. All StAR knowledge products are disseminated as widely as possible in a growing number of languages through a variety of channels: online, at public events and elsewhere.

## ACTIVITIES

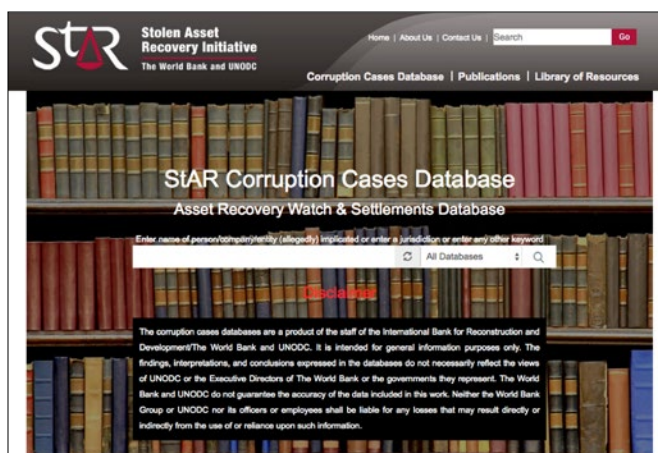
In response to requests and requirements, translations of our publications have continued to grow (see table).

StAR's Asset Recovery Watch Cases Database, as well as its library of documents from the G20, AFAR, GFAR and other forums made it an important resource for stakeholders and others interested in asset recovery.

The StAR Corruption Cases database was fully revamped in 2017 and now features a significantly better user interface with improved search functionality and filter options. We added several important functions to facilitate user access, including predictive search and options for downloading data from the database in excel or PDF format.

StAR has compiled and continuously updates an extensive record. The Asset Recovery Watch Database includes cases from almost 140 countries, jurisdictions and international organizations. It has systematized and published information about completed and active

| PUBLICATIONS  | AVAILABLE LANGUAGE(S)  |
|---|--|
| Getting the Full Picture on Public Officials: A How-To Guide to Financial Disclosure (2016) | English, Spanish   |
| Public Wrongs, Private Actions (2014)   | English, Ukrainian (Fact sheets in English, French, and Arabic)                  |
| Few and Far: The Hard Facts on Asset Recovery (2014)  | English  |
| Left Out of the Bargain (2013)  | English, French  |
| Politically Exposed Persons (2012)  | English, Russian, Spanish  |
| Public Office, Private Interests (2012)   | English, French (Fact sheets in Arabic, French and Spanish)                      |
| On the Take (2012)  | English, French, Spanish   |
| Tracking Anti-Corruption and Asset Recovery Commitments (2011)                              | English  |
| Identification & Quantification of the Proceeds of Bribery (2011)                           | English  |
| Barriers to Asset Recovery (2011)   | English, Spanish, Arabic, French (Fact sheets in English and Arabic), Vietnamese |
| Asset Recovery Handbook (2011)  | English, Arabic, French, Korean, Russian, Spanish, Thai, Vietnamese              |
| Puppet Masters (2011)   | English, Spanish, Arabic, French   |
| Towards a Global Architecture for Asset Recovery (2010)                                     | English  |
| A Good Practice Guide for Non-Conviction Based Asset Forfeiture (2009)                      | English, Arabic, Russian, French, Chinese  |



**StAR corruption cases database**

asset recovery efforts around the world. In so doing, it aims to further active recovery cases and to foster policy and legal reforms in the area of international asset recovery.

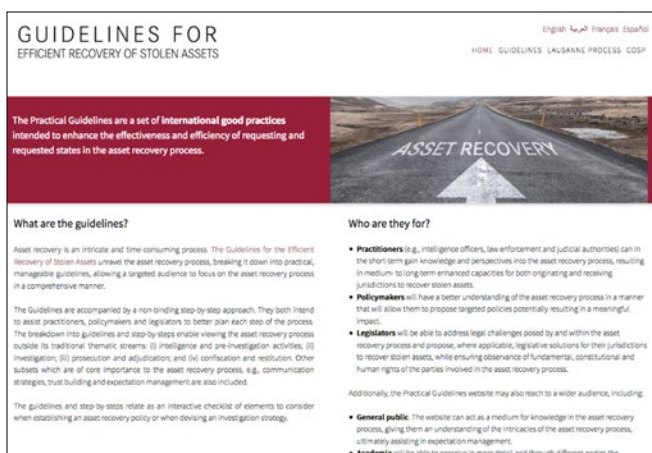
Asset Recovery Watch currently documents approx. US\$6 billion in stolen funds that have been frozen, adjudicated, or returned to affected countries since 1980. Our next update will detail an additional approx. US\$2.5 billion in stolen funds. In all likelihood, these figures represent only a fraction of actual gains from corruption that have been returned or are in the process of being located, frozen, or returned.

In 2017, StAR has contributed to the development of cumulative knowledge through other tools and their dissemination:

## Online tool for Practical Guidelines for Asset Recovery

StAR, in cooperation with the Government of Switzerland and International Centre for Asset Recovery (ICAR), finalized an online tool on the Practical Guidelines for Efficient Asset Recovery and an accompanying step-by-step guide which were launched at the 2017 CoSP in Vienna on 7 November.<sup>9</sup>

The launch of the online tool concluded a multi-year initiative including extensive consultation with practitioners from a wide range of jurisdictions in the context of the "Lausanne seminars" led by the Swiss Federal Department of Foreign Affairs with support from ICAR and StAR.



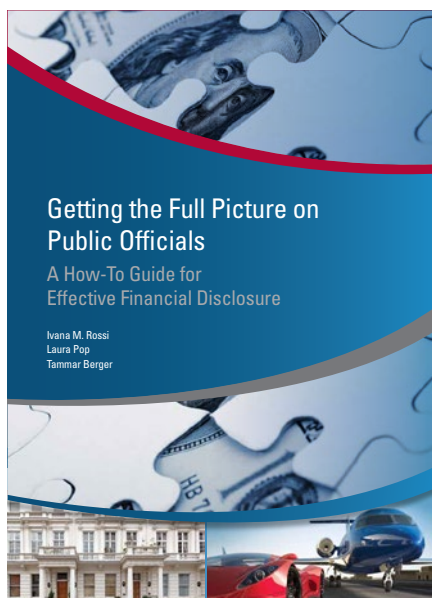
**Online tool for Practical Guidelines for Asset Recovery**

## Getting the Full Picture on Public Officials: A How-To Guide to Financial Disclosure

This publication was launched in electronic format in December 2016 and was translated into Spanish, produced in hard copy and disseminated in 2017. The handbook, which is available online, is based on rigorous data analysis aimed at helping governments who are struggling to implement financial disclosure systems.

## TRACK: The exchange of good practices, development of knowledge products and improved communication efforts

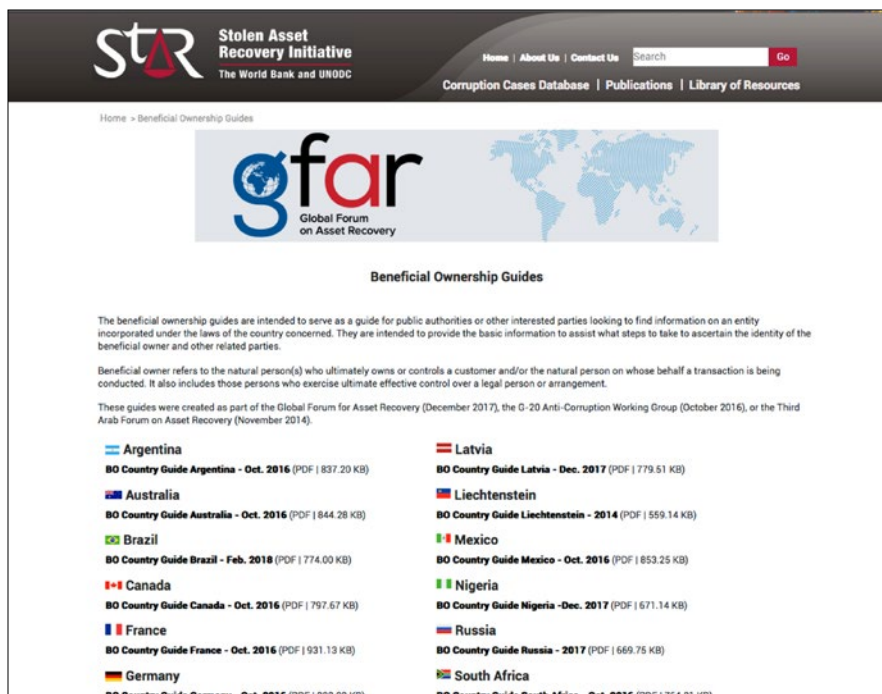
The information in the Legal Library on the TRACK website was continuously



**New StAR publication**



**Legal library on the TRACK website**



### Beneficial Ownership Guides on the StAR website

updated, including with regard to chapter V of UNCAC on asset recovery, and the TRACK Asset Recovery portal.<sup>10</sup>

The ongoing reviews of implementation of UNCAC asset recovery provisions provides an opportunity to further update the legal library.

The dedicated asset recovery page combines in one place all relevant information and links to data available to asset recovery, i.e., the legislation of 178 countries relevant to chapter V of

Criminal Matters developed by G-20 countries.

### Beneficial Ownership Guides

StAR coordinated, collated and uploaded 22 country-specific Beneficial Ownership guides to the StAR website.<sup>11</sup> Beneficial owner refers to the natural person(s) who ultimately owns or controls a customer and/or the natural person on whose behalf a transaction is being conducted. It also

Asset Recovery (December 2017), the G-20 Anti-Corruption Working Group (October 2016), or the Third Arab Forum on Asset Recovery (November 2014). In 2017-2018, new or updated beneficial ownership guides were published for Brazil, Italy, Latvia, Nigeria, Ukraine and the United Kingdom. A guide for Switzerland is forthcoming. StAR has assisted country authorities in creating these guides.

In 2018 StAR will finalize three publications on the topic of asset recovery. The first of these publications is related to and the use of insolvency laws to recover assets which will be a joint project with the International Bar Association (IBA). The second publication is a directory of asset recovery networks with information on different regional and global asset recovery networks for informal cooperation. Finally, "Financial Intelligence Units Working with Law Enforcement Authorities and Prosecutors," is a publication based on a joint study by the World Bank, Egmont Group, and United Nations Office on Drugs and Crime on Financial Intelligence Units (FIUs) Working with Law Enforcement Authorities and Prosecutors. The main objective of the publication is to support the implementation of international AML/CFT standards and to provide possible solutions in the areas currently not regulated by international standards. These publications will be launched in 2018.

## New or updated beneficial ownership guides were published for Brazil, Italy, Latvia, Nigeria, Ukraine and United Kingdom.

the Convention; the Asset Recovery Watch; the knowledge products published by the StAR Initiative; a database on settlements in cases of transnational bribery, containing 534 settlements; as well as the Country Guides for Asset Recovery that were prepared as part of the Deauville Partnership with Arab Countries in Transition Action Plan on Asset Recovery (the Deauville Action Plan) and other country-specific guides, and the Step-by-Step Guides on Requesting Mutual Legal Assistance in

includes those persons who exercise ultimate effective control over a legal person or arrangement.

These documents are intended to serve as a guide for public authorities or other interested parties looking to find information on an entity incorporated under the laws of the country concerned and to attain basic information that will assist in identifying the beneficial owner and other related parties. All guides present on the webpage were created as part of the Global Forum for

## OUTCOMES

Through its work in promoting knowledge and innovation, StAR has continued to advance asset recovery in the following ways:

- Developed knowledge to improve international cooperation and coordination in the fight against funds illicitly acquired by politically exposed persons.
- Facilitated asset recovery by collating country-specific beneficial ownership guides in a central repository.
- Identified, exchanged and disseminated good practices and knowledge more broadly.



# Advocacy & Communications



***"Safeguarding Seized Assets" appeared in the New York Times on 1 January 2017.***

## BACKGROUND

**A**dvocacy and communications support StAR's overall objectives, promote its work, and enhance the impact and effect of its activities. Advocacy and communications generate awareness and demand for StAR's offerings among key groups including, legal practitioners in the public and private sector, civil society organizations, international bodies, the media, and other groups.

In 2017, StAR built upon the significant advances it made in 2016 as an important presence in advocating and communicating asset recovery and

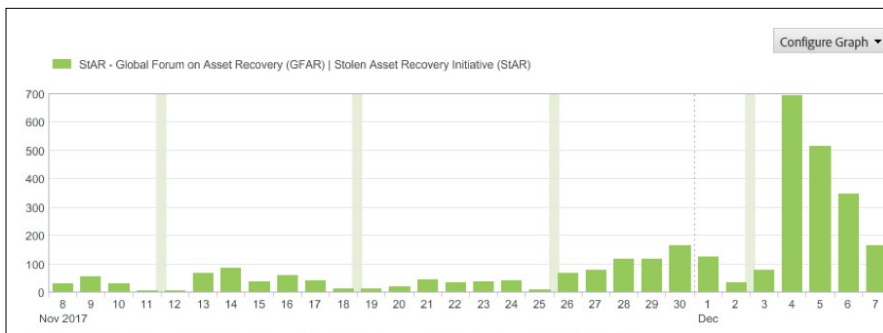
related issues such as asset disclosure and illicit financial flows. Through the publication and dissemination of the Practical Guidelines for Asset Recovery, and the continued updates to StAR's Asset Recovery Watch Cases Database and the Legal Library on the TRACK website, as well as its contribution to consolidating materials on topics related to asset recovery, StAR has increased international awareness about asset recovery. Additionally, StAR created and disseminated a large amount of content related to the GFAR event in December 2017, as well as uploading pertinent country-specific Beneficial Ownership guides to the StAR website as resources.

## ACTIVITY/OUTPUT

### Online

StAR continued to maintain and update its website and databases. At CoSP in November 2017, StAR launched, in cooperation with the Government of Switzerland and International Centre for Asset Recovery (ICAR), the *Practical Guidelines for Efficient Asset Recovery* and an accompanying step-by-step guide online.<sup>12</sup>

The number of page views to only the top 100 StAR webpages in the reporting period were nearly 124,000. Moreover, there were more than 61,000 unique visitors viewing the StAR



**StAR website—GFAR Webpage Traffic Trend Nov 8-Dec 7**

top 100 webpages during that same time period.

Previous increases in traffic to the website have coincided with major publication launches. However, in 2017, the StAR website had a considerable spike in attention to the corruption cases webpage in mid-March, to the Ferdinand and Imelda Marcos Corruption case throughout July, with the most significant spike taking place from mid-November to mid-December (period of time leading up to and following GFAR) on the StAR-Global Forum on Asset Recovery webpage when the website saw a three-fold spike in web traffic.

The Legal Library on the TRACK website<sup>13</sup> was updated with regard to Chapter V of UNCAC on asset recovery (the ongoing reviews of implementation of UNCAC asset recovery provisions provide an opportunity to continuously update this legal library). The TRACK Asset Recovery page had 2,000 unique visitors during 2017.

Similarly, the UNODC's *E-learning Anti-corruption Tool*, which was launched in January 2016, and includes an asset recovery module developed with contribution from StAR, was accessed over 7000 times as of 31 December 2017.

The StAR Asset Recovery Handbook was downloaded 2,542 times during 2017.

### Social Media

StAR's Twitter channel (@returningasets) was also used in 2017 for disseminating messages regarding issues related to asset recovery and the work of the Initiative.

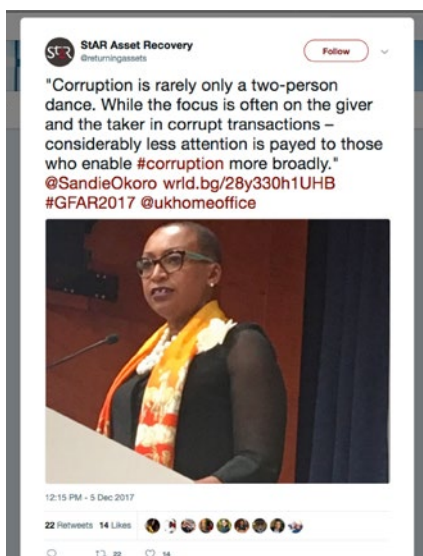
At the beginning of 2017, StAR had 2,865 followers. Twelve months later, this number rose to 3,331-- an increase of over 16.2%.

In the assessment period, there were 273,921 impressions on @returningasets (StAR's address). Of these impressions there were 5,129



engagements (how many times users interact with a twitter post e.g. likes, retweets, etc). Of these engagements, StAR tweets were retweeted a total of 1,298 times, hitting peaks in February and May. This number becomes even more significant when considering the depth and expansiveness of StAR's social network and their potential contribution to spreading StAR content and awareness.

In terms of content, the top three StAR retweets in 2017 were related to a report on the link between corruption and the Islamic State, Coutts



**StAR's Twitter account**



**StAR expert on the Mongolian program "Jargal De Facto."**

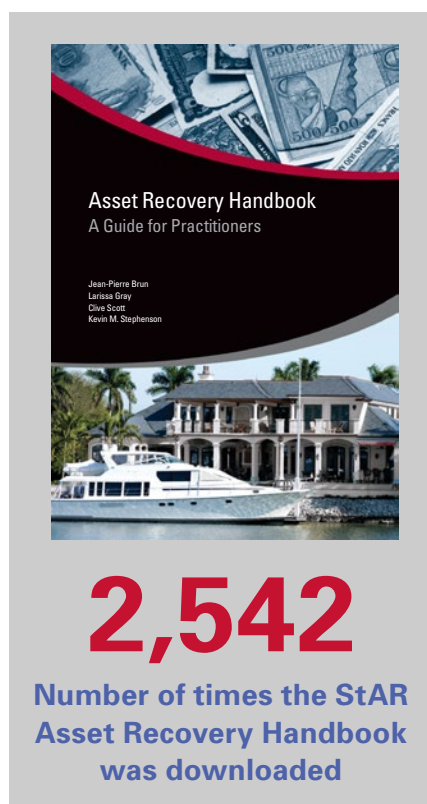


& Co being fined by Swiss regulators over money laundering, and Moldovan art illustrating US\$1 billion bank fraud. The top two most popular links on the StAR twitter page in terms of impressions were related to GFAR and its speakers, while the third most popular link dealt with secret companies allowing for cash to flood the largest real estate markets.

During GFAR a unique hashtag (#GFAR2017) was used to promote the event and disseminate information, GFAR attendees—including StAR staff and CSOs—live tweeted from the event, as did various interested CSOs that following the event remotely through livestreaming.<sup>14</sup> StAR also promoted StAR's 10th year anniversary and the redesigned Corruption Case Database. During the event @returningassets channel gained more than 71 new followers.

### Traditional Media, Public Advocacy and Outreach

Over the years, StAR has received coverage in the media, including The Financial Times, The Economist, The Wall Street Journal, Al Jazeera International, Huffington Post, Reuters and The Guardian (UK). CNN published an



article entitled “Nigerian Group Requests US\$500 million From Trump Administration” by Kieron Monks. It described a Nigerian request for the US government to release US\$500 million in stolen assets allegedly being

held as proceeds of corruption from an earlier Nigerian regime.<sup>15</sup> In this article, a StAR team member was quoted in a discussion on asset recovery. The narrative described how only “a fraction of a fraction” of corrupt funds is being recovered and, making things more difficult, victim states often struggled with issues related to MLA and coordination. However, StAR also pointed out the progress being made in the realm of asset recovery as demonstrated by a legal maneuver allowing a European nation to reclaim significant assets in “the Abacha case.”

Another featured story in the New York Times, “Safeguarding Seized Assets,” referred extensively to finding of StAR Study *Few and Far* and quoted a StAR Representative on challenges of asset recovery: “Asset recovery is highly contentious and difficult to negotiate.”<sup>16</sup> In addition to international media, StAR experts occasionally engage with national media during country engagements to raise awareness about asset recovery challenges and ways to overcome those challenges.

At the end of 2017, the GFAR event generated intense media interest and activity around asset recovery, including a front page main story on BBC



**Engaging the media and civil society in investigating corruption,” investigative journalists from New York Times, McClatchy News Syndicate (involved in Mossack-Fonseca Papers) and Civil Society discuss at GFAR.**





## ENGAGING WITH FUTURE PRACTITIONERS

In January 2017, StAR delivered a two-day asset recovery course, as part of the Master of Arts in Anti-Corruption Studies (MACS) module on “Corruption, Enforcement and Public Sector” at the International Anti-Corruption Academy (IACA) in Austria. IACA is the first international organization and educational institution to offer a global, postgraduate degree program in anti-corruption and compliance. The MACS is an executive program, and its student body is comprised of professionals from 17 countries with related work experience in the public (including law enforcement) and private sectors, international and non-governmental organizations, media, and academia.

New website. Three sessions of GFAR were open to the media: the opening session, the closing session and the press conference. These three sessions were also livestreamed and recorded

Williams of Trafford, followed by the Swiss/Nigeria/WB MOU signing—was attended by NBC, CNN, ABC and CBS, as well as photographers from AP, AFP and Getty Images. Local

## OUTCOMES

Through its promotion of asset recovery and its work, StAR achieved the following:

- It created greater awareness and interest among key stakeholders such as civil society organizations, academics, government officials, and the media in asset recovery.
- StAR highlighted the difficulties associated with asset recovery efforts as well as recent progress and successes.
- It raised the interest of influential media stakeholders in the subject of asset recovery (including through media extensive coverage of GFAR).

## At the end of 2017, the GFAR event generated intense media interest and activity around asset recovery.

(available on GFAR webpage). The opening session—headlined by World Bank Senior Vice President and General Counsel Ms. Sandi Okoro, U.S. Attorney General, Mr. Jeff Sessions, and UK Minister for Countering Extremism at the Home Office Baroness

media covering Nigeria, Tunisia and Ukraine (VOA Ukraine, Inter TV, RFE/RL Ukraine, Tunisia TV) were present as well. The closing session and the press conference generated interest from journalists covering Ukraine and Nigeria.<sup>17</sup>

# Management, Staffing & Funding

In 2017, the StAR Secretariat was based in the Finance & Markets Global Practice of the World Bank Group, that became the Financial Stability and Integrity Global Practice on 1 January 2018 due to an internal restructuring at the World Bank. As part of the corresponding reassignments due to overall portfolio, Emile Van der Does der Willebois took over as StAR Coordinator as of 1 January 2018. Emile has been part of StAR since its inception in 2007 and was the lead author on

emerging priorities as well as donor interest and additional contributions. Taking this into account, the Committee urged a renewed focus on StAR's knowledge development portfolio, both to update existing flagship publications and to expand to new substantive topics. In addition, as new or updated requests for assistance from countries were received, StAR would prioritize its activities and fund raising so that it would be well placed to respond to increased demand.

on the implementation of the StAR workplan and latest developments. Australia, Norway, Switzerland, the United Kingdom and the United States had provided contributions to the StAR Multi-Donor Trust Fund. The renewed funding enabled StAR to increase its activities compared to the two previous years and to initiate planning for new or updated knowledge products as agreed with the Management Committee.

Nine World Bank staff members, some on a part time basis and involved in other projects, work on StAR. They are involved in the practice's AMLCFT activities and on illicit financial flows. The close links with the practice's overall portfolio created increased synergies between substantive areas of work in the country engagements.

Two UNODC staff are seconded to the StAR Secretariat in Washington DC and work full time on StAR related issues. Up to eleven Vienna and two field based UNODC staff members contribute on a part-time basis to the implementation of StAR activities, particularly for country engagements.

Several consultants (both junior

## The renewed funding enabled StAR to increase its activities compared to the two previous years and to initiate planning for new or updated knowledge products.

the 2011 StAR publication "The Puppet Masters." He is a lawyer by training, having worked in private practice and at the Yugoslav War Crimes tribunal in The Hague, The Netherlands. Yira Mascaró, who was StAR Coordinator since April 2016, retains overall management functions regarding MDTF administration and human resources.

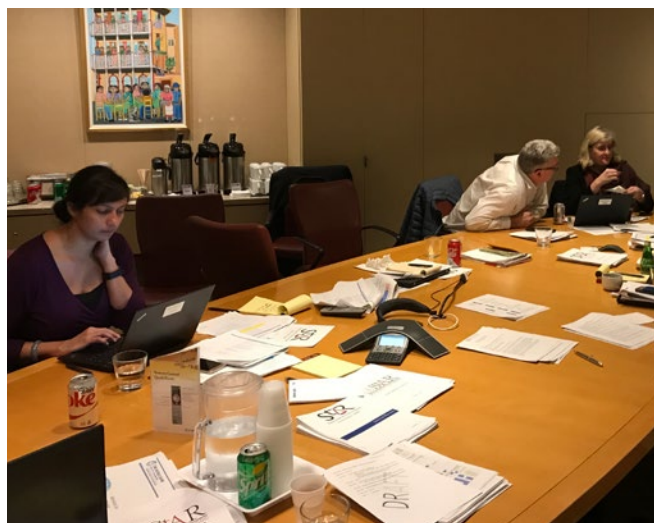
The StAR Management Committee continues to be chaired by the Vice-President of the Equitable Growth, Finance and Institutions Practice Group that hosts the Global Practice where StAR is located. It includes the Senior Director and Director in the Global Practice, as well as the Director of the Division for Treaty Affairs and the Chief of the Corruption and Economic Crime Branch in UNODC. The Committee discussed the implementation of the StAR workplan and noted the new and

The annual briefing for the Donor Consultative Group was held in November 2017 on the margins of the UNCAC COSP to share information

## STAR MDTF SUMMARY SHEET FOR JAN-DEC 2017

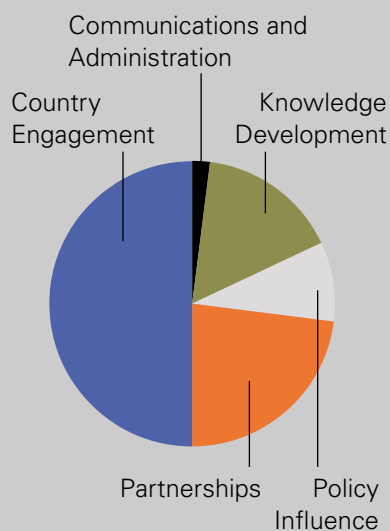
(Numbers are represented in 1000s of US Dollars)

|                                   | 2017<br>DISBURSEMENTS | %   |
|-----------------------------------|-----------------------|-----|
| Communications and Administration | 25.3                  | 2   |
| Knowledge Development             | 161.9                 | 16  |
| Policy Influence                  | 87.1                  | 9   |
| Partnerships                      | 230.6                 | 23  |
| Country Engagement                | 510.6                 | 50  |
| Total                             | 1,015.5               | 100 |



**Scenes from the StAR team retreat.**

## 2017 DISBURSEMENTS



and senior levels, depending upon work requirements) were employed in Washington on a regular basis in a variety of capacities, from training to research and for the delivery of specific priorities such as the Global Forum on Asset Recovery. Other consultants are employed to work in the field on country engagements.

## 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, 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 the seconded UNODC staff and selected activities.

- The World Bank budget to StAR in 2017 was as follows: US\$650,000.
- UNODC's budget to StAR in 2017 was as follows: US\$489,466.
- Disbursements from the Multi-Donor Trust Fund in 2017 were as follows: US\$1,015,5000.



# Conclusion & Looking Forward

**T**he tenth year anniversary of StAR marked an important year for the Initiative. StAR was involved in a wide range of regular activities in areas of country engagements, policy influence, partnerships, knowledge and innovation, and advocacy and communications, as captured in this report. But more focused work in these areas gathered pace and culminated in a grand finale, at the first ever Global Forum on Asset Recovery in December. In the context of GFAR, but also through other usual channels, StAR continued to facilitate the return of assets, including through silent diplomacy/honest brokering allowing practitioners to meet face to face and exchange information to advance their cases.

concerted efforts in this area.

While the role of the financial centers in acting against safe havens for stolen assets is vitally important in addressing these challenges, countries seeking the recovery of stolen assets also have delivered on their commitments to take action. StAR's focus on partnerships addressed the concerns on both sides and facilitated cooperation in this area.

StAR's country engagements assisted developing countries in utilizing or improving their existing legal tools and resources for asset recovery. StAR continues to engage with countries in the developing world, and will continue to do so at their request. But StAR's training and technical assistance can only work if there is the political will to follow through.

actual asset recovery cases. In addition, it will ask countries up front to provide a clear overview of its asset recovery legislation and institutional set up before it engages. It will continue to develop partnerships, looking for further opportunities for collaboration with practitioners networks like CARIN and the IBA and others, and advocate for the cause of asset recovery also using the SDGs as a catalyst.

The support of donors has been critical in making StAR's work possible, and for the success it has had in bringing the issue of asset recovery to the fore. But the increasing policy attention, and imminent completion of review of implementation of asset recovery provision of UNCAC, are generating more demand for StAR services. At the time of completion of this report in 2018 StAR had already received several new requests for assistance. StAR will only be able to respond to this increased demand while at the same time increasing its work on knowledge projects with commensurate funding.

Renewed donor contributions have enabled the team to increase delivery and plan for new engagements and activities in the past year. StAR will continue to use whatever resources it has to good effect, but in the short term it requires further resources to continue its activities at the current level beyond 2018.

StAR looks forward to building upon the momentum created in 2017, and to having the capability to respond to the growing interest in asset recovery on all fronts.

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## **The increasing policy attention, and imminent completion of review of implementation of asset recovery provisions of UNCAC, are generating more demand for StAR services.**

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At the biennial Conference of the States Parties to UNCAC, the statements made by governments, a special asset recovery resolution and the active participation of governmental and non-governmental stakeholders in a StAR Day special event, reaffirmed the momentum created by inclusion of asset recovery in the SDGs and Addis Ababa Action Agenda. Asset Recovery remains front and center of the global anti-corruption agenda. But the discussions also confirmed the ongoing frustration with low rate of confiscation, freeze and return of substantial sums of stolen money, and the need for more

Knowledge products and tools, such as Guidelines on Effective Recovery of Stolen Assets, developed by StAR and its partners, provided the essential resources for country engagements and continued to inform policy discussions at the global level.

At the end of 2017, a StAR retreat provided an opportunity for introspection, taking stock and considering new and emerging initiatives and priorities. As a result, StAR hopes to recalibrate its efforts to put more emphasis on knowledge development. For country engagements it wishes to prioritize those where there is a clear link to

# Appendix: Country Engagements 2017

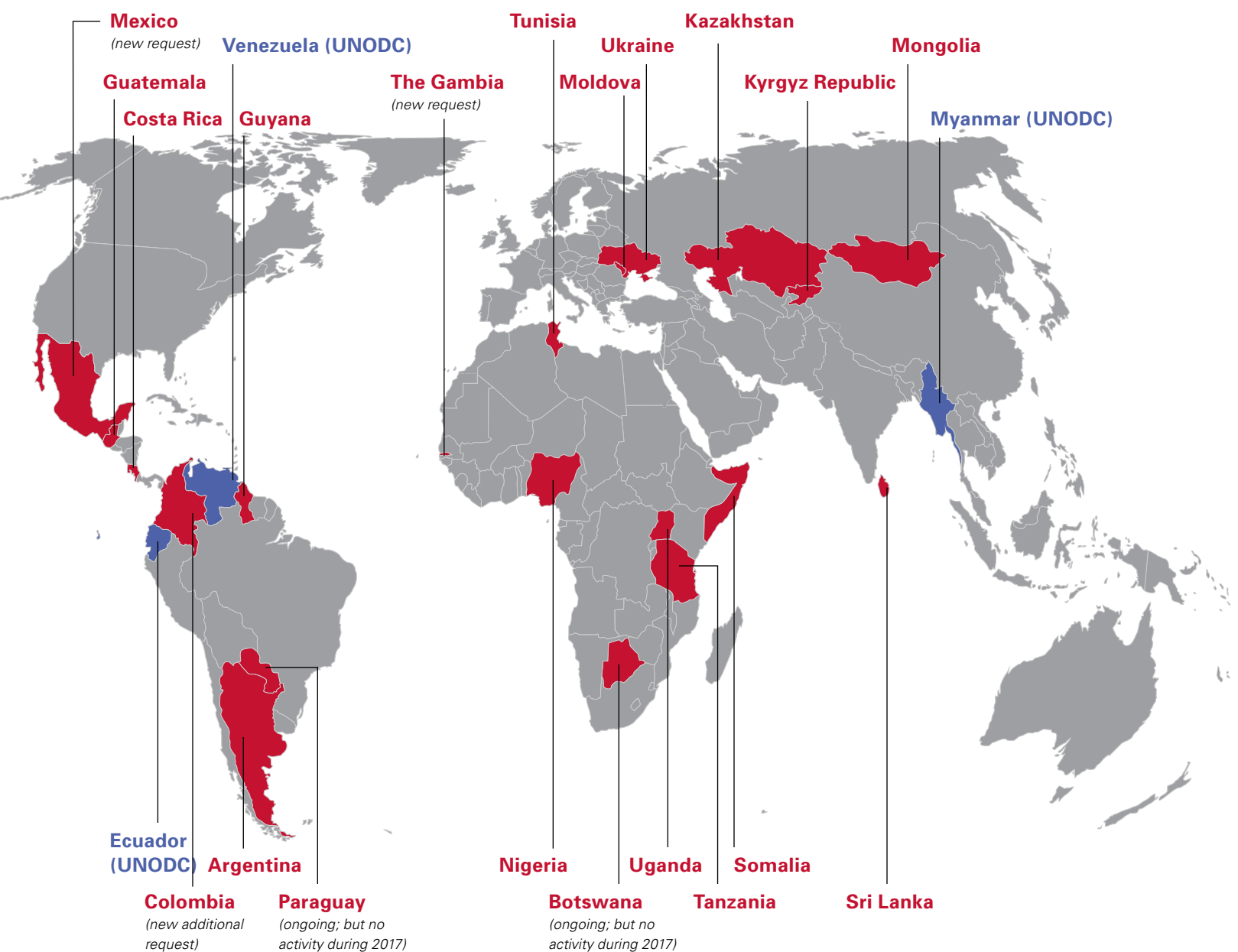
**S**o far, the StAR Initiative has provided country-specific technical assistance in over 30 countries, with case-specific assistance in several of them. During 2017, StAR received additional requests from

countries both for general capacity building as well as for case specific support.

Listed below are individual country engagements carried out by StAR, but in addition to these, StAR also worked with a number of other jurisdictions and

regional and international organizations in areas such as capacity building and technical assistance.

In addition UNODC conducted ad hoc activities in the area of asset recovery in the countries colored blue.





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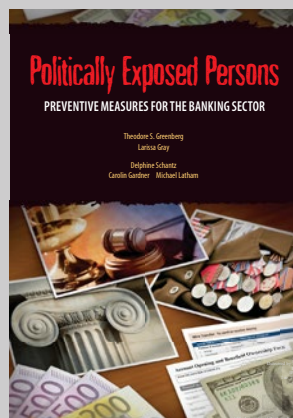
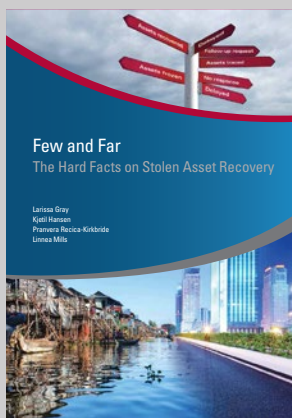
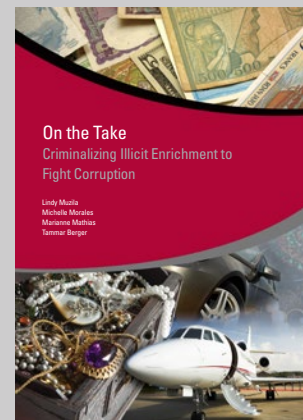
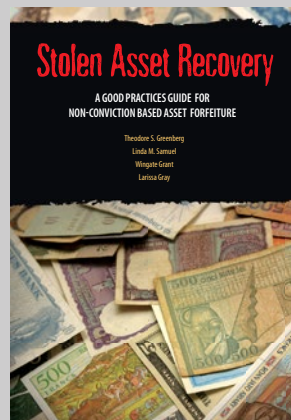
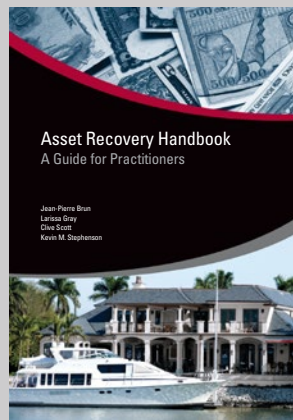
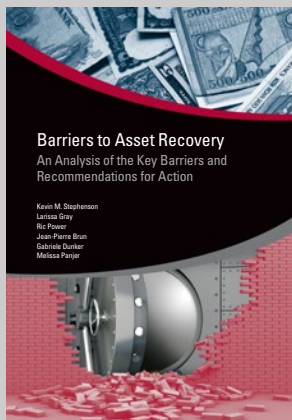
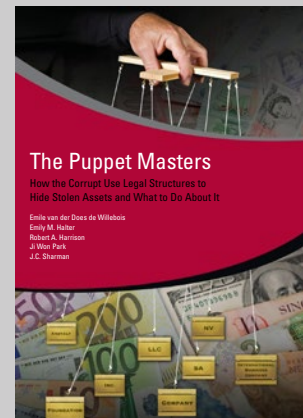
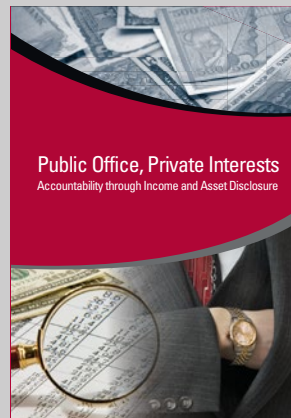
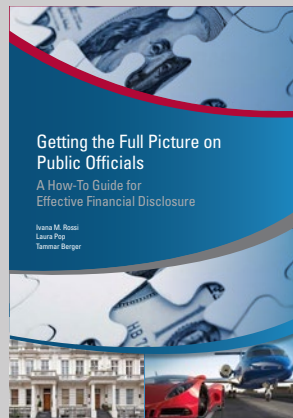
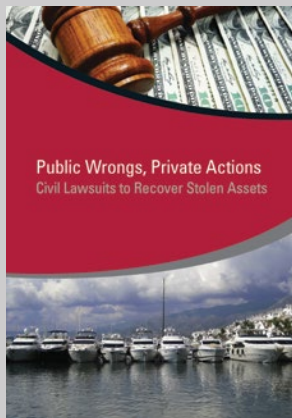
**Negotiations of Asset Recovery resolution at Conference of the States Parties (COSP).**

## NOTES

1. According to data from ACPO there is a final judgment for the confiscation of US\$25.4 million in the case of the former Prime Minister. There is another court decision, which is not yet final, on the confiscation of US\$47.8 million against a prominent businessman involved in the fraud, who was convicted on money laundering charges (US\$36.7 million have been seized). Two more prominent cases are now in court against past senior management of a bank at the center of the fraud in which prosecutors are requesting the confiscation of US\$332 million. US\$18.7 million have already been seized.
2. One prominent example is StAR analysis of package on decriminalization of certain economic activities.
3. Prior action focused on launching the electronic filing and verification system for public officials; bringing key amendments to the legal framework (including systematic declaration of beneficial interests and ownership of public officials and their family members, making sanctions more dissuasive, strengthening verification system to deliver better inputs and triggers in terms of administrative procedures, criminal investigations); and adoption of the verification methodology for public officials. StAR engaged with stakeholders to ensure the implementation of all these measures.
4. Goal 16 of SDGs is to "[p]romote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels" and its target 16.4 reads as follows: "by 2030 significantly reduce illicit financial and arms flows, strengthen recovery and return of stolen assets, and combat all forms of organized crime."
5. For more information see the adopted Report of the 2017 CoSP which includes the resolution: <https://www.unodc.org/documents/treaties/UNCAC/COSP/session7/V1708295E.pdf>.
6. For more information on the network see: <https://www.interpol.int/es/Crime-areas/Corruption/International-asset-recovery>.
7. As delivered by Vice-President Yemi Osinbajo at the opening of the 8th Commonwealth Conference of Heads of Anti-corruption Agencies in Africa.
8. See earlier references to StAR's contribution to of SDGs and financing for development discussions under Policy Influence section.
9. The online Guidelines are accessible at: <https://guidelines.assetrecovery.org>
10. Can be accessed at: <http://www.track.unodc.org/AssetRecovery/Pages/home.aspx>
11. Beneficial ownership guides can be accessed at <https://star.worldbank.org/star/content/beneficial-ownership-guides>.
12. The online Guidelines are accessible at: <https://guidelines.assetrecovery.org>.
13. <http://www.track.unodc.org/AssetRecovery/Pages/home.aspx>.
14. StAR Twitter—@returningassets—was the main channel for the campaign. @WB\_Finance, the World Bank's corporate Facebook and Twitter cross-promoted the event. Co-hosts promoted the event through their twitter accounts: @StateINL, @ukhomeoffice. In addition to unique hashtag: #GFAR2017, #unitedagainstcorruption, #AssetRecovery were tapped into a broader conversation on the issue.
15. Article can be accessed at <https://edition.cnn.com/2017/02/15/africa/nigeria-lost-assets-trump/index.html>.
16. See: Leslie Wayne, "Safeguarding Seized Assets," New York Times, 1 January 2017, Sunday Business, Pages 1, 4–5.
17. For a sample of GFAR media coverage see: "The Global Forum on Asset Recovery: Assistance for Combatting Corruption in Nigeria, Sri Lanka, Tunisia, and Ukraine," CNBCAfrica.com, Dec 6, 2017; "State Department: US experts in NABU helped to raise 108 corruption allegations," Ukrainian VOA, Dec 6, 2017. "US provides assistance for combatting corruption in Sri Lanka," Colombo Page, Dec 5, 2017, "Abacha loot': Switzerland to return \$320m to Nigeria," BBC News, Dec 5, 2017; "Switzerland to return \$321m stolen from Nigeria by dictator Sani Abacha," The Times UK Dec 5, 2017; "Swiss make deal with Nigeria on final payout for Abacha loot," RFI, Dec 6, 2017; "Nigeria: Civil Societies Hail Agreement On Recovery of Abacha Loot," AllAfrica.com, Dec 7, 2017 "Switzerland to return over \$320m of Abacha family loot to Nigeria," africanews, Dec 5, 2017.



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