

Antigua and Barbuda

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented these laws effectively. There were isolated reports of government corruption during the year. Both political parties frequently accused the other of corruption, but investigations yielded few or no results.

Corruption: The Integrity in Public Life Act requires public officials to disclose all income, assets (including those of spouses and children), and personal gifts while in public office. An Integrity Commission, established by the act and appointed by the governor general, receives and investigates complaints regarding noncompliance with or contravention of any provisions of this law or of the Prevention of Corruption Act. The commission responded to isolated reports of corruption, administered the act, and received the required disclosure reports.

Financial Disclosure: The Integrity in Public Life Act requires sitting public officials to disclose all income, assets (including those of spouses and children), and personal gifts in a confidential report to the Integrity Commission. The law established this commission, appointed by the governor general, to receive and investigate complaints regarding noncompliance with or contravention of any provisions of this law or the Prevention of Corruption Act. Critics stated the legislation was inadequately enforced and the act should be strengthened.

While the commission did not disclose the particulars of any of the declarations filed, it submitted to the House of Representatives an annual report on its audited accounts and its activities during the preceding year. There were sanctions for noncompliance, as determined by the director of public prosecutions. As the only agency charged with combating corruption, the commission was independent but understaffed and under-resourced. The commission adequately responded to isolated reports of corruption, administered the act, and received the required disclosure reports. There was no particular collaboration with civil society.

Public Access to Information: The Freedom of Information Act gives citizens the statutory right to access official documents from public authorities and agencies, and it created a commissioner position to oversee the process. Citizens found it difficult to obtain documents, possibly due to government funding constraints rather than obstruction. A defined unit is mandated to monitor and verify disclosures. By law the disclosures are not made available to the public, and there were criminal and administrative sanctions for noncompliance.

Argentina

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials; nonetheless, multiple reports alleged that executive, legislative, and judicial officials engaged in corrupt practices with impunity, suggesting a failure to implement the law effectively. Weak

institutions and an often ineffective and politicized judicial system undermined systematic attempts to curb corruption.

Corruption: Cases of corruption occurred in some security forces. The most frequent abuses included extortion of, and protection for, those involved in drug trafficking, human trafficking, money laundering, and the promotion of prostitution.

On October 13, former national transportation secretary Ricardo Jaime pled guilty to bribery and under a plea bargain arrangement received a suspended sentence of 18 months, a fine of two million pesos (\$206,000 as of December 9), and a two-year ban on serving in public positions. Jaime admitted to receiving in-kind bribes of travel and vacation rentals from transportation companies it was his responsibility to regulate. Following a plea bargain that federal judge Julian Ercolini accepted, Jaime also faced trial for his alleged institutional responsibility in a 2012 commuter train crash that killed 51 persons and injured more than 700.

Allegations of corruption in provincial as well as in federal courts remained frequent. At year's end a trial date remained pending for former vice president Amado Boudou, who was indicted in June 2014 for illicit enrichment and other lesser offenses.

Financial Disclosure: Public officials are subject to financial disclosure laws, and the Ministry of Justice and Human Rights' Anti-Corruption Office is responsible for analyzing and investigating federal executive branch officials, based on their financial disclosure forms. The law provides for public disclosure, but not all agencies complied, and enforcement remained a problem, since authorities did not sanction public officials for noncompliance. The anticorruption office is also responsible for investigating corruption within the federal executive branch and in matters involving federal funds, except for funds transferred to the provinces. As part of the executive branch, the office does not have authority to prosecute cases independently, but it can refer cases to other agencies or serve as the plaintiff and request a judge to initiate a case.

Public Access to Information: While the country does not have a law that provides for public access to government information, a presidential decree provides for access to public documents and information that fall within the jurisdiction of the executive. Implementation of the decree was not consistent. On September 1, the Supreme Court upheld a lower court's decision requiring the Ministry of Justice and Human Rights to disclose details regarding the budget, personnel, and objectives of a program under the ministry's jurisdiction. A national deputy brought the case after the Ministry of Justice and Human Rights argued it was not required to make the information public.

Bahamas, The

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 engaged in corrupt practices with impunity. There were frequent reports of government corruption during the year.

Corruption: The procurement process was particularly susceptible to corruption, as it is opaque, contains no requirement to engage in open public tenders, and does not allow award decisions to be reviewed. In October the government charged a former state energy-company board member under the Prevention of Bribery Act, the first significant case brought under the act since 1989.

Financial Disclosure: The Public Disclosure Act requires senior public officials, including senators and members of parliament, to declare their assets, income, and liabilities on an

annual basis. The government publishes a summary of the individual declarations. There is no independent verification of the submitted data, and the rate of annual submission was weak, except in election years.

Public Access to Information: As of October the government had not issued implementing regulations or taken other steps to bring the 2012 Freedom of Information Act into force. The act provides access to government information upon request from citizens and permanent residents--unless one of several exceptions related to national security, diplomatic exchanges, or the security of a prison or cabinet papers applies--and stipulates a fine of 10,000 Bahamian dollars (B\$) (\$10,000) for anyone who contravenes the legislation.

Barbados

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.

Corruption: There were no reports of government corruption during the year.

Financial Disclosure: No law requires public officials to disclose income or assets.

Public Access to Information: No law provides citizens access to government-held information. While government websites provided access to information, responses often were slow to requests for specific government information by citizens, the media, and other interested parties.

Belize

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. The World Bank's worldwide governance indicators reflected that corruption continued to be a problem.

Corruption: Allegations of corruption in government among public officers, including ministers and chief executive officers, were numerous; however, no substantial proof was presented in the majority of the cases, with the exception of the sale of visas involving the case of Representative Edmund Castro (see section 2.a.). Through September the Office of the Ombudsman had received two reports of corrupt acts against two government ministers (members of cabinet).

Corruption within the Lands Department continued during the year. Citizens made most allegations against the department through the news media, which some believed was a more effective way to achieve justice than through the Ombudsman's Office or other watchdog organizations. There were several reports of department employees canceling leases without giving due notice to the leaseholders and fraudulently transferring land titles without consent. Despite accusations of political cronyism, the government insisted that it maintained transparency in the distribution of land.

In April the prime minister (minister of finance) announced that BZ\$500,000 (\$250,000)

was missing from the Treasury Department. A joint investigation by police and the Ministry of Finance led to the arrest and charge of two government employees.

Financial Disclosure: The law requires public officials to submit annual financial disclosure statements, which the Integrity Commission reviews. At the same time, the constitution allows authorities to prohibit citizens from questioning the validity of such statements. Anyone who does so, either orally or in writing, outside a rigidly prescribed procedure is subject to a fine of up to BZ\$5,000 (\$2,500), three years' imprisonment, or both.

The body governing financial disclosure did not function, and with the exception of one member of parliament, no elected official submitted financial statements to the committee.

Public Access to Information: The law provides for public access to documents of a ministry or prescribed authority upon written request, although it protects a number of categories, such as documents from the courts or those related to national security, defense, or foreign relations. The government must supply to the Office of the Ombudsman a written reason for any denial of access, the name of the person making the decision, and information on the right to appeal. There was no training relating to public access to information during the year.

Bolivia

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. There were numerous reports of government corruption during the year.

Corruption: According to Transparency International's 2013 *Global Corruption Barometer*, 86 percent of citizens believed the police were corrupt or extremely corrupt, and 76 percent labeled the country's judiciary as corrupt or extremely corrupt. A 2014 study by InSight Crime "affirmed that elements of the police work with drug traffickers, while criminal defense attorneys claimed judges and prosecutors charge between 137,200 and 343,000 bolivianos (\$20,000 and \$50,000) to let alleged criminals off."

In February a comptroller audit of the government-run Indigenous Fund revealed that as overseer of the fund, former minister of rural development Nemesia Achacollo helped divert more than 68.3 million bolivianos (\$9.95 million) from the Indigenous Fund. Between 2010 and 2013, these diverted funds reportedly went to the private bank accounts of 148 individuals associated with eight different social organizations that made up the government's ruling coalition. Although the Indigenous Fund was intended to support projects in favor of rural development that would aid indigenous peoples, another 210 million bolivianos (\$30.6 million) reportedly went toward political campaigning purposes. The comptroller uncovered at least 153 instances of ghost projects used to justify the corruption and at least 713 projects that received funds but were never completed. The total cost associated with ghost and uncompleted projects was estimated at 102 million bolivianos (\$15 million). Achacollo resigned from her position on August 31. On September 30, President Morales defended Achacollo, saying that it was impossible to believe that she could be involved in acts of corruption. According to media reports, Minister of the Presidency Juan Ramon Quintana knew of irregularities in the fund since at least February 2014, and several leaders of social organizations publicly stated that President Morales knew of the issue but urged silence to keep unity within the social movements. Four former and current leaders of social organizations have been preventatively jailed, and two senators have been put under house arrest, as of December. Attorney General Ramiro

Guerrero had announced on December 8 that Achacollo would be called before the court, but as of December 29 she had not been called and no charges had been filed against her.

Police corruption remained a significant problem, partially due to low salaries and lack of training. The Ministry of Anticorruption and Transparency and the Prosecutor's Office are responsible for combating corruption, but most corrupt officials operated with impunity. In January then transparency minister Nardi Suxo identified 20 prosecutors, 18 judges, and 12 police officials who worked on corruption and drug trafficking cases and had suspicious asset declarations.

Cases involving allegations of corruption against the president and vice president require congressional approval before prosecutors may initiate legal proceedings, and congress rarely allowed cases against pro-government public officials to proceed. The government ignored court rulings that found that the awarding of immunity for corruption charges is unconstitutional.

Financial Disclosure: The law requires public officials to report potential personal and financial conflicts of interest and to declare their income and assets. The law mandates that elected and appointed officials disclose their financial information to the auditor general, but their declarations are not available to the public. According to the law, noncompliance results in internal sanctions, including dismissal. The auditor general must refer cases involving criminal activity to the Attorney General's Office.

In one case under investigation, a police colonel amassed close to 995,000 bolivianos (\$145,000) in assets in the span of 10 years on a salary of approximately 2,740 bolivianos (\$400) a month. The official reported the purchase of five properties on his declaration of assets, while omitting the purchase of two more.

Public Access to Information: The constitution provides for the right to access, interpret, analyze, and communicate information freely in an individual or collective manner. Nevertheless, no law implements this right.

Brazil

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption. The law stipulates civil penalties for corruption committed by Brazilians or Brazilian entities overseas. The government did not always implement the law effectively, however, and there were numerous reports of government corruption.

Corruption: The law mandates civil and administrative penalties for national entities and legal persons that attempt to bribe foreign officials or engage in corrupt practices in the country or abroad. Individuals found to have engaged in such acts are prohibited from bidding on government contracts. Some news reports indicated authorities had difficulty enforcing the law. There were numerous reports of government corruption throughout the year.

In March 2014 the Federal Police announced it broke up a large money laundering operation involving the parastatal corporation Petrobras, certain private companies, and some members of Congress and the executive branch. More than a year later, the scandal, which had become the largest corruption scandal in the country's history, continued to unfold. The Operation Carwash (Lava Jato) investigation uncovered a complicated web of corruption and led to the arrests of money launderers, Petrobras directors, and major construction contractors, and to the investigation of politicians. Information gained through collaboration and plea bargains with suspects launched a widening net of new

investigations.

Financial Disclosure: Public officials are subject to financial disclosure laws, and officials generally complied with these provisions. While asset declarations are not made public, federal employees' salaries and payment information are posted online and can be searched by name.

Public Access to Information: The law provides for public access to unclassified government information. The list of exceptions is sufficiently narrow and includes personal information; information that affects public safety or health, national security, or international relations; and sensitive military and intelligence information. The only fees charged are the costs of printing, copying, and mailing documentation. The government has 20 days to respond to requests and can request an additional 10 days, for a maximum of 30 days, after receiving the request.

Canada

Section 4. Corruption and Lack of Transparency in Government

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

Corruption: A Quebec law stipulates elected officials arrested for a crime and facing more than two years in prison must step down until the case is completed. The law also stipulates elected officials must cover their own legal fees.

On April 7, the trial of Senator Mike Duffy opened. The case addressed 31 criminal counts of bribery, fraud, and breach of trust related to his claims for housing and travel expenses, awarding of contracts, and his acceptance of a C\$90,000 (\$68,400) check from the prime minister's former chief of staff to repay allegedly improperly claimed expenses. The senator denied the charges, none of which had been proven in court. The trial continued as of November.

The court scheduled for 2016 the trials of Senator Patrick Brazeau and former senator Mac Harb, charged in 2014 with fraud and breach of trust.

The Charbonneau Commission, a public inquiry ordered by the Quebec government in 2012, has a mandate to investigate allegations of corruption, collusion, and the involvement of organized crime in the awarding of contracts for public infrastructure projects. The commission investigated alleged organized crime links to municipal and provincial political parties and was scheduled to deliver a final report in November.

In 2014 Montreal established an inspector general office to investigate public corruption. In May the inspector general reported that in 2014 the city's whistleblower hotline received nearly triple the number of complaints about wrongdoing in Montreal than in previous years.

Financial Disclosure: Conflict of interest and ethics commissioners administer conflict of interest codes for members of the federal elected House of Commons and the appointed Senate, as well as the law relating to public officeholders. Members of the legislative branch are not required to disclose financial holdings but must recuse themselves from voting or conducting hearings on matters in which they have a pecuniary interest. By law public officeholders, including elected members of the executive branch and their staff and designated senior nonelected officials, must disclose information about their personal financial assets. These declarations, as well as an annual report, are available to the

public through regular reports from a commissioner for conflict of interest and ethics. The commissioner may impose an administrative monetary penalty for noncompliance, but the law does not provide for criminal sanctions. Provincial governments provide independent audits of government business and ombudsman services.

Public Access to Information: The law permits public access to government information, and the government granted access for citizens and noncitizens, including foreign media. Although the law was implemented effectively, in March the federal information commissioner recommended changes to modernize and strengthen the law, including extension of the law's scope to cover the Prime Minister's Office and other government institutions that are exempt. The commissioner also expressed concern that the number of cases in which the government exceeded the legal timeline for processing had increased. The law provides for the denial of legal requests for information on limited and specific grounds given and cited in law, a reasonably short timeline to disclose or respond, reasonable processing fees, and a mechanism to appeal denials, including to the federal courts. The law does not impose criminal or administrative sanctions for noncompliance. The government released quarterly information on the public expenditures of senior government officials and published expense information on individual ministerial websites and a centralized website.

Chile

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented these laws effectively, although officials sometimes engaged in corrupt practices with impunity. There were isolated reports of government corruption during the year.

Corruption: During the year government prosecutors opened an investigation against a large financial services organization, Penta Group. Penta was alleged to have illegally financed election campaigns of politicians belonging to an opposition party, the Independent Democratic Union, and evaded taxes by claiming the campaign donations as business expenses. At year's end four Penta executives were charged with tax fraud, bribery, and money laundering and confined to house arrest while awaiting trial. The lithium producer Soquimich (SQM) also came under investigation during the year for alleged engagement in similar practices; SQM allegedly provided illegal funding to candidates across the political spectrum. In February the government opened an investigation against the president's son, Sebastian Davalos, alleging improper influence during his participation in a real estate transaction made by his wife's company. Prosecutors also charged Senator Jaime Orpis and Senator Felipe Harboe with bribery for allegedly accepting money in exchange for their votes on a controversial fishing quota law.

On February 23, the president announced the creation of a presidential committee against corruption and conflicts of interest and in April sent draft legislation to Congress that would strengthen ethics and campaign finance laws. The first of these laws was passed in November. Additionally, in November the committee released a report recommending 236 anticorruption measures, and the president participated in the launch of a new NGO, the Anticorruption Observatory, to monitor the implementation of these measures.

Financial Disclosure: A regulation subjects public officials to financial disclosure. The law requires that all declarations be made public and provides sanctions for noncompliance; however, it does not mandate a unit to monitor disclosures.

Public Access to Information: The constitution requires the government and its agencies make all unclassified information about their activities available to the public. The government granted citizens and noncitizens, including foreign media, access to all unclassified information. The law regulates government transparency and provides public access to information. The law applies to ministries; regional, provincial, and municipal level governments; the armed forces, police, and public security forces; and public enterprises where the state owns more than 50 percent or holds a majority of appointments on the board of directors. The law has a list of five exceptions for nondisclosure. Responses to any requests for information must be delivered within 20 business days, and there is no cost for the request. In cases of noncompliance, the head of the organization is subject to a fine of between 20 percent and 50 percent of his or her monthly salary. The autonomous Transparency Council provides for the right of access to information and issues rulings on cases in which information is denied.

Colombia

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, although officials sometimes engaged in corrupt practices without punishment. The World Bank's worldwide governance indicators reflected that government corruption was a serious problem. Drug-trafficking revenues exacerbated corruption.

Corruption: On May 16, *Semana* magazine published an article alleging corruption involving members of the military assigned to the Fernando Landazabal Battalion located south of Bogota. A former member of the battalion accused the leadership of the unit of contracting irregularities and profiting from the contracting of members of the battalion as private security escorts. There was no information on the status of any investigation into the allegations.

In February 2014 *Semana* published an article alleging corruption involving several members of the military, including generals, colonels, and lieutenant colonels. The article cited hours of secretly recorded audio that allegedly implicated the officials in contracting irregularities and "kickbacks" of up to 50 percent on government contracts, including to officials who were already under investigation for involvement in cases of extrajudicial execution. In addition to the criminal investigation launched by the Accusations Commission of the Congress, with participation by delegate prosecutors, the Inspector General's Office reported launching a disciplinary investigation.

The investigation continued into the 2013 killing of Stalin Ortiz, a city council member in Buenaventura, allegedly because of his efforts to uncover corruption at the Luis Ablanque de la Plata Hospital and affiliated health-care network, including improper hiring of the mayor's brothers and alleged money laundering by criminal organizations to move drugs and weapons.

On August 4, the Inspector General's Office barred former mayor of Bogota Samuel Moreno Rojas from holding public office for 18 years. Moreno was charged in 2011 with failing to fulfill his public duty and contracting irregularities, and he remained in detention as his criminal trial continued into its fourth year.

A special investigative unit of the Supreme Court of Justice charged with investigating members of congress and senior government officials reported that from January 1 through June 30, it opened 291 investigations, of which 67 were closed for lack of evidence. As of June 30, the unit opened 64 new investigations involving former or current governors.

During the same period, the unit won no convictions in cases against governors, members of congress, and senior government officials.

Financial Disclosure: By law public officials must file annual financial disclosure forms with the tax authority. The information is not made public. The law states that persons who intend to hold public office or work as contractors for the government for more than three months shall submit a statement of assets and income, as well as information on their private economic activity. The Administrative Department of Public Service is in charge of preparing the required forms, and the human resources chief in each entity is responsible for verifying the information submitted. Congress maintained a website on which members could voluntarily post their financial information.

Public Access to Information: The law provides for public access to government information, and the government generally provided this access. While there are no prohibitive fees to access government information, there were reports that some low-level officials insisted on bribes to expedite access to information.

Costa Rica

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented the law effectively. There were numerous reports of government corruption during the year.

Corruption: During the first six months of the year, the Ministry of Public Security received 310 requests for review of discipline, suspended 11 officers, and dismissed 24 of a total of approximately 13,100 uniformed police officers. Most of the suspensions occurred due to investigations related to breach of duty, negligence in performing duties, and failing drug tests. During the first six months of the year, authorities arrested one uniformed police officer, and judicial authorities sentenced three other officers, for involvement in criminal activity.

On October 29, the Comptroller General's Office denounced cases of mismanagement in the use of public funds for infrastructure projects. Separately, on May 12, the president dismissed his minister of culture and two vice-ministers after an international arts festival failed amid canceled events and presentations, following a series of failures in coordination and logistics. In July 2014 the Attorney General's Office began an investigation of the ministry's expenses over concerns regarding increased prices for contracts for previous festivals.

The public ethics solicitor, attorney general, comptroller general, and ombudsman are responsible for combating government corruption. The Public Ethics Solicitor's Office is responsible for taking the necessary administrative steps to prevent, detect, and eradicate corruption and to raise ethical and transparency standards in the public service. The Attorney General's Office includes an anticorruption unit responsible for the investigation and prosecution of cases involving public officials. The Judicial Inspection Tribunal is the organ of the judiciary responsible for investigating and sanctioning judicial misconduct.

Financial Disclosure: Public officials are subject to financial disclosure laws that require senior officials to submit sworn declarations of income, assets, and liabilities. The law requires income and asset disclosure by appointed and elected officials. The Comptroller General's Office monitors and verifies disclosures. The content of the declarations is not made available to the public. The law stipulates administrative sanctions for noncompliance and identifies which assets, liabilities, and interests public officials must

declare. Officials are required to file a declaration annually and upon entering and leaving office.

Public Access to Information: The law provides for public access to government information, and the government generally implemented the law effectively, providing access for citizens and noncitizens, including foreign media. Authorities have 10 days to disclose or respond to a request for access. There are no processing fees or sanctions for noncompliance, although requesters can file a petition if their request is denied. Government institutions published reports that detailed their activities during the year. The Public Ethics Solicitor's Office provided regular training to public employees on public access to information. The Ombudsman's Office operated a webpage dedicated to enhancing transparency by improving citizens' access to public information.

Cuba

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption, and the government was highly sensitive to corruption allegations and often conducted anticorruption crackdowns.

Corruption: The law provides for three to eight years' imprisonment for "illegal enrichment" by authorities or government employees. The government did not implement the law effectively, and officials sometimes engaged in corrupt practices with impunity. There were numerous reports of law enforcement and other official corruption in enforcement of a myriad of economic restrictions and government services. There were widespread reports of police corruption. Multiple sources reported that when searching homes and vehicles, police sometimes took the owner's belongings or sought bribes in place of fines or arrests.

Financial Disclosure: The law does not require appointed and elected officials to disclose their assets.

Public Access to Information: The law provides for public access to government information, but requests for information routinely were rejected. The government engaged in limited public outreach activities. It did not conduct training of public officials to encourage effective use of the law granting public access to government information.

Dominica

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. According to civil society sources and members of the political opposition, officials sometimes engaged in corrupt practices with impunity, but there were no documented cases.

Corruption: The independent DPP is responsible for prosecuting major crimes, including corruption offenses, but it lacked adequate manpower and resources for complicated money laundering and public corruption cases. These offices did not collaborate with any civil society groups. Integrity in Public Office Commission officials stated the challenges to the implementation of integrity legislation included the need for increased resources, inadequate prosecution of cases, failure of relevant authorities to present the

commission's annual report to parliament, a lack of regulations concerning the procedures to deal with bribery and corruption, and a lack of public support.

In 2012 the integrity commission rejected two parts of a three-part public complaint brought against the prime minister for abusing his office. The commission began an inquiry into the third charge, that the prime minister used his influence to secure concessions for a business concern in which he allegedly had an interest. In 2012, however, the prime minister's personal attorney publicly accused the commission of failing to act fairly on objective evidence and individual commission members of having political bias, and he called on the government to amend the law to change the composition of the committee. In 2014 the prime minister's personal attorney applied to the High Court for an injunction to prevent the commission from continuing its inquiry. The court granted the injunction pending the High Court's review of the matter, and a hearing in the case was set for November 5.

Financial Disclosure: The Integrity in Public Office Act requires government officials to account annually for their income, assets, and gifts. All offenses under the act, including the late filing of declarations, are criminalized. The commission generally reported on late submissions and inappropriately completed forms but did not share financial disclosures of officials with the DPP.

Public Access to Information: The law does not provide for public access to government information, and the government did not provide routine access. The government maintained a website and a government information service, where it posted information such as directories of officials and a summary of laws and press releases. The government budget and an audit of that budget were publicly available on the website.

Dominican Republic

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption; however, the government did not implement the law effectively, and officials frequently engaged in corrupt practices with impunity. The attorney general investigated allegedly corrupt officials, but government corruption remained a serious problem and a key public grievance. There were numerous reports of government corruption.

On October 23, *HOY*, a widely circulated daily newspaper, published a front-page story on 250 corruption cases that had been filed by prosecutors before the courts in the previous five years and the failure of the courts to issue sentences in the cases.

The Public Ministry, led by the attorney general, was responsible for investigating and prosecuting corruption cases through the Office of the Special Attorney for the Prosecution of Administrative Corruption (PEPCA). The Chamber of Accounts supported government accountability through audits and investigations, which formed the basis of many PEPCA corruption cases. PEPCA, the Chamber of Accounts, and comptroller general operated independently and appeared free from political influence, although there were few successful prosecutions of high-profile public officials for corruption. While government agencies complained of insufficient resources, credible NGOs noted the greatest hindrance to effective investigations was a lack of political will to apply the law and prosecute particularly high-level politicians.

Corruption: Civil society organizations criticized the widespread practice of awarding government positions as political patronage and alleged many civil servants, referred to as "empty bottles," did not have to perform any job functions for their salary. Small

municipalities reported having staffs of 200, 350, or 600 workers when the municipality buildings could hold no more than a tenth of the reported workers.

On many occasions police officers attempted to solicit bribes from individuals facing fines or arrest. Numerous individuals reported having their personal property taken by police. Police reportedly detained drivers, including foreign tourists, requesting money in exchange for not being issued a citation. Local human rights observers reported immigration and police officers detained undocumented construction workers and other manual laborers of Haitian descent and extorted money from them. NGOs reported incidents of corruption among military and immigration officials stationed at border posts and checkpoints.

Prison officials accepted money in exchange for a recommendation that a prisoner be furloughed or released for health reasons. There were credible allegations that prisoners paid bribes to obtain early release on parole.

The use of nonjudicial sanctions continued. These measures included the dismissal or transfer of military personnel, police officers, judges, and other minor officials engaged in bribe taking and other corrupt behavior. A widespread attitude of tolerance toward some forms of corruption complicated anticorruption efforts.

On October 21, the Supreme Court voted not to indict Senator Felix Bautista and six codefendants on charges that they embezzled more than 4.5 billion pesos (\$100 million) when Bautista headed the State Works Supervisory Engineers Office. Attorney General Francisco Dominguez Brito responded immediately, called it a blow in the fight against corruption, and stated that the high court “doesn’t deserve the slightest credibility.”

On November 16, the Judicial Council suspended five judges for allegations of corruption. Two of the five were sentenced to preventative prison terms while they awaited trial.

Financial Disclosure: The law requires the president, vice president, members of congress, some agency heads, and other officials, including tax and customs duty collectors, to declare their personal property within 30 days of being hired, elected, or re-elected as well as when they end their responsibilities. The constitution further requires public officials to declare the provenance of their property. The new law also changed responsibility from the Public Ministry to the Chamber of Accounts to receive and review these declarations. In August, Accounts Chamber President Licelott Marte delivered to the attorney general a list of 1,222 officials who had not submitted their financial statements and should face criminal prosecution.,

The General Directorate of Ethics and Governmental Integrity operated with a strong political mandate but obtained minimal results.

During the year the Chamber of Accounts submitted five audit reports to PEPCA with findings of misuse of public funds and lack of proper procedures. These reports corresponded to the period between 2009 and 2012 and implicated both municipal authorities as well as members of the central government. Some of the implicated persons were charged and tried, while others remained under investigation. No actions were taken on reported incidents from previous years.

Public Access to Information: The constitution provides for public access to government information. The law places limits on the availability of such information only under specified circumstances, such as to protect national security. Authorities are required to disclose or respond to requests for access within 15 workdays, and processing requests is either free or the fee is reasonable. The law provides for penalties of up to two years in prison and a five-year ban from positions of public trust for officials who obstruct access to public information. Responses to requests were often timely but incomplete, and the government regularly rejected follow-up requests. Although much information was easily available online, it was often inaccurate or inconsistent with other government reports. There was little consistency in determining what public information was and what it was

not, due to the lack of a single oversight agency. Under the Anticorruption Participatory Initiative, civil society organizations and government institutions conducted activities and training to promote public knowledge and effective official application of the law.

Ecuador

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 often engaged in corrupt practices with impunity.

The government recognized corruption in the legislative and judicial branches. It continued a process to reform the judiciary, which improved the judiciary's ability to remove corrupt or ineffective judges. Many civil society activists noted, however, that the judges on the higher courts appeared more closely aligned with the current administration, and many questioned the independence of those courts, especially in politicized cases. Media reports alleged police corruption and extensive corruption in public contracts and procurement. Labor leaders and business owners reported corruption among labor inspectors.

The Council for Citizen Participation and Social Control (CPCCS), together with the Office of the Comptroller General, the ombudsman, and a number of superintendencies, make up a nominally independent fifth branch of government, known as the Transparency and Social Control Branch. These organizations are in charge of policy development for the promotion of transparency, control, and accountability in the public and private sectors. They head the National Plan against Corruption. The Office of the Comptroller General investigates reports of corruption in the public sector. When there are grounds for a criminal investigation, the comptroller general refers the case to the Public Prosecutor's Office. The National Secretariat for Management Transparency, part of the National Secretariat of Public Administration, also has responsibility for investigating and reporting complaints of corruption in the public sector. Observers noted that the CPCCS, which is tasked with promoting and controlling civic participation, did not effectively engage a broad segment of civil society. Critics argued that the new members of the CPCCS, assigned on July 23, had close ties to the ruling party.

David Rosero, a former CPCCS member, stated that government funding for the CPCCS' Index of Transparency, intended to measure transparency in all public institutions, amounted to \$65,000 in the year, a 98-percent decrease from the \$3.65 million requested by the CPCCS.

Corruption: On May 24, police arrested Maria Esperanza Galvan, a National Assembly legislator affiliated with the AP, for allegedly receiving an \$800,000 bribe from a company selected to provide potable water services to the city of Esmeraldas and surrounding towns. Police also arrested Miguel Salvatierra, the former AP director in Esmeraldas and former manager of the provincial branch of the public water company; and Walter de la Torre Cevallos, Galvan's legislative advisor. President Correa publicly apologized for "a serious case of corruption in the ranks of the Citizens' Revolution." A judge ordered their pretrial detention, and Vice President Jorge Glas announced on May 25 that the AP had expelled the accused. On November 24, media reported that the Criminal Tribunal of the National Court of Justice found Galvan, Salvatierra, and another individual guilty of bribery and sentenced them to three years in prison. Prosecutors did not press charges against de la Torre, whom the court declared innocent.

On April 27, the Criminal Chamber of the National Court of Justice sentenced former

minister of sports Raul Carrion to four years in prison for embezzlement, in relation to his involvement in contracts related to the construction of sports complexes in Macas, Carpuela, and Sucua in 2007 and 2008. The court also sentenced other former ministry of sports employees to between two and four years in prison for their role in the embezzlement scheme, while the recipient of the contract received an eight-year prison sentence. In May 2014 Carrion received a three-month prison sentence for a separate charge in relation to the same case.

There were other reported instances of corruption involving lower-level government officials, judges, and police officers.

Financial Disclosure: Government officials are required to declare their financial holdings upon taking office and if requested in an investigation, and all agencies must disclose salary information annually. The constitution requires civil servants to present a sworn statement regarding their net worth at the beginning and end of their term of office, including their assets and liabilities, as well as an authorization to lift the confidentiality of their bank accounts. The Office of the Comptroller General has the responsibility to monitor and verify disclosures, examine the statements, and investigate those cases where illicit enrichment is alleged. Interested parties can request statements of disclosures. All declarations are filed in the offices of public notaries and are entered as a public document. The comptroller general's website contains a section where the public can conduct a search on officials to see if the officials complied with the income and asset disclosure requirement. There are no criminal or administrative sanctions for noncompliance, except for the inability to assume office. The comptroller general can report any unusual actions or activities to other government officials, who in turn can initiate their own investigations. Public officials are not required to submit periodic reports, even when changes occur in their holdings.

Following the May 24 arrests of a National Assembly member and two other public officials, National Assembly president Gabriela Rivadeneira requested that the comptroller general investigate the declared assets of all 137 lawmakers. As of December the comptroller general had not made public the results of the investigation.

Public Access to Information: The constitution and other regulations provide for the right of public access to government information, but authorities did not effectively implement the law. The law requires all public and private organizations that receive public funds to respond to written requests for information, publish specific information on their website, and submit an annual report to the Ombudsman's Office that details their compliance with the transparency law. Because of this legislation, government agencies increasingly included budget information, functions, organizational information, lists of government officers, and official notices on the internet in addition to responding to written requests. Nevertheless, the government did not always grant requests for information, and the government made exceptions, stating that the requested information was not available. Judges did not enforce the legislation requiring the government to release information.

Opposition legislators complained that, although the law allows them to request information directly from government institutions, President Correa instructed government ministers to respond only to requests for information channeled through the president of the National Assembly.

El Salvador

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 often engaged in corrupt practices with impunity. The NGO Institute for Social Democracy stated that officials, particularly in the judicial system, often engaged in corrupt practices with impunity.

Corruption: Former president Francisco “Paco” Flores, charged with embezzlement and illicit enrichment for allegedly stealing \$15.3 million, remained detained on house arrest. On June 15, the Institute for Social Democracy criticized the attorney general for failing to pursue adequately the prosecution of former president Flores on embezzlement charges. Flores was scheduled to have a case hearing before the First Appeals Court of San Salvador on December 3.

On September 5, approximately 1,000 demonstrators in San Salvador called for an end to impunity and the creation of an international commission against impunity.

Financial Disclosure: The illicit enrichment law requires appointed and elected officials to submit their assets records to the Probity Section of the Supreme Court. The declarations are not available to the public, and the law does not establish sanctions for noncompliance.

Public Access to Information: The law provides for the right of access to government information. Although the law establishes mechanisms to appeal denials of information, authorities did not effectively implement the law. The law provides a narrow list of exceptions outlining the grounds for nondisclosure, a reasonably short timeline for the relevant authority to disclose or respond, no processing fees, and administrative sanctions for noncompliance.

The National Foundation for Development announced in July that the Legislative Assembly had spent \$1,066,278 on official travel in 2013. Civil society groups strongly criticized the expenditures, given current fiscal constraints. Following the release of legislative expenditures, the Access to Public Information Institute (IAIP), a government body, ruled any information related to government travel, including travel for legislators was “reserved.” Civil society groups criticized the decision, citing Article 10 of the Access to Public Information Law, which they argued expressly classifies such information as public.

Some public officials refused to publish information. For example, former minister of economy Armando Flores refused to disclose financial information on Alba Petroleos to the Access to Public Information Institute. In May 2014 the institute imposed a fine of \$6,060 on Flores for refusing to comply. In August 2014 the Administrative Dispute Chamber of the Supreme Court issued a temporary injunction on the fine to permit a review of its imposition. In September 2014 the IAIP ruled that the Administrative Dispute Chamber did not have the jurisdiction to review the imposition of an IAIP fine and ordered Flores to pay the fine. On August 22, Flores refused to pay the fine.

Grenada

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption; however, officials frequently engaged in corrupt practices with impunity. While there was a perception, particularly among the political opposition and some media outlets, that the government did not implement the law effectively, there were no new cases or serious allegations of public corruption during the year.

Corruption: Allegations continued to circulate of instances in prior years of corrupt practices by government officials, but subsequent investigations did not report any

findings of corruption. The Integrity in Public Life Commission is responsible for combating corruption, while the Ombudsman's Office, in its capacity as an independent organ with the powers to investigate maladministration, has a role as well. The Ombudsman's Office continued to operate independently and to cooperate with the media and other elements of civil society.

Financial Disclosure: The law requires all public servants to report their income and assets, beginning with members of the Integrity in Public Life Commission. The commission monitors and verifies disclosures, although disclosures are not made public except for the possibility of eventual disclosure in court. According to the provisions of the bill, failure to file a disclosure should be noted in the *Official Gazette*. If the office holder in question fails to file in response to this notification, the commission can seek a court order to enforce compliance, and a judge can impose conditions to such order as he or she deems appropriate.

Public Access to Information: Although no law provides for public access to government information, citizens may request access to any information not deemed classified. Statistics on government responsiveness to those requests were not available.

Guatemala

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented the law effectively, but officials frequently engaged in corrupt practices. There were numerous reports of government corruption during the year, many of which were investigated at the highest levels.

Corruption: The Comptroller General's Office and the Public Ministry are responsible for combating corruption. The comptroller general's mandate is to monitor public spending, and the attorney general's mandate is to prosecute related crimes. Both agencies actively collaborated with civil society and were relatively independent; however, they lacked adequate resources, which affected their capabilities. As of early November, the Public Ministry reported that at least 602 public officials were arrested during the year for corruption and/or abuse of authority.

On April 16, authorities arrested several high-ranking government officials, including the then head of the Tax Authority Omar Franco and his predecessor Carlos Munoz, for participating in a group dedicated to contraband, tax evasion, and money laundering. On October 5, officials implicated and arrested Juan Carlos Monzon, then private secretary of Vice President Roxana Baldetti. The Public Ministry/CICIG investigation led to President Otto Perez Molina's and Vice President Baldetti's resignations and arrests (resigned on September 2, arrested on September 3; resigned on May 8, arrested on August 21, respectively). The tax fraud case and subsequent investigations of official corruption resulted in 15 high-ranking officials (deputy minister and above) forced from office. During the year the Supreme Court lifted the immunity of three judges. At year's end the cases against the former president and vice president were pending; they remained in preventive custody.

On July 15, the Public Ministry/CICIG charged the then main opposition party and largest single party in Congress (Democratic Liberty Renewed--LIDER) vice presidential candidate Edgar Barquin (who had served as president of the Central Bank of Guatemala), Congressmen Manuel Barquin, Jaime Martinez, and others with money laundering and illicit association.

On September 9, the Supreme Court unanimously lifted the immunity of Magistrate Marta Sierra de Stalling. On September 22, authorities arrested and charged her with malfeasance and receiving bribes from the attorneys of six alleged members of the tax fraud scandal in return for ordering their release on bail. The case continued as of December 1.

Financial Disclosure: Public officials who earn more than 8,000 quetzales (\$1,040) per month or who manage public funds are subject to financial disclosure laws overseen and enforced by the Comptroller General's Office. The financial disclosures were available to the public upon request. Administrative and criminal sanctions apply for inadequate or falsified disclosures of assets.

Public Access to Information: The law provides for the right of citizens to access public information and establishes fines for government agencies that obstruct such access. The disclosure law contains exceptions for national security, sets reasonably short timelines for disclosure, and allows for a reasonable processing fee. There are no sanctions for noncompliance. The government granted access to public information for citizens and noncitizens, including foreign media, although at times in a slow and incomplete manner. While there was no formal mechanism to appeal denials of requests, petitioners often successfully appealed to the Office of the Human Rights Ombudsman for assistance relating to a government denial of public information.

Guyana

Section 4. Corruption and Lack of Transparency in Government

The law provides for criminal penalties for corruption by officials, and the government generally implemented the law effectively. There were isolated reports of government corruption during the year and the current administration has responded to these reports. There remained a widespread public perception of corruption involving officials at all levels, including the police and the judiciary.

Financial Disclosure: Although the law requires public officials to declare their assets to an Integrity Commission, the commission has not been constituted. In 2012, the then prime minister stated that members would soon be appointed to this commission. Members were not appointed, however, and the commission remained inoperative.

The law sets out both criminal and administrative sanctions for nondisclosure. If a person fails to file a declaration, that fact can be published in the daily newspapers and the official *Gazette*. Failure to comply with the law can lead to a summary conviction, fines, and imprisonment for six to 12 months. If property is not disclosed as it should have been, the magistrate convicting the defendant must order the defendant to make a full disclosure within a set time. No such publication or convictions occurred during the year.

Public Access to Information: The law provides for persons to secure access to information under the control of public authorities and for the appointment of a commissioner of information. In 2013 the government appointed a commissioner, but the government has not issued implementing regulations. Requests to the commissioner were infrequent.

Haiti

Section 4. Corruption and Lack of Transparency in

Government

The 2014 Law on Prevention and Repression of Corruption, the country's first anticorruption law, criminalizes a wide variety of corruption-related offenses, including illicit enrichment, bribery, embezzlement, illegal procurement, insider trading, influence peddling, and nepotism. The law imposes sentences of three to 15 years' imprisonment and gives new legal authority to the government's Anticorruption Unit (ULCC) and its Financial Intelligence Unit, among others, to combat corruption. During the year the ULCC launched a national outreach campaign to sensitize the general population to offenses addressed by the new law. The ULCC also opened a national hotline that remained active, although underutilized, to field complaints that in some instances led to investigations.

Despite these efforts there were numerous reports of government corruption and a perception of impunity for abusers. Law enforcement authorities and the government's anticorruption agencies launched several investigations that led to the dismissal and arrest of some government officials. Although the government continued to implement legal, administrative, and management reforms designed to increase accountability in several ministries and government institutions, the perception of corruption remained widespread in all branches and at all levels.

Corruption: The constitution mandates that the Senate prosecute high-level officials and parliament members accused of official corruption instead of handling such cases within the judicial system. In the absence of a functioning parliament, no such investigations or prosecutions occurred during the year, nor was there any progress on matters before the Senate in 2014.

In April, HNP police and judicial officials were implicated in a scheme to extort money from a Haitian-American inmate. Enock Gene Genelus, the prosecutor in Gonaives (Artibonite Department) investigating an assault and domestic dispute matter against the accused, directed HNP officers to escort the defendant from jail to an ATM machine, where he was instructed to withdraw \$50,000 to be paid to his attorney, Marcelin Duclas. A Ministry of Justice investigation resulted in the firing of Genelus.

In March Nonie Mathieu, one of the 10 judges on the high administrative and financial court (CSCCA), was alleged to have misappropriated 37 million Haitian Gourdes (HTG) (\$694,000). While there was an internal investigation, by law only the Senate can order an official audit of the CSCCA and formally charge the judge, and the Senate ceased functioning as of January.

There were frequent reports of corruption in the HNP. For instance, affluent prisoners at times obtained favorable conditions of detention. The HNP investigated some allegations of police malfeasance. New leadership at the HNP OIG helped to improve the unit's efficiency and advance more internal investigations. Initial OIG investigations indicated the 2014 prison break at the Croix-des-Bouquet facility was an orchestrated event involving multiple HNP officers. Five officers were fired, seven were suspended, and 12 others received letters of reprimand.

The former ULCC director was removed in February and replaced by someone with little anticorruption experience, according to government watchdog groups. Although the ULCC remained operational, there was a significant reduction in the number of cases forwarded for prosecution. ULCC officials cited a lack of prosecutorial follow-through as an impediment to resolution of matters referred for prosecution.

Financial Disclosure: The law requires all senior officials of the government to file financial disclosure forms within 90 days of taking office and within 90 days of leaving office. There is no requirement for periodic reporting. Disclosure reports are confidential and not available to the public.

The sanction for failure to file financial disclosure reports is a withholding of 30 percent

of the official's salary, but the government did not apply this sanction in previous years.

Public Access to Information: No law requires the government to provide citizens access to government information.

Honduras

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. Government institutions were subject to corruption and political influence, and some officials engaged in corrupt practices with impunity. The government took steps to address corruption at high levels in government agencies, including arresting and charging members of congress; judges; prosecutors; current and former senior officials, including presidential staffers from previous administrations; mayors and other local authorities; and police officers.

Corruption: Since the 2014 indictment of the entire board of directors of the Social Security Institute, prosecutors filed charges against 54 persons, including former government officials and business and labor leaders; many were charged in multiple cases. As of September, 37 individuals had been arrested and two convicted of bribery and money laundering, including prominent businessman Jose Bertetty. In June the government brought charges against public officials at the Ministry of Health and employees of the private company Astropharma, including the vice president of the National Congress, Lena Gutierrez, and three members of her family. As of November 30, the case was in the preliminary-hearing stage.

A widespread public perception remained that the government's anticorruption institutions did not take sufficient steps to contain corruption and were unwilling or lacked the professional capacity and resources to investigate, arrest, and prosecute those involved in high-level corruption. In November the Association for a More Just Society, Transparency International's domestic partner, released its first reports on education and security following Transparency International's 2014 agreement with the government designed to promote and encourage transparency. The association found significant failings in the Ministries of Education and Security regarding compliance with required procedures, including in procurement and human resource management. C-Libre reported that in the first nine months of the year, more than 30 threats were made against individuals who reported public corruption, including 18 threats against journalists and social communicators.

The Corruption Prosecutor's Office in the Public Ministry continued to make slow progress in prosecuting cases involving public officials implicated in acts of corruption and abuse of power. Between March and June 2014, the office presented 16 cases totaling 61 indictments. In the same period, 13 individuals the office presented were convicted, including three cases filed after March 2014. Through July courts of first instance (Juzgados de Letras) had issued verdicts in 86 cases, including 51 new cases received during the year. As of the end of August, trial courts had received 45 new cases linked to corruption, recorded 13 convictions, and granted four acquittals. The Corruption Prosecutor's Office more than doubled its staff by adding 55 prosecutors in June.

Financial Disclosure: Public officials are subject to financial disclosure laws, but compliance with the laws was mixed. The law mandates the Supreme Financial Tribunal (TSC) to monitor and verify disclosures. The TSC published its reports on its website and published the names of public officials who did not comply with disclosure laws. A special nominating board that recommends candidates for the Supreme Court asked the candidates

to submit financial disclosures.

Public Access to Information: The law provides for public access to government information for citizens, and the government generally implemented it effectively. In 2014 the National Congress passed a controversial law giving the National Security and Defense Council the authority to classify information that puts national security and defense at risk. NGOs and some members of congress criticized both the breadth of the law and the manner in which the congress approved it.

All institutions receiving public funding are required to disclose their expenditures and to present an annual report for the prior year's activities to the National Congress 40 days after the end of the fiscal year. The IAIP operated a website through which citizens could request information from government agencies. The IAIP is responsible for verifying that government institutions comply with transparency rules and practices for access to public information. Although the IAIP reported in June that nearly one-third of government agencies were deficient in providing legally required reports and information, the majority met minimum transparency standards. In September the government launched a municipal portal for transparency designed so that each municipality can use it to disclose public information. If a government agency denies a request for public information, a party can submit a claim to the IAIP, which has the authority to grant a resolution, including sanctioning noncompliance with fines. In the first nine months of the year, the IAIP received 14 complaints (down from 51 the previous year); it resolved one of them and as of October was investigating 13.

Jamaica

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 government continued efforts to interdict and prosecute officials' corrupt practices and raise public awareness on corruption. Media and civil society organizations, however, continued to criticize the DPP for being slow and at times reluctant to prosecute corruption cases. For example, the DPP did not order an investigation of a former mayor for nepotism in the award of public contracts until after a court, in December, ruled in favor of the Contractor General in deciding the DPP could prosecute.

The Ministry of Justice and the Attorney General's Office have overall responsibility to combat official corruption; other ministries were responsible for their own investigations.

Corruption: Through September the JCF's Major Organized Crime and Anti-Corruption Agency arrested and charged 10 officials for public-sector corruption and 22 police officers for corruption. During the same period, courts reached 27 convictions, three acquittals, and 14 dismissals. Pending in the courts were 159 corruption cases from 2008 to 2015.

Financial Disclosure: The Corruption Prevention Act requires public servants earning two million JMD (\$16,800) or more per year to disclose income, liabilities, and assets annually, and carries administrative sanctions for noncompliance. In February, 51 employees from the country's central bank, including the senior deputy governor, pleaded guilty and were fined between \$3,000 JMD (\$25) and \$5,000 JMD (\$42) each for failing to file statutory declarations in the previous three years. The Commission for the Prevention of Corruption, which implements this law, stated that 38 percent of required declarations remained outstanding. It cited lack of awareness among public servants as the primary reason for the low rate of compliance, and established in February a public education

program across all government entities.

Public Access to Information: The Access to Information Act authorizes public access to government information. Although the last mandatory review of the law concluded in 2010, the government generally implemented the law effectively. The act does not include a mechanism to sanction or penalize officials who do not respond to access-to-information applications. Documents exempt from disclosure include those classified for national security reasons; those considered confidential to protect essential public interests or the private or business affairs of others; cabinet documents; investigative documents compiled for law enforcement proceedings; those affecting the national economy, personal privacy, or the government's deliberative process; and documents subject to legal privilege. The government must inform all requesters in writing within 30 days of receipt of the application if it will disclose the information and of the right to appeal disclosure denials.

Mexico

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for official corruption, but the government did not enforce the law effectively. There were numerous reports of government corruption during the year. Corruption at the most basic level involved paying bribes for routine services or in lieu of fines to administrative officials and security forces. More sophisticated and less apparent forms of corruption included overpaying for goods and services to provide payment to elected officials and political parties.

By law all new applicants for federal law enforcement jobs (and other sensitive positions) must pass a vetting process upon entry into service and every two years thereafter throughout their careers. According to SEGOB and the National Center of Certification and Accreditation, most active police officers at the national, state, and municipal level underwent at least initial vetting. Nevertheless, the CNDH continued to report police, particularly at the state and local level, were involved in kidnapping, extortion, and providing protection for, or acting directly on behalf of, organized crime and drug traffickers.

Corruption: Responsibility for investigating federal police criminal or administrative abuse falls under the purview of the PGR or the Office of Public Administration (SFP), depending on the type of offense. In 2012 the country adopted the Federal Law Against Corruption in Public Procurement, which prohibits companies and individuals from offering money or gifts to secure a business advantage in the procurement of public contracts with the government. Observers considered the agencies generally effective and adequately resourced, but there was broad public criticism that corruption was not investigated, prosecuted, and punished. In November the PGR Office of the Special Prosecutor for Electoral Crimes (Fepade) filed for the arrest of the former Green Party president for distributing 10,000 discount club cards to voters in the June midterm elections. On November 25, he resigned from his position as the SEGOB undersecretary for prevention and citizen participation. The investigation continued at year's end.

Financial Disclosure: The law requires all federal and state-level appointed or elected officials from the middle to high ranks to provide income and asset disclosure. The SFP monitors disclosures with support from each agency. Disclosures are required at the beginning and end of employment, and yearly updates are also required. Declarations are not made publicly available unless the official provides consent. Criminal or administrative sanctions apply for abuses.

Public Access to Information: The government passed the General Law on Transparency in

February, which grants free public access to government information at the state and federal levels. Authorities implemented the law effectively. The law includes exceptions to disclosure of government information, including for information that may compromise national security, affect the conduct of foreign relations, harm the country's financial stability, endanger another person's life, or for information relating to pending law enforcement investigations. The law also limits disclosure of personal information to third parties.

Nicaragua

Section 4. Corruption and Lack of Transparency in Government

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

Executive branch officials continued to disburse economic and developmental assistance funds lent by the Venezuelan-led Bolivarian Alliance for the Peoples of Our America (ALBA), which averaged more than \$500 million dollars annually, outside the normal budgetary process controlled by the legislature. The media reported that ALBA-funded contracts were awarded to companies with ties to the Ortega family and noted the funds from Venezuela served as a separate budget tightly controlled by the FSLN, with little public oversight.

Independent media, human rights groups, and opposition parties reported President Ortega's administration blurred distinctions between the FSLN and the government through its use of FSLN-led family cabinets and party-controlled Sandinista leadership committees (CLSs). The government administered subsidized food, housing, vaccinations, access to clinics, and other government benefits directly through either the family cabinets or CLS system, which reportedly often coerced citizens into FSLN membership and denied services to opposition members. Persons seeking to obtain or retain public sector employment, national identity documents, or voter registration were obliged to obtain recommendation letters from CLS block captains. The government continued to devolve legal responsibilities to Family Cabinets, community-based bodies operating in the same fashion as CPCs, specifically regarding mediation processes in cases of domestic violence.

In 2013 the government awarded a 50-year concession, with the possibility of a 50-year extension, to the Hong Kong Nicaraguan Canal Development Investment Company (HKND) to build and operate an interoceanic canal through the country. The concession was awarded with little or no previous public debate and without an openly competitive process. Civil society organizations, scientists, environmentalists, and indigenous groups expressed concerns over the project, mainly due to lack of information or public consultation regarding the concession process, the potential environmental and social impact, and the technical and economic feasibility of the canal. Additionally, landowners along the canal route protested the law's provisions that their land is to be bought at cadastral and not market value. Following the announcement of the concession, more than 50 marches occurred protesting the construction of the interoceanic canal, with the largest occurring in Managua on October 27. On November 5, the Nicaraguan National Commission for the Grand Interoceanic Canal approved an international firm's environmental and social impact study commissioned by HKND. Independent national and international environmental specialists stated the study was vague in some areas and that it required further scientific studies and public consultations to fully comply with international standards.

Corruption: The courts remained particularly susceptible to bribes, manipulation, and other forms of corruption, especially by the FSLN, giving the sense that the FSLN heavily influenced CSJ actions. Observers noted delays in the administration of justice, such as in the cases of those arrested in Mina El Limon and Chichigalpa. The judge did not hold the initial hearings, stating he had health problems, but he held other hearings and was present at court during the same period. The time allotted by law to start the hearings expired. Some observers suggested a specific political motivation in keeping those arrested in jail was a concern that the protests endangered economic interests affecting the ruling party.

Financial Disclosure: Public officials were subject to financial disclosure laws. The law requires these declarations be made public and provides for sanctions in cases of noncompliance. The Office of the Comptroller is responsible for combating corruption within government agencies and offices. Observers, however, questioned the impartiality of the comptroller, especially concerning the lack of oversight of ALBA funds given directly to the government. Since 2007 the comptroller had not investigated any government office or mandated sanctions due to noncompliance as required by law.

Public Access to Information: Although the law mandates public access to government information and statistics, lack of transparency and access to information remained serious problems. Delays and denial of information were common, while appeals mechanisms were overly burdensome and slow. Control over government information is centralized through the Communication and Citizenship Council, headed by First Lady Rosario Murillo, but there is no provision for that office in the law. Media and civil society organizations, such as CINCO and Foundation Violeta Barrios de Chamorro, repeatedly reported that requests for official information without express authorization from the council were often refused. The law provides for exceptions to disclosure in cases related to national security and trade secrets. There are no mandated timelines for compliance with disclosure requests.

Panama

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented these laws effectively. There were allegations that government officials and members of the previous government administration engaged in corrupt practices with impunity. Corruption remained a problem in the executive, judicial, and legislative branches as well as in the security forces.

Anticorruption mechanisms such as asset forfeiture, whistleblower, and witness protection, plea bargaining, and professional conflict-of-interest rules exist. In August, President Varela signed Law 53 establishing the judicial career, considered by many observers as a means to reduce corruption and judicial authorities' abuse of authority.

Corruption: The National Authority for Transparency and Access to Public Information (ANTAI) combats and investigates government corruption. During the year there were multiple credible allegations of corruption against current or former members of the government.

In March the government sentenced then Supreme Court Justice Alejandro Moncada Luna to 60 months in prison for illegal enrichment and document forgery and seized two luxury apartments and several bank accounts. Moncada Luna, who was barred from holding public office for five years after completion of his sentence, remained at the El Renacer prison at year's end.

In an open letter to the president of the board of directors of the Panama Canal Authority in August, the ANTAI administrator requested the removal of a board member under investigation for corruption during the Martinelli administration. The case demonstrated that the Panama Canal Authority's internal bylaws do not include sanctions against board members who engage in unethical activities or behavior.

During the year ANTAI opened dozens of investigations of alleged cases of nepotism, resulting in the resignations of 23 public servants. Other cases remained pending.

Corruption and a lack of accountability among the police continued to be a problem. The PNP's Office of Internal Affairs reported 747 new cases against police from January through September. In August the PNP began implementing a new policy that requires members of the PNP who serve as prison guards to rotate to other police functions after two years. The policy aims to reduce corrupt behavior by members of the PNP who have been at one prison for an extended period.

In January a judge denied former vice minister of commerce Luis Eduardo Camacho Gonzalez's request to dismiss the 2014 embezzlement case against him, and the case continued during the year.

The investigative phase of the case, filed in mid-2014, against former minister of labor Alma Cortes related to misuse of travel funds and improper claims for reimbursement continued as of September.

Financial Disclosure: The law requires certain executive and judiciary officials to submit a financial disclosure statement with the Comptroller General's Office. The information is not made public unless the official grants permission for public access.

In August, ANTAI instituted a standardized reporting form for all government authorities, including the executive, legislative, and judicial branches, to be submitted for each official trip made overseas.

Public Access to Information: The law provides for public access to information about public entities, with the exception of cabinet meeting minutes. ANTAI statistics as of April showed 53 requests for access of information, 23 of which the government offices fulfilled; the others remained pending as of September. Citizens can appeal denials of information to the Supreme Court. Deadlines are 30 days, and there are no processing fees. There are sanctions, primarily fines, for noncompliance.

Paraguay

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, but the government generally did not implement the law effectively. Officials in all branches and at all levels of government frequently engaged in corrupt practices with impunity. Cases typically spent several years in the courts. Under a law that prohibits court cases from lasting longer than four years, politicians convicted in lower courts routinely avoided punishment by filing appeals and motions until reaching the statute of limitations.

Corruption: During the year several high-profile public-sector corruption cases resulted in both voluntary and forced resignations. In some instances the Attorney General's Office indicted individuals for corruption and convicted at least three former ministerial level officials for acts committed under previous administrations. Nevertheless, impunity continued to be pervasive.

On May 19, the Attorney General's Office indicted former national police commander Francisco Alvarenga and remanded him to house arrest for illicit enrichment. President Cartes removed Alvarenga from his post on May 18 due to allegations that he and his son had stolen and sold gasoline worth more than Gs. 1.2 billion (\$200,000) from police motor pool facilities. The case was pending at year's end.

Financial Disclosure: The constitution requires all public employees, including elected officials and employees of independent government entities, to disclose their income and assets within 15 days after taking office or receiving an appointment and again within 15 days after finishing their term or assignment. Public employees must also disclose assets and income of spouses and dependent children.

The law mandates the Comptroller's Office to monitor and verify disclosures, which may make income and asset disclosures public only at the request of the executive branch, Congress, the Attorney General's Office, or judicial authorities. The Attorney General's Office occasionally opened investigations for inconsistencies in the disclosures.

The law bars public employees from government positions for up to 10 years for failure to comply with financial disclosure laws and imposes monetary fines of up to Gs. 19.1 million (\$3,350). The law obligates the Comptroller's Office to monitor all disclosures. Filings often were late, incomplete, or misleading. In addition, many simply did not disclose their finances. Legislators generally ignored the law with impunity, using political immunity to avoid investigation or prosecution. During the year the Superior Court of Electoral Justice suspended and terminated 142 employees for not meeting reporting requirements.

Public Access to Information: The constitution guarantees public access to government information. Citizens and noncitizens, including foreign media, had access to government information.

On September 17, the president officially signed the implementing regulations bringing the 2014 Access to Public Information Law into effect, which require all government agencies to provide requested information within 15 days.

Peru

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for officials engaged in corruption; however, the government did not always implement the law effectively, and officials often engaged in corrupt practices with impunity. There were numerous reports of government corruption during the year. There was a widespread perception that corruption was pervasive in all branches of government.

Corruption: The governmental Public Service Office, which reports directly to the cabinet, manages a registry of former government officials who are no longer eligible for public service due to corruption crimes. As of October, 10 of the 25 regional governors were either under preliminary investigation or appealing corruption-related charges, and electoral authorities barred two additional elected governors from serving based on corruption charges against them. Electoral authorities suspended one governor in September due to his June conviction on corruption charges. An appeals court affirmed the ruling in November. One former regional governor under investigation for corruption remained a fugitive at year's end.

There were allegations of widespread corruption in the judicial system. The new criminal procedural code, although not implemented in Lima and Callao Region, was applied to

corruption cases in those judicial districts. In May authorities dismissed Attorney General Carlos Ramos Heredia for impeding investigations into corruption networks orchestrated by former regional governor Cesar Alvarez and businessman Rodolfo Orellana. In 2014 authorities arrested Alvarez for homicide and corruption-related crimes and Orellana for fraud and money laundering. Both were accused of bribing vast networks of police officers, judges, prosecutors, and other public officials to protect themselves from prosecution for illegal and corrupt acts. A special congressional investigative commission, the Public Ministry, and the National Magistrates Council continued investigations into the networks.

Members of congress enjoy congressional immunity and may not be prosecuted for any acts during their time in the legislature. In the case of flagrant crimes, the judicial branch may request that congress lift immunity and allow the arrest of a member. By law congressional immunity does not apply to crimes committed before the member was sworn in, but it impeded most prosecutions. It also does not officially protect members of congress from civil crimes, such as failure to fulfill contracts or pay child support. As of September the Congressional Ethics Committee investigated and suspended four members of congress and was investigating 15 other members for questionable activities ranging from inappropriately reducing employee salaries to links to corruption networks.

Corruption in prisons was a serious problem, and in some cases guards cooperated with criminal bosses who oversaw the smuggling of guns and drugs into prisons. There were several reports of military corruption, impunity, and resistance in providing information on military personnel under investigation for human rights abuses committed during the country's internal armed conflict. Security forces sought to strengthen accountability with training in human rights and the revision of disciplinary procedures but were doing so slowly.

Financial Disclosure: Most public officials by law must submit personal financial information to the Office of the Comptroller General prior to taking office and periodically thereafter. The office monitors and verifies disclosures, but the law was not strongly enforced. There are administrative sanctions for noncompliance that escalate from 30-day to one-year suspensions, include bans on signing government contracts, and culminate with a bar to holding government office. Declarations are made available to the public.

Public Access to Information: The law provides for public access to government information, and most ministries and central offices provided information on websites. Implementation of the law was incomplete, particularly outside of Lima, where few citizens exercised or understood their right to information. The ombudsman encouraged regional governments to adopt more-transparent practices for releasing information and monitored their compliance with the requirement for public hearings at least twice a year.

The law has a narrow list of exceptions outlining grounds for nondisclosure that includes classified and protected information, including topics of national security, intelligence, police investigations, and advanced technology. The law requires a reasonable timeline for officials to disclose financial information, at the beginning of the first quarter of every year, and does not require the official to bear any processing fees. The ombudsman reported that response times to information requests submitted to the Constitutional Court were often lengthy, varying from 18 to 36 months. The law imposes administrative, but not criminal, sanctions for noncompliance.

Saint Kitts and Nevis

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials. Parliament passed Integrity in Public Life legislation in 2013, but it had been not implemented as of November.

Corruption: The media and many private citizens reported that government corruption was a problem. In particular, private citizens continued to express concern about the lack of financial oversight of both the Sugar Industry Diversification Foundation (SIDF) and the Citizenship by Investment Program (CIP). The administration was auditing the SIDF and vacated the appointments of the SIDF committee. By the end of October, the government had not made public details regarding the operations of the SIDF and CIP.

Financial Disclosure: Public officials are not subject to financial disclosure laws. The Financial Intelligence Unit investigates reports on suspicious financial transactions, along with the police white-collar crime unit, but these reports were not available to the public.

Public Access to Information: While no laws provide for public access to government information, the government maintained a website and broadcast briefings of weekly cabinet meetings on radio and parliament meetings on television and radio.

Saint Lucia

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented these laws, but not always effectively. The government passed a public procurement and asset disposal bill in September that is designed to strengthen anticorruption laws. There were reports of government corruption during the year.

Corruption: Prime Minister Anthony said in September that corruption was “rampant and rife in the private sector and public.” Although no officials were charged, there were investigations of police officers for misappropriation.

The parliamentary commissioner, auditor general, and Public Services Commission are responsible for combating corruption. Parliament can also appoint a special committee to investigate specific allegations of corruption. These agencies did not collaborate with civil society. While the agencies were independent, lack of resources hampered their effectiveness.

Financial Disclosure: High-level government officials, including elected officials, were subject to annual disclosure of their financial assets to the Integrity Commission, a constitutionally established entity. While authorities do not make public the disclosure reports filed by individuals, the commission submits a report to parliament each year. The commission lacked sanctions to compel compliance with the law, and as a result compliance was low.

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

Saint Vincent and the Grenadines

Section 4. Corruption and Lack of Transparency in Government

Rumors of high-level corruption persisted, but there were no cases during the year to substantiate these claims. The law provides criminal penalties for official corruption.

Corruption: Allegations of political handouts and other forms of low-level corruption in the time leading up to the 2010 election continued to plague both parties ahead of anticipated upcoming elections. Such bribes were historically a part of the country's political culture. The government stated there was no need to have a national anticorruption agency. The law provides the DPP with the authority to prosecute the following offenses related to official corruption: extortion by public officers, public officers receiving property to show favor, false claims by officials, abuse of office, and false certification by public officers.

In October 2014 officials fined Tamara Gibson-Marks, former registrar of the High Court, \$10,500 Eastern Caribbean Dollars (XCD) (\$3,900), after she pleaded guilty to charges of theft and abuse of authority while serving in public office. The DPP dropped a third corruption charge related to false certification by public officers after Gibson-Marks plead guilty to the other two charges.

Members of the public called for the resignation of the commissioner of police when he attended a political rally in plain clothes and showed support for the prime minister's party. The media and the public questioned his ability to perform official duties objectively when he was expressing a political view so publicly. The individual was a political appointee whose mandatory retirement was extended so he could continue to serve as commissioner of police.

Financial Disclosure: There are no financial disclosure laws for public officials.

Public Access to Information: The law provides for public access to information. Human rights organizations considered the mechanism for gaining access deficient and assisted individuals in obtaining information. There was a narrow list of exceptions outlining the grounds for nondisclosure but no specific timeline for the relevant authority to disclose or respond. There are no criminal or administrative sanctions for not providing a response, and there is no appeal mechanism for review of a disclosure denial. There were public outreach activities via radio call-in shows encouraging use of the access process.

Suriname

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. No cases came to trial during the year, although at least three suspects were under investigation. The World Bank's worldwide governance statistics continued to indicate corruption was a serious problem.

Corruption: Widespread allegations of corruption at all levels of government continued, particularly regarding land issuance, mineral and timber concessions, government contracting, and residency permits. There was a continuing widespread perception that officials used public power for private gain.

Various sections of the Ministry of Justice and Police, including the Fraud Police and the Attorney General's Office, are responsible for investigating and prosecuting government corruption. Civil society, the media, and other nongovernmental parties particularly scrutinized and criticized the Ministries of Natural Resources, Public Works, Social Affairs, Justice and Police, and Physical Planning, alleging widespread corruption and favoritism.

The Attorney General's Office showed a willingness to investigate claims of corruption throughout the year. In August the office launched a criminal investigation of officials of the state-owned electricity company, based on a report by the Central Government

Accounting Office, which identified numerous financial irregularities, including overpayment for non-delivered goods and unauthorized contracting. Three persons face prosecution in this case.

The Ministry of Justice and Police commenced an investigation of its Alien Services Department in September into bribes allegedly taken for issuance of residency permits. An arsonist burned down the subject office days after the minister dismissed all suspect staffers. A criminal investigation by the Attorney General's Office was ongoing.

The Ministry of Justice and Police removed and disciplined personnel of the Drivers' License Department after an investigation revealed that staff members sold driver's licenses.

Financial Disclosure: Officials were not subject to financial disclosure laws.

Public Access to Information: No law requires public disclosure of information. Although occasionally granted, access remained very limited in certain areas. There is a centralized office for media and information requests under the Office of the President. Gaps in official government statistics and bureaucratic hurdles made obtaining information difficult. There were no administrative or criminal sanctions for nondisclosure and no appeals mechanism.

Trinidad and Tobago

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. There were numerous reports of government corruption during the year, and the World Economic Forum Global Competitiveness Report ranked corruption as the second-most problematic factor to doing business in the country. Parliament passed procurement legislation but did not implement it, investigative capacity was weak, and there were no documented instances of individuals receiving a criminal punishment for alleged corruption.

Corruption: Corruption in the police and immigration services continued to be a problem, with senior officials acknowledging that officers participated in corrupt and illegal activities. There were allegations that some police officers had close relationships with gang leaders and that police, customs, and immigration officers often accepted bribes to facilitate drug, weapons, and human trafficking. There were also allegations that police officers participated directly in the trafficking of persons and commonly frequented illegal brothels. To help combat corruption in the prison services, prison guards are required to pass through screening devices to prevent smuggling contraband. There is no internal affairs unit responsible for investigating incidents of professional misconduct attributed to law enforcement officials.

There were continued allegations that some ministers used their positions for personal gain. In December the incoming minister of energy fired Super Industrial Services, a favored contractor of the former government, for being more than 50 percent behind schedule on the construction of a one billion TDD (\$158 million) water treatment plant, for which it already received 760 million TDD (\$121 million). The company owner, Krishna Lalla, shielded his assets behind a third company and abruptly left the country for Panama days after the September elections resulted in a new government.

Financial Disclosure: The law mandates that public officials disclose their assets, income, and liabilities to the Integrity Commission, which monitors, verifies, and publishes

disclosures. Officials and candidates for public office were reluctant to comply with asset disclosure rules, primarily because of the perceived invasiveness of the process. The act stipulates a process when public officials fail to disclose assets and provides criminal penalties for failure to comply. The law clearly states which assets, liabilities, and interests public officials must declare, but in 2014 the commission stated that because of staffing shortages, it was unable to publish the names of those who failed to provide necessary supporting information.

While the commission undertook numerous investigations, it seldom referred cases to law enforcement authorities, and prosecution of those officials who refused to comply with asset disclosure rules was very limited. The Integrity Commission experienced turnover in its leadership positions and staffing shortages, and the media and public regularly raised questions about its effectiveness.

Public Access to Information: The law provides for public access to government documents. It includes a sufficiently narrow list of exceptions outlining the grounds for nondisclosure, although some critics charged that authorities exempted a growing number of public bodies from the law's coverage. The law has an appeal mechanism for review of disclosure denials. Critics also noted the law does not have an enforcement mechanism if the government does not respond within the prescribed 30-day period. Criminal penalties, including imprisonment, exist for those who destroy documents of record, but there are no sanctions or other penalties for officials who do not comply with the procedural requirements of the law. The government maintained an easily navigable website on how to use the law effectively.

Uruguay

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by officials, and the government generally implemented the law effectively. Officials sometimes engaged in corrupt practices that authorities addressed with appropriate legal action.

Corruption: A three-member Advisory Economic and Financial Board is responsible for promoting transparency in government and implementing preventive measures in the fight against corruption. It serves as an advisory board for the executive branch and collects financial disclosure information from appointed and elected government officials.

Financial Disclosure: The law requires income and asset disclosure by appointed and elected officials. Each year the presidentially appointed Transparency and Ethics Board lists the names of government officials expected to file a declaration on its web page and informs the individuals' organizations of those expected to comply. The incumbent, the judiciary, a special congressional committee, or the board may access the information in the declarations (by majority vote of the board). The board may direct an official's office to retain 50 percent of the employee's salary until the declaration is presented, and it may publish the names of those who fail to comply in the federal register.

Public Access to Information: The Public Information Access Law, which defines public access to government information as a human right, provides for general access to public information. By law public information includes all information held by a government entity, except information considered classified. The law requires government agencies to make public their organizational charts, responsibilities, salaries, and budget allotment and to produce regular reports. Authorities effectively implemented the law; however, there were no public outreach activities to encourage its use.

Venezuela

Section 4. Corruption and Lack of Transparency in Government

The law provides criminal penalties for corruption by government officials, but the government did not implement the law effectively, and the press reported officials sometimes engaged in corrupt practices with impunity. The government frequently investigated and prosecuted its political opponents selectively on corruption charges to harass, intimidate, or imprison them. In July the Comptroller General's Office declared several opposition-aligned politicians ineligible to hold public office based on allegations of corruption but did not levy bans against government-aligned politicians in similar circumstances. There were numerous reports of government corruption during the year. The Public Ministry cited numerous examples of investigations, stemming largely from improprieties in the distribution and sale of price-controlled items and government currency allocations.

Corruption: The government continued a campaign to tackle corruption through fast-track authority and executive powers, but critics contended the government's efforts focused only on low- to mid-level public officials while targeting high-level opposition politicians. The campaign includes enforcement against smuggling of goods carried out by private citizens as part of what the government calls the fight against the "economic war" waged by the political opposition and foreign governments. According to the NGO Transparency Venezuela, weak government institutions and a lack of transparency allowed public officials at all levels to participate in corrupt activity with impunity.

On April 1, the Public Ministry filed charges against a judge in the 20th Judicial Circuit of Caracas for corruption on the grounds that the judge issued "too lenient" a sentence in a high-profile narcotics trafficking case.

The Public Ministry and the Office of the Human Rights Ombudsman also investigate abuses by police and military officials. Corruption was a major problem in all police forces, whose members were generally poorly paid and minimally trained. Some government officials explicitly acknowledged impunity for corruption as a major problem. There was no information publicly available about the number of cases involving police and military officials during the year, although the Public Ministry publicized several individual cases against police officers for soliciting bribes and other monetary corruption. In one instance the ministry cited the arrest and investigation of four Aragua State police officers for allegedly soliciting a bribe to drop charges against a person suspected of trafficking in narcotics.

On May 15, Attorney General Luisa Ortega Diaz reported that 277 individuals had been convicted on charges of corruption stemming from misuse of the government's Foreign Exchange Administration Commission and that an additional 7,000 companies were under investigation for potential violations. Ortega stated that low-level government officials were prosecuted and convicted of crimes related to foreign-exchange adjudications, but disclosed no specific numbers.

On September 24, the Public Ministry reported the arrest and conviction of Jose Gregorio Velasquez Lozada, director of health economy at the Ministry of Health in Aragua State, on allegations of fraud and embezzlement stemming from the alleged misappropriation of 531,000 units of medical supplies.

Transparency Venezuela criticized the widespread practice of nepotism in the government in a September 21 announcement, citing the example of Minister of Housing, Habitat, and Eco-socialism Ricardo Molina, who appointed his wife, children, and other family

members to serve in positions within the ministry. The NGO noted that nepotism of this type was not specifically illegal, which undercut effective oversight of improper benefits.

Financial Disclosure: The law requires public officials, as well as all directors and members of the boards of private companies, to submit sworn financial disclosure statements. The entities responsible for ensuring compliance with this requirement are the Central Bank; the comptroller general of the republic; the comptroller general of the armed forces; and the comptrollers of states, districts, metropolitan districts, and municipalities. By law the Public Ministry and competent criminal courts may require statements from any other persons when circumstantial evidence arises during an investigation. In 2014 (the most recent data available), the Public Ministry cited 12,319 complaints or grievances of corruption, leading to charges against 2,326 individuals.

Public Access to Information: Although the law provides for public access to government information, human rights groups reported the government routinely ignored this requirement. The law requires a government agency to respond to a petition within 20 days of filing. The agency must also notify the applicant within five days of any missing information needed to process the request. Government agencies are subject to sanctions if they do not respond to a request. If the agency rejects the petition, an individual may file another petition or appeal to a higher level within the government agency. The agency must respond to the appeal within 15 days. In a June presentation to the UN Human Rights Council, the Pro Access Coalition, composed of NGOs advocating for the right to access public information, denounced difficulties in accessing public information. According to a 2013 study by the coalition, the government ignored 94 percent of citizen petitions for information, a trend cited as continuing during the year.