



**TRANSPARENCY INTERNATIONAL | USA**

*Working to Strengthen Integrity, Enhance Transparency and  
Combat Corruption in the United States and Internationally*



*2015 Annual Report*

## Foreword



In 2015, the global community continued to see everyday headlines about continued corruption. Examples of institutional and endemic corruption of staggering proportions came to light – namely the unfolding Petrobras scandal, the start of criminal investigations against FIFA officials, and the arrest of the President of Guatemala over his involvement in a corruption scheme, among others. The Corruption Perceptions Index 2015 showed that our world is still rife with corruption but it also saw small improvements in a majority of countries. Perhaps more impactful, in places like Guatemala, South Africa, Sri Lanka and Ghana, citizen activists and everyday citizens took

to the streets, made their voices heard to try to end, sometimes successfully, the impunity enjoyed by corrupt public officials. These decisive collective citizen actions have inspired and presented us with hope and support for our belief that if we work together, we can rid our societies of corruption.

In the United States, we continued to see scandals plague state and federal government and the private sector. These included the arrests and charges of corruption against New York Assembly Speaker Sheldon Silver and, in a separate case, Senate leader Dean Skelos; and the unfolding of the Navy contracting scandal involving charges and arrest of high level Navy officials who received “gifts” in exchange for Navy contracts.

We share the U.S. public’s sense of urgency in restoring the integrity of the U.S. federal and state electoral system and promoting the integrity of elected officials; preventing the transfer, laundering and hiding of corruptly acquired monies and assets; promoting open government and good governance in our public institutions; and promoting corporate adherence to integrity and transparency standards. We, at TI-USA, are committed to continuing our work and broadening our impact on these key American issues.

We are grateful for all the support – financial and of time and effort – we received in 2015 from individuals, enterprises and institutions who share our vision. We look forward to continuing our efforts and welcoming new allies to join our cause to strengthen integrity, enhance transparency and combat corruption in the United States and internationally.

**Claudia J. Dumas, President and CEO**

# TI-USA: A Force for Reform

## Our Mission:

Transparency International-USA (TI-USA) works to strengthen integrity, enhance transparency and combat corruption in the United States and internationally.

## Our Programmatic Priorities:

In implementing our mission, TI-USA focuses on the following priorities:

- Greater transparency and integrity in U.S. governance
- The effective enforcement of global anti-corruption laws and standards;
- Increased integrity and strengthened anti-corruption standards and practices in the private sector;
- Prevention of corruption in international development.

## Our Work:

In 2015, TI-USA worked towards these goals by

- **Informing** rule-making and policy developments in U.S. and international organizations by presenting rigorous analyses and implementable recommendations;
- **Engaging and bringing together** leaders in government, business, labor, academia, and civil society;
- **Advocating** in writing through articles and social media; and
- **Public speaking** to reach wider and diverse audiences.

This report highlights some key actions during 2015. We thank our supporters, listed at the end of this report, for their time, expertise and financial support.

## Spotlighting Integrity: 2015 Integrity Award Dinner



TI-USA's 2015 Integrity Award Dinner, recognizing leaders who have contributed to the fight against corruption, was held on December 3 in Washington, D.C.

TI-USA honored President Jimmy Carter with the TI-USA Integrity Award in recognition of his lifelong commitment to honest government, as exemplified by the reforms he championed as President to further honesty and

transparency in the U. S. Government and his inspirational leadership since leaving office in promoting free and fair elections and human dignity worldwide. PepsiCo received the TI-USA Corporate Leadership Award for its commitment to integrity, transparency and anti-corruption compliance in its operations and those of its suppliers around the world.

More than 300 leaders from civil society organizations, U.S. Government, business, and the international diplomatic community attended the award ceremony. President Carter was unable to attend the Dinner but, to the delight of the attendees, sent a video acceptance speech. Ambassador Stuart Eizenstat accepted the award on behalf of President Carter.

In accepting the award, Ambassador Eizenstat noted: "It is rare that an organization [TI-USA] and its awardee [President Carter] have such striking similar goals which each has pursued with great success -- to improve transparency, integrity, and accountability in government, in business, and in all sectors."

Tony West, Executive Vice President of Public Policy and Government Affairs, General Counsel and Corporate Secretary, PepsiCo, accepted the award on behalf of PepsiCo. Mr. West, in his comments, stated that he believes that "companies that can demonstrate that they are operating from an ethical foundation; ... that can challenge their own internal thinking to expand their circle of concern, their circle of influence to include all of the corporation's stakeholders; that can pursue actions that can maximize quarterly returns as well as the duration of shareholder returns over the long term ... for those companies, their social license to operate will continue to be renewed because they will continue to build trust and ... build strength within the societal ecosystems in which they operate. The work that TI-USA does reminds us of this, which is why the work that you all do is so important and the recognition that you bestow with this reward is significant."

In the fall of 2016, we will again invite supporters and allies to support our Integrity Award Dinner to celebrate enduring commitment and contributions to our mission.

## Greater Transparency and Integrity in U.S. Governance



TI-USA works to increase government transparency and accountability, strengthen institutions, enable citizen oversight and ultimately ensure that U.S. federal, state and local governments are accountable to the public they serve. Among the initiatives TI-USA pursued in 2015 are the following:

### **Elections and Elected Officials' Integrity**

On April 22, 2015, TI-USA issued a policy statement setting forth ten recommendations to strengthen the integrity of federal and state elections and elected officials. The recommendations include a call for the full, timely and evenhanded disclosure of the original funding sources of PACs and super PACs, the development of effective rules to ensure that independent political spending is not coordinated with a candidate's campaign, and stronger and more uniform laws restricting the size and requiring the disclosure of gifts to elected officials. The statement also includes specific provisions regarding judges, who are elected in some states. It urges especially close scrutiny and full disclosure of spending in connection with the election of judges, selection systems that emphasize merit, and that judges be required to recuse themselves from cases in which one of the parties was a significant election supporter. Asset and outside income disclosures by elected officials are also recommended. TI-USA will continue promoting the adoption of these recommendations. The policy statement can be found [here](#).

### **Enhancing Public Oversight of Procurement**

TI-USA seeks to advance procurement reforms both domestically and internationally, including through the use of TI-USA's [Civil Society Procurement Monitoring Tool](#) (CSPM Tool).

- Using TI-USA's on-line tool that allows non-governmental organizations to monitor public procurements for red flags of corruption, TI-USA and students from the American University School of International Service conducted monitored 21 procurements in Washington, DC, Prince George's County, Maryland, and Arlington, Virginia. At a gathering hosted by Weil, Gotshal & Manges LLP, TI-USA presented the findings of this project to a group of local civil society, business, and government leaders in an animated discussion about how to improve local public procurement practices.
- In response to the findings of this procurement pilot, TI-USA initiated a project in collaboration with the Center for the Advancement of Public Integrity of Columbia Law School and the American University School of International Service in which students are conducting a comparative assessment of the transparency of procurement systems of the 12 largest U.S. states by population. We plan to use these findings to provoke a discussion and actions by state officials to strengthen procurement transparency and integrity across the United States. .
- Working with TI chapters in Latin America, TI-USA developed a concept note for the monitoring of large infrastructure projects in the Northern Triangle. This project is especially timely in light of the \$750 million aid package approved by Congress for the region conditioned on the need for stronger tools to strengthen institutions and promote the participation of civil society to prevent and combat corruption. .
- TI-USA continued to provide technical support to TI-Rwanda, which is using the CSPM Tool to monitor approximately 20 infrastructure projects. The CSPM Tool has proven useful in identifying instances in which procurement officials have not followed procurement regulations.

### **Extractive Industries Transparency**

TI-USA continued to participate in the U.S. Multi-Stakeholder Group (MSG) for the Extractive Industries Transparency Initiative (EITI), contributing to the MSG's issuance of its first U.S. report. Under EITI, participating governments work with company and civil society representatives to produce annual reports that help citizens understand how the government

manages its extractive sectors. Central to these annual reports is reconciling government revenues with payments made by industry. The seminal 2015 report contains a discussion of the sustainability of extraction in 12 leading producing counties, a reconciliation report of Department of Interior (DOI) revenues with company payments, and a reconciliation report of Internal Revenue Service receipts with company tax payments. A website was also created to showcase report information in an interactive format and additional information not included in the report.

For the report, DOI provided figures on all payments it received on a company-by-company basis with 31 of 45 companies that paid DOI at least \$50 million reporting their payments to DOI for reconciliation. On the tax side, only 12 of 45 companies reported their tax payments and only 5 agreed to reconciliation. Civil society groups represented on the MSG are exploring ways to encourage greater reporting for the next report to increase the value of EITI in the U.S. and support compliance with the international EITI standards.

## Effective Enforcement of Global Anti-Corruption

### Laws and Standards



TI-USA promotes effective enforcement of international conventions and standards, and the inclusion of anti-bribery and transparency requirements in trade agreements. To enhance our efforts, TI-USA worked collaboratively with numerous civil society groups, as well as

the TI Secretariat and TI national chapters. Our 2015 initiatives in this area include:

#### **G20 Anti-Corruption Advocacy Work**

Home to two-thirds of the world's population, the G20 are responsible for 80 per cent of world trade and more than 85 per cent of the world economy. Tackling corruption is crucial to the G20's goal of generating strong and balanced growth and establishing a safer and more sustainable economic framework.

G20 leaders established the Anti-Corruption Working Group in 2010 and tasked it with developing bi-annual G20 Anti-Corruption Action Plans and with reporting annually on the progress. In 2015, the G-20 Anti-Corruption Working Group was co-chaired by Turkey and the United States, which provided TI-USA a unique opportunity to advocate for implementation and enforcement of the [G20 2015-2016 Anti-Corruption Action Plan](#).

TI-USA advocacy activities included:

- Preparing and presenting recommendations on key priorities to the Anti-Corruption Working Group. At the June meeting of the G20 Anti-Corruption Working Group, TI-USA presented the Civil 20 anti-corruption recommendations on procurement, beneficial

ownership transparency, and immunity from prosecution for public officials.

Representatives of the B20 Task Force on Anti-Corruption and Transparency, including IBLF Global, Fluor, General Electric and Bank of Montreal were also present at the meeting.

- TI-USA organized and led a discussion between G20 Anti-Corruption Working Group delegates and U.S. civil society organizations on beneficial ownership, public procurement and offsets.
- Collaborating with other civil society organizations to deepen our impact, we lead the Anti-Corruption Policy Group of InterAction, an alliance of more than 180 U.S.-based non-governmental organizations. TI-USA drafted the [Group's Anti-Corruption Policy Brief](#) to provide prioritized recommendations for the G20 Anti-Corruption Working Group.
- Contributing to TI policy papers on [beneficial ownership transparency](#), [public procurement](#), and the [role of financial sector in preventing corruption](#).
- Constructively engaging the U.S. Government on TI-USA policy recommendations through letters and meetings with U.S. officials in the National Security Council of the White House, State Department and Treasury Department.

Following TI-USA's and TI advocacy:

- [G20 Integrity in Public Procurement Principles](#) were adopted at the Summit. These include a number of TI and TI-USA's recommendations on transparency of awards, selection criteria, use of competitive tendering procedures, and adequate complaint mechanisms for suppliers.
- All G20 countries with the exception of Brazil and Saudi Arabia published their individual action plans for implementing the G20 Beneficial Ownership Principles. Publication of these plans was a TI recommendation.

China is the chair of the G20 for 2016 and has indicated that the major focus of the anti-corruption work will be on denial of entry to corrupt officials and repatriation.

**Ending Impunity: Beneficial Ownership Transparency**

One of TI-USA’s top priorities is to increase beneficial ownership transparency in the United States. Every year, approximately two million corporations, LLCs, and other business entities are formed in the United States—with many states [collecting less information](#) from the individuals forming these entities than from people applying for a driver’s license. Information about natural persons who directly or indirectly exercise substantial control and persons who receive substantial economic benefits from the company/legal entity is not collected. This anonymity facilitates domestic and foreign corruption by allowing individuals to hide their identities and their corruptly obtained assets behind the façade of a U.S. corporation. Once a U.S. corporation is formed, it can easily open one or more bank accounts, wire money, buy property like any other company, and engage in activities that launder the tainted funds. A 2011 study by the Stolen Asset Recovery Initiative – [“The Puppet Masters”](#) – found that in nearly all of the 150 grand corruption cases analyzed, corporate vehicles were misused to conceal the identities of corrupt public officials.

The U.S. government has pledged to increase transparency of companies formed in the United States in various fora such as the [Open Government Partnership National Action Plan](#), [G8 Action Plan for Transparency of Company Ownership and Control](#), and most recently the [G20 High Level Principles on Beneficial Ownership Transparency](#). However, meaningful progress in the U.S. remains elusive.

Our 2015 advocacy toward these goals included the following:

- Urging the Financial Crimes Enforcement Network (FinCEN) of the Department of the Treasury to close the loopholes in the current legal framework that allow corrupt individuals to launder money in the U.S. through anonymous real estate transactions. In February 2015, the New York Times published a multi-part investigative series [“Towers](#)

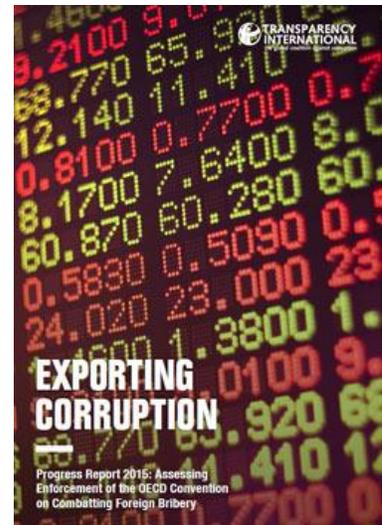
[of Secrecy](#)” showing how billions of dollars worth of luxury real estate in New York City has been purchased using anonymous companies by individuals under investigation for corruption and other crimes. Shortly thereafter, TI-USA sent a [letter](#) signed by 17 civil society organizations to FinCEN seeking action to close the loopholes that enable the corrupt to enjoy luxury lifestyles with ill-gotten gains. The New York Times printed an [article](#) on the advocacy letter with quotes from both Treasury and TI-USA. (As a result of our advocacy, the U.S. Department of Treasury [announced](#) in early 2016 that it would begin a 6 month pilot project for identifying and tracking secret buyers of high-end properties in two of the nation’s major destinations for global wealth: Manhattan and Miami-Dade County).

- Advocating that beneficial ownership information for all corporate bidders on World Bank-financed procurements be collected and published. In June 2015, we submitted a [letter](#) signed by 107 civil society organizations urging the World Bank to collect and publish beneficial ownership information for legal entity bidders on Bank-financed procurements. Reuters [published](#) a story on the letter with quotes from TI-USA and the World Bank’s Chief Procurement Officer. In July 2015, the Bank announced a [new procurement framework](#) that includes many of the recommendations and suggestions advocated by TI-USA. We will continue to monitor closely the development of the regulations that will accompany this new framework as well as how it is implemented.
- Reviewing the U.S. Section of TI’s report “[Just for Show? Reviewing G20 Promises on Beneficial Ownership](#)”, published in November, which concluded that the United States has a weak transparency legal framework, is not fully compliant with any of the G20 principles on beneficial ownership, and U.S. anti-money laundering laws have significant loopholes with respect to real estate industry.
- The B20 Anti-Corruption Task Force increased its focus on beneficial ownership transparency. TI confirmed that TI-USA’s advocacy work earlier in 2015 directed at the World Bank’s new procurement framework was an important factor in achieving

recommendations on beneficial ownership transparency in both the [Business 20 Policy Paper](#) and the [B20 Anti-Corruption Specific Policy Paper](#).

### **OECD Anti-Bribery Convention Enforcement**

TI-USA again contributed to TI's annual progress report on the Enforcement of the OECD Anti-Bribery Convention, [Exporting Corruption – Assessing Enforcement of the OECD Convention on Combating Foreign Bribery](#). TI-USA, with pro bono assistance from Steptoe & Johnson, LLP, provided TI with statistics and analysis on U.S. enforcement actions (investigations and settlements), information on major developments and recommendations for priority actions. The U.S. remains one of only four “active” enforcers of the OECD Anti-Bribery Convention. There are twenty countries, including six G20 countries, with little or no enforcement, that make up 20.4 per cent of world exports. TI-USA also continued to work with TI in promoting the national advocacy campaigns and in advocating for stronger enforcement of foreign bribery laws by all countries and securing major emerging economies such as China and India to accede to the Anti-Bribery Convention.



## Increased Integrity and Strengthened Anti-corruption Standards and Practices in the Private Sector



TI-USA develops tools and publishes guidance on strengthening anti-corruption programs. We also organize exchanges with the private sector to increase awareness and promote the adoption of best practices.

### Verifying Corporate Anti-Corruption Compliance

TI-USA continued to promote its report, [Verification of Corporate Anti-Corruption Compliance Programs](#). The report sets forth concrete recommendations for companies to use in evaluating their anti-corruption compliance programs. It is based on an in-depth examination of compliance verification practices and is intended to strengthen corporate anti-corruption compliance programs and to improve public credibility regarding their effectiveness.

TI-USA presented the findings and recommendations of the report at a webinar co-organized by CREATE; a presentation to Wells Fargo compliance personnel; a MetLife's Anti-Corruption Day event; the Ira M. Millstein Center for Global Markets and Corporate Ownership during a discussion on effective transparent disclosure; and a presentation at the ABA's Section of International Law Spring Meeting.

The report is contributing to raising the standards of practice in corporate anti-corruption compliance programs. Many company compliance officers have expressed appreciation for the comprehensive and practical guidance provided.

### Managing Third Parties



TI-USA worked with TI-UK and an Expert Advisory Committee of leading U.S. and U.K. companies on a new guide for business on due diligence and managing of third party relationships. TI-USA interviewed eight multinational corporations and firms; provided technical input and editorial comments to drafts prepared by an expert consultant; and participated in discussions with members of the Expert Advisory Committee to ensure the report will provide companies with clear guiding principles and practical recommendations. The report will be released in early summer 2016.

### **Corporate Forum**

The Corporate Forum is designed to provide TI-USA corporate supporters with an opportunity to share views on emerging global issues and benchmark programs and practices with peers. More specifically, the Corporate Forum has provided updates on notable new cases and developments; briefings by agency officials; in-depth exchanges on approaches to complex compliance challenges; practical advice and recommendations from experts; and updates on TI-anti-corruption initiatives of importance to the private sector.

In 2015, TI-USA organized four meetings of its Corporate Forum. The topics covered at these Forums were Internal Investigations: Issues and Best Practices; Third Party Due Diligence and Management; Recent Developments in Anti-Corruption Compliance and Enforcement; and Anti-Corruption Risks in the Technology Sector, which was presented at the first TI-USA Corporate Forum in the West Coast – at the Google Offices in Mountain View, California. These topics were presented by a variety of prominent speakers including discussed by compliance experts, senior compliance officers from multinational companies, and regulators.

### **Speaker Series**

- TI-USA organized and held on May 29 the first of two speaker series events sponsored by PricewaterhouseCoopers (PwC). Approximately 60 participants from companies, service providers, academia, think tanks and press attended *Combatting Corruption: Setting Strategy: Challenges of Doing Business in Eastern Europe*. Speaking on the panel were TI-USA, Baker & McKenzie, U.S. Steel, PwC, and the Federal Bureau of Investigation.
- On September 18, TI-USA organized the second event sponsored by PwC, a two-panel discussion, in Miami on *Combatting Corruption, Setting Strategy in Latin America*. The

event was hosted by Greenberg Traurig LLP and speakers included TI-USA, Greenberg Traurig, the Office of Foreign Asset Controls, PwC, and FBI. Approximately 70 participants from companies, law firms and services providers were in attendance.

## Prevention of Corruption in International Development



TI-USA promotes more effective development by working with multilateral development banks, U.S. bilateral aid agencies and other organizations in order to favor the development and implementation of comprehensive transparency, anti-corruption, and risk-management policies in their operations and in projects and countries

where they operate. In 2015, TI-USA worked toward this goal through the following activities:

### **New Millennium Development Goals**

TI-USA, in collaboration with TI, continued to advocate for a stand-alone governance goal in the Sustainable Development Goals (SDGs) being developed by the United Nations to replace the Millennium Development Goals in 2016. TI-USA participated in several civil society conference calls with both the U.S. Department of State and the U.S. Mission to the U.N. where we stressed the importance of defending the creation of a strong governance goal with meaningful indicators on corruption, transparency and accountability. After significant advocacy by TI, TI-USA and other civil society organizations, the United Nations adopted the Sustainable Development Goals (SDGs) at the U.N. General Assembly meeting in September, which included for the first time a stand-alone governance goal – Goal 16. Goal 16 commits all countries to promote the rule of law, significantly reduce illicit financial flows, strengthen recovery and return of stolen assets, and “substantially reduce corruption and bribery in all their forms,” develop accountable and transparent institutions, and ensure public access to information. TI-USA will continue to work with TI and other civil society organizations to help move forward the development of best indicators for effective monitoring of the implementation of Goal 16.

### **World Bank Operations**

Through the first half of 2015, we continued to engage with the World Bank on how to increase transparency in Bank-financed procurement. This built on TI-USA's well-received 2014 advocacy [urging](#) the Bank to make Bank-financed procurements more transparent, to strengthen anti-corruption policies, to allow for civil society monitoring of Bank-financed procurements, and to develop procurement capacity in borrower countries. Our advocacy was received favorably and was the focus of our engagement with the World Bank in 2015. For the 2015 Civil Society Policy Forum held in conjunction with the World Bank and IMF spring meetings, TI-USA organized a panel discussion on beneficial ownership transparency in procurement with the participation of TI-USA, Global Witness and the World Bank's Stolen Asset Recovery Initiative. In July 2015, the World Bank announced a new framework for procurement which committed the Bank to taking action on several of TI-USA's recommendations. More specifically, the Bank agreed to greater bidder beneficial ownership transparency, the use of third party monitors, including civil society organizations, to help protect the integrity of large value, high risk procurements.

Although the Bank's Safeguards policies deal primarily with environmental, human rights, and labor issues one of the Safeguards deals exclusively with transparency and public participation. In February, TI submitted five major recommendations prepared by TI-USA with respect to the Bank's Safeguards policies and in August, TI-USA participated in the third round of consultations on the World Bank's safeguards system promoting its earlier recommendations on public participation.

### **New Website: Sharing and Engaging Others in Our Work**

TI-USA's new [website](#), launched in early 2016, benefits from TI-USA preparing the design and content for the site in 2015. With a fresh and user friendly feel, we look forward to using the site and other social media to engage stakeholders across the United States in fighting corruption and sharing news on our work.

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TI-USA is grateful for the generous support from a broad range of individual, foundations, corporation and professional firms.

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