

Algeria

Section 4. Corruption and Lack of Transparency in Government

The law provides for criminal penalties of two to 10 years in prison for official corruption, but the government generally did not implement the law effectively. Corruption remained a problem as reflected in the Transparency International corruption index.

Corruption: While many organizations are involved in the fight against corruption, the Central Office for the Suppression of Corruption is the government's main actor on the subject. The Ministry of Justice reviews cases referred to it by the inspectors general of mainline ministries, including the Ministry of Finance, the General Direction of Customs, and law enforcement agencies. The National Organization for the Prevention and Fight Against Corruption plays a consultative and preventive role regarding corruption.

The government introduced a law by presidential decree and published it in the official gazette on July 23. This law amended the criminal code to stipulate that charges related to theft, embezzlement, or loss of public and private funds may only be initiated against senior, public sector "economic managers" by the board of directors of the institution. Critics of the law asserted that by only permitting senior officials of state businesses to initiate investigations, the law protects high-level government corruption and promotes impunity.

The government brought several major corruption cases to trial resulting in dozens of convictions. Media reporting and public opinion viewed the absence of charges against any or former senior government officials as an indication of impunity for government officials. On June 23, a Blida court sentenced Abdelmoumene Khalifa to 18 years in prison for forming a gang, counterfeiting and using counterfeit documents, theft, bribery, breach of trust, fraud, and fraudulent bankruptcy. Observers believed Khalifa embezzled between DZD 157.5 billion and DZD 525 billion (\$1.5 billion and \$5 billion) from the government. His defense attorneys criticized the trial for the absence of important witnesses, namely several sitting ministers and senior government officials whose presence the presiding judge did not require. Of the 51 other defendants in the case, several received prison sentences, but most were cleared of all charges.

On May 7, an Algiers court convicted financial consultant Chani Medjdoub, former director of studies at the National Agency of Highways Khelladi Mohamed, and former director of planning at the Ministry of Transportation Salim Hamdan Rashid on charges of bribery, abuse of function, abuse of power, receiving undeserved gifts and advantages, waste of public funds, money laundering, violation of currency legislation, and the illegal movement of capital abroad. The court sentenced them to prison terms of seven to 10 years and fined them DZD 1 million to DZD 3 million (\$9,520 to \$28,600) resulting from their involvement in the construction of the "East-West Highway." Started in 2006 and estimated to span approximately 756 miles and cost DZD 630 billion (\$6 billion), the infrastructure project officially cost the government DZD 1.15 trillion (\$11 billion), with unofficial estimates ranging from DZD 1.37 trillion to DZD 1.79 trillion (\$13 billion to \$17 billion). Despite a number of unresolved allegations, the presiding judge did not summon former minister of public works and transport Amar Ghouli, who oversaw the planning and implementation of the project. The court charged but ultimately acquitted a former secretary general and a former chief of staff of the Ministry of Public Works. The judge fined seven international companies involved in the case an estimated DZD 5 million (\$47,600) on charges of corruption.

Corruption throughout the government stemmed largely from the bloated nature of the bureaucracy and a lack of transparent oversight. The National Consultative Commission for the Promotion and Protection of Human Rights (CNCPPDH), a government human rights organization, stated in its 2014 annual report that public corruption remained a problem and hindered development. The National Association for the Fight Against Corruption noted the existence of effective anticorruption law but stated that the government lacked the “political will” to apply the law.

Financial Disclosure: The law stipulates that all elected government officials and those appointed by presidential decree must declare their assets the month they commence their jobs, if there is substantial change in their wealth while they are in office, and at the end of their term. Few government officials made their personal wealth public, and there was no enforcement of the law.

Public Access to Information: Lack of government transparency remained a serious problem. Most ministries had websites, but not all ministries regularly maintained them with updated information. Analysts, academics, and other interested parties often had difficulty obtaining even routine and nominally public economic data from government ministries.

Bahrain

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 adequately, and some officials reportedly engaged in corrupt practices with impunity. The law subjects government employees at all levels to prosecution if they use their positions to engage in embezzlement or bribery, either directly or indirectly. Penalties can be up to 10 years’ imprisonment.

Corruption: The Bahrain National Audit Bureau is responsible for combating government corruption. Segments of its most recent report were released publicly in November; however, the full report was not published or made available online. The report noted the government’s failure to implement the prior reports’ recommendations, which detailed corruption, irregularities, and mismanagement in most government ministries.

Significant areas of government activity, including the security services and the Bahrain Defense Force, lacked transparency, and the privatization of public land continued to be a concern among opposition groups.

On March 8, legislators announced they were going to investigate alleged excessive expenditure of 400 million dinars (\$1.06 billion) of public funds by government departments and state-linked companies. On May 19, the audit bureau released its 2014 report internally but not publicly. According to the media, the report said the bureau had referred five “major” cases of suspected corruption to the Public Prosecutor’s Office for investigation, but it gave no details on the cases. Unlike in previous years, the bureau did not report that it referred any corruption cases to criminal courts. On December 9, however, the Ministry of Interior announced it had transferred 64 corruption cases to the Public Prosecutor’s Office during the year.

Financial Disclosure: The law does not require government officials to make financial disclosures.

Public Access to Information: The government generally did not provide citizens access to government-held information. Most companies and ministries have public websites, but specific budgetary information, such as individual expenditures and income, was not

available. Other officials resisted efforts in some parts of the government to improve transparency.

Egypt

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not consistently enforce the law. There were allegations members of the government, as well as the previous Mubarak and Morsy governments, engaged in corrupt practices with impunity. Court cases still pending at year's end were inconclusive regarding the accusations of impunity. The current government has pursued corruption cases against senior officials.

Corruption: The Central Agency for Auditing and Accounting (CAA) was the government's anticorruption body and submitted reports to the president and the prime minister that were not available to the public. The auditing and accounting agency stationed monitors at state-owned companies to report corrupt practices. The Administrative Control Authority, another independent body, had jurisdiction over state administrative bodies, state-owned enterprises, public associations and institutions, private companies undertaking public work, and organizations to which the state contributes in any form.

On July 9, the government issued a decree allowing the president to dismiss the head and members of the CAA. The CAA challenged the constitutionality of the law in the SCC, because the constitution states that the agency is "technically, financially, and administratively independent." The SCC took no action by year's end. Observers did not judge the CAA to be sufficiently resourced, and the agency did not actively collaborate with civil society.

In May a media report based on disclosed financial records from fiscal years 2010-13 indicated authorities had moved billions of dollars into accounts potentially held illegally by state and commercial banks.

In September, Agriculture Minister Selah Eddin Helal resigned, and authorities immediately arrested him on charges that he and other ministry officials took bribes to help businessmen illegally acquire state land. Court proceedings against the minister and several other ministry officials continued at year's end.

Criminal proceedings on corruption charges continued against former members of the Mubarak regime. On May 9, the Cairo Criminal Court sentenced former president Mubarak and his sons, Alaa Mubarak and Gamal Mubarak, to three years each in prison as a consequence of the appeal of a corruption case in which authorities charged them with embezzling LE 125 million (\$16.2 million) for renovations to presidential palaces. They were also fined collectively 21.2 million LE (\$2.74 million) and ordered to repay LE 125 million (\$16.2 million) in stolen funds. On October 12, the court ordered the release of Alaa Mubarak and Gamal Mubarak from prison upon completion of their sentences. Observers expected the Court of Cassation to rule on January 9, 2016, on whether it will accept an appeal for a second retrial in the case.

On June 4, the Court of Cassation upheld a lower court's acquittal of Mubarak and his sons in a case involving a different set of corruption charges against them, including charges of illegally exporting gas to Israel. The court ordered a retrial on separate charges related to killing protesters in the same case (see sections 1.a. and 1.d.).

Financial Disclosure: There are no financial disclosure laws for public officials. A 2013 conflict-of-interest law forbids government officials from maintaining any pecuniary

interest in matters over which they exercise authority.

Public Access to Information: There is no legal framework stipulating how citizens can access government information. The government generally was not responsive to requests for documents regarding government activities and did not provide reasons for its lack of responsiveness.

Iran

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 corruption was a serious and ubiquitous problem. Officials in all three branches of government frequently engaged in corrupt practices with impunity. Many officials expected bribes for providing routine service. Individuals routinely bribed officials to obtain permits for illegal construction.

Corruption: Endowed religious charitable foundations, or “bonyads,” accounted for a quarter to a third of the country’s economy according to some experts. Government insiders, including members of the military and clergy, ran these tax-exempt organizations, which are defined under law as charities. Members of the political opposition and international corruption watchdog organizations frequently accused bonyads of corruption. Bonyads received benefits from the government, but no government agency must publicly approve their budgets.

Numerous companies and subsidiaries affiliated with the IRGC engaged in trade and business activities, sometimes illicitly, in the telecommunications, mining, and construction sectors. Other IRGC entities reportedly engaged in smuggling pharmaceutical products, narcotics, and raw materials. The domestic and international press similarly reported that individuals with strong government connections had access to foreign currency at preferential exchange rates, allowing them to exploit a gap between the country’s black market and official exchange rates.

According to multiple news sources, authorities arrested former vice presidents Mohammad Reza Rahimi and Hamid Baqai on corruption charges in February and June, respectively. A court sentenced Rahimi to five years in prison for financial corruption and embezzlement, and Baqai awaited sentencing at year’s end.

According to media reports, businessman Babak Zanjani, originally arrested in 2013, had his first hearing on corruption charges related to missing funds from the Oil Ministry in October. Authorities charged him with money laundering, fraud, and “corruption on earth.”

Numerous government agencies existed to fight corruption, including the Anticorruption Headquarters, the Anticorruption Task Force, the Committee to Fight Economic Corruption, and the General Inspection Organization. Authorities also authorized parliament’s Article 90 Commission to investigate complaints of corruption within the government. Information was unavailable regarding these organizations’ specific mandates, their collaboration with civil society, and whether they operated effectively, independently, and with sufficient resources.

Financial Disclosure: Regulations require government officials, including cabinet ministers and members of the Guardian Council, the Expediency Council, and the Assembly of Experts, to submit annual financial statements to the government inspectorate. No information was available on whether the government effectively implemented the law, officials obeyed the law, or financial statements were publicly accessible. There was also no information available on whether there were public outreach activities or public official

training to encourage effective use of the financial statements.

Public Access to Information: The law does not provide for public access to government information although websites of parliament and other government agencies share some public records on voting and other activity.

Iraq

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. There were numerous reports of government corruption during the year. Officials in all parts of the government often engaged in corrupt practices with impunity, and investigation of corruption was not free from political influence. Family, tribal, and religious considerations significantly influenced government decisions at all levels. Bribery, money laundering, nepotism, and misappropriation of public funds were common.

The Commission of Integrity generally refrained from releasing the names of government officials in its annual reports. By year's end the COI had not released its 2015 annual report.

Corruption: There were reports alleging that senior officials involved in bribery schemes held illicit funds in overseas accounts, making bribery more difficult to detect. In August international media reported that the government launched a corruption investigation against the former deputy prime minister for energy affairs Baha al-Araji, accusing him of nine crimes, including property racketeering and financial corruption. Araji publicly admitted to owning as many as seven houses, a hotel, and other properties. He also had 300 guards paid by the state. There were no results publicly available by year's end. In August the COI announced it would investigate the Ministry of Trade for corruption, due to complaints about irregularities in the ministry's public distribution system. In October the judiciary announced it had issued an arrest warrant for Minister of Trade Milas Muhammad Abdul Karim on corruption charges. The minister had since left his post, but the corruption investigation continued at year's end.

During the first half of the year, the COI investigated 13,398 cases and referred 2,171 cases to relevant courts, including 13 officials at the ministerial level and 80 at the director general level. The COI reportedly recovered 36 billion dinars (\$32.7 million) in stolen assets and issued a court order to recover an additional 12 billion dinars (\$10.9 million) during the year.

The Central Bank's Money Laundering Reporting Office leads the government's efforts to combat money laundering and terrorist financing. The office is responsible for monitoring financial transactions and compiling information on money laundering and disseminating it to law enforcement agencies. The office was largely ineffective due to its lack of qualified staff at all levels of the organization as well as the lack of effective enforcement capabilities against banks and exchange houses in the country. In September the Council of Representatives approved a law to combat money laundering and terrorist financing. The effectiveness of the law's implementation was not determinable by year's end.

The Council of Ministers Secretariat also has an anticorruption advisor, and the Council of Representatives has an Integrity Committee. The Joint Anticorruption Council reporting to the Council of Ministers oversees and monitors compliance with the government's 2010-14 anticorruption strategy. The secretary general for the Council of Ministers led the anticorruption council, which also included the chairperson of the Federal Board of

Supreme Audit, the commissioner of the COI, and representatives of the Inspector Generals' (IG) offices. When the agenda of the anticorruption council calls for high-level participation by the government, the Ministry of Interior's head of economic crimes may attend. Despite the council's mandate, the public generally regarded it as having little effect due to the scale of official corruption. The COI's National Strategy to Combat Corruption (2015-19) aimed to increase training and development of staff of the IG's office and COI staff. On April 14, the Council of Ministers established an anticorruption academy to conduct trainings and workshops for COI staff, offer postgraduate studies in anticorruption, and publish anticorruption research.

Lack of agreement about institutional roles, insufficient political will, political influence, poor transparency, and unclear governing legislation and regulatory processes hampered joint efforts to combat corruption. Although anticorruption institutions increasingly collaborated with civil society groups, organizing workshops, surveys, and training courses, the impact of expanded cooperation was limited. The media and NGOs continued to attempt to expose corruption independently, although their capacity to do so was limited. Anticorruption, law enforcement, and judicial officials, as well as members of civil society and the media, faced threats and intimidation in their efforts to combat corrupt practices (see section 2.a.).

Government officials and the IGs frequently contended that corruption investigations were highly politicized. For example, in August the head of parliament's integrity committee told international media that the body recommended 500 cases for investigation during the year but that the COI addressed only a few cases because judges in the commission were not independent. Human rights NGOs alleged that government officials sought to influence the outcome of corruption investigations or to stifle anticorruption efforts altogether.

As in previous years, ministries effectively stalled investigations by failing to comply with requests for information or for officials to appear in court. The IGs claimed some ministers stifled their oversight efforts or openly threatened IG staff with dismissal for performing basic oversight functions. Some government officials stated politically motivated corruption investigations hindered public administration because officials reportedly feared corruption allegations from political opponents.

The law requires the prime minister's approval before a corruption case may proceed against members of the presidency or the Council of Ministers; there was no information regarding specific instances of the prime minister or other ministers withholding approval during the year. The constitution provides members of the Council of Representatives immunity from prosecution, which the council may lift by a majority vote.

The IGs and other anticorruption officials lacked sufficient resources, especially adequate personal security. High turnover among the IGs left positions unfilled for long periods. The IGs reported these deficiencies were key factors in determining whether to report instances of corruption. The executive branch's failure to seek legislative confirmation of the appointment of key anticorruption officials further weakened the independence of the Federal Board of Supreme Audit, COI, Central Bank, and IGs by leaving many officials in an "acting" capacity, subject to removal by the prime minister at any time.

On August 9, the prime minister announced, and the Council of Representatives approved, a series of reforms designed to eliminate official corruption and to improve public services. Reforms went into effect August, but implementation was inconsistent. His plan called for the end of sectarian quotas in determining senior positions, as well as the establishment of an executive committee to select ministers, advisors, and director generals based on merit and competence. The reforms reduced the number of government ministries from 33 to 22. Although the canceled ministries lost their official mandate, in reality working-level employees continued at their posts and continued to be paid while the Council of Ministers engaged in protracted negotiations to merge ministries and reassign employees from canceled ministries. Finally, the reform package authorized a

high commission to reopen and investigate old corruption cases. The government subsequently referred 2,000 corruption cases to the courts for prosecution; however, the vast majority of these cases dated from 2003 to 2005.

The prime minister also called on the judiciary to appoint expert judges known for their integrity to investigate and prosecute corruption cases. In September authorities appointed 34 new judges to courts across the country and 19 integrity judges to Baghdad courts. Baghdad Integrity Court--an investigation court that specializes in integrity cases--announced it was investigating dozens of corruption cases involving many government ministries. In September two new integrity courts opened in Basrah and Najaf to evaluate corruption cases in their districts.

Widespread and pervasive corruption and lack of government transparency, including with regard to oil revenue, were major problems in the IKR. According to the Kurdistan Commission on Public Integrity, corruption in the IKR was extensive. Weak budgetary oversight and lack of training for personnel further hindered the commission from fighting corruption effectively. Allegations and rumors of missing oil revenue were rampant, but there had been no audits or unbiased investigations as of year's end.

Financial Disclosure: The law authorizes the COI to obtain annual financial disclosures from senior public officials, including ministers, governors, and parliamentarians, and to take legal action for nondisclosure. Penalties range from fines to imprisonment. A unified system for enforcing annual financial disclosures did not exist. The COI has no jurisdiction over the IKR, but Kurdish members of the central government were required to conform to the law. The law obligates the COI to provide public annual reports on prosecutions, transparency, accountability, and ethics of public service.

The Kurdistan Commission on Public Integrity is responsible for distributing and collecting financial disclosure forms in the IKR. The commission reported that by August the Kurdistan region's president, all members of its parliament, and 20 of its 23 ministers had submitted financial disclosure reports. There was no information available indicating that public officials faced penalty for financial nondisclosure.

Public Access to Information: The law does not provide public access to government information. The IKR Information Law expands citizens' rights to request information from the regional government, parliament, and court system, except in cases of national security or classified information. According to the Kurdistan region's Human Rights Commission, the government did not implement this law.

Israel and The Occupied Territories

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The law provides criminal penalties for corruption by officials, and the government implemented these laws effectively. There were reports of government corruption, although impunity was not a problem.

Corruption: The media routinely reported on corruption. The national police, the state comptroller, the attorney general, and the accountant general are responsible for combating official corruption. These entities operated effectively and independently, and authorities sufficiently resourced them. NGOs that focused on anticorruption efforts operated freely without government interference.

The government continued to investigate and prosecute top political figures. In April authorities convicted Rabbi Yeshayahu Pinto of bribing senior police officers in connection with an investigation of alleged fraud by a charitable organization he headed.

As part of a plea bargain in which Pinto gave evidence against the head of the National Crime Unit, Police Commander Menashe Arbiv, he received a reduced sentence of one year in jail and a fine of NIS one million (\$256,000). The investigation of Arbiv continued at year's end.

On May 14, the government filed indictments against lawyer Ronel Fisher, retired police superintendent Eran Malka, former Tel Aviv district attorney Ruth Blum-David, and several business figures. Authorities variously charged the accused with taking and giving bribes, fraud and breach of trust, fraudulent receipt of assets in aggravated circumstances, money laundering, or obstruction of justice, each according to his or her role in the corruption affair. Authorities accused attorney Blum-David of obstructing justice in relation to two cases of giving and taking bribes in exchange for privileged information about ongoing criminal investigations, and of receiving assets obtained through crime. Emerging from the indictments were allegations that Fisher had operated a criminal network, reaching law-enforcement bodies. Authorities alleged retired police superintendent Eran Malka, a senior police officer in the Lahav 433 National Fraud Unit, was a key figure in the ring's obstruction of justice. Further developments in the trial were pending at year's end.

On December 2, a Tel Aviv court indicted former Knesset member and minister for industry, trade, and labor, Benjamin Ben-Eliezer, on charges of bribery, fraud, breach of trust, money laundering, and tax evasion.

On May 25, the Jerusalem District Court sentenced former prime minister Ehud Olmert to eight months in prison, following a conviction for fraud and breach of trust in the Talansky "cash envelopes" case. In July, Olmert filed another appeal to the Supreme Court, which again agreed to suspend Olmert's sentence, pending the appeal. On December 29, the Supreme Court ruled on Olmert's appeal of separate charges from 2014 in the "Holyland" affair, accepting his appeal of some charges but maintaining his sentence of 18 months in prison for bribery. Olmert was scheduled to begin serving his sentence in February 2016.

On May 31, a Tel Aviv court sentenced Ramat Hasharon mayor Yitzhak Rochberger to six months of community service and fined him NIS 40,000 (\$10,300) following his conviction for fraud and other crimes of moral turpitude. As part of the sentence, he cannot return to public office for at least seven years. Under the terms of a 2014 plea bargain, in April courts sentenced former Bat Yam mayor Shlomo Lahiani to eight months in jail on three counts of breach of trust.

Financial Disclosure: Senior officials are subject to comprehensive financial disclosure laws, and the Civil Service Commission verifies their disclosures. Authorities do not make information in these disclosures public without the consent of the person who submitted the disclosure. There is no specific criminal sanction for noncompliance.

Public Access to Information: The law requires governmental agencies to make internal regulations, administrative procedures, and directives available to the public. All governmental agencies did not effectively implement the law.

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Palestinian law provides criminal penalties for official corruption, and the government respected the law, making progress in investigations and prosecutions during the year.

Corruption: The PA's anticorruption commission consisted of special prosecutors and an anticorruption court with a panel of three judges. The PA attorney general has responsibility for combating official corruption. There were allegations of corrupt practices among Fatah officials, particularly the theft of public funds and international assistance funds.

In the Gaza Strip, local observers and NGOs alleged instances of Hamas complicity in corrupt practices, including preferential purchasing terms for real estate and financial gains from involvement in the illegal tunnel trade by Hamas security forces, but authorities severely inhibited reporting and access to information.

Financial Disclosure: PA ministers were subject to financial disclosure laws.

Public Access to Information: PA law requires official PA institutions to "facilitate" acquisition of requested documents or information by any Palestinian, but it does not require agencies to provide such information. Reasons for denial generally referred to privacy rights and the necessity of security. Authorities made inadequate effort to train officials on the implementation of the law.

Jordan

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, although the government did not implement the law effectively. Officials often engaged in corrupt practices with impunity. During the year there were some investigations into allegations of corruption but very few convictions. The use of family, business, and other personal connections to advance personal business interests was widespread. There were allegations of lack of transparency in government procurement, government appointments, and dispute settlement.

Corruption: The Anti-Corruption Commission (ACC) is the main body responsible for combating corruption, although the Anti-Money Laundering Unit in the Central Bank is responsible for combating money laundering. Despite increased investigations, some local observers questioned the ACC's effectiveness due to its limited jurisdiction, insufficient staff, legal obstacles, and the small number of investigations involving senior officials or large government projects. There were credible allegations that the ACC failed to investigate cases involving high-level government officials.

In June the ACC referred the Mawarid Company, affiliated with the armed forces, for investigation in response to allegations of misuse of office and squandering of public funds related to the purchase of a private security company in 2007.

The Ombudsman Bureau receives and investigates public complaints about corruption and misconduct by public officials.

There were no high-profile corruption convictions during the year. According to a report released in October, the ACC received 1,155 complaints about corruption in 2014 and opened 151 investigations, which resulted in three convictions. Public Security Directorate (PSD) officials seconded to the ACC investigated an additional 155 cases in 2014. As of November 25, the ACC had received 950 complaints during the year, referred 75 cases to the judiciary, closed 500 complaints for lack of evidence of corruption, and was still investigating 295 cases.

Financial Disclosure: The law requires certain government officials (along with their spouses and dependent children) to declare their assets privately within three months of

their assuming a government position. Officials rarely declared their assets. In the event of a complaint, the chief justice may review the disclosures. Under the law failure to disclose assets could result in a prison sentence of one week to three years or a fine of five to 200 JD (\$7 to \$280). As of December no officials were punished for failing to submit a disclosure.

Public Access to Information: The law provides for public access to government information that is a matter of legal record but denies requests for reasons of national security, public interest, and personal freedoms. On September 8, Prime Minister Abdullah Ensour instructed all ministries and public agencies to have publicly available information request forms. The government has 30 days to respond to requests for information. If a government official refuses to respond to a request, the requestor can appeal to the governmental Information Council the decisions of which are nonbinding. The fees were not prohibitive and usually were associated with photocopy costs, if necessary. Journalists criticized the law, claiming that it permitted the government to deny requests without justification, or to refuse to respond, effectively denying the request.

Kuwait

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. Government observers believed officials engaged in corrupt practices with impunity. There were numerous reports of government corruption during the year.

There were many reports that individuals had to pay intermediaries to receive routine government services. Police corruption was a problem, especially when one party to a dispute had a personal relationship with a police official involved in a case. Widespread reports indicated that police favored citizens over noncitizens.

All judicial officers received training on corruption and transparency obligations as part of the Judicial Institute's official curriculum.

Corruption: The Audit Bureau is an independent agency responsible for supervising public expenses and revenues and for preventing any misuse or manipulation of public funds. The government distributes reports by the Audit Bureau annually to the emir, prime minister, head of parliament, and minister of finance. The public did not have access to these reports. The parliamentary Committee on the Protection of Public Funds frequently announced inquiries into suspected misuse of public funds, but none resulted in prosecution during the year.

In March the government activated to dictate financial disclosure provisions and provide protection for whistleblowers. The law charges the ACA with receiving and analyzing complaints and forwarding complaints to the appropriate authorities in either the Public Prosecutor's Office or police for further investigation or action. The government funds the authority, which has its own budget. In December, however, the courts declared the ACA law invalid because it was passed by emergency decree. At year's end the National Assembly was working to introduce new legislation to re-implement the ACA.

Media and government officials reported cases of widespread, visa-related corruption, namely selling visas or visa fraud, at the Ministry of Social Affairs and Labor and Ministry of Interior. Several officials at the Ministry of Interior faced prosecution after their arrests on charges of falsifying labor import documents to profit from the sale of visas. In October media reported the government ordered the arrest of a key visa trafficker who recruited

1,500 foreign workers on fake work permits, charging each worker 1,500 dinars (\$5,000) for a visa. According to a government official, of 1,368 firms found to be involved in visa fraud, authorities have referred only 336 for prosecution.

In September the minister of electricity, water, and public works resigned after his conviction, along with 14 other officials, in a corruption case dating to 2007.

Financial Disclosure: The anticorruption law requires that executive-level public employees, including officials at the ministerial level and above, MPs, the speaker of parliament, and the head of the Supreme Judicial Council, disclose their financial assets. Repercussions against those who do not provide appropriate financial disclosures include fines and possible imprisonment.

Financial disclosure reports are confidential, not public documents; leaking of such information is a crime. The law mandates the ACA to monitor disclosures. The ACA has the right to oblige those who report to provide additional information. As of October the speaker of the National Assembly submitted his financial disclosure documents, and other government ministers were in the process of submitting the required documents.

Public Access to Information: The law provides for public access to unclassified government information by citizens and noncitizens alike, but access appeared largely theoretical. Legal experts stated that the only way for unclassified information to be released was through a request by a government ministry.

Lebanon

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 often engaged in corrupt practices with impunity and on a wide scale. Government security officials, agencies, and police were subject to laws against bribery and extortion. The lack of strong enforcement limited the laws' effectiveness.

Corruption: Observers widely considered government control of corruption to be poor. Types of corruption generally encountered included systemic patronage; judicial failures, especially in investigations of politically motivated killings; electoral fraud facilitated by the absence of preprinted ballots; and bribery. Bribes customarily accompanied bureaucratic transactions. In addition to regular fees, customers paid bribes for driver's licenses, car registrations, or residential building permits. Syrian refugees reportedly paid bribes to shopkeepers or municipal officials for a variety of services, for example, to receive consignment of aid or facilitate their registration.

Financial Disclosure: The law requires the president of the republic, the president of the Chamber of Deputies, and the president of the Council of Ministers to disclose their financial assets in a sealed envelope deposited at the Constitutional Council, but the information is not made available to the public. Judges disclose their financial assets in a sealed envelope at the Higher Judicial Council, and civil servants deposit their sealed envelopes at the Civil Servants Council, but the information is also not available to the public.

A 2011 report by the Lebanese Transparency Association claimed corruption was institutionalized. Since parliament had not passed a budget since 2005, there was limited parliamentary or auditing authority oversight of revenue collection and expenditures.

Public Access to Information: There were no laws regarding public access to government

documents, and the government generally did not respond to requests for documents.

Libya

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials. The government did not implement the law effectively, and officials reportedly engaged in corrupt practices with impunity. There were numerous reports of government corruption during the year, but as in 2014, no significant investigations or prosecutions occurred.

The Constitutional Declaration states that the government shall provide for the fair distribution of national wealth among citizens, cities, and regions. The government struggled to decentralize distribution of oil wealth and delivery of services through regional and local governance structures. There were many reports and accusations of government corruption due to lack of transparency in the government's management of security forces, oil revenues, and the national economy. There were allegations that officials in the interim government submitted fraudulent letters of credit to gain access to state funds.

Corruption: Slow progress in implementing decentralization legislation, particularly with regard to management of natural resources and distribution of state funds, led to accusations of corruption and calls for greater transparency. There were no reports of meetings of or actions taken by the oil corruption committee, formed in April 2014 to investigate both financial and administrative means of corruption in the oil industry.

Financial Disclosure: There are no financial disclosure laws, regulations, or codes of conduct requiring income and asset disclosure by appointed and/or elected officials.

Public Access to Information: There are no laws providing for public access to government information, and there was no available information whether the government granted requests for such access.

Morocco

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. Officials often engaged in corrupt practices with impunity. Corruption was a serious problem in the executive branch, including police, as well as in the legislative and judicial branches. There were reports of mostly petty government corruption, but authorities investigated few cases and successfully prosecuted none during the year. There was a widespread perception of serious government corruption, but few reports of mid- or high-level corruption. Generally, observers considered corruption a serious problem, with insufficient governmental checks and balances to reduce its occurrence.

The king, who has made statements calling for judicial system reform since 2009, acknowledged the judiciary's lack of independence and susceptibility to influence. Many members of the well-entrenched and conservative judicial community were loath to adopt new procedures.

Corruption: The ICPC is responsible for combating corruption. In May parliament adopted a constitutionally mandated law providing the ICPC with the authority to compel government institutions to comply with anticorruption investigations and published it in the *Official Bulletin* in July. According to government figures, the ICPC received 400 formal complaints or denunciations in 2014 (7 percent fewer than in 2013). The ICPC forwarded to the general prosecutor 37 cases of corruption in 2014 and 14 in 2015. Legal penalties for corruption were rare, with the government reporting that only one official during the year was the subject of a judicial inquiry, and that did not result in charges.

The government announced during the year new measures designed to tackle corruption, including the June inauguration of a new hotline to receive public tips about instances of corruption, which reportedly resulted in 10 arrests. Government sources stated that the most common type of corruption in the country was fraud related to government procurement contracts.

In addition to the ICPC, the Ministry of Justice and the High Audit Institution (government accountability court) had jurisdiction over corruption issues, but they did not pursue any high-profile cases during the year.

Observers noted widespread corruption in the police force. The government claimed to investigate corruption and other instances of police malfeasance through an internal mechanism. During the year 24 gendarmes were the subject of judicial investigations, of which 12 were sentenced to two months in prison and fines ranging from 1,000 to 5,000 dirhams (\$100 to \$500); one has been sentenced to four months in prison; and three were awaiting judgment in their cases.

Financial Disclosure: The law requires judges, ministers, and members of parliament to submit financial disclosure statements to the High Audit Institution, which is responsible for monitoring and verifying disclosure compliance. But according to allegations from government transparency groups, many officials did not file disclosures. There are no effective criminal or administrative sanctions for noncompliance.

Public Access to Information: There is no freedom of information law. The constitution provides for citizen access to information held by public institutions, but authorities did not provide a dedicated access mechanism. The government rarely granted access to official information to citizens and noncitizens, including foreign media. Public officials received no training on access to information. There were no public outreach activities regarding public access to information.

Oman

Section 4. Corruption and Lack of Transparency in Government

Corruption: The law provides criminal penalties for official corruption, and the government generally implemented these laws effectively. There were reports of government corruption during the year, including in police, ministries, and state-owned companies.

Financial Disclosure: Public officials are subject to financial disclosure laws. When selected for disclosure, officials are required to list their finances, business interests, and property, as well as that of their spouses and children. These records are made public, and there are fines associated with noncompliance. The State Audit Authority monitors this process.

Public Access to Information: The law does not provide for public access to government information, although the government published all royal decrees and ministerial decisions in the *Official Gazette*.

Qatar

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, and the government generally implemented these laws effectively. There were reports, however, of government corruption during the year. In November the emir issued a new law increasing penalties for corrupt officials. Local media reported that the court system had prosecuted at least 14 cases of embezzlement during the year. In July the criminal court sentenced two senior officials to five years in prison for accepting QAR three million (\$824,000) in bribes.

Corruption: In November local press reported that courts had reviewed 14 cases of corruption and/or bribery cases, with the accused allegedly having embezzled QAR 4,885,564 (\$1.34 million). The cases included both Qatari citizens and noncitizens.

Financial Disclosure: There are no legal requirements for public officials to disclose their income and assets, and they did not do so in practice.

Public Access to Information: The law does not provide for public access to government information beyond the requirement that the government publish laws in the official gazette. Information on the government, such as the budget, expenditures, or draft laws, was generally not available.

Saudi Arabia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption. The government did not implement the law effectively; some officials engaged in corrupt practices with impunity, and perceptions of corruption persisted in some sectors.

Government employees who accept bribes face 10 years in prison or fines up to one million riyals (\$267,000). The National Anticorruption Commission (Nazaha), established by King Abdullah in 2011, was responsible for promoting transparency and combating all forms of financial and administrative corruption. The commission's ministerial-level director reported directly to the king. In February the Shura Council censured Nazaha for its failure to prosecute a sufficient number of corruption cases. The council also stated that the public did not believe Nazaha could handle its responsibility to investigate and punish corruption. The Control and Investigation Board remains responsible for investigating financial malfeasance, and the BIP has the lead on all criminal investigations. The HRC also responded to and researched complaints of corruption. Provincial governors and other members of the royal family paid compensation to victims of corruption during weekly majlis meetings where citizens raised complaints.

Corruption: In April Nazaha opened an investigation into corruption allegations associated with 672 delayed government projects (44 percent of all government projects). In October, Nazaha requested the creation of a judicial program dedicated to corruption cases in order to speed up rulings, which were subject to lengthy delays. Nazaha also complained that 16 ministries and government agencies refused to cooperate with its probes. In July, Nazaha announced it had prosecuted six Ministry of Health officials on charges of forgery, bribery, and extortion; their prison terms varied from three to 10 years, and they faced

fines of up to one million riyals (\$267,000).

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

Public Access to Information: The law does not provide for, and there is no right to, public access to government information, such as ministerial budgets or allocations to members of the royal family.

Syria

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. Corruption continued to be a pervasive problem in police forces, security services, migration management agencies, and throughout the government.

Corruption: Due to the lack of free press and of opposition access to instruments of government and the media, there was almost no detailed information about corruption, except petty corruption. There were reports of prison guards demanding bribes from prisoners and their visitors. Visiting family members who paid higher bribes enjoyed visits to detainees without police surveillance. The price of bribes continued to rise from previous years. Human rights lawyers and family members of detainees stated that government officials in courts and prisons solicited bribes for favorable decisions and provision of basic services. Traffic police officers regularly solicited bribes from drivers, and child laborers reported bribing police to avoid arrest.

Financial Disclosure: There are no public financial disclosure laws for public officials. The prime minister's Central Commission for Control and Inspection is the main administrative body responsible for coordinating and monitoring public sector corruption. Each government body, including the ministries, has a Control and Inspection Department that reported directly to the Central Commission.

Public Access to Information: The media law provides for access to information from ministries and other government institutions. The law contains ambiguous provisions for nondisclosure, including forbidding access to information that "affects national unity and national security." The law obliges authorities to respond to requests within seven days of receiving an inquiry. The law requires administrative judiciary courts to investigate total or partial refusals of information requests and issue a decision within one month. It does not stipulate penalties for noncompliance. There was no evidence the government implemented the law during the year.

Tunisia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption, and the government took some preliminary steps to implement these laws, though they were not always effective according to transparency NGOs. Government institutions, such as the National Commission to Combat Corruption (NCCC), lacked resources and technical expertise, according to its president, Samir Annabi. The law tasks the NCCC with investigating and preventing corruption and drafting effective policies to combat corruption.

Corruption: Anticorruption watchdog groups reported increasing government corruption during the year, especially petty corruption. According to NCCC President Annabi, of the estimated 12,000 cases the NCCC received since its inception in 2013, one quarter were related to corruption. The NCCC was able to transfer 460 cases to the judiciary. Annabi said most cases that reach the judiciary either were dismissed for procedural reasons or defendants received light sentences. The main sectors affected by corruption included real estate, agricultural land, energy, mining, and public procurement.

Financial Disclosure: The constitution requires those holding high government office to declare assets “as provided by law.” At the end of the year, there was no law that requires appointed or elected officials to disclose their income or assets.

Public Access to Information: To improve transparency and promote national reconciliation following the 2011 revolution, a new law granted journalists and civil society organizations access to the records of the previous regime. Bureaucratic hurdles, however, limited the law’s implementation. Information from the previous regime deemed sensitive remained inaccessible. The law on transitional justice grants access to members of the Truth and Dignity Commission, tasked with investigating gross violations of human rights from 1955 until passage of the transitional justice law in 2013.

United Arab Emirates

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, and the government generally implemented the law effectively. There were isolated reports of government corruption.

Nepotism in government appointments and contract allocations existed. The Ministries of the Interior and Justice and the state audit institutions are responsible for combating government corruption.

Corruption: The government took steps to punish government corruption. For example, in April authorities in Dubai sentenced two police officers to three years in jail for forging police reports.

Financial Disclosure: There are no financial disclosure laws, regulations, or codes of conduct requiring officials to disclose their income and assets, although the operating instructions for the Federal National Council elections required all candidates to disclose sources of funding for their campaigns.

Public Access to Information: The law provides for public access to government information, but the government followed this provision selectively. Requests for access usually went unanswered. There were no reports of public outreach activities or training for public officials to encourage the effective use of the law to access public information.

Western Sahara

Section 4. Corruption and Lack of Transparency in Government

Corruption: Moroccan law and practice apply, including in the areas of financial disclosure and public access to information. As in internationally recognized Morocco, the law provides criminal penalties for corruption by officials, although the government did

not implement the law effectively, and officials often engaged in corrupt practices with impunity. Enforcement was sporadic, and there were no high-profile investigations and no high-level prosecutions during the year. Corruption was a continuing serious problem.

Substantial development spending and military officers' involvement in private business created susceptibility to corruption, as well as impunity. Some military officers reportedly relied on government connections to gain preferential access to fishing licenses or lucrative contracts for sand and other quarries on state lands. The government and state-owned enterprises were the territory's principal employers, and residents sought civil service jobs and taxi licenses through official contacts. Government officials denied that corruption was a serious problem.

Financial Disclosure: Moroccan law and practice apply.

Public Access to Information: Moroccan law and practice apply.

Yemen

Section 4. Corruption and Lack of Transparency in Government

While the law provides for criminal penalties for official corruption, the government-in-exile was unable to implement the law effectively. There were reports of government corruption during the year. A burdensome process creates a separate legal system for the political elite. According to the constitution, approval of one-fifth of the members of parliament is necessary to conduct a criminal investigation on a deputy minister or higher-ranking official. The law then requires a two-thirds majority in parliament and presidential permission to bring criminal investigation results to the general prosecutor for indictment. The government did not use the procedure before Houthi rebels illegally disbanded parliament in February.

Corruption: The culture of corruption was pervasive, and observers reported petty corruption in nearly every government office. Job candidates often expected to purchase their positions. Observers believed tax inspectors undervalued assessments and pocketed the difference. Many government officials and civil service employees received salaries for jobs they did not perform or multiple salaries for the same job. Corruption also regularly affected government procurement.

Recent analyses by impartial international and local observers, including Transparency International, agreed that corruption was a serious problem in every branch and level of government, and especially in the security sector. International observers presumed government officials and parliamentarians benefited from insider arrangements, embezzlement, and bribes. Political leaders and most government agencies took negligible action to combat corruption.

The Central Organization for Control and Audit (COCA) is the national auditing agency for public expenditures and the investigative body for corruption. COCA presented no report to parliament before Houthi rebels illegally disbanded parliament in February. Prior to the outbreak of conflict, the president was responsible for appointing its top officials. In cases involving high-level officials, COCA submitted reports directly to the president, who had the power to refuse the reports. Since COCA's inception in 1999, authorities have prosecuted only low-ranking officials for corruption. It has conducted no known investigations since February.

Some police stations reportedly maintained an internal affairs section to investigate security force abuses, and citizens had the right to file complaints with the Prosecutor's Office. The Ministry of Interior had a fax line for citizens to file claims of abuse for

investigation. There was no available information on how many fax complaints the ministry received or investigated or whether the mechanism still existed.

In August 2014, to combat fraud and corruption in the government payroll system, the government implemented a plan to collect biometric information on all government employees, including soldiers and security forces, and to create a central registry designed to eliminate tens of thousands of fraudulent names and double dippers from the payroll. By the end of 2014, this registry included nearly half a million civil servants. It had reportedly identified 5,000 workers who illegally received more than one paycheck. The government suspended implementation following the armed Houthi takeover in February. The government also suspended implementation of a payment system for soldiers and security forces via bank or post office accounts. Prior to the outbreak of conflict, that system bypassed paymasters who had previously paid soldiers in cash, to provide for only the intended individuals collecting salaries.

The independent Supreme National Authority for Combating Corruption (SNACC) received complaints and developed programs to raise awareness of corruption prior to the outbreak of conflict. It included a council of government, civil society, and private sector representatives. A lack of capacity, particularly in terms of financial analysis, hampered the SNACC. According to the government-in-exile, the SNACC continued to operate “at minimal levels” during the year; however, no information was available on the number of complaints received or referrals for prosecution.

On June 10, GOPAC presented Yemeni parliamentarian Ali Ashal with its first-ever International Anticorruption Award “for his work fighting corruption and promoting oversight in Yemen and around the world.” GOPAC recognized him in part for introducing the Access to Information Right Law in parliament, which passed in 2012.

Financial Disclosure: The law requires annual disclosure of financial assets by all ministers, deputy ministers, agency heads, members of parliament, and Shura Council members. Filers are to provide disclosures to the SNACC for verification. The information was not publicly available. The SNACC may also request disclosures from any other government employee. The law does not require disclosure of assets of children or spouses. It provides for penalties for false filing of information.

Public Access to Information: The country’s “right of access to information” law requires establishment of an independent agency to respond to requests for information and resolve grievances when authorities deny requests; however, the government did not establish that agency prior to the outbreak of conflict. Houthi rebels established extralegal “resolution committees” and “monitoring committees” within ministries as part of their continued efforts to establish parallel government institutions, while at the same time inserting themselves into the government.

The law normally requires the Ministry of Finance to publish the government budget online, in print, and in CD format; however, the government-in-exile continued to implement the 2014 budget on a month-by-month basis, as provided for under Article 88 of the constitution. Information related to contract awards, including geographical area, company, and terms of the contract, was publicly available through the High Tender Board website and announcements in state media. Government spending, however, particularly at the local level and with respect to military and security, and data relating to extractive industries were murky and difficult to trace.

The law provides for journalists to have some access to government reports and information, but the government did little to provide for accessibility or transparency.