

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

Addressing Corruption in Latin America and the Caribbean Furthers U.S. National Interests

Introduction

In 2017, with support from the Ford Foundation, Global Americans convened a High-Level Working Group on Inter-American Relations and Bipartisanship, comprising former policymakers, business leaders, civil society leaders and scholars, to discuss bipartisan and cross-regional ways that the current U.S. administration can build and improve upon the achievements of the past two decades of inter-American relations.

Our group, representing civil society, academia, and the policymaking and business communities in the U.S., Latin America and the Caribbean, has produced an initial series of papers laying out members' consensus opinions on the topics of:

- Economic integration and trade
- Combating organized crime and narcotics trafficking
- Greater U.S.-Latin American collaboration on anti-corruption
- Expanding and improving education exchanges in the Americas
- Extra-hemispheric actors

Future topics will include rebuilding Venezuela and re-thinking development assistance.

The initial set of policy topics addressed by the working group reflects a long-standing hemispheric and bipartisan consensus on the key areas that have helped to secure U.S. and hemispheric economic, diplomatic and security interests. All of these topics are inter-related. But rather than address them collectively, we decided to narrow our focus to specific, constructive, and actionable issues and recommendations.

Convinced that the countries of the Americas will be able to solve their shared challenges only through collaboration, the members of our high-level working group have made a series of recommendations on each of the topics outlined above. We urge our governments, members of civil society, the media, the private sector, academia, and citizens of the Americas to consider them as a framework for charting the way forward.

This paper addresses the issue of corruption and the threat it poses to development opportunities across the globe. We follow Transparency International's definition of corruption as "the abuse of entrusted power for private gain." Our group's recommendations are tailored mainly to address "grand" and "political" corruption. These include expanding efforts to work with partner governments, establish an Inter-American Citizen Coalition Against Corruption, adopt transparency and anti-corruption provisions in existing free trade agreements to make them fairer for businesses and workers across the hemisphere, and expand individual visa sanctions to private citizens and public officials charged with international bribery and corruption.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

Addressing Corruption in Latin America and the Caribbean Furthers U.S. National Interests Executive Summary

Corruption is the Achilles heel of most democracies in the Americas. In its many variations, from bribery and petty crime to grand corruption schemes, it represents a complex challenge for our hemisphere. Corruption retards development, undermines human rights and freedom, and perpetuates social exclusion and poverty. In addition, corrupt practices in countries where the U.S. invests hurts U.S. workers, adding as much as [10% to the cost of doing business](#), and 25% to the cost of public contracts. The result: An uneven playing field for companies and investments overseas.

Corruption infects every dimension of society and creates an environment often linked to organized crime, money laundering and the financing of terrorism. It threatens human security and the adequate allocation of resources to services that safeguard basic human rights. In Latin America and the Caribbean one in three people paid a bribe to access a service in 2016. Bribes are estimated to have cost at least \$2 trillion annually at a global scale (2 percent of global GDP).

And just as concerning, the lack of political will to address corruption fuels domestic instability. In Latin America, approximately five in ten people cite such political inaction on corruption as a reason for dissatisfaction with their governments. In the U.S. that number has risen to seven out of ten people, up from half in 2016.

President Donald J. Trump has been a strong supporter of anti-corruption efforts such as the U.S.-led Global Magnitsky Act. As he declared in Executive Order 13818 on December 20, 2017, corruption [and human rights violations] “undermine the values that form an essential foundation of stable, secure, and functioning societies,” and represent an “unusual and extraordinary threat to the national security, foreign policy, and economy of the United States.”

U.S.-led initiatives have played an important role in hemispheric efforts to control and sanction corruption. Examples include the Foreign Corrupt Practices Act (FCPA) and the Global Magnitsky Act. Between 2007 and 2013, USAID funded 40 projects in Latin America and the Caribbean, including anti-corruption initiatives, through grants totaling \$478 million. USAID funding has been a factor in the passage of nearly 250 anti-corruption measures across the hemisphere by 2015. Much of the U.S. assistance has been channeled into investment in civil society initiatives, where such support often has the most powerful impact.

We cannot afford to go backwards. As the Western Hemisphere finds itself immersed in region-wide corruption scandals and a broad popular—and political-electoral—backlash, the United States has a unique opportunity to collaborate with reformers in government, the private sector, the media and civil society in these countries to address the structural causes of corruption in a way that levels the playing field for the U.S. businesses in the region, strengthens democracy, and promotes inclusion and economic growth.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

To protect its economic and national interests, the U.S. must continue to pursue its longstanding commitment to fight corruption. The U.S. is facing potential difficulties and public perception challenges in nations across the Americas to continue to lead by example, but we recognize that the fight against corruption in the hemisphere must be a collaborative effort, and there are many areas in which the U.S. can join forces with its counterparts in the Americas to achieve our common goal.

To that end, we offer a series of recommendations for U.S. leadership and hemispheric cooperation on this critical issue. Here are some highlights.

- 1) **Create an Inter-American Citizen Coalition Against Corruption.** We encourage the United States to take the lead in establishing a hemisphere-wide coalition, that tracks in a transparent way how the nations of the Americas are implementing the Inter-American Convention against Corruption (MESICIC). Such a coalition would be a major force in coordinating cross-border, anti-corruption efforts, and enhancing institutional capabilities.
- 2) **Increase U.S. funding for good-governance efforts by civil society.** A major joint strategic goal of the US. Department of State and USAID should be supporting civil society organizations throughout the hemisphere that are advocating and developing initiatives to combat corruption in all its forms.
- 3) **Corporations and non-governmental groups should join the UN Global Compact.** To support corruption prevention efforts on all possible fronts, business organizations, academic institutions, and civil society organizations across the Americas are strongly encouraged to apply for membership in the UN Global Compact, publicly endorsing “Principle 10” to work against corruption in all its forms, including extortion and bribery.
- 4) **Create guidelines and standards for business practices.** To reinforce the role of private business in fighting corruption, we strongly urge governments, chambers of commerce, business associations, and civil society groups across the Americas to work together to create federal level anti-corruption guidelines for the private sector, with recurrent employee training and certification programs, following the model of corporate responsibility or sustainability certification models.
- 5) **Initiate a discussion on the creation of an International Anti-Corruption Court (IACC).** We encourage governments, academia and civil society groups in the Western Hemisphere to examine the feasibility of establishing an evaluation, monitoring and criminal enforcement body under the authority of the UN Security Council.

Global Americans
High Level Working Group on Inter-American Relations &
Bipartisanship
2017-2018

**Addressing Corruption in Latin America and the Caribbean Furthers
U.S. National Interests
Report**

To protect its economic and national interests, the U.S. must continue to pursue its longstanding commitment to fight corruption. The U.S. is facing potential difficulties to continue leading by example, but we recognize that the fight against corruption is not a task for the U.S. alone. With [seven in ten people](#) in Latin America and the Caribbean standing ready to support anti-corruption efforts, governments across the Americas must work in collaboration with civil society groups, which have proven to be the real change agents triggering structural and legal reform, advocating for marginalized sectors and pushing for reforms focused on corruption prevention to detection to action and to eradication in the region.

In Latin America, one out of three people pay bribes to access some type of service in the form of school, hospital services, identity document requests, parking tickets, and court processes. Payments to speed up procedures—from obtaining registration forms to enroll in public schools to billion-dollar contracts illicitly negotiated between governments and companies across the hemisphere—pile up into thousands of cases every year that feed corruption. It has become the greatest threat facing the region, not only to our institutions and our development, but also to our democracy, values and our culture.

For decades, U.S.-led initiatives—such as the Foreign Corrupt Practices Act and the Global Magnitsky Act—as well as foreign aid, through USAID mainly, have assisted the hemisphere in achieving great milestones in advancing measures to control and sanction corruption. Between 2007 and 2013, USAID directed \$478 million to fund 40 projects in Latin America and the Caribbean that included anti-corruption initiatives. By 2015, Latin American countries adopted nearly 250 anti-corruption measures, partly because of USAID funding but mainly through the actions of civil society. Investing in civil society groups that fight corruption *in situ* is putting money in the right hands for the right purpose.

Funding to support development programs focused on preventive measures and building institutional capabilities is extremely vital to accelerate the virtuous cycle already in motion, but where current transparency and rule of law initiatives have fallen short. A reduced USAID budget that fails to support civil society will hurt not just U.S. political and diplomatic relations in the hemisphere; it will also affect U.S. businesses.

With the recent rise of corruption scandals all the hemisphere—Brazil’s far-reaching Odebrecht case being the latest and most tangible example, having affected 14 Latin American and Caribbean countries so far—citizens are demonstrating their discontent and resentment toward government and institutions that have neglected their needs in favor of political elites. In Latin America, approximately five in ten people have expressed dissatisfaction with their governments over the failure to address corruption. According to Transparency International, in the U.S. the number has risen to seven out of ten people believing the government is failing to fight corruption, up from half in 2016.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

Deep-rooted corruption represents the main obstacle to achieving sustainable economic, political and social progress. Moreover, corruption can affect investment prospects in both U.S. territory and in U.S. companies operating in foreign countries. Since U.S. companies and citizens doing business abroad are under close anti-bribery scrutiny under the Foreign Corrupt Practices Act (FCPA), domestic and other non-U.S. companies may present an unfair advantage in countries that have not implemented an adequate anti-corruption regulatory framework. Where bribery is commonplace, the cost and time of doing business increases, while job creation opportunities for U.S. workers across borders decrease.

But when governments work together, the picture changes. It becomes much easier to prevent, detect, sanction and ultimately eradicate corrupt practices. The chances of succeeding further increase when efforts are coordinated with the private sector and an ever more active civil society. In other words, when good governance models are set in motion—when governments manage public resources in a transparent and responsible way—corruption and its multiple sources can no longer operate with impunity.

In this regard, the U.S. has always led by example. But some in the hemisphere are concerned that these questions are now a lower priority for the United States.

A specific initiative that was originally conceived to fight corruption but was later adapted as a preventive tool is the Foreign Corrupt Practices Act (FCPA). Since its enactment in 1977, FCPA has served to deter corporate bribery and set tough accountability standards in the United States. The Act has also been an instrument for addressing international corruption. Its provisions prohibit the payment of bribes to foreign officials to assist in obtaining or retaining business. Those provisions apply both inside and outside the United States, and bar corrupt payments made through third parties or intermediaries. Under FCPA, Odebrecht was sentenced in U.S. federal court to pay \$2.6 billion to the governments of Brazil, the U.S. and Switzerland for violations of anti-bribery provisions. That was possible because Odebrecht indirectly owns 38.1% of the total shares of Braskem—with shares registered with the SEC and traded on the New York Stock Exchange—so, FCPA regulation applied.

FCPA has also served as a model for acts passed by other countries in the hemisphere pursuing similar regulation. For example, Peru's Corporate Corruption Act passed in March 2016; Colombia's Transnational Corruption Act (TCA), the first foreign bribery law in the country; and Mexico's General Law for Administrative Responsibility followed, more recently, by the National Anti-Corruption Enforcement System (SNA).

The United States has also led and participated as founding party in a number of other international anti-corruption practices such as the OECD's Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, where all member and even non-member states in Latin America, such as Argentina and Brazil, are signatories.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

Corruption can also affect investment prospects, reducing opportunities for healthy business environments to flourish, and chilling job creation. Although the World Bank’s “Ease of Doing Business” index does not consider corruption as a dimension for national rankings, it does measure business regulation, where “fair, efficient and transparent rules improve governance and tackle corruption” (World Bank, 2017). If we consider this index as a benchmark for a healthy business climate, out of the 190 countries measured, the countries of Latin America and the Caribbean barely pass the test. (Mexico scores highest at 49 and Venezuela lowest at 188.)

As recent prominent scandals have demonstrated, corruption, paired with weak local enforcement laws and scarce-to-null prevention programs, continue to hinder the business climate of the region as a whole. Of greater concern, however, are the cross-border forces (mainly Transnational Criminal Organizations) behind money laundering and other financial crimes threatening national security at a greater pace than the U.S. government can account for, sanction and control. According to the U.S. Department of State between 3 and 5 percent of global GDP is laundered—approximately \$2.17 trillion to \$3.61 trillion annually. Greater intra-regional cooperation and enforcement of the Financial Action Task Force (FATF) standards between the U.S. and committed countries is essential to adequately trace money and combat this plague.

An ounce of prevention is better than a pound of cure

Structural reforms to strengthen and renew institutions are, of course, crucial. The most relevant of these reforms is the establishment of autonomous judicial systems where they are either nonexistent or weak so that they can monitor the use of public resources and enforce greater transparency. It’s important not to minimize the progress that the region—in many cases with the aid of the United States—has already achieved in this regard. But it has fallen short. Eradicating systemic corruption in the long term demands a redirection of the discussion from corruption to good governance. Doing so will help prevent resource mismanagement and ensure that those involved are adequately punished and prevented from repeating the practice. At the same time, individuals who share and exchange information on corrupt acts, and the judges and prosecutors involved in the judicial process overseeing enforcement should be protected.

In addition to U.S.-led initiatives aimed at strengthening democratic institutions and increasing transparency in the region, the U.S. has played an influential role in the enactment of inter-American conventions to counteract corruption-related acts. But deeper structural reform is needed, not just of judicial systems, but also of rules governing illicit campaign financing, disclosure of the incomes of public officials, and transparency in public procurement bidding and contracts. With 14 presidential elections scheduled in the region over the next two years (2017-2019), it is especially urgent to focus on how the Americas can nurture good governance to strengthen institutional capabilities to fight corruption.

The region has set a precedent for good-governance models by launching and implementing policies and programs at the international and domestic level, including the OAS Mechanism for Follow-Up on the Implementation of the Inter-American Convention against Corruption (MESICIC), the OECD Convention on Combating Bribery of Foreign Public Officials in International Business Transactions, and the Open

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

Government Partnership (OGP). These have shown promise, both because they provide a global venue for collectively monitoring transparency and accountability, and because global and national civil society organizations have been involved in the discussions.

Two high-level efforts that have succeeded in promoting accountability and strengthening the rule of law are Chile's high-level Anti-Corruption Commission and Guatemala's International Commission Against Corruption (CICIG). Chile's example is worth highlighting because it has implemented an extraordinary whistleblower protection program, a key component of investigating and punishing corrupt practices.

In the Odebrecht case, a largely independent judiciary in Brazil helped uncover the largest corruption case in Latin America's history; but the court system is still heavily overburdened and bureaucratic, and [perceived as insufficiently independent](#) to settle disputes and challenge regulations into the future.

Recent corruption scandals and increasing citizen dissatisfaction make clear the shortcomings in the region's focus on creating strong independent judiciary bodies, without providing them the capacity to fully prosecute cases at multiple levels. These bodies also often ignore the other state- and politically-related roots of corruption. In other words, the resources and tools to hold the judiciary accountable are missing. As well as punishing the corrupt, these judicial bodies should devote equal attention to the prevention of corruption.

The economic and social costs of corruption and impunity across the Hemisphere

Transparency International's [2017 Corruption Perceptions Index](#)—which ranks levels of corruption of 180 countries on a scale from 0 (highly corrupt) to 100 (clean)—reported an average score of 44 for the Americas. Setting Uruguay, Chile, Costa Rica and a few Caribbean islands aside, all Latin American countries scored below 50. Venezuela has the lowest score in the region with 18 points.

Numerous studies show that deep-rooted corruption represents the main obstacle to achieving sustainable economic, political and social progress, no matter the level of development. In Latin America in particular, deeply rooted corruption has weakened state institutions and their capacity to operate and manage public resources, undermining other areas for development such as competitiveness, economic growth, employment opportunities, social inclusion, and adequate implementation of the rule of law.

Transparency International's research on corruption in Latin America and the Caribbean shows that the police and elected representatives are perceived as the most corrupt among a range of institutions, followed by the local government and judges and magistrates.

But corruption doesn't take part exclusively in public office. It is a problem of behavioral norms that are reflected in business and personal practices. Therefore, policies that seek to address corruption must be constructed from the government and citizens and all interactions in between them. To paraphrase the World Bank's "Making Politics Work for Development" report, behavioral norms to extract private

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

benefits from public resources extend to ordinary citizens; as such the problem must be resolved on both the demand and supply sides.

Bribes are estimated to cost at least [\\$2 trillion annually](#) globally (2 percent of global GDP), but that is only one of many forms of corruption. The economic and social effects of a single act of bribery are certainly higher. In Latin America and the Caribbean, approximately [90 million people across 20 countries \(or one in three people\)](#) paid a bribe to access a service in 2016. Public health care services and public education are the sectors that had the highest bribery rate, and in both cases bribery reduces access for the poor who require those services to advance economically and personally.

Another worrying fact for the region is the rate at which younger people pay bribes, especially when trying to access the two services mentioned above. People under the age of 35 were more likely to pay a bribe than people aged 35 or over.

The connection between corruption and impunity is a strong factor in contributing to inequality. As a consequence of this corruption trap, citizens in Latin American countries have turned to alternative sources of income. The outcome is now all too familiar as we battle daily challenges in violence and insecurity, criminal activity, graft, embezzlement, and bribery.

During the past decade, the region has witnessed a number of scandals originating entrenched and endemic corruption. These include the rising homicidal violence of organized crime and counter-drugs policy, gang-fueled violence in Central America and the resulting wave of unaccompanied minors fleeing across the U.S.-Mexican border, the Panama Papers (and now Paradise Papers), the region-wide stain of Odebrecht, a roster of conflict of interest cases in Mexico, the political and electoral use of the institutions of the State, a number of impeached, and extradited or imprisoned political leaders—to name just a few of the more prominent examples.

Corruption in the region is no longer a surprise. Institutional trust is broken, widespread public malaise threatens the credibility of institutions, and fighting back seems an increasingly difficult task. But precisely in this frustrated apathy lies a huge risk—that corruption may be seen as the new norm and may breed a sense that it is widespread and inevitable.

Legislative and judicial reforms have been central to fighting corruption. Since 1985, USAID has supported judicial reforms in Latin America. The financial sector, on the other hand, has developed and enforced numerous anti-corruption efforts across the U.S. and Latin America (including anti-money laundering laws and asset recovery programs). But the battle is far from over, especially in securing structural reforms and ending impunity for white-collar crimes.

The good news is that a disappointed society has started to act, with citizens joining civil society and business groups to lead anti-corruption measures; according to Transparency International, seven in ten people in Latin America and the Caribbean stand ready to support anti-corruption efforts.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

In fact, in countries such as Mexico, El Salvador and Paraguay, where systemic corruption and lack of political impede progress on accountability and transparency measures, nongovernmental organizations and civil society groups have taken the matter into their own hands. One particular example is worth describing:

In Mexico, using a bill that requires congress to legally discuss regulatory content if it is backed by at least 110,000 signatures, civil society groups, academics and activists coordinated to push for the creation of the National Anti-Corruption System (NAS). The NAS was approved in 2015, along with secondary legislation required to enact and regulate it. As Max Kaiser, IMCO Anticorruption Director, describes it, NAS was a radical law; its board will be presided by a citizen and not by a state agency where a body comprising five independent citizens will preside over the anti-corruption system. For a particular law to back up NAS (the famous *Ley 3 de 3* that requires public servants to declare publicly their assets, any possible conflict of interest, and proof of fiscal standing), citizens delivered 634,143 signatures, pushing the Senate to pass the bill.

Our Recommendations

The Working Group has prepared a set of recommendations intended to create the conditions for good governance that will aid in preventing corruption in the hemisphere. The task must involve the collaboration of governments, multilateral organizations, the private sector, civil society and the press (as an impartial sector).

To this end, the High-Level Working Group on Inter-American Relations and Bipartisanship proposes the following:

1) We encourage the United States to lead efforts in **the creation and establishment of an Inter-American Citizen Coalition Against Corruption**, that would track individual countries' progress in implementing the Inter-American Convention against Corruption (MESICIC) and publish the results. Such a coalition would act as a tool for the MESICIC in coordination efforts between countries on anti-corruption measures to build prevention programs, enhance institutional capabilities, make laws and investigations more effective and transparent, and install protection programs for those that inform on or sanction corrupt practices.

Within the coalition, we propose the formation of three task forces led by independent civil society groups to work on:

- a) *The establishment of independent anti-corruption agencies (watchdogs) and protection mechanisms for whistleblowers and judges;*
- b) *The creation of merit-based civil service recruitment, management and training processes to limit clientelism and patronage in the public sector; and*
- c) *The creation of a regional fund for independent and investigative journalism in alliance with the private sector and academia.*

2) We encourage the United States to continue to strengthen its foreign policy commitments in the hemisphere through **increased funding of the U.S. Department of State and USAID joint strategic goals**, particularly through supporting civil society organizations in their battle to install good governance initiatives against corruption.

U.S. development assistance serves to protect U.S. national interests. The U.S. should help the region upgrade its anti-corruption efforts at a greater scale, continuing and expanding on the recent successes in the improvement of rule of law to promote and support good governance and accountability. This should include support for civil society groups to educate citizens about their right to free and transparent information. The evolution of Plan Mérida from counter-narcotics to a judicial reform mechanism is a good example. Upgrading it to a good-governance model would be the next step.

Global Americans

High Level Working Group on Inter-American Relations & Bipartisanship

2017-2018

3) To support corruption prevention efforts on all possible fronts, the group strongly recommends **business organizations, academic institutions and civil society organizations across the Americas to apply for membership in the UN Global Compact**, publicly endorsing “Principle 10” that commits members to work against corruption in all its forms, including extortion and bribery.

4) To reinforce the role of private business in fighting corruption, we strongly urge governments, chambers of commerce, business associations, and civil society groups across the Americas to **work together to create federal level anti-corruption guidelines for the private sector** for recurrent employee training and certification programs, following the model of corporate responsibility or sustainability certification models.

5) **The working group encourages government and non-governmental actors to establish open forums** where civil society, academia and the private sector can share best practices to tackle corruption, especially in cases where technology can help advance information exchange, money traceability and transparency platforms. One concrete example to work on is electoral-campaign-financing traceability systems.

6) **Civil society groups and NGOs should participate in multilateral forums** where member states commit to anti-corruption practices and initiatives, and to hold governments accountable and inform the public through web-based channels of information about commitments taken in such forums, with particular emphasis on the OAS Summit of the Americas, the Global Declaration against Corruption held in London in 2016 and the G-20 Anti-Corruption Action Plan 2017-2018.

7) We encourage governments and civil society groups to **study the potential of replicating the successful International Commission Against Impunity in Guatemala (CICIG)**, a mechanism originally conceived as a tool to protect human rights, but that has also served to complement domestic efforts to combat impunity and institutional weakness.

8) We encourage the United States to seek ways to **strengthen transparency and anticorruption provisions and sanctions in existing free and future trade agreements** between the U.S. and Latin America and the Caribbean. U.S. withdrawal from the Trans Pacific Partnership doesn't prevent anti-corruption provisions from being integrated into current agreements (especially NAFTA) to ensure fairness for American firms and workers.

9) We encourage the U.S. to continue efforts to **foster the adoption by Latin American and Caribbean countries of versions of the FCPA's anti-bribery provisions and Anti-Money Laundering regulation**. The Foreign Corrupt Practices Act (FCPA) has proven to be an excellent tool in addressing anti-bribery provisions to prohibit individuals and businesses from bribing foreign government officials in order to obtain or retain business, as well as accounting provisions.

Global Americans High Level Working Group on Inter-American Relations & Bipartisanship 2017-2018

While the FCPA's anti-bribery provisions apply both inside and U.S. companies outside the United States, they are focused only on payments intended to induce or influence a foreign official to use his or her position "in order to assist in obtaining or retaining business."

10) **Initiate a discussion on the creation of an International Anti-Corruption Court (IACC).** We encourage governments, academia and civil society groups in the Western Hemisphere to examine the feasibility of establishing an evaluation, monitoring and criminal enforcement body under the authority of the UN Security Council.

11) We also encourage the United States to assist other country governments in the hemisphere to **enact anti-bribery regulations, with particular attention to including a component to protect whistleblowers** who report on bribery violations and judges who block and/or punish corrupt parties. The FCPA oversees these provisions through the Sarbanes-Oxley Act of 2002 and the Dodd-Frank Act of 2010, which prohibit retaliation against whistleblowers and set the procedures for which they would be eligible to receive reinstatement, back pay, and other compensation.

As for Anti-Money Laundering regulation, the working group highly encourages countries to obtain certification and training programs to trace and sanction individuals involved in money laundering practices. One practical and cost effective way to address this problem is continued USAID funding directed at FCPA and AML training.

12) The working group encourages the U.S to **continue the practice of denying visas to private citizens and officials charged with international bribery and corruption** as another sanction targeted at individuals engaged in transnational crime through the Global Magnitsky Act. The act allows the "executive branch to impose visa bans and targeted sanctions on individuals anywhere in the world responsible for committing human rights violations or acts of significant corruption" (Human Rights Watch)."

Since the president can also review credible information obtained by other countries or nongovernmental organizations that monitor human rights and corruption violations in determining whether to impose sanctions—along with the State and Treasury Departments—the working group encourages the U.S. to invite the participation of nongovernmental and civil society organizations across the hemisphere in closed-door and confidential sessions.

13) Finally, we **encourage the United States to assist other hemisphere governments in passing their own versions of the Global Magnitsky Act.**

Global Americans
High Level Working Group on Inter-American Relations & Bipartisanship
2017-2018

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Global Americans
High Level Working Group on Inter-American Relations & Bipartisanship
2017-2018

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Global Americans
High Level Working Group on Inter-American Relations & Bipartisanship
2017-2018

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