Hello all,

Last month saw the latest leak of documents to reveal the vast scale of money laundering enabled by banks and regulators throughout the world. Following the Panama and Paradise Papers, and the Lux and Luanda Leaks, the FinCEN Files once again shed light on how the global elite have been able to move vast sums of dirty money around the world, highlighting how some of the biggest banks and financial institutions have continued to allow suspicious transactions to take place.

At the heart of the FinCEN scandal is the leak of more than 2000 so-called Suspicious Activity Reports (SARs) filed with the US Treasury Department’s Financial Crimes Enforcement Network. Details of these files and their links with illegal activities will doubtless continue to emerge in the coming weeks and months, but the initial information highlights not just the role of financial institutions, but also - as Oliver
Bullough has pointed out in his Oligarchy newsletter - the signal failure of western politicians to properly resource investigators and prosecutors to act on the SARs.

The FinCEN Files' revelations serve to underline the relevance of the focus on this month’s newsletter: promoting integrity in professional fields, as well as one of the key GI-ACE themes on international architecture, which includes Jackie Harvey’s recent piece on practical research on beneficial ownership.

Thank you,
Paul Heywood, Director of GI-ACE
Cities of Integrity: Building Integrity in Urban Planners

Our Cities of Integrity research team closed off this year’s Southern Africa City Studies Conference by bringing together leading voices on the topic of corruption and the desire for integrity in South Africa’s local governance sphere. Stephen Berrisford, senior consultant on the GI-ACE project, drew on his extensive experience in urban law and policy to facilitate a frank debate. Moreover, the team launched their first animated video in a series of three, showing the importance of promoting integrity in urban development.

The Interdependence of Ethics Codes

Surveying public servants on the (known limited) efficacy of ethics and disciplinary codes, Jan-Hinrik Meyer-Sahling and Kim Sass Mikkelsen recently
published an article in the Review of Public Personnel Administration on the interdependence of anti-corruption tools. Arguing that we need to consider baskets of tools, or frameworks, in our fight against corruption, the team advocates a move away from distinct and isolated anti-corruption interventions.

Revisiting the Gulnara Karimova Case

John Heathershaw and his team’s research has taken a recent look at specific money laundering checks performed on African and Central Asian politically exposed people or ‘PEPs’ - those who hold positions of political power and their families - in the spheres of banking, real estate, and reputation management. The research looks at real life examples of properties in the UK purchased by such individuals, and examines whether current anti-money laundering regulations are strong enough to prevent potentially corrupt funds from entering the housing market. One infamous example is the £30 million worth of real estate purchased by Gulnara Karimova, the daughter of the first president of Uzbekistan, who lived the high life before her downfall saw her end up in jail.
**NEW HIRES**

*welcome to the team!*

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Ambika Samarthya-Howard  
Global Integrity Head of Communications

Ambika comes to us with extensive multimedia experience working with international non-governmental organizations. Having filmed and worked with communities and social change projects throughout Asia, Africa, and the U.S., she is focused on bringing fresh voices and formats to Global Integrity’s work.

Aiysha Varraich  
Research Fellow

Aiysha has been a PhD candidate in the Department of Political Science and the Quality of Government Institute since 2014. She is currently working with the GI-ACE Director to synthesize final programme results. Her research interests include clientelism, religion, trust, and corruption in developing countries.

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**PROJECTS**

*events and publications*
Upcoming Events

GI-ACE researcher Liz David-Barrett presented some early results from Thorsten Chmura’s project on international deal-making, beliefs, and local social norms at the American Political Science Association Annual Meeting.

As finalists in the IMF Anti-Corruption Challenge, Liz David-Barrett’s research team will be attending a virtual pitch event. Read their submission and join them on October 7th here.

Is London the engine room of global corruption? Join Tena Prelec from the testing and evidencing compliance with beneficial ownership checks research team as she shares research insights and breaks down those enabling corruption in the West. Sign up here and tune in on October 7th.

In Case You Missed It

Listen to GI-ACE researcher Stephen Berrisford at the Southern Africa City Studies Conference as part of the Cities of Integrity programme that took place from August 31st to September 4th.

Researchers Tom Mayne, John Heathershaw, and Tena Prelec shared findings from their project, touching on the nexus between money laundering and the UK real estate market, at the Transparency International UK Professionals (TIPS) session on September 28th.

Publications

https://mailchi.mp/globalintegrity/fincen-files-and-professionals-of-integrity-2503638


THE ARCHIVES

get caught up on our blog

GI-ACE and SOAS

Exploring and Developing: New and effective anti-corruption interventions.

Does Transparency Bring Cleanliness?

Offshore Financial Secrecy Reform and Corruption Control

Panama and Paradise Papers: Mapping politically exposed person (PEP)-linked shell companies. Daniel Haberly.

Cities of Integrity: Urban Planning and Corruption in Africa


Ethical Border Trading between

Kenya and Uganda for Small-Scale Businesses


Hiding the Beneficial Owner and the Proceeds of Corruption
Promised Changes to Nigeria’s Anti-Corruption Architecture: Are they Built On Sand? Jackie Harvey.

Civil Service Reform and Anti-Corruption:
Does Ethics Training Reduce Corruption in the Civil Service?
Ethics Codes: How they can curb corruption in public service if part of a smart anti-corruption infrastructure. Jan-Hinrik Meyer-Sahling.