

**SPOILER ALERT**

A Framework for Analyzing the Remnants of

# **TOPPLED KLEPTOCRACIES**

and the

# **FORCES OF REFORM**



NATIONAL  
DEMOCRATIC  
INSTITUTE

The **National Democratic Institute** (NDI or the Institute) is a nonprofit, nonpartisan, nongovernmental organization that responds to the aspirations of people around the world to live in democratic societies that recognize and promote basic human rights. Since its founding in 1983, NDI and its local partners have worked to support and strengthen democratic institutions and practices by strengthening political parties, civic organizations, and parliaments; safeguarding elections; and promoting citizen participation, openness, and accountability in government. NDI publications are independent of specific national or political interests. Views expressed in this document do not necessarily represent the views of NDI or those of their respective Board Members. Website: [www.ndi.org](http://www.ndi.org)

Copyright © National Democratic Institute for International Affairs (NDI) January 2023. All rights reserved. Portions of this work may be reproduced and/or translated for non-commercial purposes with the prior written permission of NDI provided that NDI is acknowledged as the source of the material and is sent copies of any translation. Please send publication requests to [legal@ndi.org](mailto:legal@ndi.org).

# **SPOILER ALERT**

A Framework for Analyzing the Remnants of

# **TOPPLED KLEPTOCRACIES**

and the

# **FORCES OF REFORM**

**By Sarah Chayes**

January 2023

Written for the National Democratic Institute

## **Acknowledgements**

This guide was written by Sarah Chayes for the National Democratic Institute (NDI or the Institute) under the auspices of a program managed by Corina Rebegea and Kristen Sample. The framework was enriched by contributions from many people at NDI and beyond. Based on their adaptation and implementation of the draft framework, NDI teams in Honduras, Zambia, and Sudan provided invaluable feedback that was incorporated in this final version. Special thanks to NDI colleagues Traci Cook, Deborah Ulmer, Clay Boggs, Sandra Pepera, Tzili Mor, Dickson Omondi, Gemima Barlow, Angela Vance, Andriy Shymonyak, Cole Speidel, Jacob Dwyer, Jerrel Gilliam, Katie Fox, Evan Summers, Hunter Sosby and Caitlin Brune for their feedback and/or inputs, as well as to external reviewers Abigail Bellows, Frank Brown, David Holiday, Eguiar Lizundia, and Josh Rudolph.

## **About the Author**

Internationally recognized for her innovative thinking on corruption and its implications, Sarah Chayes has uncovered the unrecognized reality that severe and structured corruption lies behind most international crises, such as mass anti-government uprisings, violent insurgency, mass migrations and environmental devastation. It represents, in her view, an overriding challenge of the era. Chayes lived and worked in Afghanistan for a decade, serving at the end of that time as special assistant to two commanders of international forces then the chairman of the Joint Chiefs of Staff. She expanded her thinking on corruption during a five-year stint at the Carnegie Endowment for International Peace. She is the author of *The Punishment of Virtue: Inside Afghanistan After the Taliban*, *Thieves of State: Why Corruption Threatens Global Security* (an LA Times Book Prize winner) and *On Corruption in America—And What Is at Stake*.

She lives in Paris and Paw Paw, West Virginia.

# CONTENTS

<b>Purpose of the Assessment</b>	<b>1</b>
<b>An Understanding of Kleptocracy</b>	<b>2</b>
Repercussions of Kleptocratic Rule	3
Post-Kleptocratic Transitions	3
<b>Conducting the Assessment</b>	<b>6</b>
Risk Management	7
Components of a Report or Other Public Communication of Results	8
Data Sources	10
Written Analyses	10
Government Documents and Records	11
Data	12
Interviews	12
Analytical Framework: Questions to be Addressed	14
The Integrity Movement	14
Network Structure	16
Elements of State Function	18
Horizontal Integration	19
External Facilitators and Enablers	21
Enabling Conditions	22
Revenue Streams	22
Tactics and Countermoves	24
Vulnerabilities	24
Public Perceptions and Coping Strategies	24
Reform to Date and Prospects	25
Developing the Analysis and Depiction	28
<b>Strategies for Implementing Reform</b>	<b>29</b>
Lessons from Kleptocratic Transitions	29
Designing (or Supporting) Reform Processes	32
Strategic Variables	32
Potential Targets of Reform Effort	35
<b>Final Fundamentals</b>	<b>38</b>

<b>Annex 1: Two Prototypes for Kleptocratic Network Depiction</b>	<b>39</b>
“The Structure of Corruption in Honduras”	39
“Nepal’s Kleptocratic Network”	40
<b>Annex 2: Consolidated List of Questions to be Addressed</b>	<b>41</b>
The Reform Coalition	41
Network Structure	43
Elements of State Function	44
Horizontal Integration	45
External Facilitators and Enablers	46
Enabling Conditions	47
Revenue Streams	47
Kleptocratic Countermoves	49
Vulnerabilities	49
Public Perceptions and Coping Strategies	50
Reform to Date and Prospects	50

# PURPOSE OF THE ASSESSMENT

**RECOVERY FROM KLEPTOCRATIC RULE** is more frequently the exception than the rule. A change of political leadership is an essential first step, but insufficient on its own to ensure a transition out of kleptocracy. Even in contexts where incoming leaders demonstrate political will for pro-integrity reform, numerous country experiences give testament to the deeply embedded nature of corrupt networks, structures and practices.

The departure of a kleptocratic government should be understood as a rare—and almost certainly fleeting—“window of opportunity” for thoroughgoing pro-integrity reforms, whose enactment will nevertheless require a fight.<sup>1</sup> Remnants of displaced corrupt networks and would-be successors will jockey strenuously to thwart bona fide reformers. Old habits and hard-earned cynicism will quickly reassert themselves. Such contexts therefore call for strategic thinking and swift, adaptive and creative moves, in contrast to “steady-state” pro-democracy programming.

This assessment framework is intended for just such “window-of-opportunity” transition contexts. It is intended for use by reformers, researchers or practitioners to identify and assess the lingering or reconfiguring kleptocratic networks that might act as “spoilers,” undermining progress toward a government of integrity acting in the broadest possible public interest, as well as rival networks that perhaps used anti-corruption rhetoric to gain power, while aiming merely to replace the prior network with their own personnel. The methodology identifies data sources, suggests a set of questions for explorations and presents options for analyzing and depicting kleptocratic networks. It is a comprehensive tool meant to cover a multiplicity of challenges that arise in post-kleptocratic transitions, but at the same time offers a menu of options adaptable to different contexts and situations, or time, security or resource constraints. The assessment that is implemented on the basis of this document can therefore take a holistic approach or focus on priority elements, depending on the particular context.

Recognizing that the leaders who succeed a kleptocratic network face myriad challenges, the framework also presents initial considerations for designing a response strategy. Given the impossibility of tackling all of the challenges simultaneously, the methodology emphasizes the selection of specific “strategic variables” that might produce an outsized impact in the struggle against kleptocratic networks.

Finally, this framework can also be integrated into general political economy analyses that local or international actors are performing, regardless of timing. It can be particularly relevant to pre-window-of-opportunity situations, so as to gain time for reformist actors once transition is underway. Given the murky and dynamic nature of these transitions, a one-time snapshot of the context may be less appropriate than continuous tracking. In this case, the framework and methodology can also be adapted for use as a monitoring tool to follow shifts in motivations, challenges and opportunities.

# AN UNDERSTANDING OF KLEPTOCRACY

**IN MANY COUNTRIES**—in law and as many members of the elite see it—corruption is framed in terms of discrete acts or transactions, perpetrated by an official or maybe a few accomplices. Such venal individuals might extort or furnish “gifts” or kickbacks, steer contracts towards cronies, or cash in on insider information. And those scandals are seen as the sum of the story. But in a striking number of countries, both in the developing world and among western industrial democracies, this image is no longer sufficient to fully describe the corruption phenomenon.

Instead, corruption might better be recognized as the adaptive behavior of dynamic, interwoven networks that span identity divides, as bitter as they may seem, while exploiting them for their own purposes. Such networks bend or cripple key government functions in order to capture revenue streams, ensure impunity for their members, and provide the means to secure and flaunt their gains.

Those gains are the objective. In a world in which the accumulation and display of wealth has become the prime marker of social standing, no strategy offers opportunities for wealth accumulation like kleptocratic state capture. In kleptocracies, corruption is no bug. It is the key feature of the political exercise. Given its repercussions, it may be the gravest challenge of our generation.

**In kleptocracies,  
corruption is no bug.  
It is the key feature of  
the political exercise.**

The corrupt networks that perpetrate such state capture are often turbulent and beset by rivalries. But appearances can deceive. Basic network structures and practices prove consistent and resilient over time and across far-flung countries with different resource bases, political histories and cultures. Competitors within such systems will quickly close ranks and unite to promote and defend skewed rules that benefit all members at the expense of the public interest.

While such networks are obviously not under the direction of some kind of central planning agency and rarely map out or execute a strategy in explicit detail, it is important to understand that their members act largely on behalf of the network as a whole, rather than—or at least alongside—their own immediate self-interests.

Crucially, this type of collective purpose means that reciprocity is often deferred or indirect. That is, the understanding of what constitutes a corrupt act should not be limited to self-dealing heists or one-off transactions. Instead, gifts may be given well ahead of the need for any official favor—the obligation is understood, and is fulfilled when opportunity or a manifest problem confronting the benefactor arises. Other times, the service is simply rendered to some segment of the group, in the knowledge of where its interests lie and on the presumption of some future return. Thus, corrupt networks are bound together by a dense tissue of reciprocal favors—as well as social links that often include intermarriage, shared work experience and seats on one another’s boards of directors. In this context, rivalries may prove to be little more than surface turbulence.

## Repercussions of Kleptocratic Rule

Kleptocratic state capture is remarkably consistent in its impact, too. In countries that suffer this syndrome, inequalities yawn. They include exaggerated barriers to political engagement by women and members of other marginalized groups, as well as the disproportionate targeting of such individuals. Not only do incomes and access to wealth and opportunities sharply contrast, but the social services and public infrastructure that do exist are largely geared to the needs of the connected super-elite and their constituencies, not the public at large. Economies tend to become less diversified. Irreplaceable natural wealth, such as forests, estuaries teeming with life, fertile river valleys—crucial both to local livelihoods, communities and the overall health of the planet—are despoiled. Identity cleavages, played upon in a “divide-and-conquer” strategy, are inflamed.

Violence almost always results.<sup>2</sup> Insurrection against the corrupt government may spin out of control into a protracted hot war. The government itself may spark hostilities as it pits its citizens against each other across identity divides. Assassins may pick off embattled peasants and land defenders.

Even where the situation has not deteriorated to such degrees, citizens face the intolerable choice between abject poverty and humiliation or participating in the corrupt order in some fashion, in effect violating or degrading their own principles.

That order invariably pillories democratic practices. Elections and legislative proceedings become shams to camouflage the control of kleptocratic networks. Alternatively, in the most tightly organized networks, outright autocracy reigns.

## Post-Kleptocratic Transitions

Over the past decade, in more than a dozen countries on every continent, victims of such systems have struck back. Sometimes the reaction has taken the form of violent insurrection, whose religious, ideological or identity rhetoric may camouflage—and denature—the anti-corruption motivations. In many other cases, however, indignation has prompted citizens’ uprisings driven explicitly by anti-corruption principles. Such uprisings have toppled governments or led to electoral upsets that oust incumbents.<sup>3</sup>

Such countries offer rare windows of opportunity for improved public integrity and governance in the public interest. But these **windows are narrow, short-lived and difficult to exploit.**

Devising effective anti-corruption approaches in countries where a government transition opens the real possibility of a break with a kleptocratic history requires resisting the temptation to allow one toppled leader and members of his or her family, especially the women, to personify and serve as a scapegoat for a whole web of perpetrators and practices. Similarly, the arrival of new leadership—even if it is well-meaning—does not in and of itself ensure transformation.

**The arrival of new leadership—even if it is well-meaning—does not in and of itself ensure transformation.**

Corrupt networks are relentless, sophisticated, multitalented and highly plastic—able to quickly reconfigure in the wake of severe blows to their leadership. Many recent anti-corruption uprisings, whose initial success ignited hopes for thoroughgoing reform, gave way within months to only slightly altered versions of the same old drama, if not worse, with just a smattering of new faces in starring roles. Indeed, there is little evidence to date that the historic openings forced by indignant populations or election upsets can be effectively seized by new leadership truly dedicated to a different order.<sup>4</sup>

Moreover, reform efforts focused on a single sector or “type” of corruption or those focused on training and technical assistance may prove to be little more than public-relations exercises that camouflage network reorganization around different revenue streams.

This degree of difficulty forces respect—and redoubled effort. Taking on such networks requires a detailed understanding of where they have been anchored within government and the private sector, where residues are likely to remain implanted, and which such sectors are dominated by up-and-coming rivals. Network structures, modes of operation, target revenue streams, the uses to which looted funds were and perhaps still are put, as well as primary international interlocutors must be ascertained in as much detail as possible. Analysis and subsequent planning should include attention to events likely to take place both inside and outside the country in question that might affect initiatives. And the vulnerabilities of both residual and alternative networks and their likely countermoves should be carefully assessed.

**This assessment is compatible with the USAID Dekleptification Guide, which identifies the need to utilize “applied political economy analysis and assessment tools to map corrupt activity, kleptocratic networks, reform coalitions, and policy priorities” as one of the two key priorities for international development partners in a window-of-opportunity context, alongside support for journalists and civil society.<sup>5</sup>**

To assist such analysis, a common framework of questions and a way of depicting the resulting information will help shape inquiry, improve legibility and facilitate cross-country analysis, comparison and action. Such a framework is provided here, with two different potential approaches to depiction provided in Annex 1, with annotations.

Questions included in any such framework will have varying relevance depending on the country to which they are applied, the political context of its window of opportunity, the identity and specific expertise and experience of a given group of interviewees, and especially the main anti-corruption actors who will be using it and capitalizing on the resulting information to push for reform. Perhaps the most important variable will be the fundamental motivation for the anti-corruption campaign in the first place.

**While the framework presents a comprehensive set of questions, researchers may choose to focus on specific priority sectors, based on their understanding of the relevant corruption risks and integrity priorities. Similarly, the research may proceed in stages, with those processes that require expedited analysis addressed first. For instance, if a key decision point with long-lasting implications—such as the selection of judges and prosecutors—is imminent, the researchers may choose to fast-track their analysis of the threats and opportunity related to that process in order to support national reformers in a timely manner.**

Any visual depiction of kleptocratic networks and practices will inevitably amount to a simplification: a compromise between clarity and detail; dynamic, multidimensional realities and two-dimensional representations capturing a specific moment in time; well-founded suspicions and hard proof. Nevertheless, such depictions can be a valuable way of lodging key information about complex, sophisticated and constantly shifting structures. The process of updating them can help reveal the kleptocratic networks' unfolding strategy to survive the challenge and/or the moves of successor networks to consolidate unfair political and economic control, beneath the veneer of anti-corruption verbiage.

# CONDUCTING THE ASSESSMENT

**AN ASSESSMENT OF THIS TYPE** requires endurance and discipline, both in seeking out a wide variety of sources and processing the disparate input, and in corraling what may seem an overwhelming body of resulting information into the more conceptually graspable format offered by this analytical framework. The process will call for different types of expertise and research methodologies, so such an assessment should be conducted as a team, whose efficiency and accuracy will be increased by a division of labor, complemented by frequent group exchanges to share information and thinking, and by frequent peer review. This integrated team approach is crucial to the value of such an assessment. If organizations are tapped to do the work, they must bring a variety of individuals and their talents to bear on this specific effort.

The competencies that would be required within such a team include (but are not limited to):

- ✓ In-country experience and language proficiency;
- ✓ Social network-mapping expertise and access to appropriate software;
- ✓ Experience with social-media scraping and other forms of “big-data” analysis, in support of the above;
- ✓ Experience with in-depth interviewing, such as a background in anthropology, sociology or gumshoe journalism or other qualitative research experience; and
- ✓ Criminal or journalistic investigations.

Entities that seek funding to conduct such an analysis should submit the names and qualifications of individuals they intend to assign to this project.

If separate individuals are assigned separate portions of the work, they should be explicitly constituted as a team, with appropriate collective workflow practices agreed upon and implemented, and not be allowed to function separately.

Because of the unusual nature of this approach—and the distinction it makes between steady-state operations and windows of opportunity, and the nimble, creative and swift action required to take advantage of them—a training session for investigators might be warranted, especially for those who are not deeply familiar with network diagramming or thinking in terms of coalition-building and unusual political tactics. In any case, this entire framework document should be provided to assessors, even if they are only responsible for completing a segment, so they can familiarize themselves with the concepts and ethos underpinning it.

Assessors should also be aware that kleptocratic networks are dynamic, both as to personnel and practices. Ideally, the design of any product should allow for constant modification.

## Risk Management

Countering kleptocracy is not for the faint of heart. Activists in widely divergent countries judge that serious challenge to kleptocratic practices draws more determined and vicious retaliation than protest against other abuses. Kleptocratic networks always have access to informal as well as formal instruments of force, and they will use them.

The danger is particularly great for actual reformers working in or alongside the new government. But researchers and the informants they rely upon may also be subject to threats or retaliation against themselves and those dear to them.

Therefore, assessors must bear in mind their responsibility to, at the very least, “do no harm.” Activities should be designed carefully to avoid increasing conflict, attracting retaliation against any individual or group, or reinforcing the status of ruling networks. This caution is applicable to all stages of the project, from the specifics of assessment design to implementation and any follow up.

In order to achieve an assessment design and implementation that mitigates these risks to the greatest extent possible while still delivering a valuable product, assessors must seek out the perspectives of a wide variety of people and groups, differing in gender, race or ethnicity, political orientation, geographic positioning and economic class.

**Risk-reduction procedures would include an assessment of the safety considerations for participants, researchers and partners and a mechanism to manage and protect data confidentiality. Information collected regarding the most vulnerable groups and individuals should be continually protected throughout the assessment process, as per their own concerns and suggestions. Tools such as the Think10 questionnaire<sup>6</sup> the Holistic Security Manual,<sup>7</sup> and the Cybersecurity Handbook for Civil Society Organizations<sup>8</sup> offer specific, tactical guidance on assessing risk and planning for security. Security in a Box<sup>9</sup> or the Global Cyber Alliance’s Cyber Hygiene for Mission-based Organizations<sup>10</sup> also includes useful cybersecurity tactics to help reduce common risks.**

Also, members of the research team should develop, agree upon and rehearse security protocols, including specific steps for members, such as women, who might face additional risks. The first step is to arrive at a clear-eyed assessment of the nature of the risk. What is the pattern of practice of the former regime, with respect to critics or independent actors? Has it used physical intimidation? Lawsuits? Reputation-shattering smear campaigns? How were the targets identified

**Members of the research team should develop, agree upon and rehearse security protocols, including specific steps for members, such as women, who might face additional risks.**

and selected? Were women or other vulnerable groups prioritized? Did officials act directly, or through agents or proxies? What are specific team members' vulnerabilities? Who are their allies?

Based on the answers to these questions, they can begin to develop protective practices, which may need to be differentiated for specific populations. Those practices may include:

- ✓ Vetting all interviewees to ensure none is loyal to network remnants or to aspiring new networks. Or, if an insider view is explicitly desired, taking precautions to keep that person isolated from team members and other informants whom he/she might endanger or from information whose disclosure might harm the enterprise of reform;
- ✓ Ensuring all interviewees understand the nature and objective of the exercise and the intended final product;
- ✓ Taking cues from those sources as to how they would like the interaction to go—including anonymity, where they would like to meet or how they would like to communicate;
- ✓ An ironclad commitment to protect sources;
- ✓ Establishing strict habits for document and electronic security;
- ✓ Lining up resources or potential donors for a legal defense fund, should the need arise;
- ✓ Identifying and preparing people of good standing to publicly counter allegations should they be lodged;
- ✓ Selecting unpredictable meeting places and/or moving them frequently;
- ✓ Maintaining an alert awareness of surroundings at all times; and
- ✓ Planning escape routes, in-place shelters, telephone trees, allies and resources in case of physical assault and/or detention.

## **Components of a Report or Other Public Communication of Results**

Depending on who mounts such a research-and-analysis effort and to what end, it may or may not result in one or more publicly available products. If reformers themselves are conducting the assessment, they may wish to keep its findings private, so as not to tip their hand. In other contexts, one or more different types of publication may be appropriate: a detailed report together with a more schematic visual, for example, or an electronic representation, which might be updatable by authorized team members as conditions change, or a video or cartoon version for mobilizing public support, etc. These might be partial expositions, leaving out certain details known to team members and active reformers, such as the names of corrupt holdovers and their vulnerabilities, or members of the new government who are bent on establishing their own network in power over the country's politics and economy and elements of their strategy.

Where a full report is an intended output, this framework should serve as the template, with omitted sections left blank with an explanation. Harmonizing the product this way will ease cross-country comparative analysis and selection of priority responses. At the very least, a report should include the following components:

- ✓ An introduction, including a statement of the nature of networked corruption in general and the specific form it took and its repercussions in the country in question. This introduction

should also include, if sharable, an honest statement of the objectives of the reform effort and how its outcomes will be measured.

- ❑ A segment devoted to identifying and analyzing the challenge, including:
  - A section on the instruments of state function, briefly stating which ones were fully captured under the prior order, which were crippled and will need rebuilding, and then a more complete section on which institutions are still populated by network remnants;
  - A section on private entities or components of the economy controlled by the former network;
  - A section on any out-and-out criminal networks in the country that may have been allied with the former regime, including traffickers of all kinds and violent gangs;
  - A section, as relevant, on any intermediary groups or gatekeepers that have played a key role in facilitating network extraction from private entities and the public;
  - A section on external facilitators whose services were employed by the former network;
  - A section on external enablers whose ongoing behavior tends to reinforce the stature and power of members of the former network;
  - A section on enabling conditions that may complicate reform efforts;
  - A section tracing financial flows and destinations; and
  - A section identifying vulnerabilities of the prior or rising kleptocratic networks, which might be exploited.
  
- ❑ As appropriate—and in some cases in precedence to the above—similar sections analyzing the structures, practices, and alliances of the new networks that are maneuvering to capture economic and political power under cover of a supposedly new anti-corruption order. That is, the individuals and groupings that will represent a fierce and crafty opposition to the efforts of genuine reformers, from inside what is ostensibly the same government.
  
- ❑ A segment devoted to potential responses. Note that windows of opportunity are extremely dynamic, and responses must include the flexibility to change course, revise allies, roles and sequencing. Still, a starting point might include:
  - Identification of likely allies of the reform coalition, internal and external, including new or potential allies that might have been excluded or marginalized previously;
  - Identification of priority elements of state function to be targeted by the reform effort, including priority service provision, and the establishment of temporary special units (for example, police, prosecution or even judiciary) where residual network implantation seems too significant to allow the reform agenda to move forward under the current institutional structure;
  - Identification of priority economic sectors to be subject to increased regulation and/or targeted for diversification;
  - Identification of discriminatory rules or implementation, exploited by the prior networks, whose reform would make an outsized difference for women or marginalized groups within the population;
  - Identification of key types of criminal activity, particularly valuable to the former network, which should receive priority law enforcement focus;
  - Suggestions as to specific reform measures and approaches to international enablers and potential allies that might be undertaken and their sequencing; and
  - Outlining of likely countermoves to be expected from members of the former networks in response to these efforts and how to mitigate their impact.

- ✓ A note on disclosure: Ideally the results of this assessment will include a social-network map, identifying individual members of residual networks who occupy key public- and private-sector positions or their potential successors in an aspiring rival network, as well as members of the positive network of genuine reformers and their allies. For the former, such a map might be accompanied by a key indicating these individuals' danger to the reform or, alternatively, the likelihood that they might be induced to defect. This degree of specificity is crucial to operationalizing the reform campaign.

But there are reasons why making such a document public might be counter-productive. Its contents would advertise that these individuals and their key economic sectors are in the crosshairs, allowing network holdovers or members of the new administration who hope to substitute themselves for their predecessors to prepare. It would also expose reformers and their allies whose efforts might be more impactful if they remained anonymous or those whose lives might become endangered. It might simply be politically sensitive to include such specifics in a public document. Therefore, care should be taken in balancing the interests of transparency and of providing funders or sponsors with proof of work done, on the one hand, with the prospects for success of the reform itself and the safety of its implementers, on the other.

**Care should be taken in balancing the interests of transparency and of providing funders or sponsors with proof of work done, on the one hand, with the prospects for success of the reform itself and the safety of its implementers, on the other.**

## Data Sources

The most important requirement regarding the data sources necessary to conduct the type of analysis outlined here is variety. Ideally, all of the below should be consulted.

### Written Analyses

- ✓ In-depth and up-to-date relevant UN reports and political economy studies by a diverse group of academicians, researchers and civil society organizations—including counterintuitive options, such as labor unions—can provide important background, if they are read with the concepts outlined above in mind.<sup>11</sup>
- ✓ Investigative journalism, increasingly active and effective in the past few years, has exposed numerous scandals.<sup>12</sup> Some NGOs also maintain their own investigative capacity. The reliance on primary documents by reputable organizations furnishes hard proof to substantiate conjectures or common knowledge. On the other hand, their investigations are often triggered by leaks, which, even when accurate, may be selective or prompted by ulterior motives. Anyone relying on such reporting should bear a few questions in mind: Who benefits from the leak? What else might all the splashy attention be overshadowing?
- ✓ On the assumption that the prior kleptocratic order constrained independent journalism at home, online coverage from a population's diaspora may also prove valuable. Often exiles are in frequent touch with ordinary people on the ground and are thus able to offer gritty, real-world



insights that international or even local experts may lack. On the other hand, authors may be less rigorous in sourcing their information and/or be subject to partisan bias.

- ✓ Other reports to be consulted might include due-diligence findings and corruption assessments by foreign companies and international financial institutions, as well as filings and findings of Western courts or other international venues appealed to by network members and/or their victims.

**Throughout the assessment process, the research team should take special care to maintain an inclusive approach in terms of gender and other factors of representation. For instance, during the review of written analyses, the research team should consider what sectors or groups are under-researched and why that might be the case. Such a focus—reaching beyond the familiar categories of gender, religion or ethnicity to other, frequently overlooked, factors such as class or local culture—can reveal forms of unforeseen harm inflicted by the kleptocratic regime and, in turn, unexpected allies and potential targets for interventions. Members of such groups and communities should be interviewed while the assessment is being conducted so that those who have already been victimized by kleptocracy are not further marginalized by the reform coalition or its supporters.**

### **Government Documents and Records**

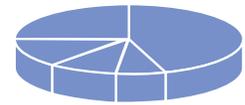
It is hard to run a kleptocracy without leaving traces of the discrepancies between real and stated revenues or the purposes to which public monies have been put. Conversely, efforts to create a façade of fair dealing may have led to the passage of legislation or regulations that, if enforced, could aid in reform. Potential sources include:



- ✓ The relevant legal framework, with particular attention to legislation on bribery, conflict of interest, curbs on the “revolving door” between government and private sector, and public procurement, as well as selection processes for key government functions, such as the judiciary;
- ✓ Elements of legislation or regulation that may facilitate or perpetuate kleptocratic practices, such as expansive secrecy provisions;
- ✓ Budget documents, with an eye to discrepancies between actual revenues and what is logged;
- ✓ Public procurement or external service contracts: look for inappropriate or padded purchase-orders, patterns in the companies that received them; and compare materials and budgeted personnel and salaries to the resources actually deployed; and
- ✓ Recordings of key meetings, conversations or sessions of public bodies.

## Data

Particularly useful for unveiling network relationships that may hide beneath the surface of well-known names or that bridge major identity divides to a surprising degree, are modern data sources and network-mapping techniques. Some of these materials may only be available to authorized government personnel only able to access them for authorized purposes. Others are open source, but may require big-data analysis techniques to yield the desired information. These sources include:



- ✓ Phone data, which is normally only accessible in the context of an authorized criminal investigation. Once lawfully accessed, it can be used not just for the narrow purposes of collecting actionable evidence regarding a given crime, but also to gain information about a suspect's broader network.
- ✓ Bank records, similarly accessible only in specific contexts.
- ✓ Corporate records, including formal and beneficial owners, boards of directors, managing executives, major investors (foreign and domestic), etc. Different countries centralize and maintain such data to varying degrees and likewise allow public access in varying degrees. Much of this data is often available on corporate websites.
- ✓ Social media “scraping”—meaning the use of an automated tool to extract specified data from the welter of social media outlets such as Twitter, Instagram and LinkedIn, but also from personal blogs and websites. (Note: The point of consulting social media in this context is not so much for the content of posts, but rather to ascertain connections among individuals that might not be otherwise obvious.)
- ✓ One of a number of commercially available social network-mapping software packages for organizing the aforementioned data.
- ✓ Public opinion data, to the extent that rigorous and reliable polling is feasible.

## Interviews

The most important source for the kind of dynamic and detailed information required here is unquestionably personal interviews. These interviews can be conducted one-on-one or in small groups. In a group setting, it helps to use whiteboards or flipcharts to document answers to the questions under debate in the view of all participants. A different flipchart/whiteboard and marker color can be used to delineate each segment of the kleptocratic structure (public sector, private sector, criminal sector, external enablers and facilitators, revenue streams, etc.) for ease of transfer into the analytical framework.



Given the destruction of trust that accompanies kleptocratic rule, it is usually best to meet with small groups of like individuals—for example, grouping together former officials who stood up against the former regime's practices, perhaps even separating groups by professional domain with civil society actors in a further group and journalists in yet another.

**The most important source for the kind of dynamic and detailed information required here is unquestionably personal interviews.**

Officials, government employees or ordinary citizens may not need to be asked all the questions included in the annex to this document. For example, based on their likely access to firsthand information, they might not be asked to opine about the structure of the network as a whole, but rather its ramifications on their own sector, industry or walk of life.

When interviewing international experts and practitioners who feel less physically vulnerable, it can be illuminating to put people from different agencies and organizations together in a single session. For example, one session might include embassy officials, internationally focused criminal investigators, development professionals, specialized anti-corruption activists, journalists and academics, including those from disciplines such as anthropology. These individuals may not have crossed paths, so the exercise has the added value of helping to weave a knowledge network among them.

At the least, consultations should include individuals or groups from each of the following categories:

- ✓ Foreign experts and officials focused on the target country, including those based inside and outside the country, who may be producing the aforementioned reports, to be consulted for background information. This group may also include practitioners who do not usually provide written analyses, as well as key employees of international agencies and financial institutions who have been selected with care. Include local-national staff of foreign embassies. A word of caution: International organizations may be the source of captured revenue streams, with the potential for inside collusion.
- ✓ Genuine would-be reformers themselves, most importantly, wherever they are to be found within government structures. If such individuals are serious about tackling corruption, they should invest the time that this exercise requires (likely at least half a day). This requirement presumes both a desire on the reformers' part to engage with the process and confidence in its implementers.
- ✓ Dissenting former officials from the kleptocratic regime who took professional risks to stand up to the corruption, whether they are members of the new administration or not. When selected with care, some disgruntled former officials may prove to be precious sources of information. For example, such individuals could potentially reveal the identities of sham reformers within the new administration.
- ✓ Rank-and-file employees within agencies or institutions at the national and subnational levels that have been critical to kleptocratic operations, or have been hollowed out by the former regime. This group may include people who felt obliged to participate in corrupt schemes or who may be witnessing similar practices on the part of the new regime. Don't overlook "invisible" employees such as IT professionals and custodial staff who may have been in a position to observe doings. Agencies meriting special attention might include the army; the police; the ministries of agriculture, development, education, energy, finance, health, infrastructure, justice, natural resources, and planning; and any key parastatals, such as national oil/gas companies or agencies in charge of managing public-private partnerships. Engendering enough trust for candid conversations will be a challenge here.
- ✓ Local traditional leaders, such as clan or tribal elders and religious leaders, where they are not subnational extensions of corrupt networks.

- ✓ Civil society activists and local journalists. Bearing in mind the trust issues mentioned above, it is important to consult activists from different identity groups, as well as those who may be focused on issues other than corruption. Organizations working to address local grievances or humanitarian crises, such as land tenure, access to justice, lack of clean water or women's rights, usually have amassed detailed and consistent personal experience of corruption.
- ✓ Private-sector leaders and executives across key industries, such as financial services, manufacturing, infrastructure, agriculture or transportation.
- ✓ Ordinary citizens, including women, who often experience the doings of such structures differently from men, as well as members of other traditionally marginalized groups.

## **Analytical Framework: Questions to be Addressed**

This section categorizes the types of questions that document analysis and interviews should address. Please note that some of the questions may seem redundant across topic areas, but asking them at different points in the sequence may elicit different or fuller answers the second (or third) time around. Some categorizations may be a matter of judgment, for example, whether a given individual or entity is a full network member or a particularly valuable enabler. For any given document perusal or interview session, answers or insights might best be noted into the text of the framework for easy retrieval and consolidation afterward.

### **The Integrity Movement**

Before any anti-corruption campaign can be launched, a number of questions must be asked of those who would lead it. These queries are designed to help them—and, potentially, their international allies—gain clarity on their true objectives and values. Only after articulating these intangibles can such a movement begin to tailor its actions appropriately. These questions are also aimed at helping movement leaders strengthen their own hand and ward off potential roadblocks and internal conflicts by identifying their constituencies and potential allies, and by developing a clear decision-making process.

- ✓ What are the real—if perhaps hidden—motivations for this effort and how do they vary among key actors? Are reformers motivated by a desire...
  - To consolidate power?
  - To assuage an indignant and restive population? (If so, initial focus might, for example, be placed on the manifestations of corruption that are causing the most consternation.)
  - To gain international respectability in order to access revenue streams (return of looted assets, debt relief, development assistance, development financing or international financial institution (IFI) loans)?
  - To cut costs or increase government revenues from internal sources?
  - To improve service delivery to average citizens? (In which case, focus might be placed on specific sectors, such as the ministry and subnational departments of health and education, local infrastructure, etc.)
  - To lay down the groundwork for a government fundamentally dedicated to the public interest?
- ✓ What values does the campaign seek to embody?

- ✓ What are the campaign's top three concrete objectives?
- ✓ What is the envisaged time-horizon for maximal effort (with attention to the challenging dynamics of windows of opportunity)?
- ✓ Who is the driving force behind the campaign? For example:
  - The new head of state?
  - Other members of the executive and legislative branches, or independent agencies, short of the head of state and his/her inner circle?
  - Civil society organizations, operating on behalf of a significant segment of the population?
  - International intervenors?
- ✓ Who are the key strategists? (Name names.)
- ✓ Who are the key implementers expected to be? Do they understand this role?
- ✓ Who are the potential allies, including counterintuitive ones?
  - Dissenting or disgruntled members of the old networks? (Note: This group is key. It is almost impossible to best a kleptocratic order without defections from within the networks or their class or coterie.)
  - Respected thought or spiritual leaders who habitually stay out of politics?
  - Business leaders?
- ✓ Who are the key constituencies? (Pay attention to any relevant intersectionalities.)
  - Neglected rural populations, across party or identity divides?
  - Peoples whose identity, life-ways and/or spirituality make them especially vulnerable to exploitation of sensitive habitats for revenue-extraction?
  - Disgruntled rank-and-file employees of captured state entities, such as soldiers?
  - Women?
  - Young people?
  - Organized labor?
  - Other groups that have suffered disproportionately from the kleptocratic practices?
  - Other groups with a history of reformist activism including in other sectors/on other issues?
- ✓ What would success look like? What specific benchmarks can be identified to indicate progress toward the ultimate goals?
- ✓ How are these benchmarks aligned with the answers to the "motivations," "values" and "time-horizon" questions above?
- ✓ What metrics will be used to measure progress against those benchmarks? Perception measures? Objective measures (often proxies)?
- ✓ What is the decision-making process within the reform coalition for selecting and adapting strategy and sequencing? Has it been spelled out to coalition members? Has it been made public?
- ✓ By means of what mechanisms will the coalition resolve internal disputes?

- ✓ What steps are being taken to bring this coalition together, even informally, into a network of its own? (The determination to do so is particularly important in cases where the post-kleptocratic administration is dominated by an aspiring new corrupt network and real reformers are seen primarily as window-dressing, and are in reality isolated and beleaguered.)
- ✓ What measures are being taken to ensure the physical safety of coalition members?

### Network Structure

Turning to the analysis of the corrupt environment, an initial series of questions should explore the basic architecture of the former ruling network(s), the degree of turbulence, the shape of the residual cadre still holding some political or economic power, and/or, separately, the shape of the new network coalescing under the aegis of the new administration. Issues to be addressed include the network(s)' organizing principles, the degree of intersectionality with identity divides in the society at large, the degree of internal rivalry, and key individuals. The answers will help determine the duration of the window of opportunity and the general dimensions of the challenge.

**An initial series of questions should explore the basic architecture of the former ruling network(s), the degree of turbulence, the shape of the residual cadre still holding some political or economic power, and/or, separately, the shape of the new network coalescing under the aegis of the new administration.**

- ✓ Under the kleptocratic order, did a single network dominate the political economy, or was the environment characterized by a shifting landscape of rival—if sometimes allied—networks? (Note: Countries dominated by a single network may appear to be authoritarian—such as Putin's Russia or Sisi's Egypt. But chaotic appearances may hide a more unitary reality, as in Afghanistan under President Hamid Karzai, where only one or two localized networks remained outside the overall structure.)
- ✓ If a fairly unitary structure prevailed, how important was the person of the chief of state to network functioning? Or is there a significant cadre of network members that is in the process of reconfiguring to retain grip on key aspects of the economy and political function? Or alternatively, is the new administration already colonized by members of an aspiring alternative corrupt network? (Note the names of key individuals who are still on the scene or those who are new.)

As experiences in Angola, Egypt, Guatemala, Tunisia and Ukraine have demonstrated, even networks that appear to be dominated by a single individual exhibit a remarkable capacity to rebound once this leader is toppled. Alternatively, what appears to be an anti-corruption change of regime may in fact merely add up to the attempted substitution of one network for another. In either case, the window of opportunity will be characterized by a struggle between genuine reformers and those seeking to gain or regain control of political and economic power.

The main question, therefore, is one of time and the efficiency of the kleptocratic restructuring. Where potential rival networks were not allowed to get beyond embryonic organization, as in Libya, the window of opportunity is likely to be longer, and the environment more chaotic. Where a significant residual cadre or one or more rival networks exist and can mobilize personnel and deploy material power, the window of opportunity will be shorter.



A Tunisian woman holds a placard reading in French "Tunisia will remain standing" as she takes part in a protest on March 18, 2015 a few hours after an attack on the National Bardo Museum in Tunis. Photo: Sofiene Hamdaoui/AFP via Getty Images.

- ☑ Was kinship an important organizing principle for the previous or a rising ruling network?
- ☑ Do family members of the former or current chief of state hold significant political or economic power?
- ☑ Are kinship ties an important organizing factor for residual networks or their rivals? Or are ties largely based on class/profession, geography or other considerations? Identify them.
- ☑ Are there any relevant gender dynamics, in reality or in public perception?
- ☑ Are there internal rivalries within these residual or rising structures? If so, note the names of key faction leaders.
- ☑ To what extent do ethnic/tribal, sectarian, political-partisan or other identity divides demarcate either the old kleptocratic order from the new administration, or rival factions within residual networks or network fragments? Which forms of identity are most important? Are there intersectionalities (ethnic/geographic, linguistic/political party, etc.)?

The existence of such identity divides, while almost inevitable, will render the transformation process more difficult, especially if they were deliberately inflamed under the prior order or if they seem to be the main distinction between the new administration and its predecessor.

- ✓ How vertically integrated are those residual network fragments? That is, for example, were subnational appointments made by national network members? Or are there local elections? Under the old order, was there a tacit exchange of license-to-loom and even guaranteed impunity in return for loyalty and an upward flow of some of the ill-gotten gains?
- ✓ Do the networks extend beyond national boundaries? Have they in the past?

### **Elements of State Function**

Network members who hold public office are not in their positions merely to fill their own pockets. They serve two primary roles on behalf of the network(s): The first is to steer public funds and opportunities toward network members. The second is to repurpose or bend the government agencies under their authority to serve the interests of the network instead of the public—and if they fail to weaponize these institutions, they must incapacitate them. This series of questions aims to identify which specific elements of state function have been, still are or are under threat of being denatured by such activities. In each case, pay attention to the mechanisms by which these powers were wrenched away from their stated purpose in order to devise tailored remedies. Key personnel should also be identified.

- ✓ What national/subnational government agencies or institutions have been deliberately bent or repurposed to serve the interests of the former ruling networks—either to extract revenue or to ensure compliance? Pay particular attention to the following functions:
  - Justice—both in terms of its power to mete out punishment and immunity and to interpret laws;
  - Instruments of coercion, including ministries of defense, interior and state security (Every kleptocratic system must dispose of at least one formal instrument of force, usually one or more special units within the army or police or straddling the two. Sometimes, the military is the dominant kleptocratic network. In those cases, there is invariably significant horizontal integration between the military and the private sector. Military-owned businesses tend to dominate whole industries. If this overlap exists, it should be signaled in detail in the network depiction. It should also be noted that defense budgets often serve as important revenue streams to be raided.);
  - Intelligence agencies (Do relics of the old order still retain access to signals intelligence?);
  - Financial agencies, especially the ministry of finance and tax and customs authorities, and the central bank;
  - Ministries of energy and natural resources;
  - Ministries responsible for large-scale publicly funded development and infrastructure projects, such as Infrastructure or Planning;
  - Agencies managing public-private partnerships;
  - State-owned enterprises (SOEs); and
  - Information ministries and/or state-owned media.
- ✓ For each function identified, what are the mechanisms by which its public purpose was distorted or its revenues funneled to the network?

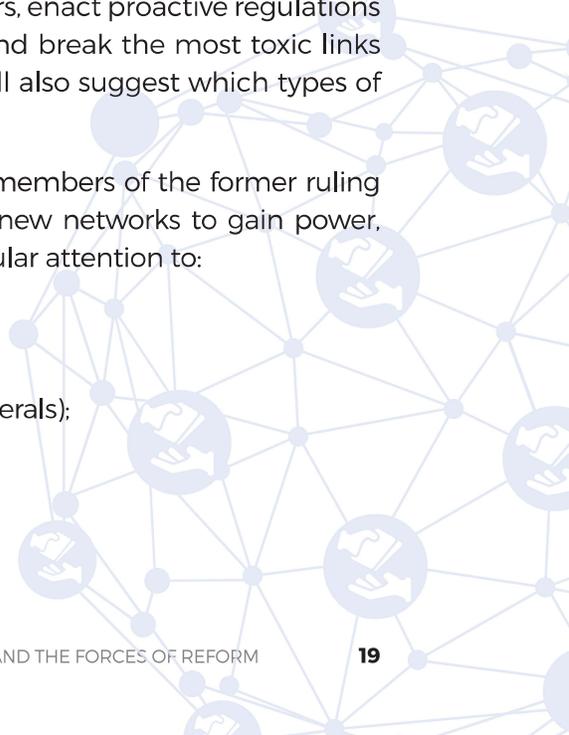
- ✓ Which individuals who were key to distorting those functions remain in position, if any? In the case of a rising alternative network, which individuals seem to be attempting to distort these or other functions?
- ✓ Can any of them be lured over to the side of reform without contaminating the campaign, either in substance or appearance?
- ✓ What instruments of state function have been deliberately crippled, hollowed out or allowed to languish with low budgets, numerous vacancies or underpaid staff? Typical examples include the following:
  - Legislative bodies;
  - Environment ministries;
  - Audit and oversight bodies;
  - Law enforcement and judicial bodies that specialize in corporate crime and corruption;
  - Agencies responsible for ascertaining or confirming title to land;
  - Electoral system design and/or electoral management bodies; and
  - Subnational governments.
- ✓ As above, identify key mechanisms, players and prospects.

### Horizontal Integration

What makes kleptocratic networks so hard to visualize and so resourceful is the way they snake across all sectors of society. That is, these networks include not just corrupt officials, but also business elites and out-and-out criminals, including violent ones. Members switch sectors from time to time. Key members may hold positions in different sectors simultaneously. Thus does the network benefit from the capabilities of all sectors, weave a flexible and resilient web that can resist attack, and spread revenues to all members over time. Questions in this section are aimed at identifying which private-sector entities (including charities or nonprofits) have been or still are controlled by network members, as well as any potential criminal activities members may have perpetrated. This understanding will help guide efforts to diversify specific sectors, enact proactive regulations regarding sectors vulnerable to capture by emerging networks, and break the most toxic links between certain specific businesses and government power. It will also suggest which types of criminal activity to prioritize for law enforcement attention.

**Kleptocratic networks snake across all sectors of society.**

- ✓ What have been the key private-sector holdings controlled by members of the former ruling network? And/or in cases where the transition has positioned new networks to gain power, what are their members' key private-sector holdings? Pay particular attention to:
  - Financial services;
  - Energy;
  - High-end real estate and construction;
  - Mining (precious stones and metals, including rare earth minerals);
  - Media;
  - Telecommunications;
  - Pharmaceuticals;
  - Weapons manufacturing;



- Select desirable consumer goods;
  - Private security companies;
  - Ostensibly philanthropic or nonprofit humanitarian or development ventures; and
  - Ostensibly nonprofit academic or research institutions.
- ☑ For each sector, how monopolistic is the control?
- ☑ What have been the key mechanisms by which control of government has allowed network members to obtain outside revenues via entities in these sectors? For example:
- Government contracts;
  - Preferential access to business authorizations;
  - Waivers or non-enforcement of antimonopoly, environmental, safety and health regulations and other citizen protections;
  - Tax exemptions, preferential loans or preferential access to land, energy or other natural resources; and
  - Preferential access to other forms of government assistance.
- ☑ Where are decision points in the above cases?
- ☑ Which members of the former ruling networks remain in control of key entities in the aforementioned sectors? And/or which key entities are in the hands of would-be future kleptocrats?
- ☑ Can those entities' finances be brought within the national budget process? (For example, in the case of military enterprises or parastatals.)
- ☑ Are there potential competitors that could thrive if given access to a level playing field?
- ☑ What other actors have played, or are situating themselves to play, a key role in network functioning? What other actors represent a source of power or capability for network fragments? Consider:
- Political parties;
  - Religious institutions; and
  - Informal go-betweens or "brokers," who provided a layer of distance between parties to corrupt transactions.
- ☑ Does, or did, horizontal integration extend to out-and-out criminal organizations? Examples might include:
- Smugglers, of people and consumer goods;
  - Traffickers in narcotics, weapons and humans for sex or forced labor;
  - Youth gangs; and
  - Armed militias or other informal instruments of violence, such as retired military or police that have been deployed as plausibly deniable assassins.
- ☑ Does or did the network incorporate terrorists or other anti-government insurgents?

## External Facilitators and Enablers

No kleptocratic network exists in a vacuum. In order to secure and flaunt their ill-gotten gains and to evade repercussions, members rely on a vast array of external enablers and facilitators. For the purposes of this analysis, the word “facilitators” refers to such service providers as banks and real estate agents, art dealers, registered agents or others who perform specific services for the network in return for a fee. “Enablers” here means outside entities and their actions that may unwittingly benefit the network, such as universities that confer honorary degrees or accept named grants, thus helping launder network members’ images, or international financial institutions that provide development loans that are captured by the network.

**Members of kleptocratic networks rely on a vast array of external enablers and facilitators.**

- ❑ To which international service providers has the previous ruling networks had recourse? And/or in the case of a rising network, are any preferential relationships already viable? Specify the company. Examples might include:
  - Law firms;
  - Accounting firms;
  - Registered agents;
  - Banks;
  - Lobbying firms; and
  - Real estate and art/antiquities dealers.
  
- ❑ What international entities or programs have served as enablers? Consider the following, among others:
  - Foreign direct investment (Which companies? Include foreign government-owned entities.);
  - Security assistance (From which countries?);
  - Humanitarian or development assistance;
  - Development financing;
  - Other IFI loans;
  - Regional organizations, such as the African or European Unions;
  - Neighboring countries, regional partners or other international partners (Consider diplomatic as well as material support, and note that it may be difficult to judge whether kleptocratic networks straddled borders or benefitted from an enabling relationship.);
  - Stature-enhancing or lucrative public events, opportunities or positions, including meetings with foreign heads of state, training or fellowship opportunities, seats on boards of directors, etc.;
  - Relationships with former colleagues at international institutions, such as the World Bank; and
  - Foreign universities, think tanks, cultural institutions and professional associations.
  
- ❑ Can pressure be brought on any of the above entities to drop their affiliation with former network members?
  
- ❑ What and who are the most important potential international allies for the effort to reform government?

## Enabling Conditions

“Enabling conditions,” as understood here, means internal or external realities that cut in favor of ongoing kleptocracy, such as the international policy priorities of key partner nations. Often these conditions cannot be altered. But if they are identified, reformers can at least address the conflicting agendas with their international partners, and together they can devise ways to minimize damage to the reform agenda.

- ✓ What are the most consequential enabling conditions? Consider:
  - Constraints imposed by agreements that permitted the transition in the first place;
  - Political, economic, security or ideological priorities of powerful international partners, or the history of their interactions with the host country;
  - Significant internal identity divides of any sort (political, gender, ethnic, religious, class, etc.); and
  - Regional conflicts that invite smuggling or other forms of corruption.
  
- ✓ In cases where a foreign interlocutor’s unrelated political or security priority conflicts with its stated reform objectives, is it possible to spell that contradiction out in order to achieve a more consistent policy?
  
- ✓ What pressures and priorities weigh on mid- and low-level officials that make it hard for them to break with corrupt practices? Such as:
  - Excessively low salaries;
  - Danger of losing their jobs or being accused of corruption as part of an effort to create the false impression that the regime is working to fight corruption;
  - Expectations of remittances or favors from family or home village;
  - A sense of obligation to elders or spiritual leaders or others who may be deemed superior to the official in the traditional hierarchy; and
  - Perceived “debts” stemming from campaign contributions or political appointments.
  
- ✓ Are there any other cultural values that might seem to conflict with anti-corruption objectives?

## Revenue Streams

This topic centers on internal and external sources of money that the displaced network has captured or a rising one aims to capture. It should be noted that these questions will overlap to some extent with the “horizontal integration” section above, and, in the case of export commodities, “internal sources” might overlap with “external sources.” Note also that corrupt transactions do not always exclusively involve money. Consider sextortion or the extortion of other services when analyzing prior kleptocratic practices.

- ✓ What were the key internal sources of lucre pocketed by the prior or rising kleptocratic elites? (If there is a distinction, pick the networks—former or rising—that pose the most immediate threat to reform.) For example:
  - Fossil fuel revenues captured either before or after inclusion in the national budget, such as via bunkering, smuggling, invoice fraud, including the exchange of raw product for refined, kickbacks, self-dealing allocations of exploration rights or “blocs”;
  - Revenues from other natural resources, including minerals, precious metals, lumber, etc.;

- Skimming from customs dues;
  - Privatization of formerly state-owned enterprises (SOEs) into network members' hands;
  - Land grabs;
  - Access to any of the commodities above, or other valuable export items including weapons or cash crops, at below-market price;
  - Government contracts or fees for rigging bids on government contracts;
  - Capture of particularly lucrative industries, such as tourism, including specialized tourism for gambling or sex;
  - Donations to network-controlled "charities" and other forced contributions to ostensibly public-spirited or public projects;
  - Criminal revenues, such as from trafficking and smuggling of people and narcotics; and
  - Extorted bribes or services.
- ☑ External sources:
- Joint ventures or local content as an obligatory part of foreign direct investment (The export commodities questions above may fit better here, as appropriate.);
  - Extorted bribes or "facilitation payments" from foreign companies;
  - Humanitarian or development assistance;
  - Development financing, such as from the International Finance Corporation (IFC);
  - Major bilateral or multilateral loans; and
  - Revenues from foreign businesses purchased with corruptly obtained capital.
- ☑ Within the country in question, where have members of the former kleptocratic networks spent their gains?
- Real estate?
  - Purchase of lucrative local commodities for export?
  - Purchase of businesses in other key sectors, such as energy supply chain, banking, construction and its inputs (cement is a common one), telecoms or media?
  - Import of luxuries for personal use?
- ☑ Were any of the gains reinvested to reinforce the networks' grip on power, in such vehicles as:
- Campaign spending;
  - Kickbacks or payoffs to network allies;
  - Development projects for select segments of the population; and
  - Media and disinformation?
- ☑ How was money spent outside the country? Be specific about destination countries, entities and assets. For example:
- Bank accounts, likely held via shell corporations;
  - Real estate;
  - Investments in private equity and other opaque funds;
  - Valuable art and antiquities;
  - Shares in foreign companies;
  - Shares in cultural or sporting entities;
  - Charitable donations;
  - Payments to lobbyists and public relations firms; and
  - Tuition for children at prestigious universities.



## Tactics and Countermoves

Kleptocratic networks do not take challenges lying down.

- ✓ What are the countermeasures that are already on display or likely to be deployed? Consider, for example:
  - Repression;
  - Assassination of exemplary reform champions;
  - Exacerbating, inflaming and otherwise playing on identity divides;
  - Co-opting government function, even if not vested with the formal authority to do so;
  - Weaponizing the anti-corruption agenda to discredit reformers (or worse);
  - Launching disinformation campaigns:
    - If so, to what apparent end?
    - Who are the key influencers?
    - What are the most effective platforms?
  - Launching smear campaigns, including by using private information obtained via signals intelligence, hacking or theft;
  - Co-opting potential reform allies, usually via payments;
  - Drawing out negotiations on the details of the ongoing transition of power;
  - Allying with foreign powers that are not supportive of the reform agenda; and
  - Getting into the good graces of foreign powers, entities or individuals that would be expected to push for reform, by making donations to charitable organizations or by purchasing troubled companies.

## Vulnerabilities

Research should also identify residual or rising kleptocrats' potential vulnerabilities. Weak points such as over-reliance on a lone resource or service provider—that is, a potential single point of failure—or internal rivalries might be uncovered through careful study of network practices and especially through interviews with former insiders. Those weak points can then be a priority focus of reform efforts.

- ✓ What are current or potential weak points of the residual or rising networks?
  - Over-reliance on a lone resource or service provider;
  - Particular appetites or desires that can be exposed or leveraged, such as foreign travel or sexual exploitation;
  - Foreign assets, including those of family members, that can be pursued by law enforcement in destination countries;
  - Internal rivalries; and
  - Socially inappropriate modes of expression or other practices that could erode support within residual constituencies or foreign enablers.

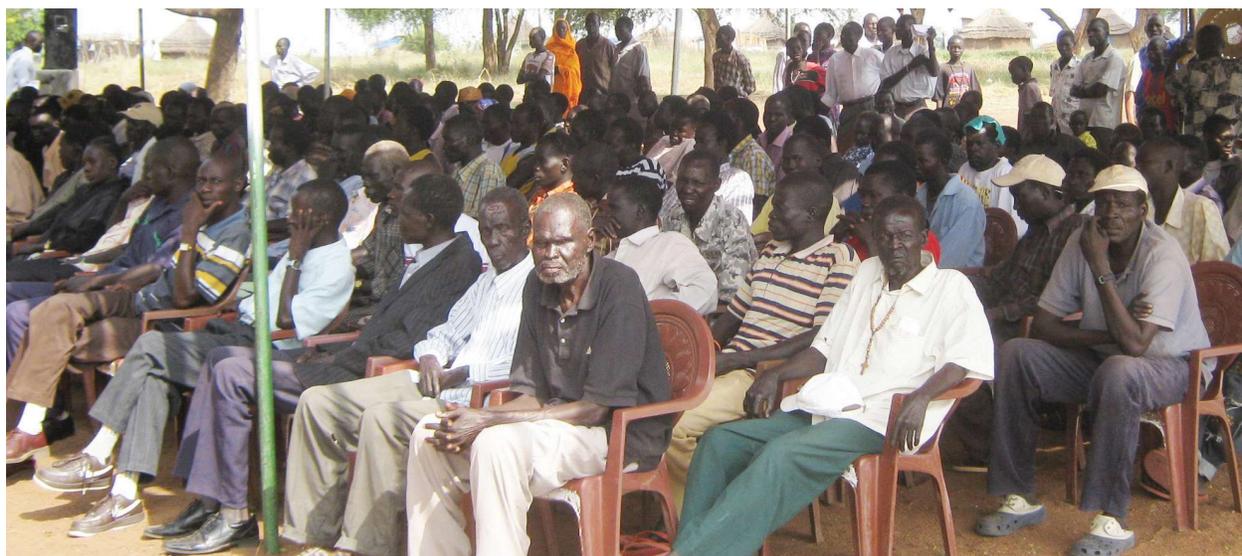
## Public Perceptions and Coping Strategies

In contexts of severe kleptocracy, a window of opportunity is almost always generated by popular indignation, which, expressed in one way or another, has forced a break with the past. No reform campaign can succeed without massive support from that same public. Therefore, it is crucial to gain an understanding

**No reform campaign can succeed without massive support from that same public.**

of how ordinary people understand corruption and its impact on their lives, how they have worked around it, and what their priorities are for a transformation in governance. Helpful answers to these questions can only be gained through patient, open-ended interviews, one-on-one or in small groups.

- ✓ How do ordinary people define corruption? (Note: These may come in narrative form, rather than as dictionary definitions.)
- ✓ To what extent is favoritism toward a family member or member of the person's identity group considered corruption? In what cases might it be tolerated? To what extent?
- ✓ What manifestation(s) of the kleptocratic regime's practices are particularly galling?
- ✓ Do the kleptocratic networks enjoy residual support from any specific constituency groups within the society?
- ✓ How did ordinary people cope with the shakedowns and neglect of basic needs?
- ✓ What are the top three things they expect from the new administration?
- ✓ Do they have confidence in the new administration's ability to tackle corruption?



Sudanese citizens gather for a public meeting.

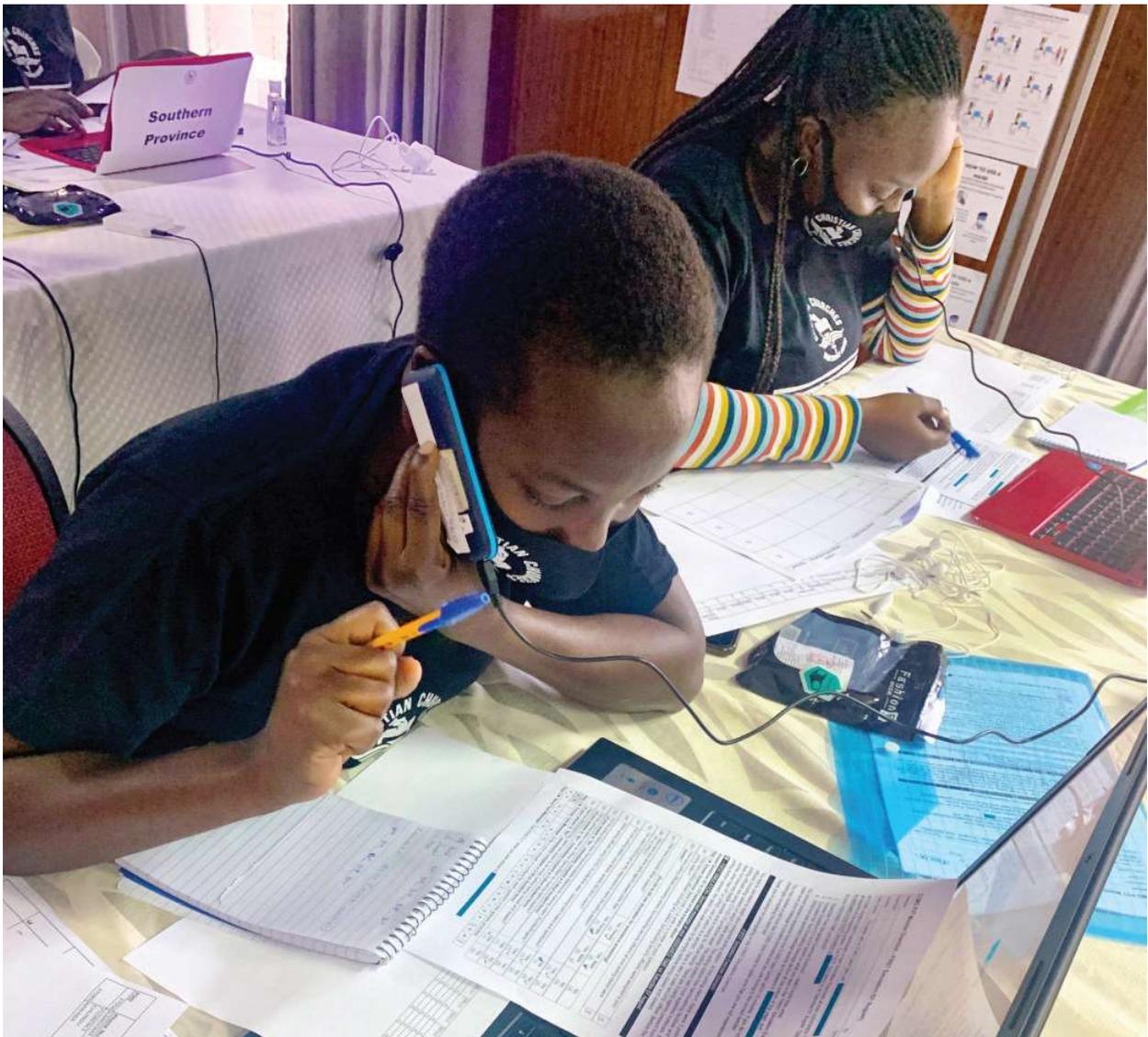
### **Reform to Date and Prospects**

By the time this analysis is being conducted, a transfer of power, even if partial, has likely already taken place. Thus the reform effort is in the proverbial position of trying to build the airplane while flying it. To have any hope of doing so successfully, it is crucial to know how much of the frame has been built, where the newly welded joints are already vibrating, and so on. This set of questions, best answered by members of the reform coalition itself, will further clarify their understanding of what assets they have at hand. These questions also remind reformers that timing and sequencing matter. They train respondents' attention to specific events on the calendar that may impact their efforts, positively or negatively, or be leveraged to maximize the effect of any given move.

- Where have reform efforts focused to date? With what results?
  - Were looted assets recovered, either through judicial process or amnesty?
  - If so, by what mechanisms were they allocated?
  - Have any anti-corruption bills been passed?
  - Is there evidence of greater governmental transparency or openness?
  - Have empowered executive branch reformers begun taking action? If so, what?
  
- What have been the main obstacles to desired reform measures to date?
  
- Does the reform coalition have the experienced personnel required for key appointments?
  
- Who are potential allies for the reform movement, including counterintuitive ones?
  - Who are the most likely defectors among dissenting or disgruntled members of the old networks?
  - Without making them cheerleaders, is there a role for respected thought or spiritual leaders who habitually stay out of politics?
  - Could business leaders, acting individually or in concert, put moral or economic pressure on the residual or rising network(s)? For example, could they refuse to contribute to the network's charities or to deal with businesses woven into the network's fabric? Could such businesses or other actors enlist international businesses in this effort?
  
- What are the key popular constituencies for serious reform?
  - Neglected rural populations, across party or identity divides?
  - Disgruntled rank-and-file employees of captured state entities, such as soldiers?
  - Women?
  - Organized labor?
  - Other groups who have suffered a disproportionate negative impact from the kleptocratic practices?
  
- What public institutions or entities have retained enough independence, public-spiritedness and/or professional pride to serve as anchors for a reform movement?
  
- What legal or institutional changes, including potential constitutional reforms, are needed to advance the reform agenda?
  
- What role could the parliament play (if largely independent and supportive of reform)?
  - Does it have budget oversight?
  - Are any elements of the budget allowed to be classified?
  - Are the revenues of publicly owned companies, including those owned by the military, subsumed into the budget process? If not, can they be?
  - Are the parliament's decision-making mechanisms clear?
  - Do genuine reformers hold key positions?
  
- What upcoming events, either internally or internationally, might serve as "pegs" for reform measures or help draw attention to the cause? What about the reverse? Are there any events or anniversaries that residual kleptocrats might use for mobilization purposes?

- ✓ Are there any international incentives that might be leveraged? For example:
  - Debt relief;
  - Removal of sanctions;
  - Favored trading status; and
  - Accession to a valued international body.

Note: As the behavior of several Eastern European governments after EU accession demonstrates, such incentives do not automatically deliver improved anti-corruption outcomes. They need to be linked explicitly to an anti-corruption agenda, and clawbacks or other repercussions must be applied if the terms of the initial incentive are violated. If the awarding body ties the incentive to different policy objectives simultaneously, the incentive's value in promoting anti-corruption decreases, as the recipient is likely to register only the most convenient message. Civil society organizations can help with monitoring such conditions, demanding accountability and providing accurate reports to international partners.



In Zambia, the Christian Churches Monitoring Group (CCMG) data clerks follow up with Parallel Vote Tabulation (PVT) observers sending in reports on election day to ensure data quality.

## Developing the Analysis and Depiction

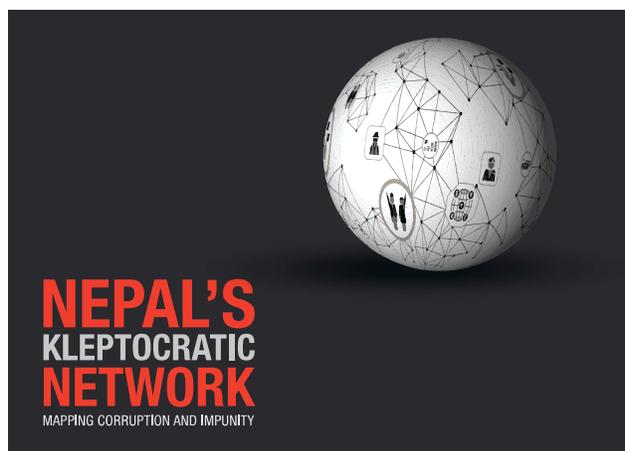
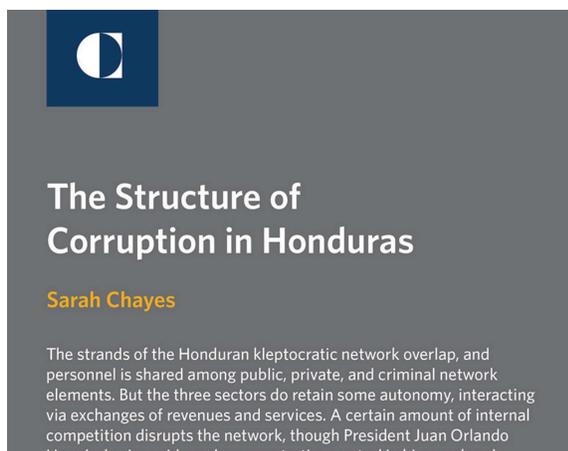
This research will result in what will likely seem a massive, even overwhelming, welter of disparate information. One way of beginning to wrestle it into the coherent structure that this analysis aims to deliver might be to use large flipcharts keyed to the categories listed above, using a different flipchart or even a different color of marker for each category. All the material can then be sorted to correspond to these categories, with repetitions providing emphasis. If a great many disparate sources mention or describe the detrimental effect of network fragments within the justice function, say, then that institution will emerge as a priority for reform efforts. Such an exercise can take up a lot of space: with easels spread around a room, or flipcharts flat on the floor, and researchers down there with them.



If a written report is a desired product, then direct quotes, properly anonymized as appropriate, are crucial to bringing analytical material to life and making it real for readers. Take note of the killer lines during the initial sketching phase for retrieval later. Placing the real stories of real people into real landscapes, too, helps drive home the import of the issues raised. So site visits as well as interviews constitute an important component of the effort.

But given the glut of reading material most policy practitioners are called upon to absorb every day, it is difficult to imagine reform campaigners, especially top government officials, sitting down to read a report that may run to hundreds of pages of prose. An accompanying graphic depiction of the findings can serve as a shortcut or a mnemonic device, while also surfacing specific topics that a given reformer would like to explore in more depth through a careful reading of the corresponding section in the report itself.

Such a graphic depiction of residual networks should provide the key elements for understanding the underlying realities of a given political economy in an easily portable and immediately graspable format. Two different prototypes, analyzing conditions in Honduras and Nepal, are fully presented in Annex 1.



# STRATEGIES FOR IMPLEMENTING REFORM

**THERE ARE FEW PHENOMENA MORE OVERWHELMING** to contemplate than the landscape wrought by systemic corruption. At every hand lies the wreckage, in every direction some institution or misshapen cultural adaptation crying out for repair. Only by rationally prioritizing steps, and sequencing them so that each builds on the preceding one, are reformers likely to remain energized and effective. Such selections will necessarily be specific to each situation. Below are some principles that may assist in making them.

## Lessons from Post-Kleptocratic Transitions

The disappointing outcomes of many recent anti-corruption uprisings provide an object lesson on the dimensions of the challenge. These outcomes have also established enough of a pattern to generate precious practical lessons applicable to future windows of opportunity.

✓ **Punishment matters.** The deliberate and reasoned decision by a community to sanction one of its own members, especially a leader, is a momentous step. Apart from the values of deterrence and retribution on behalf of victims—so they don't plunge the whole society into an endless spiral of reprisals—punishment broadcasts where the community truly draws the line between acceptable and abhorrent behavior. No list of commandments, severely worded laws or ethics training in school or on the job communicates a society's red lines better than what actually brings down some kind of repercussions. For this reason, some of the most egregious members of the prior ruling kleptocratic networks must be sanctioned.

✓ **Punishment must be—and must be seen to be—impartial, independent and transparent.** If the only force capable of defeating an entrenched kleptocratic network is a cross-cutting consensus of ordinary people, then reform efforts must not shatter that consensus by applying a double standard.

This imperative gives rise to several challenges. One is that the old kleptocratic elites have almost certainly captured major swathes of the justice function. The extant prosecutorial and judicial infrastructures may be wholly or partially unfit to impose accountability. A temporary, specially constituted body might be required, potentially with international assistance, along the lines of the International Commission Against Impunity in Guatemala (known by its Spanish acronym, CICIG), for example. It should be allowed to perform its work with no pressure from political leadership, either to open investigations or not.



Even so, its personnel should expect a barrage of disinformation from old kleptocratic elites seeking to discredit them and their work. Alternatively, rising kleptocratic networks may pay lip service to such new bodies, while dragging their feet over authorization or seeking to limit their powers.

A second challenge is that the post-kleptocratic reformers must hold themselves and their parties to the same rules they are applying to former regime members. They can demonstrate this commitment immediately by ensuring that government appointments avoid the type of cronyism and conflicts of interest that characterize kleptocratic regimes. They can publicize strict ethics guidelines, and apply them to members of the new government without waiver or exception. They can also allow legitimate criminal investigations to proceed, even into the ranks of the new regime if that is where the evidence leads. This is likely to be the major arena for conflict within a new administration between genuine reformers and would-be successor kleptocrats.

- ✓ **Repercussions alone will not defeat the network(s).** Given the resilience that kleptocratic networks have displayed in recent years, an anti-corruption campaign cannot stop at putting a few symbolic perpetrators in jail, as difficult as imposing such accountability may be. The effort must include a set of systemic reforms—including legislation, codes of conduct, public education and especially the budgets, personnel, guidance and incentives to implementers—and the raw courage necessary to enforce the new rules. Reasonable salaries for government employees, while they alone will not stamp out corruption, are a prerequisite. Ordinary citizens, whose indignation may have opened the window of opportunity in the first place, should be engaged in the design and implementation of reform measures. In cases where a new network is seeking to establish itself, priority regulatory focus toward economic sectors that its members already dominate is advised.
- ✓ **So-called petty corruption matters gravely to its victims.** Given how vertically integrated corrupt networks usually are, a mechanism may be needed to address the daily acts of corruption that victimize citizens on a local level. Some type of truth-and-reconciliation process may be necessary to metabolize the repeated injuries—often committed by cogs in the system who were trapped by it, too. The human stories of victims and perpetrators of economic crime should be heard and absorbed by the society as a whole.
- ✓ It may be that the new order is too fragile to allow for the type of unflinching punishment described above, or that the terms of a pact ending a period of conflict preclude it. In these cases, the possibility of expanding such a **truth-and-reconciliation process** beyond the realm of street-level corruption to senior officials should be explored.
- ✓ **Asset-recovery should not be the sole objective of an anti-corruption campaign.** While the possibility of repatriating some looted public funds is obviously appealing, new leadership should avoid raising public expectations too high, as it is a lengthy and difficult process that has so far not delivered the relief that was often expected. Where funds are recovered, the amounts and allocation decision-making process must be public and democratic.
- ✓ The same holds for any **amnesties** that may be offered to leading offenders in return for the repatriation of stolen funds. Amounts and rules surrounding these transactions must be subject to public scrutiny. A strict no-tolerance policy regarding subsequent corrupt behavior should be enforced.

- ✓ **Hunger for reform won't be satiated for long by just "low-hanging fruit."** Anti-corruption efforts, particularly when stimulated by foreign entities under pressure to demonstrate evidence of success, sometimes fall into the trap of narrowing their focus to what is deemed achievable. But in systemically corrupt countries, the population is usually well aware of the dimensions of the problem or at least suspicious. A focus on easily achievable low-level objectives to the exclusion of senior figures may actually backfire, convincing the public that small fish are being scapegoated, while top culprits escape repercussions. The result is usually deepened cynicism or bitter disappointment—which can be exploited by anti-reform actors.

On the other hand, where citizen complaints center on delivery of a specific service, such as potable water, then a concentrated effort to improve the integrity within that sector with citizen input can buy time for more challenging objectives. A mix of both systemic and low-level, quick-win approaches is likely to be the best strategy.

**Effective communications are essential to build and maintain popular support for government integrity reforms. Honestly communicating progress and achievements—with pride but without hype—can help bolster the legitimacy of the government, mobilize the public behind reform measures and generate support for enforcement efforts against politicians or other entrenched elites who might otherwise seek to undermine anti-corruption initiatives. A team of effective communicators, extending in concentric circles outward from the core reformers, should be poised to perform the following functions:**

- ✓ **Prepare the public for reform actions themselves, especially key constituencies that may initially feel somehow slighted or targeted. They should be contacted ahead of time, to defuse adverse reactions.**
- ✓ **Use focus groups and opinion polling to understand and monitor citizen perceptions of the reform process and priorities.**
- ✓ **Conduct social media monitoring of disinformation narratives.**
- ✓ **Prepare rebuttals of anticipated critiques.**
- ✓ **Rebut disinformation and personal attacks.**
- ✓ **Explain an element of reform and its likely or actual impact.**
- ✓ **Engage citizens in a two-way communication process, including by setting up portals where ongoing corruption can be reported—so long as a clear and publicized follow-up process is available.**
- ✓ **Add some joy to the whole process—help make the fight a celebration.**



✓ **Communication is crucial.** Participants in recent anti-corruption uprisings are unanimous about the importance of public communication either to the success or failure of their efforts. Where the kleptocratic network has been able to dominate public information and effectively smear or intimidate activists, or else misguide the public about their identity or objectives, it will be hard for the reform effort to recover. On the other hand, where reformers have themselves seized the information space, often by resorting to direct and unexpected ways of connecting, such as street theater, they have been able to generate an outsized response. The reform effort needs a considered and flexible communications strategy.

In the most effective asymmetrical insurrections, actions themselves **are** information operations. That is, the choice of targets is designed to send a message. Such an approach should serve as an axiom for a reform movement. But words (as well as music and art) must also be used.

### Designing (or Supporting) Reform Processes

It is an axiom of this analytical approach to anti-corruption reform that programs, targets and activities should not be designed before the analysis is performed. Despite the overarching patterns in kleptocratic structures and practices around the world, the specifics of each context at a given point in time are so unique as to require a finely tailored approach if the difficult prospect of systemic reform is to have a chance. Such tailoring is impossible without a granular understanding of the situation. A candid assessment of the true motivations for the anti-corruption push will also provide guidance on priorities.

**Despite the overarching patterns in kleptocratic structures and practices around the world, the specifics of each context at a given point in time are so unique as to require a finely tailored approach if the difficult prospect of systemic reform is to have a chance.**

Nevertheless, a few first principles may suggest initial avenues of approach.

#### Strategic Variables

Some factors may weigh so heavily on the overall conditions for reform that they cannot be ignored, or opportunities for significant outside reinforcement of reform efforts may exist. The power dynamics and types of networks identified during the assessment should inform the selection and

prioritization of strategic variables, which are targets likely to have an outsized payoff in reducing the influence of lingering or emerging kleptocratic networks.

One scenario likely to require a direct response, for instance, is if the network fragments control superior or significant independent economic or military power, or both. In this case, prospects for reform are daunting. The campaign will have to focus on reducing and/or counterbalancing that power by taking measures that may include:

- ✓ Simplifying administration in order to reduce opportunities for favoritism and bribery within a determined sector;
- ✓ Bringing the sources of economic power, such as military-owned private businesses, under budget supervision, as a potential prelude to prohibiting them (Budget allocations to the public entity should be reduced commensurate with the income it receives from these businesses.);
- ✓ And/or earmarking those private revenue streams for specific purposes that can then be audited, such as debt servicing;
- ✓ Where the above is unfeasible in the short term, enacting special taxes on those revenues;
- ✓ Appointing allies to the top ranks of the uniformed military or captured parastatals;
- ✓ In the case of a militarized kleptocracy (but applicable by analogy to other elements of the state apparatus), spending time listening to the rank and file, with no intermediaries, to understand their loyalty principle and whether there are sources of discontent that might allow this “GI” constituency to split off from, say, specialized units that are fiercely loyal to the residual networks;
- ✓ Paying attention to, and potentially revamping, service academies; ensuring reform values are inculcated; and promoting a critical mass of new trainees into officer ranks;
- ✓ With extreme caution, considering the advisability of building an alternative formal instrument of force, such as a special unit within the army or police (This is a potentially dangerous move, as it could lead to armed conflict. Criteria for inclusion must not inflame identity cleavages.);
- ✓ Considering vetting of public employees in key sectors and recruiting new people based on criteria of transparency, independence and professionalism;
- ✓ Leveraging powerful pro-reform international allies, particularly those that helped broker or foster the accord that may have guaranteed the former networks’ residual power, or those that provide security assistance; and
- ✓ Fostering and protecting competing local businesses in the sectors dominated by the residual network fragments.

**The power dynamics and types of networks identified during the assessment should inform the selection and prioritization of strategic variables, which are targets likely to have an outsized payoff in reducing the influence of lingering or emerging kleptocratic networks.**

Similarly, if major anti-reform international actors are investing in the survival of the kleptocratic order, the reform effort must find ways to curtail that investment, without seeming to prolong citizens' suffering. They might, for example:

- ✓ Use or enact and strictly enforce legislation or regulations governing such investments, so as to limit the scope of these activities and ensure transparency and public oversight, and ensure that they deliver benefits directly to citizens; and
- ✓ Publicly expose the misguided priorities or negative consequences of prior expenditures for ordinary people.

Especially in cases where the pre-transition elites retain economic power and instruments of coercion, the only force truly capable of checkmating them is a massive, cross-cutting coalition of ordinary people. Kleptocrats always have superior resources. Reformers must maximize their countervailing power: numbers. That means the citizens cannot be seen only as beneficiaries of the desired reforms, but must also be recruited to be its actors, by, for example:

**Kleptocrats always have superior resources. Reformers must maximize their countervailing power: numbers.**

- ✓ Building citizens' oversight into all efforts to improve service delivery, including security sector reform (Ideally, vertically integrated integrity networks should be fostered, so that local residents on the ground can join forces with communities in similar situations, such as receiving a new or repaired source of water, to report the realities of the project upward.);
- ✓ Including ordinary citizens on decision-making bodies regarding the terms and uses for money repatriated under amnesty and/or asset recovery;
- ✓ Engaging ordinary citizens in a truth-and-reconciliation process focused on economic crime;
- ✓ Engaging ordinary citizens across identity divides in the construction, repair or beautification of infrastructure and natural environments neglected by the prior regime (Consider public accolades for participants, such as uniforms and billboards or public service messages.);
- ✓ Initiating a whistleblower/ombudsman process, whereby citizens' complaints regarding government corruption can be investigated and, where substantiated, culprits can be punished or processes reformed (This would provide useful bottom-up insights into which facets of government corruption most irk citizens. It could also serve as a training ground for rising investigators in the complex and sensitive areas of corporate crime and corruption.);
- ✓ Constantly getting out in front of the residual networks with forthright information about the reform effort, its promises, obstacles and achievements (Where the network may have captured communications platforms, get creative about how to spread the word. Do not over-promise or spin.);
- ✓ Making direct payments to citizens from the proceeds of the anti-corruption efforts, such as increased tax revenues, repatriated funds, confiscated local assets or legal penalties (Such a program would be particularly important in cases where an international institution has obliged the new government to end subsidies on consumer staples as a condition for loans or debt relief.);

- ✓ Helping citizens organize a boycott of network-linked businesses, connected to demands for an explicit reform agenda (This would only work in contexts where the residual networks do not enjoy the support of a significant segment of the population.);
- ✓ Engaging citizens in recommending and designing reform measures, with an eye toward ensuring that such measures do not entrench longstanding discriminatory treatment of women and other social groups that bore the brunt of prior kleptocratic practices; and
- ✓ Making preparations for mobilizing the population in exceptional instances of deadlock.

In tandem, or alternatively, the opportunity may exist for extraordinary international reinforcement of reform efforts, such as by way of an international anti-corruption commission along the lines of Guatemala’s CICIG, or the deployment of an internationally constituted Anti-Corruption Rapid Reaction Force. If properly constituted and mandated, such entities can produce decisive effects, and enabling legislation and other supporting measures should receive priority attention.



People demonstrate in support of the International Commission Against Impunity in Guatemala (CICIG.) at the Constitution Square in Guatemala City, on September 1, 2018. Photo: Johan Ordóñez/AFP via Getty Images.

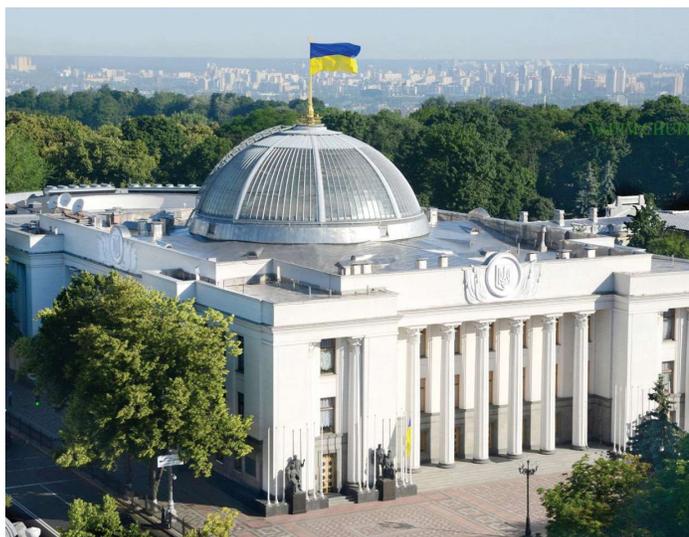
### Potential Targets of Reform Effort

Given their importance, either in maintaining the kleptocratic order or in the way citizens experience governance, bad or good, the following sectors might make appropriate early targets:

- ✓ **Regulations that govern conflict of interest, nepotism and the “revolving door.”** If enforced, such regulations are not only an important tool in the fight against corruption, but they also send a strong message to an indignant population that the new authorities are serious. Enacting such regulations early in a new administration and holding administration members to their rigorous standards will help maintain public support for further reform measures.

✓ **Justice sector.** Historically and in the eyes of a great many citizens, the most important attribute of sovereignty is the administration of justice. It is also the most effective and legitimate means of holding corrupt officials and their accomplices accountable. It is therefore imperative that control of this sector be gained by the forces of reform.

- In the short run, a temporary special anti-corruption unit may have to be stood up, and provided with a specific mandate and time horizon. International assistance, including personnel, may be needed for both technical expertise and to enhance its apparent power. This unit could also serve as the training ground for a new crop of investigators and prosecutors devoted to fighting corporate crime and corruption. To be credible and effective, such a unit must have complete independence of governmental authority, including a multi-year budget, and the independent power to select cases and appoint personnel.
- A mandatory training program for judges might be designed, incorporating the specifics of how corruption actually takes place within the sector (phone calls from social or governmental superiors requesting a certain outcome in a pending case, bribes passed to clerks by members of the defense bar, etc.). Simulations might be designed to equip judges to respond on the fly to such situations as they arise. At the end of the training, graduates' salaries should be increased, and they should be given some mark of distinction (patch, ribbon, etc.)—but with a warning regarding what wrongdoers should expect in case of future misdeeds: zero tolerance.
- Mandatory ethics and corruption awareness training should not be limited to abstract principles, but include network-mapping exercises and especially practical, scenario-based training on how to respond to corrupt requests, when social norms in conflict with integrity are activated.
- High-level justice sector professionals would benefit from training on complex financial crimes and corruption and how to assess cases presented to them, including by appealing to outside expertise.
- Reformers should pay special attention to the transparency and integrity of the bodies and mechanisms for selecting, promoting and disciplining justice-sector professionals.



The dome of the Verkhovna Rada (Ukrainian parliament) in Kyiv, Ukraine.

- ✓ **Police.** In many countries, or in certain regions or neighborhoods, police are the government officials whom citizens most frequently encounter. They are the face of the government. Where police actions are seen as biased, extortionate or brutal, they may become the lightning rod for grievances against the corrupt system as a whole. In these cases, muscular police reform measures should be taken. They might include:

  - The systematic withdrawal of police units from duty for a retraining process, in which ethical standards should be set forth and discussed. Officers should also be drilled in simulations that put trainees in situations with conflicting priorities, as with the judges above.
    - This training program should be challenging—physically, mentally and ethically.
    - Not everyone should pass.
    - Those who don't may not remain in the police force.
    - Successful graduates should receive new uniforms or patches, higher salaries and certain knowledge that they will lose their jobs if they are caught committing acts of corruption thereafter.
  - Citizens could be engaged in oversight of the newly trained and redeployed units by way of community meetings and an online platform where testimony and evidence (documents, photographs or recordings) could be submitted. If allegations of renewed corruption are substantiated, the offender should be dismissed immediately.
  - Intelligence and security sector. A similar program for vetting security-sector personnel and reforming intelligence services could help ensure that the remnants of former kleptocratic networks do not regain control over the political apparatus or use loyal security sector personnel to inform on and obstruct reformers. Revamped intelligence services committed to reform could help pursue independent investigations into these or rising networks' assets and inner workings.
- ✓ **Procurement.** Public contracting and procurement constitute a crucial instrument for government service delivery—and provide fertile ground for corruption and state capture.
- ✓ **Selected service delivery.** Where grievances seem to collect around the provision of a specific public service, such as health care, priority focus on that sector may be warranted.
- ✓ **Central bank.** If gaining international financing is a priority campaign objective, then early focus on the central bank may be warranted. Central banks are notoriously opaque, elitist and arbitrary. A program to render proceedings more transparent, rule-bound and democratic, not to mention independent of the local financial sector as well as the government, would blaze a trail for other countries in the region and around the world.
- ✓ Where a new administration harbors elements of a would-be successor kleptocracy, preemptive regulatory attention should be paid to that network's traditional sources of revenue.

# FINAL FUNDAMENTALS

**KLEPTOCRATIC STATE CAPTURE IS USUALLY YEARS,** if not decades in the making. Historic windows of opportunity—such as the one that opened up in the United States and Europe in the midst of the Great Depression—are vital in achieving once-in-a-generation improvements. Change, in these contexts, can and should be dramatic. Still, external supporters of reform efforts should not place their local partners in impossible binds by expecting breakthroughs on an unrealistic timeline.

**External supporters of reform efforts should not place their local partners in impossible binds by expecting breakthroughs on an unrealistic timeline.**

On the other hand, saying that “systemic social and political change is a slow process” is not meant here as a synonym for some impersonal, evolutionary force that inevitably will deliver better governance therefore eliminating the need for focused, swift, unusual and sometimes risky moves. On the contrary, the arduousness of the endeavor and especially the rarity and fragility of the opportunity are why the effort must be launched quickly and decisively, according to a plan and a deliberate sequence (which, as with all good plans, will have to be constantly iterated in response to unfolding realities).

At all costs, the effort must resist the temptation to rely on “natural” constituencies defined by geography, ethnic group or religious or cultural affiliation. The only way a coalition of the wealthy and powerful corrupt can be defeated is by a cross-cutting consensus of the whole population. Affiliation with any previously extant fraction of society, including political party, will only undermine the legitimacy of the reform effort, further alienate the population, and invite ongoing factional conflict.

**The only way a coalition of the wealthy and powerful corrupt can be defeated is by a cross-cutting consensus of the whole population.**

Slapdash approaches and half measures or oversold window dressing will not work. Reforms must be serious-minded. That means those who have been given amnesty, or whose potential past crimes have been deliberately overlooked as part of a retraining and reintegration program, particularly allies and friends of the new regime and the reformers themselves, must be held up to implacable standards. It does no good for the new regime to be arguably or marginally better than the old. Those who have gained power in the name of integrity will be judged more harshly than the criminals they replaced.

Rooting out kleptocracy is a contact sport. After a kleptocratic network has been unseated, the situation will be kaleidoscopic, and time will feel sped up. Reformers, despite the popular mandate they may enjoy, will likely be outmatched. They will never succeed by playing whack-a-mole. They must take the time to think strategically—but they can’t dilly-dally either. If ever there were a time for sleepless nights, it would be **after** an anti-corruption victory.

# ANNEX 1

## Two Prototypes for Kleptocratic Network Depiction

Included here are two models to help with designing an effective depiction of residual network implantation in a post-kleptocratic situation. These were created with the needs of overworked senior policymakers in mind. The objective was to provide the key elements for understanding the underlying realities of a given political economy in an easily portable and immediately graspable format.

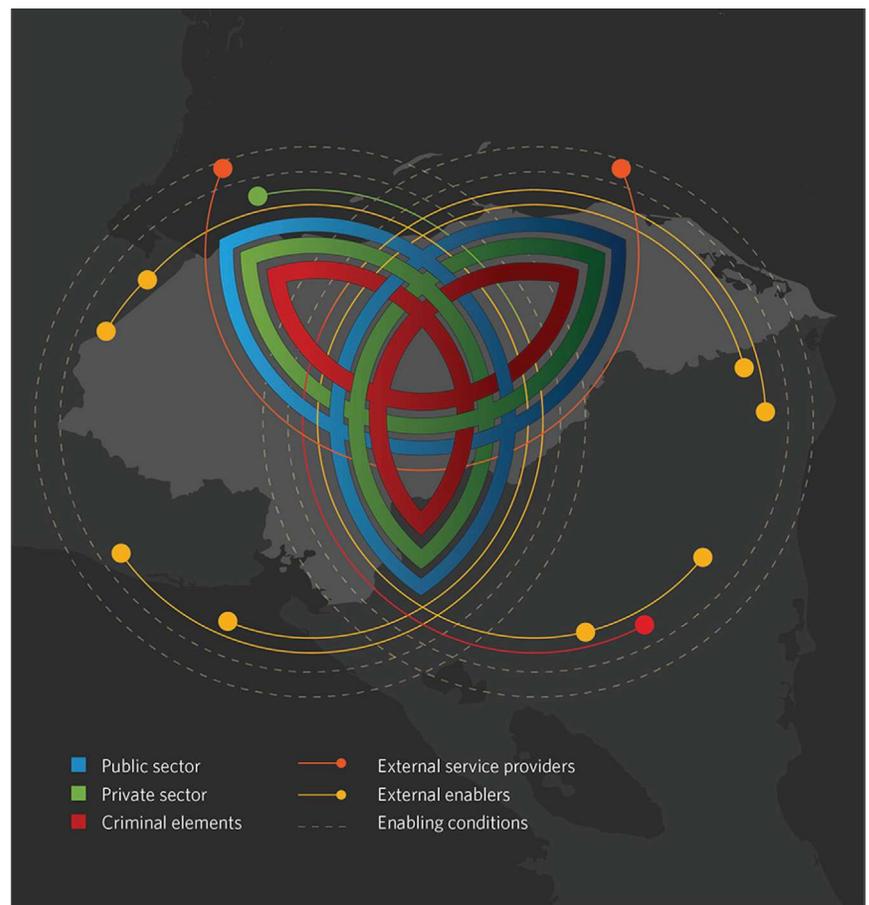
### **“The Structure of Corruption in Honduras”**

This depiction presents the linkages between private, public and criminal networks. If some of the loops had been opened to point to other countries, that would have better suggested the transnational nature of the phenomenon. Graphic design constraints precluded that option, so an effort was made at least to suggest that reality with the green and red balls attached to the strands of those colors. “Enabling conditions” are depicted as dashed lines, instead of balls in the constellation.

The significant drawback associated with this diagram is the lack of any depiction of money flows. That omission was simply due to the volume of work required and limited time, human and technical resources.

This diagram also fails to reflect the possibility or reality of vertical integration.

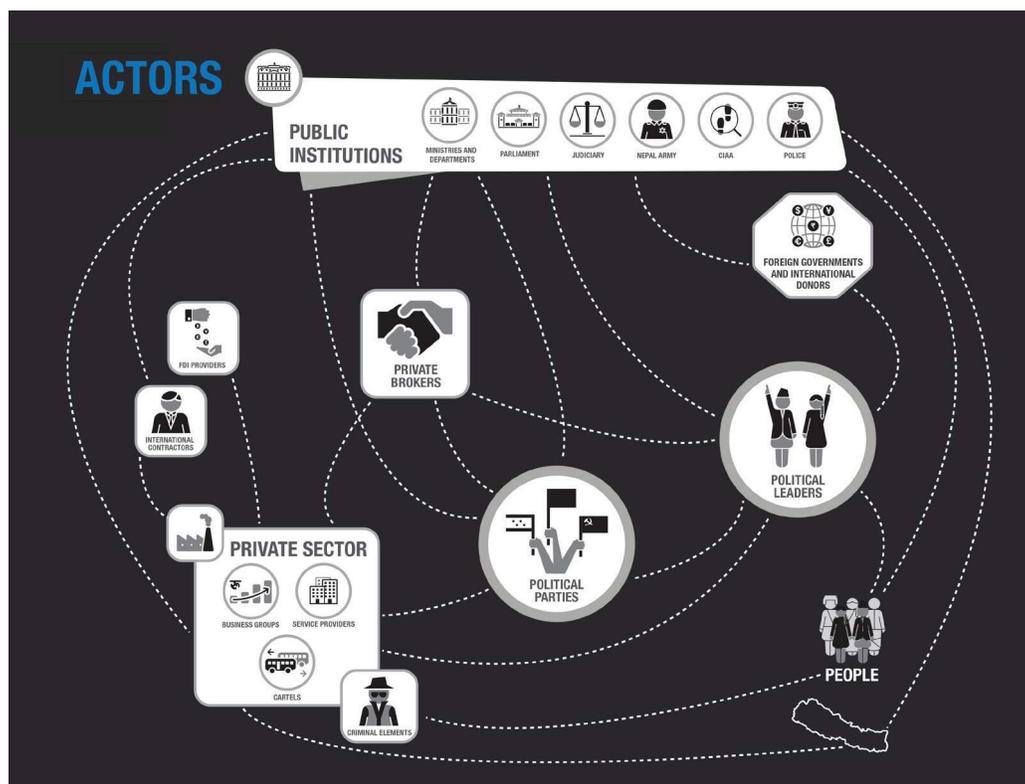
In this case, it was genuinely unclear which of the basic sectors was in the lead, so the lines are all the same thickness. Where the formal government is clearly in the lead, for example, the blue line would be thicker.



## “Nepal’s Kleptocratic Network”

This diagram has the distinct advantage of visually depicting the sectors involved in networked corruption. It also includes relevant actors that are not mentioned in the other, such as “political parties” and “brokers.” And it very usefully depicts and explains the practices, by actor, that deliver revenues to network members and keep the kleptocratic order in place.

Like the Honduras infographic, however, it lacks a more comprehensive overview money-flow diagram. Also, the visual depiction of network structure is a bit chaotic.



The infographics above suffer from the following shortcomings:

- ✓ They treat the given network as a self-contained entity, centered on a single country. In fact, kleptocratic networks are transnational. A good visual metaphor might be an airline route map, with hubs in various capitals and arcs linking them to other hubs. A kleptocratic network may be similarly anchored in one country, but intertwined with others spanning the globe.
- ✓ They only depict entity/institutional elements of the network; only a few individuals are named. This omission was due to two separate factors: the difficulty of the research, given limited time, human resources and expertise, and the danger of reprisals from named individuals. The current framework calls for that level of detailed mapping to be part of the product, even if it may not be published.

Ideally, as part of a concerted anti-corruption process, such a depiction would be a dynamic document, updated regularly to take account of changing realities. It might live online but be easily printable (perhaps in a version that could omit some sensitive information on individual targets to avoid legal action or other repercussions) for discussion and planning purposes.<sup>13</sup>

# ANNEX 2:

## CONSOLIDATED LIST OF QUESTIONS TO BE ADDRESSED

This section simply lists questions to be addressed through document analysis and interviews, as discussed in this paper, minus the discussion. Please note that some of the questions may seem redundant between topic areas. But asking them at different points in the sequence may elicit different or fuller answers the second (or third) time around. Some categorizations may be a matter of judgment, for example, whether a given individual or entity is a full network member or a particularly valuable enabler. For any given document perusal or interview session, answers or insights might best be noted in the text of the framework for easy retrieval and consolidation afterward.

Note also that some questions exploring the positive side—potential structures of and approaches for integrity networks—are scattered throughout the framework as they arise, while others are pulled together under a separate heading.

### The Reform Coalition

- ☑ What are the real—if perhaps hidden—motivations for this effort and how do they vary among key actors? Are reformers motivated by a desire ...:
  - To consolidate power?
  - To assuage an indignant and restive population?
  - To gain international respectability in order to access revenue streams (return of looted assets, debt relief, development assistance, development financing or IFI loans)?
  - To cut costs or increase government revenues from internal sources?
  - To improve service delivery to average citizens? (In which case, focus might be placed on specific sectors, such as the ministry and subnational departments of health and education, local infrastructure, etc.)
  - To lay the groundwork for a government fundamentally dedicated to the public interest?
  
- ☑ What are the values the campaign seeks to embody?
  
- ☑ What are the campaign's top three concrete objectives?
  
- ☑ What is the envisaged time-horizon for maximal effort (with attention to the challenging dynamics of windows of opportunity)?
  
- ☑ Who is the driving force behind the campaign? For example:
  - The new head of state?
  - Other members of the executive and legislative branches, or independent agencies, short of the head of state and his/her inner circle?
  - Civil society organizations, operating on behalf of a significant segment of the population?
  - International interveners?

- ✓ Who are the key strategists? (Name names)
- ✓ Who are expected to be the key implementers? Do they understand this role?
- ✓ Who are the potential allies, including counterintuitive options?
  - Dissenting or disgruntled members of the old networks? (Note: This group is key. It is almost impossible to best a kleptocratic order without defections from within the networks or their class or coterie).
  - Respected thought or spiritual leaders who habitually stay out of politics?
  - Business leaders?
- ✓ Who are the key popular constituencies? (Pay attention to relevant intersectionalities).
  - Neglected rural populations, across party or identity divides?
  - Peoples whose identity, life-ways and/or spirituality make them especially vulnerable to exploitation of sensitive habitats for revenue-extraction?
  - Disgruntled rank-and-file employees of captured state entities, such as soldiers?
  - Women?
  - Young people?
  - Organized labor?
  - Other groups who have disproportionately suffered from the kleptocratic practices?
  - Other groups with a history of reformist activism including in other sectors/on other issues?
- ✓ What would success look like? What specific benchmarks can be identified to indicate progress toward the ultimate goals?
- ✓ How are these benchmarks aligned with the answers to the “motivations,” “values” and “time-horizon” questions above?
- ✓ Which metrics will be used to measure progress against those benchmarks? Perception measures? Objective measures (often proxies)?
- ✓ What is the decision-making process within the reform coalition for selecting and adapting strategy and sequencing? Has it been spelled out to coalition members? Has it been made public?
- ✓ By means of what mechanism will the coalition resolve internal disputes?
- ✓ What steps are being taken to bring this coalition together, even informally, into a network of its own? (The determination to do so is particularly important in cases where the post-kleptocratic administration is dominated by an aspiring new corrupt network and real reformers are seen primarily as window-dressing, and are in reality isolated and beleaguered.)
- ✓ What security measures are in place to protect the physical safety of coalition members?

## Network Structure

- ✓ Under the kleptocratic order, did a single network dominate the political economy, or was the environment characterized by a shifting landscape of rival—if sometimes allied—networks?
- ✓ If a fairly unitary structure prevailed, how important was the person of the chief of state to network functioning? Or was there a significant cadre of network members that was in the process of reconfiguring to retain grip on key aspects of the economy and political function? Or alternatively, is the new administration already colonized by members of an ambitious, alternative corrupt network? (Note the names of key individuals who are still on the scene or those who are new.)
- ✓ Was kinship an important organizing principle for the previous ruling network or the forces currently on the rise?
- ✓ Do family members of the former or current chief of state hold significant political or economic power?
- ✓ Are kinship ties an important organizing factor for residual networks or their rivals? Or are ties largely based on class/profession, geography or other considerations? Identify them.
- ✓ Are there any relevant gender dynamics, in reality or in terms of public perception?
- ✓ Are there internal rivalries within these residual or rising structures? If so, note the names of key faction leaders.
- ✓ To what extent do ethnic/tribal, sectarian, political-partisan or other identity divides demarcate either the old kleptocratic order from the new administration, or rival factions within residual networks or network fragments? Which forms of identity are most important? Are there intersectionalities (ethnic/geographic, linguistic/political party, etc.)?
- ✓ How vertically integrated are those residual or emergent network fragments? Are subnational appointments made by national network members, or have they been in the past? Are there local elections? Under the old order, was there a tacit exchange of license-to-loom in return for an upward flow of some of the ill-gotten gains?
- ✓ Do the networks extend beyond national boundaries? Have they in the past?

## Elements of State Function

- ☑ What national/subnational government agencies or institutions have been deliberately bent or repurposed to serve the interests of the former ruling networks, either to extract revenues or to ensure compliance? Pay particular attention to the following functions:
  - Justice, both in terms of its power to mete out punishment and immunity and to interpret laws;
  - Instruments of coercion, including ministries of defense, interior and state security (Every kleptocratic system must dispose of at least one formal instrument of force, usually one or more special units within the army or police, or straddling the two);
  - Intelligence agencies (Do relics of the old order still retain access to signals intelligence?);
  - Financial agencies, especially the ministry of finance and tax and customs authorities, and the central bank;
  - Ministries of energy and natural resources;
  - Ministries responsible for large-scale publicly-funded development, planning and infrastructure projects;
  - Agencies managing public-private partnerships;
  - SOEs; and
  - Information ministries and/or state-owned media.
  
- ☑ For each function identified, what are the mechanisms by which its public purpose was distorted or its revenues were funneled to the network?
  
- ☑ Which individuals who were key to distorting those functions remain in position? In the case of a rising alternative network, which individuals seem to be attempting to distort these or other functions?
  
- ☑ Can any of them be lured over to the side of reform without contaminating the campaign, either in substance or appearance?
  
- ☑ What instruments of state function have been deliberately crippled, hollowed out or allowed to languish with low budgets, numerous vacancies or underpaid staff? Typical examples include the following:
  - Legislative bodies;
  - Environment ministries;
  - Audit and oversight bodies;
  - Law enforcement and judicial bodies that specialize in corporate crime and corruption;
  - Agencies responsible for ascertaining or confirming title to land;
  - Subnational governments; and
  - Electoral system design and/or election management bodies.
  
- ☑ As above, identify key mechanisms, players and prospects.

## Horizontal Integration

- ☑ What have been the key private-sector holdings controlled by members of the former ruling network controlled? And/or in cases where the transition has positioned new networks to gain power, what are their members' key private-sector holdings? Pay particular attention to:
  - Financial services;
  - Energy;
  - High-end real estate and construction;
  - Mining (precious stones and metals, including rare earth minerals);
  - Media;
  - Telecommunications;
  - Pharmaceuticals;
  - Weapons manufacturing;
  - Select desirable consumer goods;
  - Private security companies;
  - Ostensibly philanthropic or nonprofit humanitarian or development ventures; and
  - Ostensibly nonprofit academic or research institutions.
  
- ☑ For each sector, how monopolistic is the control?
  
- ☑ What have been the key mechanisms by which control of government has allowed network members to obtain outside revenues via entities in these sectors? For example:
  - Government contracts;
  - Preferential access to business authorizations;
  - Waivers or non-enforcement of antimonopoly, environmental, safety and health regulations, and other citizen protections;
  - Tax exemption, preferential loans or preferential access to land, energy or other natural resources; and
  - Preferential access to other forms of government assistance.
  
- ☑ Where are decision points in the above cases?
  
- ☑ Which members of the former ruling networks remain in control of key entities in the aforementioned sectors? And/or which key entities are in the hands of would-be future kleptocrats?
  
- ☑ Can those entities' finances be brought within the national budget process? (For example, in the case of military enterprises or parastatals.)
  
- ☑ Are there potential competitors that could thrive if given access to a level playing field?
  
- ☑ What other actors have played, or are situating themselves to play, a key role in network functioning? What other actors remain a source of power or capability for network fragments? Consider:
  - Political parties;
  - Religious institutions; and
  - Informal go-betweens or "brokers," who provided a layer of distance between parties to corrupt transactions.

- ☑ Does, or did, horizontal integration extend to out-and-out criminal organizations? Examples might include:
  - Smugglers, of people and consumer goods;
  - Traffickers in narcotics, weapons and humans for sex or forced labor;
  - Youth gangs; and
  - Armed militias or other informal instruments of violence, such as retired military or police that have been deployed as plausibly deniable assassins.
  
- ☑ Does, or did, the network incorporate terrorists or other anti-government insurgents?

### **External Facilitators and Enablers**

- ☑ To which international service providers has the previous ruling network had recourse? And/ or in the case of a rising network, are any preferential relationships already viable? Specify the company. Examples might include:
  - Law firms;
  - Accounting firms;
  - Registered agents;
  - Banks;
  - Lobbying firms; and
  - Real estate and art/antiquities dealers.
  
- ☑ What international entities or programs have served as enablers, or may in the future? Consider the following among others:
  - Foreign direct investment (Which companies? Include foreign government-owned entities.);
  - Security assistance (From which countries?);
  - Humanitarian or development assistance;
  - Development financing;
  - Other IFI loans;
  - Regional organizations, such as the African or European Unions;
  - Neighboring countries or regional or other international partners (Consider diplomatic as well as material support, and note that it may be difficult to judge whether kleptocratic networks straddled borders or benefitted from an enabling relationship);
  - Stature-enhancing or lucrative public events, opportunities or positions, including meetings with foreign heads of state, training or fellowship opportunities, seats on boards of directors, etc.;
  - Relationships with former colleagues at international institutions, such as the World Bank; and
  - Foreign universities, think tanks, cultural institutions and professional associations.
  
- ☑ Can pressure be brought on any of the entities above to drop their affiliation with former network members?
  
- ☑ What and who are the most important potential international allies for the effort to reform government?

## Enabling Conditions

Enabling conditions are internal or external realities that cut in favor of ongoing kleptocracy.

- ✓ What are the most consequential enabling conditions? Consider:
  - Constraints imposed by agreements that permitted the transition in the first place;
  - Political, economic, security or ideological priorities of powerful international partners;
  - Significant internal identity divides of any sort (political, gender, ethnic, religious, class, etc.); and
  - Regional conflicts that invite smuggling or other forms of corruption.
- ✓ In cases where a foreign interlocutor's unrelated political or security priority conflicts with its stated reform objectives, is it possible to spell that contradiction out in order to achieve a more consistent policy?
- ✓ What pressures and priorities weigh on mid- and low-level officials that make it hard for them to break with corrupt practices? Such as:
  - Excessively low salaries;
  - Expectations of remittances or favors from family or home village;
  - A sense of obligation to elders or spiritual leaders or others who may be deemed superior to the official in the traditional hierarchy; and
  - Perceived "debts" stemming from campaign contributions or political appointments.
- ✓ Are there any other cultural values or ethnic/racial tensions that might seem to conflict with anti-corruption objectives?

## Revenue Streams

Note that these questions will overlap to some extent with the "horizontal integration" section above, and, in the case of export commodities, also with "external sources." Note also that corrupt transactions do not always exclusively involve money. Consider sextortion or the extortion of other services when analyzing prior kleptocratic practices.

- ✓ What were the key internal sources of lucre pocketed by the prior or rising kleptocratic elites? (If there is a distinction, pick the networks—former or rising—that pose the most immediate threat to reform). For example:
  - Fossil fuel revenues captured either before or after inclusion in the national budget, such as via bunkering, smuggling, invoice fraud, including in the exchange of raw product for refined, kickbacks, self-dealing allocations of exploration rights or "blocs";
  - Revenues from other natural resources, including minerals, precious metals, lumber, etc.;
  - Skimming from customs dues;
  - Privatization of formerly SOEs into network members' hands;
  - Land grabs;
  - Access to any of the commodities above, or other valuable export items including weapons or cash crops, at below-market price;
  - Government contracts or fees for rigging the bidding on government contracts;

- Capture of particularly lucrative industries, such as tourism, including specialized tourism for gambling or sex;
  - Donations to network-controlled “charities” and other forced contributions to ostensibly public-spirited or public projects;
  - Criminal revenues, such as from trafficking and smuggling of people and narcotics; and
  - Extorted bribes or services.
- ☑ External sources:
- Joint ventures or local content as an obligatory part of foreign direct investment (The export commodities questions above could be moved here, as appropriate.);
  - Extorted bribes or “facilitation payments” from foreign companies;
  - Humanitarian or development assistance;
  - Development financing, such as from the IFC;
  - Major bilateral or multilateral loans; and
  - Revenues from foreign businesses purchased with corruptly obtained capital.
- ☑ Within the country in question, where have members of kleptocratic networks typically spent their gains?
- Real estate?
  - Purchase of lucrative local commodities for export?
  - Purchase of businesses in other key sectors, such as energy supply chain, banking, construction and its inputs (cement is a common one), telecoms or media?
  - Import of luxuries for personal use?
- ☑ Were any of the gains reinvested to reinforce the networks’ grip on power, in such vehicles as:
- Campaign spending;
  - Kickbacks or payoffs to network allies;
  - Development projects for select segments of the population; and
  - Media and disinformation?
- ☑ How was money spent outside the country? Be specific about destination countries, entities and assets. For example:
- Bank accounts, likely held via shell corporations;
  - Real estate;
  - Investments in private equity and other opaque funds;
  - Valuable art and antiquities;
  - Shares in foreign companies;
  - Shares in cultural or sporting entities;
  - Charitable donations;
  - Payments to lobbyists and public relations firms; and
  - Tuition for children at prestigious universities.

## Kleptocratic Countermeasures

Kleptocratic networks do not take challenges lying down. Identify countermeasures that are already on display or likely to be deployed.

- ✓ What are the countermeasures that are already on display or likely to be deployed? Consider, for example:
  - Repression;
  - Assassination of exemplary reform champions;
  - Exacerbating, inflaming and otherwise playing on identity divides;
  - Co-opting government function, even if not vested with the formal authority to do so;
  - Weaponizing the anti-corruption agenda to discredit reformers (or worse);
  - Launching disinformation campaigns:
    - If so, to what apparent end?
    - Who are the key influencers?
    - What are the most effective platforms?
  - Launching smear campaigns, deploying tactics such as using private information obtained via signals intelligence, hacking or theft;
  - Co-opting potential reform allies, usually via payments;
  - Drawing out negotiations on the details of the ongoing transition of power;
  - Allying with foreign powers that are not supportive of the reform agenda; and
  - Getting into the good graces of foreign powers, entities or individuals that would be expected to push for reform, by making donations to charitable organizations or by purchasing companies in difficulty.

## Vulnerabilities

Research should also identify residual or rising kleptocrats' potential vulnerabilities. Weak points such as over-reliance on a lone resource or service provider—that is, a potential single point of failure—or internal rivalries might be uncovered through careful study of network practices and especially through interviews with former insiders. Those weak points can then be a priority focus of reform efforts.

- ✓ What are current or potential weak points of the residual or rising networks?
  - Over-reliance on a lone resource or service provider;
  - Particular appetites or desires that can be exposed or leveraged, such as foreign travel or sexual exploitation;
  - Foreign assets, including those of family members, that can be pursued by law enforcement in destination countries;
  - Internal rivalries; and
  - Socially inappropriate modes of expression or other practices that could erode support within residual constituencies or foreign enablers.

## Public Perceptions and Coping Strategies

- ✓ How do ordinary people define corruption? (Note: These may come in narrative form, rather than as dictionary definitions.)
- ✓ To what extent is favoritism toward a family member or member of the person's identity group considered corruption? In what cases might it be tolerated? To what extent?
- ✓ What manifestation(s) of the kleptocratic regime's practices are particularly galling?
- ✓ Do the kleptocratic networks enjoy residual support from any specific constituency groups within the society?
- ✓ How did ordinary people cope with the shakedowns and neglect of basic needs?
- ✓ What are the top three things they expect from the new administration?
- ✓ Do they have confidence in the administration's ability to tackle corruption?

## Reform to Date and Prospects

- ✓ Where have reform efforts focused to date? With what results?
  - Were looted assets recovered, either through judicial process or amnesty?
  - If so, how were recovered assets allocated?
  - Have any anti-corruption bills been passed?
  - Is there evidence of greater governmental transparency or openness?
  - Have empowered executive branch reformers begun taking action? If so, in what form?
- ✓ What have been the main obstacles to desired reform measures to date?
- ✓ Does the reform coalition have the experienced personnel required for key appointments?
- ✓ Who are potential allies for the reform movement, including counterintuitive ones?
  - Who are the most likely defectors among dissenting or disgruntled members of the old networks?
  - Without making them cheerleaders, is there a role for respected thought or spiritual leaders who habitually stay out of politics?
  - Could business leaders, acting individually or in concert, put moral or economic pressure on the residual network? For example, could such leaders refuse to contribute to the network's charities or deal with its businesses? Could such businesses or other actors enlist international businesses in the effort?
- ✓ Who are the key popular constituencies?
  - Neglected rural populations, across party or identity divides?
  - Disgruntled rank-and-file employees of captured state entities, such as soldiers?
  - Women?
  - Organized labor?

- Other groups who have suffered a disproportionate negative impact from the kleptocratic practices?
- ☑ What public institutions or entities have retained enough independence, sense of public interest and/or professional pride to serve as anchors for a reform movement?
- ☑ What legal or institutional changes, including potential constitutional reforms, are needed to advance the reform agenda?
- ☑ What role could the parliament play (if not captured by past or present corrupt networks)?
  - Does it have budget oversight?
  - Are any elements of the budget allowed to be classified?
  - Are the revenues of publicly owned companies, including those owned by the military, subsumed into the budget process? If not, can they be?
  - Are the parliament's decision-making mechanisms clear?
  - Do genuine reformers hold key positions?
- ☑ What upcoming events, either internally or internationally, might serve as “pegs” for reform measures or help draw attention to the cause? What about the reverse? Are there any events or anniversaries that residual kleptocrats might use for mobilization purposes?
- ☑ Are there any international incentives that might be leveraged? For example:
  - Debt relief;
  - Removal of sanctions;
  - Favored trading status; and
  - Accession to a valued international body.

## Endnotes

- 1 For more on the concept of “window of opportunity” in anti-corruption efforts see Florencia Guertzovich, María Soledad Gattoni, and Dave Algozo. “Seeing New Opportunities: How global actors can better support anticorruption reformers,” Open Society Foundations (November 2020), <https://www.opensocietyfoundations.org/uploads/46488403-8df5-48d8-8f59-a09b3012bc1c/seeing-new-opportunities-how-global-actors-can-better-support-anticorruption-reformers-20201125.pdf>
- 2 The link between corruption and violent conflict or political violence has been widely discussed and researched. See, for instance, Shaazka Beyerle, “We Want Freedom: Nonviolent Conflict to Curb Corruption”—Chapter in Conflict Transformation: Essays on Methods of Nonviolence, Rhea A. DuMont, Tom H. Hastings and Emiko Noma (eds.), Jefferson, NC: McFarland Publishing, 2013, and Sarah Chayes, *Thieves of State: Why Corruption Threatens Global Security* (New York: Norton, 2015).
- 3 Research into major drivers of protest in the past 15 years shows that corruption motivates 20% of protests worldwide. Note that this number is very likely an understatement, as researchers rarely conduct in-depth discussions with protesters or insurgents, to tease out the different strands of motivation. See Isabel Ortiz, Sarah Burke, Mohamed Berrada, Hernan Saez Cortes, “World Protests. A study of Key Protest Issues in the 21st Century.” <https://link.springer.com/content/pdf/10.1007%2F978-3-030-88513-7.pdf>
- 4 See Sarah Chayes, “Fighting the Hydra: Lessons from Worldwide Protests Against Corruption,” Washington: Carnegie Endowment for International Peace (April, 2018), <https://carnegieendowment.org/2018/04/12/fighting-hydra-lessons-from-worldwide-protests-against-corruption-pub-76036>
- 5 “Dekleptification Guide: Seizing Windows of Opportunity to Roll Back Kleptocratic Structures,” United States Agency for International Development—USAID (June 2022), [https://www.usaid.gov/sites/default/files/documents/USAID\\_Dekleptification\\_Guide\\_-\\_Working\\_Draft.pdf](https://www.usaid.gov/sites/default/files/documents/USAID_Dekleptification_Guide_-_Working_Draft.pdf)
- 6 “Think 10,” National Democratic Institute—NDI (November 2021), <https://think10.demcloud.org>
- 7 “What is Holistic Security?” Tactical Technology Collective, accessed August 19, 2022, <https://holistic-security.tacticaltech.org/chapters/prepare/chapter-1-1-what-is-holistic-security.html>
- 8 “The Cybersecurity Handbook for Civil Society Organizations,” National Democratic Institute—NDI (July 2021), <https://cso.cyberhandbook.org>
- 9 “What Do You Need To Protect?” Security-in-a-Box, accessed August 17, 2022, <https://securityinabox.org/en/>
- 10 “Keeping Mission-Based Organizations and Their Supporters Secure,” Global Cyber Alliance, accessed August 17, 2022, <https://www.globalcyberalliance.org/mission-based-organizations/>
- 11 For East and Central Africa, a few experts already apply a similar framing, such as The Sentry and the World Peace Foundation (Alex de Waal in particular), and C4ADS. For the former Soviet space, the work of Alex Cooley and Janine Wedel, for example, is rooted in an analogous understanding. Studies of political personnel moves in a transition period, such as the Institut Français des Relations Internationales (IFRI)’s “Angola Under Joao Laurengo: Who Are the New Players of the MPLA State,” can offer precious insight into residual networks, even if they are framed in more traditional terms. Alina Mungiu-Pippidi, at the Hertie School, has closely examined the need for different approaches in steady-state versus other contexts.
- 12 Of particular note are corruption-focused collaborative efforts as the International Consortium of Investigative Journalists and the Organized Crime and Corruption Reporting Project.
- 13 For a fuller description and consideration of each infographic model, see Annex 1





---

NATIONAL  
DEMOCRATIC  
INSTITUTE

---

[ndi.org](http://ndi.org)