

Custom Report Excerpts

Angola

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for official corruption, the government did not implement these laws effectively, and local and international NGOs and media sources reported officials engaged in corrupt practices with impunity.

Corruption: Government corruption existed at all levels, although there were some institutions working to improve transparency and accountability within the government. Public prosecutions of corruption cases were rare.

Government corruption was widespread, and accountability was limited due to a lack of checks and balances, lack of institutional capacity, and a culture of impunity. The judiciary was subject to political influence and conflict of interest.

The Ministry of Finance published the national budget on its website. Information on national expenditures and debt obligations was also available on its website. During the year the Ministry of Finance and the International Monetary Fund collaborated on financial transparency initiatives.

In June the National Assembly passed the Mutual Legal Assistance Law, which allows government agencies and private companies to share information with international law enforcement agencies to combat money laundering and the financing of terrorism. In 2012 the government decided to pursue structural anti-money-laundering (AML) reforms. In support of this strategy, the country joined the International Co-operation Review Group (ICRG) established by the Financial Action Task Force (FATF). The government worked with ICRG as well as the regional FATF group to which it belongs, the Eastern and Southern Africa Anti-Money Laundering Group, to conform its laws, regulations, and organizations to FATF's recommendations.

In contrast with previous years the Central Bank (BNA) took a more aggressive role in combating corruption. The BNA had a trained team to identify and investigate money laundering and terrorist financing.

As in previous years there were credible reports government officials used their political positions to profit from business deals. The business environment continued to favor those connected to the government, including members of the president's family.

Government ministers and other high-level officials commonly and openly owned interests in companies regulated by, or doing business with, their respective ministries. There are laws and regulations regarding conflict of interest, but they were not enforced. Petty corruption among police, teachers, and other government employees was widespread. Police extorted money from citizens and refugees, and prison officials extorted money from family members of inmates.

Financial Disclosure: The law on public probity requires senior government officials to declare their assets to the attorney general. According to the Ministry of Justice and Human Rights, the financial information of government officials was provided to the appropriate government office. The law treats financial information reports of government officials as confidential. The president, vice president, and president of the National Assembly are exempt from these public probity requirements. Nonexempt government officials are to make a new declaration within 30 days of assuming a new post and every two years thereafter. The law does not stipulate a new declaration be made upon leaving office but

states that officials must return all government property within 60 days.

Penalties for noncompliance vary depending on which section of the law was violated but include removal from office, a bar from government employment for three to five years, a ban on contracting with the government for three years, repayment of the illicitly gained assets, and a fine of up to 100 times the value of the accepted bribe. The National Office of Economic Police is responsible for investigating violations of this law, as well as other financial and economic crimes, and then referring them to the Financial Court for prosecution. There were no known cases related to this law during the year.

Transparency problems remained in the diamond industry, particularly regarding allocations of exploration, production, and purchasing rights. The country was the chair of the Kimberley Process for the 2014-15 cycle and made considerable efforts to improve the conditions and legal status of artisanal miners in Angola and other diamond producing countries.

Public Access to Information: The law provides for public access to government information. While the amount of information posted on government websites gradually increased, it remained limited. Laws are made public by being published in the official gazette. The gazette can be purchased for a small fee but was not available online in its entirety. In general the government was not responsive to routine requests for information, and it was sometimes unclear what information the government considered public versus private.

Benin

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials sometimes engaged in corrupt practices with impunity. Police corruption was widespread. Police continued to extort money from travelers at roadblocks. It was commonly believed, and acknowledged by some judicial personnel, that the judicial system at all levels was susceptible to corruption. The World Bank's most recent Worldwide Governance Indicators reflected that corruption continued to be a serious problem.

The government took a number of actions during the year to combat corruption. On June 20, the president dissolved the State Audit Office for failing to address corruption cases and subsequently created the Office of the Auditor General to improve effectiveness. On July 8, the president named former special advisor for public companies' governance Michel Dognon as auditor general to head the new office.

From April 7 to 9, the National Anti-Corruption Authority (ANLC) hosted a three-day workshop in Cotonou on corruption and transnational organized crime to increase lawmakers' and law enforcement officers' knowledge of these crimes and of judicial techniques for their prosecution. The ANLC also held another three-day workshop in Lokossa from July 14 to 16 on similar topics for police and other law enforcement officers.

The leading local NGO network fighting corruption, the National Organizations Front against Corruption, organized a regional seminar from June 15 to 19 in Cotonou on transnational organized crime and corruption. Forty participants came from six countries in West Africa to share lessons learned and best practices.

On March 20, ANLC officials questioned Minister of Interior Simplicie Codjo following allegations of public funds' embezzlement linked to a public procurement deal when Codjo was deputy mayor of Dangbo, a city in the southeast.

On August 4, the president warned immigration and border control officers at Cardinal Bernardin Gantin Airport in Cotonou against extortion and harassment of passengers. He also discussed enhanced measures to eradicate such practices with police and customs leadership.

Corruption: On May 12, the minister of energy and water was forced to resign amid charges that senior ministry officials embezzled CFA francs 2.6 billion (\$4.5 million) in Dutch and EU foreign assistance funding for water and sanitation projects. Findings from an international firm's audit released July 24 implicated a sitting member of parliament who, as former minister of energy and water, engaged in a massive embezzlement scheme involving a sophisticated network of ministry officials and private businessmen. The government formally requested the National Assembly to lift the former minister's immunity from prosecution and opened investigations into at least two dozen other individuals named in the report. These officials were discharged and then investigated for violation of the criminal code, including corruption laws. Interpol issued international warrants against two businessmen associated with the scheme, who were presumed to have departed the country prior to July 13. On August 20, 45 of 83 parliamentarians in the National Assembly voted not to revoke the immunity of the former minister, claiming there was insufficient proof of his direct culpability.

Financial Disclosure: The law requires income and asset disclosure by appointed and elected public officials. Declarations are not made available to the public. On June 23, the ANLC urged the newly elected parliamentarians to submit their asset disclosure statements to the Supreme Court pursuant to the Anti-Corruption Act. The penalty for failure to submit an asset disclosure is a fine of six times the monthly wage of the official concerned.

Public Access to Information: On March 20, the president signed into law a new information and communication code that provides for increased access to government information and administrative and legal measures against government personnel who fail to grant such access.

Botswana

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally sought to implement these laws effectively. Officials tasked with enforcement lacked adequate training and resources, however. Media reports of government corruption increased during the year.

Corruption: In past years police officials acknowledged corruption was a problem in the lower ranks, and some officers took advantage of irregular immigrants and traffic violators by exacting bribes.

The press continued to publish information leaked from a Directorate on Corruption and Economic Crime (DCEC) investigation of DIS Director Isaac Kgosi, a story first reported in July 2014. The documents allegedly demonstrated substantive links to corruption and money laundering. At year's end Kgosi retained his position, and the DCEC had not initiated any action against him.

Following an investigation by the Financial Intelligence Agency, the Directorate of Public Prosecutions froze some of the assets of two members of parliament in June. The DCEC was investigating the two parliamentarians' involvement in a transport company relating to alleged money laundering and corruption.

Financial Disclosure: There are no formal financial disclosure laws; however, in 2009 a presidential directive required all cabinet ministers to declare their interests, assets, and liabilities to the president. Critics contended this policy did not go far enough to promote transparency and asserted financial declarations by senior government officials should be available to the public.

Public Access to Information: The law does not provide public access to government information, and the government generally restricted such access. The Government Printing Office releases information made available to the public for a fee.

Burkina Faso

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. Local NGOs criticized what they called the overwhelming corruption of senior civil servants. They reported pervasive corruption in the customs service, gendarmerie, tax agencies, national police, municipal police, public health service, municipal governments, education sector, government procurement, and the Ministry of Justice, Human Rights, and Civic Promotion.

The transitional government prosecuted several former senior government officials for corruption.

Corruption: On June 20, the Ouagadougou Court of Appeals sentenced former director of customs Ousmane Guiro to a two-year suspended prison term in connection with a 2012 corruption case involving 900 million CFA francs (approximately \$1.5 million). The court ordered the confiscation of his assets and fined him 10 million CFA francs (\$17,300).

On August 18 and 29, security forces arrested and detained three former ministers--Arthur Kafando, Jerome Bougouma, and Bertin Ouedraogo--for embezzlement, illicit enrichment, and misappropriation of public funds. The three awaited trial at year's end.

Financial Disclosure: On March 3, the CNT adopted a new anticorruption law that requires government officials--including the president, lawmakers, ministers, ambassadors, members of the military leadership, judges, and anyone charged with managing state funds--to declare their assets and any gifts or donations received while in office. Infractions are punishable by a maximum jail term of 20 years and fines of up to 25 million CFA francs (\$43,300). The law also punishes persons who cannot reasonably explain an increase in lifestyle beyond the threshold set by regulation in connection to lawful income. Offenders risked imprisonment for two to five years and a fine of five to 25 million CFA francs (\$8,670 to \$43,300).

The Constitutional Council is mandated to monitor and verify compliance with such laws and may order investigations if noncompliance is suspected. Disclosures are not made public, however, and there were no reports of criminal or administrative sanctions for noncompliance.

Public Access to Information: On August 30, the CNT adopted a law establishing the right of access to public information and administrative documents. In the past ministries generally did not respond to requests for information, citing national security and confidentiality.

Burundi

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but corruption remained a very serious problem. The government did not fully implement the law, and some high-level government officials engaged in corrupt practices with impunity. There were numerous reports of government corruption during the year. The 2005 constitution provides for the creation of a High Court of Justice to review accusations of corruption against high-ranking positions, including the president, the two vice presidents, ministers, the speakers of the parliament, members of parliament, and judges; however, the government had not established the court by year's end. The anticorruption law applies to the rest of its citizens, but no high-ranking person has stood trial for corruption.

Corruption: The public widely viewed police to be corrupt, and petty corruption involving police was commonplace.

RPA reported in September the CNDD-FDD transferred fuel tax income from the country's public coffers to the Imbonerakure, stating official rates for importing a tanker were 20 million Burundian francs (\$12,500) but that in reality importers paid closer to 32 million Burundian francs (\$20,000). The party allegedly shuffled the difference to party accounts for disbursement to irregular security forces, including the Imbonerakure.

There were allegations of corruption due to the government's fixed price of gasoline and fluctuations in the price of gasoline on the global market. The government fixed-price for gasoline was 1,880 francs (\$1.18) per liter, and the government retained 660 francs (\$0.41) as taxes. A consumption rate of 11 million liters per year brings in approximately 70 billion francs (\$43.7 million) in revenue. The budget for the year estimated 21 billion francs (\$13.1 million) in revenue, giving the government approximately 48 billion francs (\$30 million) in untracked revenue. Low world oil prices drove up the revenue further.

Judicial corruption occurred. Authorities often punished judges who failed to follow politicized instructions.

The Tax and Customs Revenue Authority (OBR) has an internal antifraud unit, and observers have accused OBR officials of fraud.

The state inspector general and the Anticorruption Brigade of the Ministry of Good Governance and Privatization were responsible for investigating government corruption. Within the judiciary there is a designated anticorruption general prosecutor and an anticorruption court. The Anticorruption Brigade has the authority to investigate, arrest, and refer offenders to the anticorruption general prosecutor.

In 2014 the Anticorruption Brigade investigated 163 cases. The brigade claimed it recovered more than 292 million Burundian francs (\$187,000) and prevented more than 1.5 billion Burundian francs (\$900,000) in government losses.

In view of the lengthy backlog of cases in the anticorruption court and the difficulty of obtaining convictions, the Anticorruption Brigade often resorted to enforcing the law through out-of-court settlements, in which the government agreed not to prosecute if the offending official agreed to reimburse the money stolen. The government also exercised its power to freeze and seize property and bank assets of officials to compel reimbursement, although in most cases authorities permitted corrupt officials to retain their positions.

Financial Disclosure: The law requires financial disclosure by elected officials and senior appointed officials once every five years, but it does not require public disclosure. By law the president, two vice presidents, and cabinet ministers are obligated to disclose assets upon taking office, but the nonpublic nature of the disclosure means this provision cannot

be confirmed. No other officials are required to disclose assets. There was no record of such disclosures, and the law provides no penalty for failure to disclose.

Public Access to Information: The law does not provide for public access to government information.

Cabo Verde

Section 4. Corruption and Lack of Transparency in Government

The law provides penalties of up to 15 years' imprisonment for corruption by officials, and the government implemented the law effectively. Officials sometimes engaged in corrupt practices with impunity, although there were no new reports of government corruption during the year.

Corruption: The central authority responsible for investigating and combating corruption is the Attorney General's Office (PGR), which is an independent body of government. The PGR oversees the entire judicial process and other legal matters, and gives directives to the Judiciary Police for conducting investigations related to corruption. The PGR operated effectively and independently to combat corruption, but it did not have a specialized corruption department or specific funds for this purpose.

Polling released by Afrobarometer in September showed citizens' perceptions of corruption had risen in the country in comparison with 2013. The study revealed this perception of increased corruption extended beyond the National Assembly and other elected bodies to the National Police, which 19 percent of citizens considered corrupt.

Financial Disclosure: The law sets parameters for public officials to submit declarations of interest, income, and family wealth, and regulates public discussion of this information. These declarations shall include any asset worth more than 500,000 escudos (\$4,940). Failure to submit a declaration may prohibit public officials from holding office for a period of one to five years. The SCJ must approve public disclosure of the declarations. When involved in criminal cases of alleged corruption, public officials must declare or prove the source of their income or wealth. The SCJ is in charge of monitoring the law and enforcing compliance, but enforcement was poor.

Public Access to Information: The law provides for public access to government information without restriction, provided that privacy rights are respected. The government frequently granted access.

Cameroon

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not implement the law effectively or uniformly, and corruption was pervasive at all levels of government. Officials frequently engaged in corrupt practices with impunity. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a severe problem. Although there was some improvement in efforts to combat it, institutionalized, endemic, and publicly accepted corruption was a major challenge facing the government. In the context of the fight against Boko Haram, corruption-related inefficiencies and diversion of resources from their intended purposes represented a

fundamental national security vulnerability.

Corruption: During the year the government sanctioned government employees for corruption, embezzlement, and mismanagement. The *Cameroon Tribune* reported that as of June 12, 42 cases had been filed and 11 court decisions issued at the Special Criminal Court (in French, Tribunal Criminal Special, or TCS) since the beginning of the year. Operation Sparrow Hawk, which was launched in previous years to fight corruption, including embezzlement of public funds, continued.

On June 9, the Supreme Court delivered its verdict on the September 2014 ruling by the TCS to sentence Cameroon-born French lawyer Annette Lydienne Yen Eyoum and her coaccused to a 25-year prison term. Eyoum and Honore Ngwen, former heads of the legal affairs division at the Ministry of Finance, were further required jointly to pay CFA francs 1.153 billion (\$2 million). Eyoum represented the government in litigation against Societe General des Banques au Cameroun (SGBC) in connection with the complicated 10-year liquidation of the government's National Commodity Marketing Authority. In the process of the liquidation, she and her codefendants diverted CFA francs 1.153 billion (\$2 million) into their private accounts. Eyoum claimed the money represented damages brought against SGBC (the defendant) by court decision, while the government considered it embezzlement. In a September 2014 ruling, TCS sentenced Eyoum to 25 years in prison. Her lawyers challenged the decision before the Supreme Court in October 2014, and a decision was pending.

On June 18, TCS delivered its verdict in the prosecution case against Dieudonne Telesphore Ambassa Zang and his coaccused. Ambassa Zang, former minister of public works, and Felix Debeauplan Mekongo Abega, a senior official at the same ministry, were given life sentences. They had been prosecuted since 2009 for embezzlement of public funds totaling more than CFA francs six billion (\$10.4 million), following an inspection mission by the Supreme State Audit Office. Because they were absent from the court from the opening of the case, the court issued an arrest warrant against them as part of the verdict. Ambassa Zang was also required to pay the ministry damages, including CFA francs 5.126 billion (\$8.9 million), and also CFA francs 694.465 million (\$1.2 million) jointly with his coaccused.

Although police were reportedly sanctioned for corruption, some officers convicted of corruption were relieved of their duties but retained their jobs due to weak accountability and enforcement mechanisms for internal disciplining. Individuals reportedly paid bribes to police and the judiciary to secure their freedom. Police demanded bribes at checkpoints, and influential citizens reportedly paid police to make arrests or abuse individuals with whom they had personal disputes. There were reports that some police associated with the issuance of emigration and identification documents collected additional fees from applicants.

Judicial corruption was a problem. According to press reports, judicial authorities accepted illegal payments from detainees' families in exchange for a reduced sentence or the outright release of their relatives. Judges were susceptible to executive influence and often delayed judicial proceedings in response to governmental pressure. Many powerful political or business interests had virtual immunity from prosecution, and politically sensitive cases occasionally were settled through bribery.

Corruption in the education sector was reported to be a major problem. Anecdotal reports suggested that in reviewing the files of applicants for most scholarships, including those offered by foreign partners, members of the relevant committees within government ministries rarely based their decisions on merit. They often selected their relatives or offered aid to some applicants in return for bribes. Officials of major national training schools providing direct access to the public service were also often cited for corruption. According to reports, some officials had established networks of intermediaries charged with seeking out prospects and collecting fees at the time of nationwide competitive

examinations. Such networks reportedly were organized in a manner that had no direct contact between the school official and the candidate. The amounts collected reportedly ranged from CFA francs 500,000 (\$867) to several million CFA francs, depending on the type of institution solicited.

The National Anti-Corruption Commission (CONAC) receives and investigates allegations of corruption, but it has no prosecutorial authority and must refer credible claims of corruption to the relevant ministry for administrative action or to the Ministry of Justice for judicial action. The vast majority of corruption allegations received and transmitted by CONAC resulted in administrative penalties including reprimand, suspension from 10 to 90 days, delays in promotions, removal from office, and outright dismissal. As of year's end, CONAC had not released its 2014 annual report.

The National Financial Investigations Unit is a separate financial intelligence unit that tracks money laundering and terrorist finance. Like CONAC it can carry out its own investigations but has no prosecutorial authority.

The Supreme State Audit Office audits public services, regional and local entities, public and semipublic enterprises and organizations, and associations that receive financial assistance from the state. The office also monitors the execution of the state budget and externally funded projects, and it contributes to sanctions against officers and managers of public funds in accordance with applicable laws and regulations. By direction of the president, the office may also perform audits on any companies or organizations deemed strategically important.

Financial Disclosure: The constitution and law require senior government officials, including members of the cabinet, to declare their assets, although the president had not issued the requisite decree to implement the law by year's end.

Public Access to Information: There are no laws providing citizens with access to government information, and such access was difficult to obtain. The National Institute of Statistics developed a website where some statistical data may be accessed. Most government documents, however, such as statistics, letters exchanged between administrations, draft legislation, and investigation reports, remained unavailable to the public and the media.

Central African Republic

Section 4. Corruption and Lack of Transparency in Government

Corruption: Although the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. The World Bank's 2014 Worldwide Governance Indicators indicated corruption was a severe problem.

Financial Disclosure: The transitional charter requires senior members of the executive, legislative, and judicial branches at the beginning of their terms to declare publicly their personal assets and income for scrutiny by the transitional constitutional court. The Department of the Treasury, with the transitional constitutional court, is responsible for monitoring and verifying disclosures. The law specifies no sanctions for noncompliance. Declarations are public and posted on the transitional government's website. The transitional government, however, did not use the government website established under former president Bozize on which declarations had been publicly posted. The law does not require ministers to declare their assets upon departing government and is not explicit on what constitutes assets or income.

Public Access to Information: The transitional charter stipulates that every citizen has the right to access government information, which is posted on the government website and also published in the *Official Gazette*, the newspaper in which official decrees and laws are published.

Chad

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but authorities did not implement the law effectively, and corruption was pervasive at all levels of government. Based on the World Bank's most recent Worldwide Governance Indicators, corruption remained a severe problem.

Corruption: In February the National Assembly convened an extraordinary session to review a request to impeach Atteib Doutoum, the former minister of finance and budget, and Baiwong Djibergui Rosine, the former minister of social action and current minister of agriculture and environment. The two ministers, who were under investigation by the Ministry of Good Governance, were suspected of corruption and embezzlement during their former tenures. The National Assembly created two ad hoc committees to investigate further, and both ministers were ultimately acquitted on recommendation of the committees.

Local human rights organizations reported police extorted and verbally abused motorists. Security forces arbitrarily arrested travelers on pretexts of minor traffic violations.

Judicial corruption was a problem and hindered effective law enforcement.

Financial Disclosure: Public officials are subject to financial disclosure laws, but the laws do not specify sanctions for noncompliance.

Public Access to Information: The law does not provide for public access to government information, although the government provided such access to government-employed journalists. Independent journalists stated they were not provided sufficient access to government information. The government's budget was publicly available in printed form upon request from the Ministry of Finance and Budget and included revenue and expenditure data. In 2014 the government also launched a website providing revenue and expenditure data.

Comoros

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity.

Corruption: Resident diplomatic, UN, and humanitarian agency workers reported petty corruption as commonplace at all levels of the civil service, despite the government's anticorruption campaign. Businesspersons reported corruption and a lack of transparency, while the World Bank's Worldwide Governance Indicators reflected that corruption was a significant problem. Corruption continued in the security forces. Citizens paid bribes to

evade customs regulations, avoid arrest, and falsify police reports. Some police paid bribes to receive promotions.

The National Commission for Preventing and Fighting Corruption (CNPLC) is an independent administrative authority responsible for the implementation of national policy to combat corruption, including education and mobilization of the public. The CNPLC signed an agreement on September 22 with civil society organizations to gain their support and assistance in raising awareness of the need to combat corruption, but concrete initiatives under the agreement remained to be taken at year's end. The Justice Ministry rarely prosecuted corruption cases, and the court system often dismissed charges in opaque circumstances.

The national chief of police, charged in 2013 with selling more than 700 passports to foreigners, was released from prison after a few days' incarceration, granted bail, and allowed to travel overseas for "medical treatment." Authorities released also the police chief's alleged coconspirators. One was given a position as senior advisor to the vice president and minister of finance, to whom he is related by marriage. At year's end the national police chief's case remained under investigation. In the absence of a conviction, the Constitutional Court could not prevent him from running in the legislative elections held in February; he won a seat in the national assembly, which gives him parliamentary immunity.

Financial Disclosure: The law requires high-level officials at national and island levels to declare their assets prior to entering office. Officials subject to the law submitted written declarations on taking office. The CNPLC is charged with gathering financial disclosure statements from public officials. Failure to comply is punishable by fines and up to two years in prison. During the year the commission reported all officials subject to the law had filed financial disclosures. The fact a disclosure has been submitted is made public, but the disclosure itself is not. The commission does not verify the accuracy of the disclosures.

Public Access to Information: No laws prevent general public access to government information, but such information was difficult to obtain. Those who had personal or working relationships with government officials, however, could generally access such information. The law provides for public access to government budget documents, but those documents also were hard to obtain.

Congo, Democratic Republic of the

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity.

Corruption: The mining sector continued to lose millions of dollars because of corruption by officials at all levels. Additional revenue losses were due to racketeering and exploitation of minerals in the East by the SSF and RMGs. In January 2014 the government launched a mechanism to standardize across the Great Lakes Region the processes of supply-chain management of cassiterite, wolframite, coltan, and gold. The final report published by the UNGOE in November 2014 indicated elements of the FARDC, local poachers, and armed groups remained involved in the illegal exploitation of and trade in wildlife products, including ivory (see section 1.g.). The UNGOE reported Uganda continued to be a destination and transit center for smuggled gold and ivory.

In an effort to combat corruption, the government sometimes suspended officials for the misuse of funds, including donor funds. It also continued a program to pay many civil servants and security forces in major cities by direct deposit, eliminating an important means of graft. Previously the government utilized a cascading cash payment system disbursing salaries to senior officials for payment to subordinate officials, who in turn paid their staffs.

The law criminalizes money laundering and terrorist financing. Limited resources and a weak judicial system hampered the ability of the Financial Intelligence Unit to enforce regulations against money laundering. Local institutions and personnel lacked the training and capacity to enforce the law and its attendant regulations. The president appointed a former minister of justice (Luzolo Bambi) as his special envoy to fight corruption and money laundering. Bambi was responsible for filing a money laundering case on behalf of the government. After his designation, there were press reports several prominent political figures would be the subject of a corruption investigation. Civil society groups raised concerns there was a political agenda behind the naming of these targets.

Government authorities and wealthy individuals at times used anti-defamation laws that carry criminal punishments, as well as other means of intimidation, to discourage media investigation of government corruption (see section 2.a.).

Financial Disclosure: The law requires the president and ministers to disclose their assets to a government committee. President Kabila and all ministers and vice ministers reportedly did so when they took office. The committee did not make this information public.

Public Access to Information: The law does not provide for public access to government-held information. The government did not grant access to either citizens or noncitizens, including foreign media.

Congo, Republic of the

Section 4. Corruption and Lack of Transparency in Government

The law provides for criminal penalties for corruption by officials; however, the government did not implement the law effectively, and officials engaged in corrupt practices with impunity.

According to the World Bank's most recent Worldwide Governance Indicators, government corruption was a severe problem, although the bank and the International Monetary Fund noted the government continued anticorruption reforms.

There was a widespread perception of corruption throughout government, including misuse of revenues from the oil and forestry sectors. Some local and international organizations claimed government officials, through bribes or other fraud, regularly diverted revenues from these sectors into private overseas accounts before officially declaring the remaining revenues.

Corruption: The National Commission to Fight Corruption and Fraud (CNLCCF) and the Anti-Corruption Observatory (OAC) are responsible for combating corruption and fraud. The CNLCCF is tasked with maintaining a record of reported cases of fraud in the public and private sectors, instituting a government anticorruption plan, and providing technical support for any public or private institution seeking to establish its own antifraud or anticorruption plan. The OAC is an independent government body created under the auspices of the CNLCCF. The OAC is tasked with auditing the government, implementing the anticorruption plan as it applies to central government agencies, and developing

governance reforms.

Financial Disclosure: The constitution mandates that senior elected or appointed officials disclose their financial interests and holdings both before taking office and upon leaving office. Failure to do so is legal grounds for dismissal from a senior position. The Constitutional Court is tasked with enforcement of this constitutional provision; however, authorities did not enforce this provision, and no financial disclosure statements were made public during the year. The autonomous agency National Agency for Financial Investigation (ANIF) is tasked with investigating suspicious financial transactions and, if necessary, forwarding the information to the competent judicial authorities. Its mandate is primarily related to the fight against money laundering and transnational criminal groups; however, ANIF's mandate extends to transactions by government officials as well.

Public Access to Information: The constitution and law provide for public access to government information for citizens, noncitizens, and the foreign media; however, authorities did not effectively implement the law. There were no unreasonable processing fees associated with requests for information, although there were generally lengthy delays before the government released information, if at all. Individuals may appeal denials of access to information to the Constitutional Court, but the court did not hear denial appeals.

During and following the period of civil unrest related to the constitutional referendum, authorities refused human rights NGOs and journalists entry to morgues and other government facilities normally open to the public.

Cote d'Ivoire

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity.

Corruption: The media and human rights groups reported significant official corruption. Transparency International data indicated that corruption was a severe problem, having the greatest effect on judicial proceedings, the accountability of the security forces, contract awards, and customs and tax matters.

In May the Minister of Youth, Sports, and Pleasure, Alain Lobogon, was fired from his post; his dismissal was attributed to continuing controversy regarding embezzlement of approximately 750 million CFA francs (\$1.3 million) in bonuses owed to the Ivorian national soccer team as well as approximately 500 million CFA francs (\$866,000) allocated to cover the team during the African Cup of Nations tournament.

The Independent National Public Procurement Regulatory Agency (ANRMP) is responsible for supporting, monitoring, and enforcing fair competition for government contracts. In August 2014, based on reports that 57 percent of all government contracts awarded in the first quarter of the year were sole source, the ANRMP launched an audit of all sole-source contract awards from 2011 to 2013. In September 2014 the ANRMP concluded an independent audit performed on 60 sole-source government contracts worth approximately two trillion CFA francs (\$3.46 billion) for fiscal years 2011 to 2013 and announced that 95 percent of the contracts broke procurement regulations and procedures.

Financial Disclosure: A presidential decree ordered disclosure of income and assets for the head of state, ministers, heads of national institutions, and directors of administration. Many officials obeyed this decree, but there is no penalty for noncompliance.

Public Access to Information: The law grants public access to government data, with the exception of information vital for the preservation of state security. Data relating to government activities and budgeting was largely available but varied among ministries. Much of the Ministry of Finance’s data, including the national budget, was accessible on its website and that of the International Monetary Fund. Unlike in previous years, public procurement was generally transparent. The ANRMP provided key information on procurement quickly without charge, and it had a transparent decision-making and public-appeals process.

Djibouti

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not implement such laws effectively, and officials engaged in corrupt practices with impunity. According to the World Bank’s most recent Worldwide Governance Indicators, government corruption was a serious problem. There were reports of government corruption during the year.

Corruption: No known high-level civil servants were disciplined for corruption. The government ceased an initiative begun in 2012 to rotate accountants among government offices as a check on corruption. The law requires the court and the Inspectorate General to report annually, but both entities lacked resources, and reporting seldom occurred.

Financial Disclosure: Public officials were not subject to financial disclosure laws.

Public Access to Information: There were no laws providing for public access to government information, although legislative texts were publicly available through the online official journal, and citizens could address requests for information or mediation to the Ombudsman’s Office.

Some government officials continued to block the publication of study results that might have reflected poorly on the government’s performance, especially studies in which results could be compared with those of other countries.

Equatorial Guinea

Section 4. Corruption and Lack of Transparency in Government

While the law provides severe criminal penalties for official corruption, the government did not implement the law effectively, and officials engaged in corrupt practices with impunity. Corruption at all levels of government was a severe problem, as the president publicly acknowledged. Numerous foreign investigations continued into high-level corruption tied to the country’s natural resource wealth. The attorney general’s Anticorruption Tribunal, however, did not report initiating any investigations during the year.

According to Freedom House, the budget process was “opaque.” The Open Budget Survey for 2012 gave the country a score of zero, the lowest possible result.

Although the country was delisted from the Extractive Industries Transparency Initiative (EITI) in 2010, the government took steps required to renew its EITI candidacy. During the

year the government established a National Commission, including independently elected civil society members, to oversee EITI implementation. In August 2014 the president issued a public statement of the country's intention to implement EITI and appointed a senior individual to lead the implementation of EITI.

Corruption: During the year President Obiang dismissed all presidentially appointed members of the government in an effort to reduce corruption; he made new appointments and urged an end to corrupt practices. Nevertheless, the president and members of his inner circle continued to amass personal fortunes from the revenues associated with oil exports.

In January a member of parliament was found guilty in a foreign court for bulk cash smuggling. Media reported bulk cash smuggling by high-level members of the government, including an attempt to send containers of cash to Sao Tome and Principe. There were no reports of any official investigations.

A foreign government continued to pursue seizure of real and personal property of Obiang Mangué, the president's eldest son and second vice president, as the result of a 2010 investigation into suspected concealment and laundering abroad of embezzled public funds. In an October 2014 settlement with a foreign government, Obiang Mangué was forced to sell a \$30 million mansion, a Ferrari automobile, and various items of Michael Jackson memorabilia. The settlement required that an estimated \$20 million of the proceeds be given to a charitable organization for the benefit of the country's citizens and the forfeiture of \$10.3 million to the foreign government.

During the year police officers and military personnel increased neighborhood sweeps and checkpoint and traffic stops to demand bribes, primarily from foreigners. Authorities seldom investigated such incidents, and the government had no mechanism to denounce police misconduct. Individuals feared filing complaints, especially foreigners whose applications for residence and work permits remained pending. In June the president swore in an ombudsman to take such complaints, but the Office of the Ombudsman was not operational at year's end.

Financial Disclosure: The constitution and law require public officials to declare their assets to the National Commission on Public Ethics, although no declarations were made public. There are no formal procedures to control submission of asset disclosures and no penalties for noncompliance. To date no public officials have been required to submit asset disclosures. The law precludes government officials from conducting business, but most ministers conducted businesses they conflated with their government responsibilities.

Public Access to Information: The law does not provide for general public access to government information, although it requires the government to turn over unclassified information about its activities to news agencies and other media outlets if requests are deemed legitimate. Citizens and noncitizens, including those employed by foreign media, generally were unable to access government information. A lack of organized recordkeeping, archiving, and public libraries also limited access to government information. Copies of the country's laws were obtainable only at the Public Records Office, but fees were high, and many laws were unavailable there too.

There is no mandatory disclosure of procurement information, and no bids were announced or awards made publicly available. There was no registry of companies banned from participating in the procurement process, and there was no public access to the financial records of state-owned companies, such as the GEPetrol oil company, SONAGAS gas company, or the SEGESA electricity company.

Eritrea

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity. The government, however, reportedly removed some officials from office on grounds of corruption.

The October 2015 report of the UN Monitoring Group on Somalia and Eritrea stated, “The complete lack of financial transparency by the Government of Eritrea enables it to maintain a PFDJ-controlled informal economy. Senior officials within the government and the PFDJ continue to exert full economic control over revenue through a clandestine network of state-owned companies.”

Corruption: Persons seeking executive or judicial services sometimes reported they obtained services more easily after paying a “gift” or bribe. Patronage, cronyism, and petty corruption within the executive branch were based largely on family connections and used to facilitate access to social benefits. Judicial corruption was a problem, and authorities generally did not prosecute acts such as property seizure by military or security officials or those seen as being in favor with the government. Reports indicated corruption also existed in the issuance of identification and travel documents, including in the passport office. Individuals requesting exit visas or passports sometimes had to pay bribes.

Amnesty International received reports that soldiers or military vehicles were involved in smuggling of persons to leave the country.

There were reports of police corruption. Police occasionally used their influence to facilitate the release from prison of friends and family. Police reportedly demanded bribes to release detainees.

Financial Disclosure: Public officials were not subject to financial disclosure laws.

Public Access to Information: Although the law and unimplemented constitution provide for public access to government information, the government did not as a rule release statistics or other information to either citizens or noncitizens.

Ethiopia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials. Despite the government’s prosecution of numerous officials for corruption, some officials continued to engage in corrupt practices. Corruption, especially the solicitation of bribes, remained a problem among low-level bureaucrats. Police and judicial corruption also continued to be problems. Some government officials appeared to manipulate the privatization process, and state- and party-owned businesses received preferential access to land leases and credit.

Corruption: The Ministry of Justice, through the Federal Ethics and Anticorruption Commission (FEACC), continued criminal proceedings against the director general of the Ethiopian Revenues and Customs Authority, his deputy, and other government officials and private business leaders for alleged corrupt practices.

There were numerous reported corruption cases similar to the following example: on

August 9, police arrested former head of the Revenues Bureau of Oromia Regional State, Wondimu Biratu Kena'a, on allegations of grand corruption and embezzlement. Pretrial hearings at the Ethiopian Federal High Court continued at year's end.

Financial Disclosure: The law requires all government officials and employees to register their wealth and personal property officially. The law includes financial and criminal sanctions for noncompliance. The president and prime minister registered their assets. By November 95,000 government officials had registered their assets as required by law (the 2010 Asset Disclosure and Registration Proclamation).

The FEACC held financial disclosure records. By law any person seeking access to these records may do so by making a request in writing, although access to information on family assets may be restricted unless the FEACC deems the disclosure necessary.

Public Access to Information: The law provides for public access to government information, but access was largely restricted. The law includes a narrow list of exceptions outlining the grounds for nondisclosure. Responses generally must be made within 30 days of a written request, and fees may not exceed the actual cost of responding to the request. The law includes mechanisms for punishing officials for noncompliance, as well as appeal mechanisms for review of disclosure denials. Information on the number of disclosures or denials during the year was not available.

The government publishes laws and regulations in the national gazette prior to their taking effect. The Government Communications Affairs Office managed contacts between the government, the press, and the public; the private press reported the government rarely responded to its queries.

Gabon

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. Some police were inefficient and corrupt. Security force members sought bribes to supplement their salaries, often while stopping vehicles at legal roadblocks to check vehicle registration and identity papers. The 2014 World Bank Worldwide Governance Indicators indicate corruption remained a serious problem.

The government increased its efforts to curb corruption. In August the government created the Special Court against Financial Crimes to try corruption cases more effectively and to address ritual crimes (see section 6). In November the court officially opened, and authorities transferred some financial crimes cases to it. In December the Constitutional Court ruled its creation unconstitutional and dissolved it.

The National Commission against Illicit Enrichment (CNLCEI) is the primary body responsible for combating official corruption. The commission's mandate includes the investigation of corruption cases, policy development, and preventive measures, including raising public awareness. Within the scope of this mandate, the commission generally operated effectively and independently. The Directorate General for Auditing Resources and Public Charges has the lead on corruption investigations within the public administration.

Corruption: In March, three Ministry of Agriculture, Husbandry, and Fishing civil servants were charged with embezzlement of 43 million CFA (\$75,000). The accused were in jail awaiting trial at year's end.

Financial Disclosure: The law requires executive-level civil servants and civil servants who manage budgets to disclose their financial assets to the CNLCEI within three months of assuming office. Most officials complied, but some attempted to withhold information. The government did not make these declarations available to the public. There were administrative sanctions for noncompliance. According to the CNLCEI, it took steps to enforce the law during the year, including by deducting up to 100,000 CFA francs (\$174) per month from the salaries of noncompliant civil servants or, in serious cases, by freezing their assets.

Public Access to Information: No law requires government offices to share information with the public. Individual offices may do so when requested, after assessing its sensitivity.

Gambia, The

Section 4. Corruption and Lack of Transparency in Government

While the law provides criminal penalties for corruption by officials, the government did not implement the law effectively. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a serious problem. The president spoke against corruption on numerous occasions during the year.

Corruption: There were prosecutions for corruption of several civilian officials during the year. For example, on September 7, officials arraigned Ebrima Jawara, son of former president Sir Dawda Jawara, and four other senior officials of the Ministry of Agriculture (Dr. Alasan Bah, Sulayman Manneh, Lamin Fatajo, and Momodou Lamin Mass) before the Banjul Magistrates Court on a 10-count indictment. The allegations included stealing by persons in public service, abuse of office, stealing by a clerk or servant, theft, and four related economic crimes charges. In December authorities released the five accused, but re-arrested and arraigned Ebrima Jawara before the high court on December 20 on charges of abuse of office and economic crimes. Officials separately arraigned him before the same court on a charge of causing malicious injuries.

The trial continued during the year of five senior officials of the Ministry of Agriculture whom authorities arrested in October 2014 and charged with economic crimes and related offenses in connection with the management of the Food and Agriculture Sector Development Project (FASEP). The accused persons were Ada Gaye, permanent secretary at the Ministry of Agriculture; Fafanding Fatajo, FASEP coordinator; Omar Jammeh, FASEP financial controller; Foday Jadama, deputy director of the soil and water management services of the Ministry of Agriculture; and Dr. Abdou Ceesay, director of the department of livestock services. The charges mainly related to overpayment for services rendered by an external contractor. The trial continued at year's end.

The trial also continued during the year of former magistrate Saikou Fatty, whom authorities arraigned before the Banjul Magistrates' Court in November 2014 on charges of official corruption. Fatty allegedly solicited the sum of 20,000 dalasi (\$500) and a gold wristwatch from a defendant in a matter before his court as a bribe to settle the matter in the defendant's favor. He denied the charges, and his trial continued at year's end.

Financial Disclosure: The law subjects public officials, both appointed and elected, to financial disclosure laws, but the government seldom enforced these laws. The law mandates no particular agency to monitor and verify disclosures, but the president may appoint judicial commissions of inquiry to investigate any category of public officials or private individuals. The meetings of such commissions were public.

Public Access to Information: The constitution and law do not provide for public access to government information. The law prohibits civil servants from divulging information about their departments or speaking to the press without prior clearance from their department heads.

Ghana

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices. Corruption was present in all branches of government, according to media and NGOs, and various reputable national and international surveys such as the World Bank's Worldwide Governance Indicators highlighted the prevalence of corruption in the country.

Corruption: In addition to the corruption case involving judicial officials (see section 1.e.), another major corruption case came to light in December 2014, when the EU withheld more than 775 million Ghanaian cedis (\$205 million) in budget support to the country due to alleged payroll corruption it was investigating. Audits revealed that several million dollars of EU aid were being paid to ghost workers (i.e., deceased individuals, duplicates, or fake names) on the government official payroll. United Kingdom-based media outlets noted that "more than 1 percent of Ghana's GDP--several hundred million pounds--was spent on ghost workers last year." In March the government began enacting its Payroll Action Plan, which reviewed the government's payrolls to identify and remove irregularities. As a result of these efforts, the EU resumed its assistance in June. While some perpetrators of the fraud were dismissed from their positions and others made to repay stolen funds in accordance with the law, no one was prosecuted in connection with the scandal.

Financial Disclosure: The constitution's code of conduct for public officers establishes an income and asset declaration requirement for the head of state, ministers, cabinet members, members of parliament, and civil servants. All elected and some appointed public officials are required to make these declarations every four years and before leaving office. Financial disclosures can also be requested through court order, but only the auditor general is allowed to review documents so obtained. Financial information typically was not disclosed to the public.

Public Access to Information: The constitution provides for public access to government information, but obtaining such access was difficult. Government offices kept poor records, many official records were missing, and requests for information often received no reply. Ghana is a party to the Open Government Partnership--an international initiative signed in 2011 to enhance transparency, citizen participation, accountability, and technology and innovation within government--but implementation of its commitments under this initiative was uneven. Right to information legislation has been pending in parliament since 2002.

Guinea

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials often engaged in corrupt practices with

impunity. The World Bank's most recent Worldwide Governance Indicators reflected that corruption continued to be a severe problem. Officials diverted public funds for private use or for illegitimate public uses, such as buying expensive vehicles for government workers. Land sales and business contracts generally lacked transparency.

Corruption: Security force corruption was endemic. Police and gendarmes ignored legal procedures and extorted money from citizens at roadblocks, in prisons, and in detention centers. The government reduced the number of road checkpoints, but traders, small business operators, drivers, and passengers were still obliged to pay bribes to pass. Observers noted prisoners exchanging money with guards in exchange for favors.

The Reform of the Justice Sector encompassed an increase in salary for the magistrates and the establishment of the High Council for the Magistrature to handle cases of corrupt magistrates. Gendarmes, police, and prison guards--also poorly paid--offered to release prisoners in exchange for bribes, including prisoners to whom the courts had already granted release. Police and court officials often asked defendants in criminal and civil cases for money to reduce or eliminate charges.

Business leaders asserted regulatory procedures were opaque and facilitated corruption.

The ANLC, created in 2004, is the only state agency focused solely on fighting corruption. It is an autonomous agency but reports directly to the presidency. The ANLC receives anonymous tips concerning possible corruption cases received by the Bureau of Complaint Reception. During the past two years, however, there were no prosecutions based on any of these tips.

Financial Disclosure: Public officials are not subject to public disclosure laws. The electoral code bars persons from certain types of financial activity if they are members of or candidates for the National Assembly. They may not be paid by a foreign state; be the chief executive officer (CEO), a deputy of a CEO, or the president of a company under state control; or be a shareholder in an enterprise under state control or reliant on state subsidies or other state benefits. Despite these rules, some National Assembly members depended on state revenues to support their businesses, such as operating schools funded by public tuition. Authorities threatened to cut the state subsidies of some National Assembly members if they did not support the ruling party.

Public Access to Information: Although in 2010 the National Transition Council adopted a law providing free access to government information, free access was not regularly provided. Lower-level bureaucrats often did not respond to requests in a timely fashion, if at all. Government websites and other files functioned poorly, provided little information, and were not easy to navigate.

Guinea-Bissau

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties of one month to 10 years in prison for official corruption; however, the government did not implement the law effectively, and officials in all branches and on all levels of government engaged in corrupt and nontransparent practices with impunity. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a severe problem.

Police are mandated to fight corruption, but were ineffective and received minimal external assistance or support.

The government made few efforts to combat corruption or increase transparency.

The National Assembly held a three-day seminar in October 2014 on corruption and drug trafficking, led by the regional office of the UN Office on Drugs and Crime. The government took no follow up action.

Corruption: Members of the military and civilian administration reportedly trafficked in drugs and assisted international drug cartels by providing access to the country and its transportation infrastructure. The failure to interdict or investigate suspected narcotics traffickers contributed to the perception of government and military involvement in narcotics trafficking.

Financial Disclosure: By law public officials are required to disclose their personal finances before the Court of Audits and these disclosures are to be made public. The court has no authority to enforce compliance, and no penalties are specified for noncompliance. To date no public officials have disclosed their personal finances.

Public Access to Information: The law states that “everyone has the right to information” on laws, regulations, and government policies, and provides for a narrow list of exceptions, a reasonably short timeline, reasonable processing fees, administrative sanctions for noncompliance, and an appeal mechanism. Authorities seldom provided access due to a lack of technical support and functioning infrastructure.

Kenya

Section 4. Corruption and Lack of Transparency in Government

The criminal code and the 2013 Anticorruption and Economic Crimes Act provide criminal penalties for official corruption. The government did not implement these laws effectively, however, and officials frequently engaged in corrupt practices with impunity.

Although it commenced several high-profile corruption investigations during the year, the government did not successfully conclude any prosecutions of high-level officials for corruption. Officials from agencies tasked with fighting corruption, including the Ethics and Anticorruption Commission (EACC), the ODPP, and the judiciary, were sometimes the subject of corruption allegations.

The World Bank’s Worldwide Governance Indicators for 2014, the most recent data available, indicated that corruption was a severe problem. According to a University of Nairobi/Afrobarometer report issued in April, a majority of citizens said that corruption had increased during the previous year, and the government had performed poorly in fighting it. According to the report, police, government officials, members of Parliament, and business executives were most widely perceived as corrupt. A majority of participants who said they paid bribes did not report the incidents. The main reasons for nonreporting were fear of retaliation and perceived inaction by authorities. Official corruption was pervasive at all levels of government, often in the form of land seizures, conflict of interest in government procurement, and demands for bribes.

The EACC, an independent agency created in 2011, has the legal mandate to investigate official corruption allegations, develop and enforce a code of ethics for public officials, and engage in public outreach on corruption. The EACC, however, lacks prosecutorial authority and must refer cases to the ODPP to initiate prosecutions. The EACC and the ODPP lacked the technical and financial capacity to execute their mandates fully.

The EACC continued to implement a five-year strategic plan, adopted in 2014, designed to *increase its capacity*. *The government increased the EACC’s budget significantly during the year, from 1.8 billion shillings (\$17.6 million) in 2014 to 2.6 billion shillings (\$25.4 million).* According to the government’s *Economic Survey for 2015*, the EACC increased the

number of cases it handled by 19.4 percent, from 3,355 in 2013 to 4,006 in 2014. Between January and November, the EACC referred 117 cases to prosecutors and obtained six convictions. There were 286 corruption cases pending in court.

The EACC made some progress in ensuring that government ministries, departments, and independent commissions developed leadership and integrity codes as required by the 2012 Leadership and Integrity Act. As of October 22, 38 ministries, departments, and independent commissions had submitted ethics codes to the EACC for approval. Those government institutions that failed to comply with the act's requirements, however, included some of those charged with eradicating corruption, including the Judicial Service Commission, the Parliamentary Service Commission, the Public Service Commission, the ODPP, the Office of the Auditor General, and the Commission on Administration of Justice.

On March 26, the president ordered the release of a confidential EACC report containing corruption allegations against 124 government officials, including five cabinet secretaries and three principal secretaries. As of September the EACC had submitted 59 of those cases to the ODPP, which approved 32 cases for prosecution. These included cases against two cabinet secretaries (Transport Secretary Michael Kamau and Lands Secretary Charity Ngilu), two governors (Murang'a Governor Mwangi wa Iria and Garissa Governor Nadhif Jama), four members of Parliament, several directors of state corporations, and a number of county officials. Those cases continued at year's end. There were numerous similar abuses reported during the year.

In 2013, during implementation of the 2010 constitution, the government initiated a new system of devolved governance through which the national government began sharing responsibilities and revenues with 47 newly established county governments led by directly elected governors. Many county executive committees struggled with budgeting fundamentals and financial accountability.

On March 25, the president issued an executive order for the implementation of a Code of Governance for Government-Owned Entities. The code, developed in consultation with the World Bank, instituted some corporate governance standards consistent with those adopted by the Organization for Economic Cooperation and Development, the King III Report on Corporate Governance, and the Malaysia Code.

The government continued a push to digitize government services in an effort to increase fiscal transparency. A government website launched by the president in 2013, where citizens could anonymously report corruption and bribery by government officials, was not functional. In July the president committed to complete reinstating it by December, and an online procurement system designed to reduce fraud became mandatory for national and county government offices. An electronic system for tracking imports and exports, designed to reduce graft and improve revenue collection, became operational during the year.

Corruption: While police and government corruption was widely viewed as endemic, authorities rarely arrested and prosecuted public officers (see section 1.d.). Observers reported bribe taking by immigration officials during the year. According to widespread international and local media reporting following the April terrorist attack in Garissa, corruption by security agencies at border points was widespread and may have contributed to security lapses in preventing terrorist attacks.

Officers set up roadblocks to solicit bribes from those who were not in possession of identification documents. According to IPOA, bribes solicited ranged from 2,000 to 20,000 shillings (\$19.60 to \$197) on a sliding scale depending upon individuals' ethnicity, whether they were carrying identification, and whether they were refugees. In June the Judiciary and National Police Service released new measures to reform the handling of traffic cases by police and courts, streamlining the management of traffic offenses to curb corruption.

Financial Disclosure: The law requires all public officers to declare their income, assets, and liabilities to their “responsible commission” (for example, the Parliamentary Service Commission in the case of members of Parliament) every two years. Public officers must also include income, assets, and liabilities of their spouses and dependent children under age of 18. Information contained in these declarations was not readily available to the public, and the relevant commission must approve requests to obtain and publish this information. Any person who publishes or otherwise makes public information contained in public officer declarations without such permission may be subject to imprisonment for up to five years, a fine of up to 500,000 shillings (\$4,902), or both. Authorities also required police officers undergoing vetting to file financial disclosure reports for themselves and their immediate family members. These reports were publicly available (see section 1.d.).

The 2012 Leadership and Integrity Act requires public officers to register potential conflicts of interest with the relevant commissions. The law identifies interests that public officials must register, including directorships in public or private companies, remunerated employment, securities holdings, and contracts for supply of goods or services, among others. The law requires candidates seeking appointment to nonelective public offices to declare their wealth, political affiliations, and relationships with other senior public officers. This requirement is in addition to background screening on education, tax compliance, leadership, and integrity. Many officials met these requirements and reported potential conflicts of interest. The government generally did not seek criminal or administrative sanctions for noncompliance. Authorities did not strictly enforce ethics rules relating to the receipt of gifts and hospitality by public officials.

There were no challenges to any declarations of wealth or conflicts of interest filed by public officials.

Public Access to Information: The constitution provides citizens access to information held by the state and requires the government to publish and publicize important information affecting the country. There is no freedom of information implementing legislation, however, and the government frequently did not respond to requests for information. The government did make some information available on the internet.

In 2011 the government joined the Open Government Partnership, a multilateral initiative that aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. It also launched a website, the Kenya Open Data Portal to provide a comprehensive and transparent site for citizens to access data from government ministries. The website contains census data and information on government expenditures, parliamentary proceedings, and public service delivery locations. In July the portal was a finalist in a global competition held by the Bloomberg company and the United Kingdom’s Open Data Institute.

Of the Open Government Partnership’s four goals (citizen engagement, fiscal transparency, access to information, and income and asset disclosure), the government made the most progress in fiscal transparency and income and asset disclosure through institution of its online tender system and automated tax payment systems.

In March the government launched a news portal allowing citizens to access information about government services, initiatives, programs, and policies. Information on the site generally appeared to be up to date and accurate.

The government televised its spokesperson’s briefings and broadcast parliamentary debates live on television and radio.

Lesotho

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials. While the government made significant efforts to implement the law, some officials engaged in corrupt practices with impunity.

Corruption: In 2014 the *Lesotho Times* newspaper alleged the DCEO was investigating Deputy Prime Minister Mothetjoa Metsing in relation to 446,000 maloti (\$30,800) deposited in two bank accounts over a nine-month period. On November 6, the Court of Appeal dismissed Metsing's appeal of a Constitutional Court ruling allowing DCEO's access to his personal bank accounts without his authorization.

Two cases concerning DC party deputy leader and former minister of natural resources Monyane Moleleki were pending. In one, authorities charged Moleleki and four executives of Refela Holdings with fraud and corruption related to mining licenses awarded in 2012. In the second, Moleleki, two directors of Daystar Electrical Construction, and a member of parliament for Maliba-matso, were accused of diverting 15 million maloti (\$1.04 million) earmarked for electrification projects at mining sites to electrify villages in Moleleki's constituency. Moleleki was appointed minister of police in March and the case was postponed until 2017.

Financial Disclosure: The law requires appointed and elected officials to disclose income and assets, including the income of spouses and unmarried dependent children under age 18, and prohibits false or misleading declarations. The declaration regime identifies which assets, liabilities, and interests public officials must declare. Officials must file their declarations annually by April 30. The law provides for disciplinary measures and criminal penalties for failure to comply. The law does not require public declarations or that officials file declarations upon leaving office. The law mandates that the DCEO monitor and verify disclosures. The DCEO claimed it could not effectively implement the law because it lacked adequate resources.

During the year some mid-level civil servants and senior government officials declared assets and potential conflicts of interest, but others did not abide by this requirement. Authorities did not question any declaration's veracity or impose sanctions.

Public Access to Information: The law does not provide for public access to government information. Some ministries made information available to the public but not according to any stated policy or procedure. The government put few of its publications online.

Liberia

Section 4. Corruption and Lack of Transparency in Government

The law does not provide explicit criminal penalties for official corruption, although criminal penalties exist for economic sabotage, mismanagement of funds, bribery, and other corruption-related acts. Corruption persisted, and the World Bank's most recent Worldwide Governance Indicators reflected that corruption was a serious problem.

Corruption: Some officials engaged in corrupt practices with impunity. Low pay for civil servants, minimal job training, and little judicial accountability exacerbated official corruption and contributed to a culture of impunity. The government dismissed or in some instances suspended officials for alleged corruption and recommended others for prosecution. The Liberian Anti-Corruption Commission (LACC) and the Ministry of Justice are responsible for exposing and combating official corruption. The LACC is empowered to

prosecute any case it refers to the Ministry of Justice that the ministry declines to prosecute within 90 days. During the year the LACC received 29 allegations, of which it investigated six cases and recommended one for prosecution by year's end. Twenty-five of these allegations involved serving officials.

The government dismissed or suspended a number of officials for corruption. For example, in April, based on a LACC investigation, President Sirleaf suspended the managing director and comptroller of the National Port Authority. In August she dismissed a deputy minister of the Foreign Ministry over alleged misuse of grant funds from an international donor country and directed the Justice Ministry to investigate the allegations.

Some judges accepted bribes to award damages in civil cases. Judges sometimes solicited bribes to try cases, release detainees from prison, or find defendants not guilty in criminal cases. Defense attorneys and prosecutors sometimes suggested defendants pay bribes to secure favorable decisions from judges, prosecutors, and jurors. Corrections officers sometimes demanded payment to bring a detainee before the Magistrate Sitting Program.

Police corruption was a problem. The LNP investigated reports of police misconduct or corruption, and authorities suspended or dismissed several LNP officers. For example, in January police authorities dismissed and referred to the judicial system for trial two police officers for misappropriation of 2.9 million Liberian dollars (L\$) (\$33,000) entrusted to them for EVD control operations.

Financial Disclosure: The LACC was not required to release the contents of financial disclosures mandated for executive branch officers in 2012 and 2013, and during the year it released only aggregate information about officials' cooperation and overall compliance.

Concerns remained about the transparency of the finances of state-owned enterprises and autonomous bodies. Many of these enterprises had not been audited for several years. Government ministries and agencies often did not adhere to public procurement regulations, particularly for natural resource concessions, or to government vetting procedures when hiring ministry officials.

Public Access to Information: The law provides that the government release upon request information not involving national security issues. Some transparency advocates, including the head of the LACC, stated the law did not provide citizens adequate access to verify the proper spending and accounting of government funds.

Madagascar

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not implement the law effectively, and officials engaged in corrupt practices with impunity. Corruption was pervasive at all levels of government, and the World Bank's most recent worldwide governance indicators reflected corruption was a serious problem.

Corruption: During the year the Independent Anticorruption Bureau (BIANCO) launched corruption investigations into several high-level officials or individuals reputed to be close to the government, although few investigations resulted in conviction.

In July a BIANCO investigation resulted in charges of illicit rosewood smuggling against Johnfrince Bekasy, a ruling party candidate in municipal elections in Sambava. Authorities dropped charges in August, when the prosecutor determined the case could not proceed because authorities had not notified the Ministry of Environment of the case. After

objections from international partners, authorities reinstated the case in September, and Bekasy returned to prison. In October authorities released him without explanation, and he departed the country, although subject to a travel ban.

BIANCO is a nominally independent government agency with a presidentially appointed director and oversight from the committee for the safeguard of integrity within the presidency. It is responsible for preventing, combating, and investigating corruption. A special anticorruption court prosecutes corruption cases referred by BIANCO. In 2014 BIANCO received 1,043 complaints involving corruption, of which 79 percent were deemed eligible for investigation; the bureau completed 650 corruption investigations in 2014. The largest number of corruption complaints targeted the national gendarmerie, decentralized institutions, the education sector, land management authorities, and the justice sector. These cases, however, did not reflect the full extent of corruption in the country, as citizens were less likely to report larger scale corruption cases involving influential individuals.

Financial Disclosure: The law requires regular income and asset declaration for individuals in the following positions: prime minister and other government ministers; parliamentarians; members of the high constitutional court; chiefs of regions and mayors; magistrates; civil servants holding positions of or equivalent to ministry director and above; inspectors of land titling, treasury, tax, and finances; military officers at the company level and above; inspectors from the state general inspection, army's general inspection, and national gendarmerie's general inspection; and judicial police officers. Although BIANCO may inform the prosecutor's office in cases of noncompliance, there was no indication authorities applied sanctions for noncompliance.

Between January and September, 70 parliamentarians and eight members of government, including the prime minister, had declared their assets.

Public Access to Information: There are no laws providing for public access to government information.

Malawi

Section 4. Corruption and Lack of Transparency in Government

There were reports of government corruption during the year. The law provides criminal penalties for conviction of corruption by officials, but the government did not implement the law effectively. Officials sometimes engaged in corrupt practices with impunity. There was little criminal or professional accountability for those involved.

The government, in consultation with donors, devised an action plan to pursue cases of corruption, review how the "Cashgate" corruption scandal occurred, and introduce internal controls and improved systems to prevent further occurrences. Progress on investigations and promised reforms was slow. The vice president headed a public sector reform effort to address the factors that allow corruption to thrive.

Corruption: The investigation and prosecution of approximately 70 individuals, primarily mid-level civil servants, arrested in 2013 for involvement in the theft of approximately 20 billion MWK (\$55 million at the time) through fraudulent transactions--the Cashgate corruption scandal--proceeded slowly. As of October, nine cases had resulted in convictions with prison sentences ranging from three to 11 years. On August 7, the Anti-Corruption Bureau (ACB) arrested the Financial Intelligence Unit manager of monitoring and analysis in connection with the Cashgate scandal.

Financial Disclosure: The constitution requires the president, vice president, and

members of the cabinet to disclose their assets in writing to the speaker of the National Assembly within three months of being elected or appointed. There is no requirement in law for the speaker to make the declarations public or available to other members of parliament. The Public Officers Declaration of Assets Law requires officials in 48 categories, ranging from the president, members of parliament, and senior officials down to specific categories of civil servants, including traffic police and immigration officers, to make financial disclosures. Noncompliance is a basis for dismissal and individuals who knowingly provide inaccurate information may be fined, dismissed, and imprisoned. The broad sweep of the law risks significantly diluting its implementation where most needed. The declarations are to be accessible to the public upon request, but the director has the authority to deny such requests. Denials may be appealed to the High Court.

Public Access to Information: The constitution provides for public access to government information but only insofar as such information is required for the exercise of an individual's rights. There were no reports of fees charged or denial of access to requested records. In the absence of implementing legislation, access to government information was rarely sought and poorly understood.

Mali

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity.

Corruption: Corruption in all sectors of the administration was widespread. Authorities did not hold police accountable for corruption. Officials, police, and gendarmes frequently extorted bribes. There were reports of uniformed police or individuals dressed as police directing stopped motorists to drive to dark and isolated locations where they robbed the victims.

In July and August, Bamako's economic and financial court charged the former general directors of the Agency for the Promotion of Youth Employment, Tieman Diarra and Sina Damba, with embezzling more than five billion CFA (\$8.6 million).

In 2013 police arrested five magistrates and a court clerk for their alleged involvement in government corruption. In June the court sentenced one defendant in the case to a two-year suspended prison term and acquitted the four others.

Government institutions responsible for combating corruption included the Anticorruption Agency (CASCA) and the independent Office of the Auditor General (VEGAL). CASCA oversees a number of smaller anticorruption units within various government ministries and reports directly to the presidency. VEGAL has an independent budget and operated independently. CASCA did not open any corruption cases during the year.

Financial Disclosure: The constitution requires the president, prime minister, and other cabinet members to submit annually a financial statement and written declaration of their net worth to the Supreme Court. The Court of Accounts, a section within the Supreme Court, is responsible for monitoring and verifying financial disclosures. There are no sanctions for noncompliance. The Court of Accounts requires officials to identify all assets and liabilities when they start and complete their terms and provide yearly updates throughout their tenure. Officials are not required to submit disclosures for their spouses or children. In September 2014 President Keita submitted his annual financial statement and written declaration of net worth to the Supreme Court. Although the constitution calls for these

filings to be public, this did not occur.

Public Access to Information: The law provides for public access to government information, and the government generally granted such access to citizens and noncitizens, including foreign media. Journalists, however, had difficulty accessing information on military procurement, contracts, or operations deemed sensitive by the government. The national budget was available to the public upon request. If authorities refused requests for information, persons could appeal to an administrative court, which must respond within three months. The government generally respected these rules, although officials sometimes requested bribes to provide requested information. The government may refuse a request by citing national security.

Mauritania

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but authorities did not enforce the law effectively, and officials often engaged in corrupt practices with impunity. Corrupt practices were widely believed to exist at all levels of government. According to the World Bank's most recent Worldwide Governance Indicators, corruption was rampant.

Corruption: There were reports government officials frequently used their power to obtain favors such as unauthorized exemption from taxes, special grants of land, and preferential treatment during bidding on government projects. Corruption was most pervasive in government procurement but also common in the distribution of official documents, fishing licenses, land, bank loans; and tax payments. Although there was a slight increase in prosecutions for corruption during the year, authorities rarely jailed those found guilty. Instead, they were required only to return the funds in question.

In May the Criminal Division for Economic and Financial Crimes accused an accountant of the National Guard of embezzling public funds from the salaries of soldiers and officers and arrested him.

The arrests of several treasury managers in the rural, interior regions of the country occupied public attention. Audits and investigations revealed fraud in several government sectors and private sector companies and resulted in the ousting of senior officials, including ambassadors, accountants, and managers, while others managed to escape to neighboring countries to evade prosecution. Authorities arrested 30 employees of the state treasury for fraud and the embezzlement of more than one billion ouguiyas (\$3.03 million) and dismissed many financial auditors who overlooked the embezzlement in regional treasury services. The embezzlement network extended to the fishing, foreign customs, and health sectors, and led the minister of finance to resign.

Corruption and impunity were serious problems in the police force, and the government rarely held security officials accountable or prosecuted them for abuses.

On August 20, parliament adopted an anticorruption law, but its enforcement was used as a weapon against opponents of the regime. The law defines corruption as "all exploitation by a public agent of his position for personal purposes, whether this agent is elected, or in an administrative or judicial position."

Financial Disclosure: The government enforced the requirement that senior officials, including the president, file a declaration of their personal assets at the beginning and end of their service. The information is not available to the public. The last public accounting of President Aziz's personal assets took place in 2010; the president of the Supreme Court declared Aziz did not have to renew the public declaration when he was re-

elected in 2014. Members of his first administration who resigned in the wake of his re-election had not declared their assets.

Public Access to Information: The law provides for public access to government information, and the government generally granted some access to citizens and noncitizens, including foreign media. The government did not fully implement the law, since the law still requires adoption of implementing legislation before it can take effect.

Mauritius

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively, and officials sometimes engaged in corrupt practices with impunity. The World Bank's most recent Worldwide Governance Indicators cited the government for being less effective in combating corruption in 2014 than in 2013, underscoring that corruption remained a problem.

Corruption: Authorities disbanded the Police Complaints Investigation Bureau in 2013, but corruption complaints against police officers could be filed at the Independent Commission Against Corruption. On November 19, authorities found a police officer guilty of soliciting bribery in a 2009 case in which he asked for 2,000 rupees (\$57) to maintain the remand conditions of a detainee.

Financial Disclosure: The law requires national government cabinet officers and commissioners of the Rodrigues Island Regional Assembly to make a public disclosure of assets upon taking office and at the dissolution of the national assembly or the Rodrigues Island Regional Assembly. The government, however, did not enforce the law.

Public Access to Information: No law provides public access to government information, but members of the public may request information by contacting the permanent secretary of the appropriate ministry. The government generally complied with requests from citizens and noncitizens, including foreign media.

Mozambique

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials. The government generally struggled to implement the law effectively. Officials often engaged in corrupt practices with impunity.

Corruption: Corruption, including extortion by police, remained widespread, and impunity remained a serious problem. Police regularly demanded identification documents solely to extort bribes. Many crime victims reportedly declined to seek police assistance because of a lack of confidence police would help.

In October the Maputo City Court convicted eight Ministry of Education employees of stealing 33 million meticaís (\$1.1 million) from the ministry. Local media reported that those convicted falsified payroll documentation in order to collect the money between 2008 and 2011. The sentences ranged from one to 20 years in prison. The shortest sentences were converted to fines.

Negative fiscal ramifications from the 2013 EMATUM (a state-owned tuna fishing company) transaction, which directly related to lack of transparency in the public tender process, continued during the year. In June the government assumed approximately \$500 million of state guaranteed debt of the \$850 million in EMATUM financial liabilities amid growing concern over government debt to GDP ratios. The country's international credit rating was downgraded by multiple ratings agencies in June.

Financial Disclosure: The law requires annual income and assets disclosure by appointed and elected members of the government, high-ranking civil servants, their spouses, and their legal dependents to the Ministry of State Administration. The law provides for fines if declarations are not made; however, the declarations are not public. In November local media reported the PGR found only 63 of 700 officials in Nampula Province required to submit an assets disclosure actually did so.

Public Access to Information: A law enacted in December 2014 provides for public access to official sources of information. Due to lack of a procedural code and historical cultural sensitivities regarding public requests for government information, however, the law was not effectively implemented. Efforts to train officials on the implementation of the law were underway.

Namibia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials; however, the government did not implement the law effectively, and officials sometimes engaged in corrupt practices with impunity. There were isolated reports of government corruption. During the year the Anti-Corruption Commission (ACC) continued awareness campaigns and workshops for government officials, politicians, civil society organizations, church leaders, and schoolchildren on the dangers of corruption.

Corruption: The ACC, Prosecutor General's Office, NamPol, Auditor General's Office, Financial Investigative Center at the Bank of Namibia, Public Service Commission, and Ombudsman's Office are responsible for combating corruption. The ACC and the Ombudsman's Office receive and investigate corruption complaints, often from the public. The Financial Investigative Center investigates and reports suspicious money transfers. The Public Service Commission investigates corruption complaints in the civil service hiring process. The Auditor General's Office also investigates corruption and turns cases over to the Prosecutor General's Office and NamPol for further investigation and criminal prosecution where appropriate. These organizations actively collaborated with civil society, conducted thorough investigations, and operated both effectively and independently.

The corruption trial of suspended magistrate Melanie Theron continued during the year. Police finished their investigations of three employees of the Walvis Bay Magistrate's Court arrested in 2013 for allegedly soliciting illegal payments from motorists to cancel traffic tickets and arrest warrants. The prosecutor general referred their cases to the control prosecutor in Swakopmund for a decision on whether to prosecute, and the case remained with that office at year's end.

Financial Disclosure: In October the National Assembly adopted a parliamentary code of conduct requiring the annual declaration of financial interests. The adopted declaration form included a confidential portion to which the public will not have access. The National Council, the country's upper house of parliament, already had a code of conduct and annually produced a register listing members' financial interests. In May the president

voluntarily published an accounting of his and his wife's assets.

Public Access to Information: The law prohibits public employees from sharing information held by a government ministry without permission from the minister or permanent secretary of the ministry. No law provides for public access to government information, but media outlets generally found the government willing to provide information when requested.

Niger

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. The World Bank's most recent Worldwide Governance Indicators reflected corruption was a severe problem. The government publicly acknowledged corruption was a problem, and there were several reports of government corruption during the year.

Corruption: Civil servants often demanded bribes to provide public services. A poorly financed and trained law enforcement establishment and weak administrative controls compounded corruption. Other contributing factors included poverty, low salaries, politicization of the public service, traditional kinship and ethnic allegiances, a culture of impunity, and the lack of civic education. A French appeals court found in March that a 35 million euro (\$38.5 million) contribution by French nuclear company Areva towards the purchase of a new presidential airplane for Niger constituted moral corruption.

Several incidents in August and September in which large amounts of foreign currency and gold were discovered at Niamey's international airport raised concerns in the media of money laundering or corruption. In all incidents senior officials reportedly instructed customs officials to return the money and gold to the travelers without levying customs taxes.

The High Authority to Combat Corruption and Related Crimes (HALCIA) forwarded several corruption cases to the Ministry of Justice. HALCIA investigated and uncovered several corruption and fraud cases involving civil servants, judges, and security force members, notably customs officers. HALCIA referred most of the cases to state prosecutors for action. Individuals were charged with crimes and occasionally jailed for short periods, although they often were granted provisional release, and no sentences were handed out for corruption.

Financial Disclosure: The constitution requires the president of the republic, presidents of other government institutions, and cabinet members to submit written statements of their personal property and other assets to the Constitutional Court upon assuming office, and they complied. These statements are to be updated annually and at the end of an individual's tenure. The National Register and the press publish the initial statements and updates. Copies of the statements are forwarded to the government's fiscal services. Filers must explain any discrepancies between the initial and the updated statements. The Constitutional Court has authority to assess discrepancies, but there was no indication it questioned a declaration's veracity and/or imposed sanctions. The law does not allow designated officials to purchase or rent, by themselves or through other parties, any government-owned property or to bid for government contracts. HALCIA and the State Inspectorate have investigative roles, with the State Inspectorate being more administrative.

Public Access to Information: The law provides for access to public information and administrative documents, and this occurred. Requestors can also obtain many documents

from individual ministries and the National Archives. The law provides a list of “communicable” and “noncommunicable” documents and establishes procedures for accessing them and paying related costs. If officials deny access to a document, they are required to notify the requestor in writing and provide the legal grounds for denial. The law provides an appeal mechanism for review through the national mediator, and legal complaints are referred to the Administrative Court. It also provides for sanctions against agencies, individual civil servants, and users for noncompliance.

Nigeria

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for official corruption, the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity. Massive, widespread, and pervasive corruption affected all levels of government and the security services. The constitution provides immunity from civil and criminal prosecution for the president, vice president, governors, and deputy governors while in office. There were numerous reports of government corruption during the year.

Corruption: In July, President Buhari signed into law the Proceeds of Crime Act, which provides for the recovery of illegally acquired property through forfeiture, confiscation, or civil recovery. It also provides the powers to seize, freeze, and restrain criminals from having access to such property. In August the administration appointed a Presidential Advisory Committee Against Corruption to advise President Buhari on a strategy to fight corruption. The same month the president ordered the national security adviser to form a panel to investigate allegedly fraudulent defense procurement practices during the previous eight years.

The Independent Corrupt Practices Commission (ICPC) holds broad authorities to prosecute most forms of corruption. The Economic and Financial Crimes Commission’s (EFCC) writ extends only to financial and economic crimes. By November the ICPC had obtained 11 convictions, was prosecuting 29 cases, and had 295 open investigations. The EFCC had secured eight convictions by November, was prosecuting 18 cases, and had 60 open investigations.

Although ICPC and EFCC anticorruption efforts remained largely focused on low- and mid-level government officials, following the national elections in March, both organizations started investigations into and brought indictments against various current and former high-level government officials.

Among successful prosecutions, the EFCC convicted the brother of former Edo State governor, Lucky Igbinedion, and an accomplice on an 81-count indictment for the laundering of 25 billion naira (\$125 million), misappropriation of funds, and abuse of office. In another high-profile prosecution, in December the EFCC indicted former national security adviser Sambo Dasuki on 22 counts of fraud and money laundering.

Multiple press reports noted the ICPC investigated wealthy civil servants and had confiscated buildings ostensibly owned by civil servants whose salaries did not support such acquisitions. According to other reports, the ICPC set up a task force to investigate corruption allegations against eight former state governors: Rabiw Kwankwaso of Kano, Rotimi Amaechi of Rivers, Ibrahim Shema of Katsina, Sullivan Chime of Enugu, Fashola of Lagos; Godswill Akpabio of Akwa Ibom, Martin Elechi of Ebonyi, and Sule Lamido of Jigawa.

In June the police announced new measures to tackle rampant police corruption. Among the

initiatives were the dismantling of roadblocks, establishment of public hotlines, and creation of inspector general monitoring teams to investigate allegations of corruption.

In 2013 police released a code of conduct that includes provisions on officer integrity, but as of September there was no indication the police had brought any corruption charges against officers. According to the police, the code of conduct serves only as a reminder to officers of expected ethics and conduct.

Financial Disclosure: The Code of Conduct Bureau and Tribunal Act (CCBTA) requires public officials--including the president, vice president, governors, deputy governors, cabinet ministers, and legislators (at both federal and state levels)--to declare their assets to the Code of Conduct Bureau (CCB) before assuming and after leaving office. The constitution calls for the CCB to “make declarations available for inspection by any citizen of the country on such terms and conditions as the National Assembly may prescribe.” The law does not address the publication of asset information. Violators risk prosecution, but cases rarely reached conclusion.

On September 3, the Office of the President announced President Buhari had declared his assets to the CCB, consisting of 30 million naira (\$150,000), five homes, two mud houses, two undeveloped plots of land, farms, an orchard, a ranch, 270 head of cattle, 25 sheep, five horses, and several cars. The same statement also indicated Vice President Yemi Osinbajo had similarly declared his assets to the CCB and briefly listed them. According to the Office of the President, the CCB would release all documents to the public once verified and validated.

In late September the CCB brought charges before the Code of Conduct Tribunal (CCT)--a court created by the CCBTA to try violations of that act--against Senate President Bukola Saraki for false declaration of assets. The case went to trial in October, but the CCT had issued no ruling by year’s end.

Public Access to Information: The law allows any person to request information from a government office. The office must grant access to the information, explain why access was denied within seven days of receiving the request, or transfer the request to the appropriate office within three days. By law all public offices must keep records. The law provides immunity for public officers against any form of civil or criminal proceeding for “disclosure in good faith of any information” pursuant to the law. The law provides a 30-day window during which anyone denied access by any public institution may submit the matter to court for a judicial review. The law includes a fine of 500,000 naira (\$2,500) for any institution or public officer who wrongfully denies access to information or records. Destruction of records is a felony punishable by a minimum penalty of one year’s imprisonment. Immunity from this law, however, is provided for the president, the vice president, the senate president, the speaker of the House of Representatives, and all state governors.

Rwanda

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials and private persons transacting business with the government that include imprisonment and fines. The law also allows citizens who report requests for bribes by government officials to receive financial rewards when officials are prosecuted. While the government continued to implement anticorruption laws and encourage citizens to report requests for bribes, corruption remained a problem.

Corruption: Transparency International Rwanda and other CSOs reported the government investigated and prosecuted reports of corruption among police and government officials. Police frequently conducted internal investigations of police corruption, including sting operations. The Office of the Ombudsman released quarterly lists of persons convicted of corruption, but journalists and other observers noted corruption investigations focused on local officials and private persons. The government did not prosecute any senior officials for corruption during the year.

In April prosecutors announced that ambassador to Ethiopia and former minister of Sport and Culture Protais Mitali was under investigation for allegedly embezzling 50 million Rwandan francs (\$69,640) from the Liberal Party. Mitali refused to return and instead fled to Europe; the government subsequently issued an Interpol Red Notice for his arrest pursuant to corruption-related offenses.

There were reports district officials manipulated health insurance enrollment and socioeconomic classification statistics in order to appear to meet development targets.

International and domestic investors reported the government strongly supported the establishment of new businesses, including through one-stop business licensing efforts that generally resulted in business registration within 72 hours. Nevertheless, investors reported contract disputes with the government and arbitrary enforcement of tax, immigration, and investment rules.

Investors at times encountered business difficulties because of political disputes. For example, in August the Rwanda Revenue Authority issued a notice of delinquent taxes to investor Tribert Rujugiro Ayabatwa, although the City of Kigali had expropriated Ayabatwa's Union Trade Center in 2013 (see section 1.e).

The National Public Prosecution Authority (NPPA) prosecuted civil servants, police, and other officials for fraud, petty corruption, awarding of public tenders illegally, and mismanagement of public assets. Under the Ministry of Justice, the NPPA is also responsible for prosecuting police abuse cases. The RNP Inspectorate of Services investigated cases of police misconduct, and in March 2014 the RNP launched an anticorruption unit. From July 2013 to July 2014, the RNP dismissed 78 officers for corruption-related charges, suspended an unknown number of additional officers for corruption, abuse of power, or misconduct, and imposed administrative punishment on others for indiscipline. The RNP advertised a toll-free hotline number on local radio and in the press and provided deposit boxes in many communities to encourage citizens to report both positive and negative police and DASSO behavior.

The Office of the Auditor General worked to prevent corruption, including by investigating improper ministerial tendering practices. The RNP and the NPPA used the auditor general's annual report to pursue investigations into government-owned businesses. The Office of the Ombudsman led the National Anticorruption Council and had an active good governance program and several local-level anticorruption units. The Office of the Ombudsman launched a public comment initiative and installed information boxes in government offices and police stations to solicit anonymous reports of corruption but stated it received few reports. From January to June, the office investigated 174 cases of embezzlement and corruption and referred 27 cases for prosecution, the majority of which involved misuse of public funds. In 2013 the Office of the Ombudsman was granted legal authority to prosecute corruption cases, but it has yet to prosecute any cases. The Rwanda Governance Board monitored governance more broadly and promoted mechanisms to control corruption. The Rwanda Revenue Authority's Anti corruption Unit had a code of conduct and an active mechanism for internal discipline. The National Tender Board, the Rwanda Utilities Regulatory Authority, and the National Bureau of Standards also enforced their own regulations.

The government utilized a "bagging and tagging" system to aid companies with regional and international due diligence requirements related to conflict minerals. The government

maintained a ban on the purchase or sale of undocumented minerals from neighboring countries. Observers and government officials reported smugglers succeeded in trafficking an unquantifiable amount of undocumented minerals through the country.

Financial Disclosure: The constitution and law require annual reporting of income and assets by public officials as well as reporting them upon entry into and exit from office. There is no requirement for public disclosure of those assets, except in cases where irregularities are discovered. The Office of the Ombudsman, which monitors and verifies disclosures, reported 98 percent of officials complied with the requirement in 2013. In cases of noncompliance, the Office of the Ombudsman has the power to garnish wages and impose administrative sanctions that often involved loss of position or prosecution.

Public Access to Information: The government promulgated the Access to Information Law in 2013. The law grants wide access to government information upon request and in some cases to information held by private entities when disclosure is deemed to be in the public interest. The government may limit access to information if its release is deemed to be against the public interest or if the information pertains to national security, as determined by the Prosecutor General's Office.

An NGO dedicated to facilitating citizen access to information, the Open Democracy and Sustainable Development Initiative, reported difficulties in obtaining government responses to requests for information submitted under the Access to Information Law. As of October the Access to Information portal *Sobanukirwa*, which was launched in February, indicated that of 69 requests for information submitted to the government, seven were replied to and 62 did not receive answers.

Sao Tome and Principe

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government reportedly did not implement the law effectively, and many citizens believed that some officials were corrupt. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a problem. Many citizens viewed police as ineffective and corrupt.

Corruption: The state prosecutor's office and the court system had responsibility for handling corruption cases.

Financial Disclosure: The law does not require public officials to disclose their assets or income, but it permits such disclosures. Public disclosure of these financial statements, however, rarely occurred.

Public Access to Information: While laws do not provide for public access to government information, there were no reports the government restricted the access of citizens or noncitizens, including foreign media, to such information. The government did not charge processing fees for granting access to information.

Senegal

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government often did

not enforce the law effectively. Officials frequently engaged in corrupt practices with impunity.

Corruption: In March the Court for the Suppression of Illicit Enrichment (CREI) convicted Karim Wade, a former government minister and the son of former president Wade, of “illicit enrichment”; he was sentenced to six years in prison and fined 1.38 billion CFA francs (\$2.39 million).

On May 18, the CREI froze the assets of Abdoulaye Balde, the mayor of Ziguinchor and a former cabinet minister, pending the outcome of his corruption trial.

Financial Disclosure: In January 2014 the National Assembly passed a law requiring the president, cabinet ministers, the speaker of the National Assembly and its chief financial officer, and managers of public funds in excess of one billion CFA francs (\$1.7 million) to disclose their assets to the National Anticorruption Commission. Failure to comply may result in a penalty amounting to one-quarter of an individual’s monthly salary until forms are filed. The president may dismiss appointees who do not comply. Disclosures, except the president’s, made under the law are confidential, and unauthorized release of asset disclosures is a criminal offense. The president, all cabinet officials, the speaker, and chief financial officer had complied with the law by year’s end.

Public Access to Information: The constitution and law provide citizens the right to access government information, but authorities did not follow consistent practices with respect to determining the grounds for nondisclosure, establishing deadlines for responding to requests for information, or charging processing fees. The government did not have an appeals mechanism to review disclosure denials or public outreach activities or training for public officials on the release of government information.

Seychelles

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not always implement the law effectively, and officials sometimes engaged in corrupt practices with impunity. The World Bank’s most recent Worldwide Governance Indicators reflected corruption was a problem.

Corruption: According to the minister of finance, trade, and the blue economy, the government investigated a number of corruption cases, but no prosecutions were made public. The ombudsman has legal authority to investigate and report on allegations of official fraud and corruption, and the Attorney General’s Office prosecutes such cases. Police corruption remained a problem.

Financial Disclosure: The law requires senior public servants and board members to disclose their assets, although the law was not always enforced.

Public Access to Information: There are laws allowing public access to government information, but the government did not comply with them. Citizens generally had no access to such information.

Sierra Leone

Section 4. Corruption and Lack of Transparency in

Government

Substantial corruption existed in the executive (including the security sector and in migration management), legislative, and judicial branches. The law provides criminal penalties for corruption by officials. The government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity. Police and prison staff regularly extorted or solicited bribes from detainees and convicted prisoners. The World Bank's most recent Worldwide Governance Indicators reflected that corruption was a severe problem.

Corruption: As of November the Anti-Corruption Commission (ACC) had indicted Mohamed Osman Sesay and Dennis Jones for conspiracy to commit a corruption offense and deceiving a principal. According to the indictment, Sesay and Jones allegedly forged the signatures of the minister and the deputy minister of information and communications to defraud a British national of money.

Financial Disclosure: The law requires public officers, their spouses, and children to declare their assets and liabilities. It also mandates disclosure of assets by government ministers and members of parliament. The ACC is empowered to verify asset disclosures and may publish in the media the names of those who refuse to disclose and petition the courts to compel disclosure. Failure to disclose also carries a penalty of up to 20 million leones (\$3,700) and one year in prison. The particulars of individual declarations were not available to the public without a court order.

Public Access to Information: The law requires public authorities to grant citizens access to government-held information. The law incorporates a sufficiently narrow list of nondisclosure exceptions, a reasonably short timeline for disclosure, and reasonable processing fees. It includes civil and criminal sanctions for noncompliance. The law also provides for establishment of an information commission to facilitate enforcement of its provisions. Applicants for information may appeal a disclosure denial to the information commission and subsequently to the courts. The law was not, however, effectively implemented.

Somalia

Section 4. Corruption and Lack of Transparency in Government

Government officials frequently engaged in corrupt practices. The law provides for criminal penalties for corruption by officials. The government did not implement the law effectively.

Corruption: The provisional constitution called for establishment of an independent anticorruption commission in 2012 with a mandate to investigate allegations of corruption in the public sector. The federal government established the commission in January, but no cases were brought to the body by year's end.

The October 2014 report by the UN Monitoring Group on Somalia and Eritrea (SEMG) indicated corruption continued as did "patterns of misappropriation with diversion rates between 70 and 80 percent." The report also addressed "secret contracting," in which officials signed contracts regarding public assets without transparency or oversight. It stated "individuals close to the presidency" were working to gain control of recovered overseas assets that should have gone to the central bank. The report stated the central bank made payments to private persons or office holders for private purposes and reported on diversion of revenue from Mogadishu's port. Allegations persisted that diversion of government revenue for private purposes continued unabated.

A 2015 SEMG annex report documented that the Soma Oil and Gas company paid more than half a million dollars to senior civil servants in the Ministry of Petroleum and Mineral Resources under the rubric of “capacity building agreement.” The report detailed several ministry officials receiving salaries simultaneously from the federal government and Soma Oil and Gas Company. The international oil production sharing agreement between Soma Oil and the federal government gave the company extremely favorable terms.

The Financial Governance Committee (FGC) consisted of three members of international financial institutions and three members of the federal government. The body reviewed 13 contracts during the year. Of the contracts reviewed, four were never approved or implemented and two were adjusted in line with FGC recommendations. The FGC did not receive a substantive federal government response on seven contracts it reviewed.

The FGS appointed an accountant general in July. Neither he nor the auditor general had publicly released any reports by years’ end.

The SEMG continued to report on the export of charcoal in violation of a UN Security Council ban. The report discussed charcoal production in areas controlled by al-Shabaab, the IJA, and Kenyan AMISOM forces as well as its export, which the SEMG reported to be primarily from Kismayo. Internationally registered vessels fished illegally in the country’s territorial waters. Officials stated such illegal practices represented millions of dollars of forgone income for the government.

Somaliland had a national auditor and a governance and anticorruption commission appointed by Somaliland’s president. Somaliland did not try any Somaliland officials for corruption.

Puntland’s Good Governance and Anticorruption Commission did not try any Puntland officials for corruption.

Al-Shabaab extorted high and unpredictable “zakat” (a Muslim obligation to donate to charity during Ramadan) and “sadaqa” (a voluntary charity contribution paid by Muslims) taxes in the regions it controlled. It also diverted and stole humanitarian food aid.

Financial Disclosure: The law does not require income and asset disclosure by appointed or elected officials.

Public Access to Information: The provisional constitution states that citizens have the right of access to information held by the state. It also states that parliament shall enact a law to provide for this right, but parliament had not approved such a law by year’s end.

South Africa

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for conviction of official corruption, and the government continued efforts to curb corruption, but officials sometimes engaged in corrupt practices with impunity. The World Bank’s most recent Worldwide Governance Indicators reflected that corruption remained a problem.

Corruption: During the year the Office of the Public Protector, a constitutionally mandated body designed to investigate government abuse and mismanagement, investigated thousands of cases, some of which involved high-level officials. The public and NGOs considered the Office of the Public Protector independent and effective, despite limited funding. According to the NPA’s 2014-15 Annual Report, 23 persons were convicted of corruption in cases where the value of assets seized exceeded five million rand

(\$384,000), and 130 government officials were convicted of corruption.

The government secured one high-profile public-sector corruption conviction during the year. On October 14, a court convicted Northern Cape ANC chairperson (and former provincial premier) John Block of corruption, racketeering, and money laundering. The state accused Block--along with Trifecta Holdings chief executive Christo Scholtz and Northern Cape Minister of Social Development Alvin Botes--in a multimillion-rand fraud, corruption, and money-laundering scheme. Scholtz paid kickbacks to Block and Botes between 2006 and 2010 in return for it influencing provincial departments to rent office space at inflated rates in Trifecta's favor. The ANC forced Block, whose sentencing was scheduled for January 2016, to resign his post as provincial chairperson.

On May 28, the police minister presented parliament's ad hoc committee with his report on the upgrades to the president's Nkandla residence; in 2014 the public protector concluded the Zuma family should repay a portion of the 249 million rand (\$19.2 million) in nonsecurity upgrades to the president's private home. On August 18, the ANC majority in the National Assembly voted to accept the committee report exonerating the president, despite a rare filibuster attempt by the opposition. Opposition parties and the public protector subsequently filed challenges with the Constitutional Court, which agreed to hear the case in February 2016.

On July 7, the Gauteng North High Court cancelled dates for hearings on corruption charges against Richard Mdluli, the head of the SAPS Crime Intelligence Division. In 2012 the president suspended Mdluli for allegedly using state funds to pay for his private automobile and registering his relatives, girlfriends, and their families as covert intelligence operatives in order to pay them.

Corruption remained a problem within prisons. According to the 2014-15 JICS report, there were 706 complaints of corruption during the annual reporting period. At least 10 agencies, including the SAPS Special Investigation Unit, Public Service Commission, Office of the Public Prosecutor, and Office of the Auditor General, were involved in anticorruption activities.

Financial Disclosure: Public officials, including members of national and provincial legislatures, all cabinet members, deputy ministers, provincial premiers, and members of provincial executive councils, are subject to financial disclosure laws, but some failed to comply, and departments filed the majority of their reports late. The declaration regime clearly identifies which assets, liabilities, and interests public officials must declare. Government officials are required to declare publicly their interests when they enter office, and there are administrative and criminal sanctions for noncompliance, but no defined unit is mandated to monitor and verify disclosures of government officials. The government made declarations by government officials public, but not those of their spouses or children.

The awarding of tenders was a problem at all levels of government. In March 2014 the auditor general's annual report revealed government departments awarded contracts worth 438 million rand (\$33.7 million) to companies in which senior employees of the department had personal financial interests. Moreover, government departments awarded contracts worth 141 million rand (\$10.8 million) to companies in which family members of senior department officials had interests. In 75 percent of these cases, the conflict of interest was not disclosed. The 2014-15 auditor general's report released on November 25 found approximately 25.7 billion rand (\$1.9 billion) in irregular expenditure, although not all was necessarily fraudulent. The report also found an absence of follow-up or punishment for officials who failed to comply with public financial management act regulations, resulting in a culture of impunity in government.

Public Access to Information: The law provides for access to government information, although the government did not always comply with the law. The government operated a publicly accessible website for interested persons to obtain all laws, speeches,

parliamentary proceedings, and other official information. If a government department refuses to respond to a specific information request, the requester is entitled to launch a formal appeal. If this also fails, the requester may appeal to the High Court, a lengthy and expensive process. The Open Democracy Advice Center reported the government was late in responding to many requests for information or failed to answer entirely. On September 28, Minister in the Presidency Buti Manamela told the SAHRC only 52 percent of government ministries had a structure in place to comply with the Promotion of Access to Information Act.

South Sudan

Section 4. Corruption and Lack of Transparency in Government

The transitional constitution provides for criminal penalties for acts of corruption. The government did not implement the law, and officials engaged in corrupt practices with impunity.

Corruption: Corruption was endemic in all branches of government. Poor recordkeeping, lax accounting procedures, absence of strict procurement laws, a lack of accountability, and the pending status of corrective legislation compounded the problem.

The transitional constitution assigns responsibility for investigating and prosecuting corruption to the South Sudan Anticorruption Commission (SSACC). The commission has no authority to prosecute because the constitution did not repeal or amend previous laws vesting prosecutorial powers in the Ministry of Justice. A further barrier was the fact that neither the constitution nor the criminal code defines corruption.

An investigation by the NLA found that letters of credit had been misused. The Ministry of Trade, Investment, and Industry, for example, approved nearly 1.44 billion South Sudanese pounds (SSP, equivalent to \$480 million) in the letters since early 2014, but whether the money was used for its intended purposes was not clear.

Financial Disclosure: Government officials of director general rank and higher are required to submit financial declaration forms annually, although there is no penalty for failure to comply. The assets of spouses and minor children must be declared as well. Although the SSACC received these forms and was responsible for monitoring compliance, no monitoring occurred by year's end.

Public Access to Information: No law provides for public access to government information, and the government resisted domestic and international pressures for increased transparency, particularly in the financial sector. Although the government published the budget, the Ministry of Finance failed to investigate and report on large discrepancies between planned and actual budget expenditures. The Central Bank did not publish information on foreign reserve holdings or other commonly available data. The Ministry of Petroleum did not publish information on oil production, oil revenues, or loans provided in exchange for future oil sales. The government did not publicize procurements, and single-source contracting was the norm.

Sudan

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials; nevertheless, government corruption at all levels was widespread. The government made few efforts to enforce legislation aimed at preventing and prosecuting corruption.

Corruption: According to the World Bank's most recent Worldwide Governance Indicators, corruption was a severe problem. The law provides the legislative framework for addressing official corruption, but implementation was weak, and many punishments were lenient. Officials found guilty of corrupt acts could often avoid jail time if they returned ill-gotten funds. Journalists who reported on government corruption were sometimes intimidated, detained, and interrogated by services.

A special anticorruption attorney investigates and tries corruption cases involving officials, their spouses, and their children. Punishments for embezzlement include imprisonment or execution for public service workers, although these sanctions were almost never carried out. All bank employees are considered public service workers.

On August 26, the Council of Ministers chaired by the minister at the Presidency endorsed the Anti-Corruption Commission Bill for 2015, presented by the minister of justice. The bill aimed to establish an anticorruption commission for all levels of government to boost transparency in financial and administrative transactions. By year's end the president had not approved the bill.

In April 2014 two employees of the Khartoum State governor's office were charged with running a massive embezzlement scheme. The two men remained free, however, and were not brought to trial during the year. Reporting on corruption was considered a "red line" set by NISS and a topic authorities prohibited newspapers from covering for the most part.

Financial Disclosure: The law requires high officials to disclose publicly income and assets. There are no clear sanctions for noncompliance, although the commission possesses discretionary powers to punish violators. The Financial Disclosure and Inspection Committee and the Unlawful and Suspicious Enrichment Administration at the Justice Ministry both monitored compliance. Despite two different bodies ostensibly charged with combating official corruption, there was no effective enforcement or prosecution of offenders. In October the country was deemed in compliance with anti-money-laundering and antiterrorism financing regulations and removed from the international Financial Action Task Force blacklist.

Public Access to Information: In January the government passed a freedom of information law to promote greater transparency and allow citizens greater access to information. Local and international human rights observers and journalists remained skeptical throughout the year the law would improve access to information given that little was publicly known about the law. The law excepts 12 categories of information that can be maintained as classified, including personal information and information on national security, foreign policy, and criminal procedures.

Swaziland

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government did not implement the law effectively. Officials sometimes engaged in corrupt practices with impunity. There was a widespread public perception of corruption in the executive and legislative branches of government and a consensus that the government did little to combat it.

The Anticorruption Commission (ACC), funded by the Ministry of Justice, is charged with

fighting corruption by carrying out education and prevention programs as well as by investigating cases. The ACC has the power to investigate cases, gather evidence, and arrest individuals for failure to respond to ACC requests. The ACC conceded it made little progress in curbing corruption. Citizens continued to refer to former minister of finance Majazi Sithole's 2011 statement that corruption resulted in a monthly loss of an estimated 80 million emalangi (\$5.1 million) in potential government revenue.

In prevention and education efforts, the ACC conducted dozens of sensitization workshops and meetings around the country, provided educational materials for schools, and made presentations on numerous radio and television shows. ACC representatives acknowledged a widespread public perception that the ACC was ineffective and asserted that the commission--established in 2008--remained in "startup" mode largely because of a lack of financial and human resources and the general backlog of cases in the court system.

Corruption: School principals and teachers routinely demanded bribes to admit students, and immigration and customs officials did so to issue government documents.

Credible reports continued that government road construction and other contracts; the appointment of officials, employment and promotions; military and police recruitment; and school admissions were determined based on a person's relationship with government officials. Authorities rarely took action on reported incidents of nepotism.

Financial Disclosure: The constitution prohibits government officials from assuming positions in which their personal interests are likely to conflict with their official duties. The constitution requires appointed and elected officials to declare their assets and liabilities to the Commission on Public Administration and Human Rights. The commission is mandated to monitor and verify disclosures. There are criminal and administrative sanctions for noncompliance. Sanctions for failure to disclose assets and conflicts of interests include removal from office, disqualification from holding a public office for a period determined by a court, and confiscation of any property illegitimately acquired during tenure in office. According to the commission, the majority of those required to declare assets and liabilities did so, but the commission suspected underreporting in some cases. The commission did not make this information public.

Public Access to Information: No law provides for public access to government documents. The Ministry of Finance, however, provided limited access to budget documents on its website.

Tanzania

Section 4. Corruption and Lack of Transparency in Government

While the law provides criminal penalties for corruption by officials, the government did not implement the law effectively, and officials often engaged in corrupt practices with impunity. There were reports of corruption during the year, and corruption was generally perceived to be rampant at all levels nationwide.

Corruption: According to the Prevention and Combating of Corruption Bureau (PCCB), most corruption investigations concerned government involvement in mining, land matters, energy, and investments. Through September the PCCB reported it had opened 675 new investigations and forwarded 277 case files to the Director of Public Prosecutions for action. There were 266 new cases filed and 611 ongoing cases in court. Two hundred seventy-four cases were concluded, with 134 convictions and 140 acquittals. According to Afrobarometer findings for 2014-15, the most corrupt entities were the police, Tanzania Revenue Authority, courts, and local government. NGOs reported that allegations of

corruption involved the Tanzania Revenue Authority, local government officials, police, licensing authorities, hospital workers, and the media.

In July the former ministers for finance and for energy and minerals were convicted on corruption charges. The two were sentenced to two years in prison for issuing illegal tax exemptions and “arbitrarily” awarding a contract in 2002.

Newspaper articles, civil complaints, and reports of police corruption from the PCCB, as well as from the Ministry of Home Affairs, continued.

The PCCB’s mandate does not extend to Zanzibar. In Zanzibar the Anti-Corruption and Economic Crimes Authority received 56 complaints, 37 of which were under investigation.

Financial Disclosure: Government ministers and MPs, as well as other public servants, are required to disclose their assets upon assuming office, annually at year’s end, and upon leaving office. Although penalties exist for noncompliance, there was no enforcement mechanism or means to determine the accuracy of such disclosures. The Ethics Secretariat distributes forms each October for collection in December. In May the minister of state responsible for central establishment in the President’s Office reported that 3,595 public leaders did not submit their wealth declaration forms by the end of 2014. Secretariat officials previously stated the individuals who failed to meet the deadline were asked to show cause for the delay. Any declaration forms submitted or filed after the deadline must explain the failure to observe the law. Asset disclosures are not public.

Public Access to Information: No law provides for public access to government information, and such access remained limited. Government officials routinely refused to make information available. Civil service regulations effectively allow only a handful of high-level government representatives to communicate information to the media. Media groups continued to press the government and parliament to adopt a freedom of information act and revise the bill governing the media industry.

Togo

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for official corruption, the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity.

The body officially responsible for combating corruption, the National Commission for the Fight against Corruption and Economic Sabotage, continued to lack a specific anticorruption legal mandate and was inactive. Other state entities, such as the Government Accounting Office and Finances Inspectorate, investigate and audit public institutions, but their resources were limited, and they reported few results. Authorities established toll-free and text-messaging lines for citizens to report cases of corruption.

In August the National Assembly passed a law to create the High Authority for the Prevention of and Fight Against Corruption. The law provides for a seven-person independent body to, among other things, hear complaints of corruption and refer them to legal authorities, work with the judiciary on strengthening countercorruption practices, educate the public, and oversee adherence of public officials to anticorruption statutes. As of October the government had yet to appoint board members.

Corruption: The World Bank’s Worldwide Governance Indicators for 2014, the most recent available, reflected government corruption was severe and most severe among prison officials, police officers, and members of the judiciary. There were no major corruption

cases reported during the year.

Financial Disclosure: Only the Togo Revenue Authority requires its officers to disclose their income and assets. No provisions in the constitution, law, regulations, or codes of conduct require income and asset disclosure by appointed or elected officials.

Public Access to Information: Although the law provides for public access to government information, the government does not always respond to requests. Many documents were only available in hard copy.

Uganda

Section 4. Corruption and Lack of Transparency in Government

The 2009 Anticorruption Act provides criminal penalties for official corruption, including up to 12 years' imprisonment upon conviction. The government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity. Government agencies responsible for combating corruption included the Inspectorate of Government, the DPP, the Anticorruption Division (ACD) of the High Court, Parliament's Public Accounts Committee, the police Criminal Investigation Division, the Office of the Auditor General, and the Directorate for Ethics and Integrity. These agencies lacked the political will to combat corruption at the highest levels of government, and many corruption cases remained pending for years. In March the auditor general released the annual report for the fiscal year ending June 2014. The report revealed government departments increasingly lacked financial discipline, leading to loss of funds or failure to account for funds.

On October 15, the president signed the 2013 Anticorruption (Amendment) Bill that Parliament passed on July 7. The bill retained the criminal penalties in the 2009 Anticorruption Act and added the mandatory confiscation of property of persons convicted. It also widened the scope of categories of persons liable for offenses related to corruption to include political leaders and private companies.

Police arrested and suspended several police officers implicated in bribery, extortion, and corruption. Authorities arrested several magistrates and judicial officials for forgery as well as for soliciting and receiving bribes.

Corruption: On July 29, the ACD sentenced former director of the Parliament Budget Office Samuel Wanyaka to 10 years' imprisonment for embezzling more than 822 million shillings (\$225,000). Under section 46 of the 2009 Anticorruption Act, the court also banned Wanyaka from being employed by any government entity for 10 years and ordered him to refund the money he embezzled. According to the media, however, Parliament was still paying Wanyaka a salary, despite protests from the inspector general of government (IGG). The IGG started investigating the Parliament Budget Office in 2013 after a whistleblower filed a complaint with the office.

On April 15, the court dismissed a case connected to the 2013 pension scam in which the government lost more than 165 billion shillings (\$45 million) after officials from the Ministries of Public Service and Finance created 2,605 ghost pensioners. The court dropped the case because the government had not presented a witness in nearly two years. Following reports police detectives working on the case allegedly received bribes from some suspects, the inspector general of police transferred the detectives, and on August 19, the DPP reinstated the case. On August 30, the ACD denied bail to the suspects and further remanded them to Luzira Prison. The case continued at year's end.

The 2014 Uganda National Roads Authority (UNRA) investigation continued. In August

authorities suspended four top UNRA managers over the controversy surrounding the tender for construction of a 46-mile road from Mukono to Katosi, a project in which the government lost 24.7 billion shillings (\$6.8 million). On July 2, a judicial commission appointed by the president began its investigation into corruption at UNRA. On July 28, the IGG, in a separate investigation into UNRA, filed charges against former minister of works and transport Abraham Byandala and five others involved in the contract. Byandala and his coaccused faced 24 counts of fraud, corruption, abuse of office, and influence peddling. The ACD remanded the suspects to prison and granted them bail. On September 29, the UNRA executive director announced the dismissal of all remaining UNRA staff as part of the restructuring of the agency but noted that fired staff could apply to rejoin the agency. The case continued at year's end.

Financial Disclosure: Public officers are required to disclose their income and assets upon assuming and leaving office. The IGG is responsible for monitoring compliance, and penalties include a warning or caution, demotion, dismissal, and administrative leave from office. The government selectively enforced financial disclosure laws, to which an estimated 25,000 public officials were subject to biannual reporting requirements that applied to spouses and dependent children as well. According to the IGG, as of March 22, 500 public officials had declared their assets.

Public Access to Information: The 2005 Access to Information (ATI) Act provides for public access to government information, but the government rarely provided such access. The law allows individuals to petition any government department to access information. The Secrecy Act, however, bars public servants from revealing information.

The ATI Act provides that requesters pay 20,000 shillings (\$5) to access information held by the government. Information may be denied on security or sovereignty grounds, and the law provides for redress through internal dispute resolution processes or courts.

On February 6, the Chief Magistrates Court upheld the constitutional right of citizens to access government information, regardless of the reason for the request. The Hub for Investigative Media (HIM), a local NGO promoting transparency in government, noted, however, that many public servants were unaware of the law's requirements and that most requests for information were improperly denied. Between January and August, HIM submitted 52 ATI requests, of which two were granted. HIM submitted court cases for all declined requests. Courts issued judgments in three of the cases, finding for HIM in each case.

Zambia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for officials convicted of corruption, and the government attempted to enforce the law but did not do so consistently. Officials often engaged in corrupt practices with impunity.

The government had a national anticorruption policy and a national anticorruption implementation plan that addressed matters such as resource mobilization, coordination of anticorruption programs in the public and private sectors, program monitoring and evaluation, and legal reform. The ACC, which reported to the vice president, was responsible for combating government corruption. The ACC reported receiving 413 reports of suspected cases of corruption in the first quarter of the year, attributing the high numbers to better public education and sensitization about corruption and the channels for reporting it. Some civil society organizations, however, criticized the ACC for failing to act on these complaints expeditiously.

Although the government collaborated with the international community and with civil society organizations to improve capacity to investigate and prevent corruption, anticorruption NGOs observed less commitment than in previous years to fighting corruption among senior government officials and in the civil service.

Corruption: The government investigated one serving and a few dismissed senior government officials in connection with allegations of corruption-related offenses. On March 19, the ACC arrested former deputy minister of agriculture Rodgers Mwewa and his wife Annie Mwitwa, a former cabinet permanent secretary, for corruption. NGOs observed that the government only targeted minor offenders and avoided prosecuting serving senior officials until they had left office or joined opposition political parties. For example on July 22, the ACC arrested former minister Sylvia Masebo after she was discharged from her ministerial position and announced support for the UPND.

Financial Disclosure: The law requires income and asset disclosure by a small fraction of political officeholders and public servants, but it was not enforced. Some government departments and institutions, such as the Zambia Revenue Authority, maintained integrity committees to enhance asset disclosure mechanisms within the workplace. In several institutions, asset disclosure requirements were vague or inadequately enforced. The Office of the Auditor General reported the asset disclosure law needed broader coverage to include civil servants, among whom many had wealth that far exceeded what could be reasonably be accumulated from their government salaries. It also noted even for those to whom the law applied, enforcement and follow-up mechanisms were weak or nonexistent.

Public Access to Information: The law does not provide for public access to government information. Nonetheless the government provided information to media and other interested parties, including foreign media, on an informal basis. Despite promises to do so, the government did not present to parliament draft legislation to provide for public access to information. The government withheld information related to defense and the security forces from the public for reasons of national security.

Zimbabwe

Section 4. Corruption and Lack of Transparency in Government

Although the law provides criminal penalties for corruption, the government did not implement the law effectively or impartially, and officials frequently engaged in corrupt practices with impunity. Despite government pronouncements, corruption remained a severe problem. Police frequently arrested citizens for low-level corruption while ignoring reports implicating high-level businesspersons and politicians.

Corruption: Corruption occurred at every level of the police force but took different forms, depending on position, rank, or location. At the junior levels, to augment their low salaries, corrupt officers extorted nominal to exorbitant fines from the public for various claimed offenses. Armed police routinely erected roadblocks, claiming to be looking for criminals or smuggled goods. In many cases police arbitrarily seized goods for their own consumption or extracted bribes from commuters. Municipal police in urban areas often raided vendors and confiscated their wares for personal use. Generally no records of the confiscated goods existed, despite the law's requiring it. In August the courts ordered municipal police to compensate vendors whose wares were confiscated but unaccounted for in official records.

Implementation of the government's redistribution of expropriated white-owned commercial farms often favored the ZANU-PF elite and continued to lack transparency (see section 1.f.). High-level ZANU-PF officials selected numerous farms and registered them

in the names of family members to evade the government's policy of one farm per official. The government continued to allow individuals aligned with top officials to seize land not designated for acquisition. The government had yet to issue the mandated comprehensive land audit to reflect land ownership accurately.

Senior executives in state-owned enterprises earned salaries and benefits up to \$500,000 per month. The government alleged corruption and misuse of public funds in the Public Service Medical Aid Society (a medical insurance company), the Zimbabwe Broadcasting Corporation, the Grain Marketing Board, Air Zimbabwe, and Harare City Council, among others. The individuals implicated were politically well connected, and state prosecutors brought only one of the cases--the Air Zimbabwe case--to trial. The case continued as of September.

There were reports that ZANU-PF officials in the government discriminated against, harassed, or removed persons perceived to be MDC supporters from the civil service and the military (see section 7.d.).

It remained common for the ZANU-PF minister of local government to appoint ZANU-PF supporters to bureaucratic positions in local governments. City public administrators reportedly earned hugely inflated salaries. In most rural areas, the government appointed ZANU-PF activists as "special interest" councilors. In August the local government minister fired 16 Gweru city councilors and the mayor and his deputy on allegations of gross misconduct and mismanagement of council funds.

Unqualified persons employed by the Public Service Commission remained on the state payroll. The majority served as Youth and Gender Officers in various ministries and other public entities. According to the most recent audit, illicit salary payments were made to large numbers of persons who were retired, deceased, or otherwise absent from their place of employment. Duplicate personally identifiable information and files were also uncovered indicating some persons received more than one salary.

Corruption was especially pervasive in local government, where officials abused their positions and government resources openly and with impunity. Local councilors' allocation of land lots for residential and commercial use led to numerous allegations of bribery attempts and rent-seeking opportunities. Police arrested and charged some low-level land barons but not politicians benefiting from the deals. Government officials also demanded bribes or excessive fees for "expediting" paperwork, including birth certificates, passports, and driver's licenses. Councilors practiced nepotism in hiring general council workers and in land allocation. Allegations of corruption continued regarding both ZANU-PF and MDC-T councilors. Most council employees were members of the political party dominating that council.

Prosecutions for corruption continued but were selective and generally seen as politically motivated. The government targeted MDC-T officials, persons who had fallen out of favor with ZANU-PF, and individuals without high-level political backing.

Financial Disclosure: The law does not require elected or appointed officials to disclose income or assets. While government policy requires officials to disclose interests in transactions that form part of their public mandate, this policy was not enforced.

Public Access to Information: Citizens generally were unable to access government information. Although the government asserted that the law intended to improve public access to government information, the law contains provisions that restrict freedom of speech and press, and these elements of the law were the ones the government enforced most vigorously. The Access to Information and Protection of Privacy Act restricts the information citizens may request from public offices. During parliamentary debate about the Reserve Bank Debt Assumption Bill, opposition MPs requested that bank administrators disclose the list of persons who benefitted from the state loans. They responded it was not in the public's interest to disclose such information.

While the law permits access to some government records, it also imposes nominal fees for administrative costs involved in retrieving the records that many citizens found burdensome. In addition citizens often faced burdensome and complicated regulations to obtain access to government buildings where records are kept, including parliament, where security officers often turned away citizens for “wrong dress.”