



# Impact Report

## 2022





## A Letter from our Co-Founder

Globally, billions of dollars in public funds are stolen every year, undermining critical efforts to promote sustainable development. According to the World Economic Forum, corruption, bribery, theft, and tax evasion cost developing countries more than \$1.2 trillion every year. That money is desperately needed to help the people in these countries face the ravages of war, poverty, and climate change.

Corrupt networks linked to war criminals and oppressive regimes are dependent on the global financial system to launder their dirty money and hide their stolen assets. Banking practices over many decades have failed to stop these kleptocrats from funneling huge sums through their accounts. Unfortunately, the international community has not had the most effective laws or infrastructure to tackle this reality. The Sentry is aiming to solve this by advocating for enhanced tools and providing evidence and strategic advice to banks, governments, law enforcement, and civil society to improve transparency and eliminate impunity for the worst offenders.

The Sentry is acutely focused on following the money as it is laundered from war zones to financial centers around the world. Our goal is to hold the perpetrators and enablers of violence and corruption to account, and ensure that these funds can be used to feed people in need, provide access to critical healthcare, and drive global, sustainable development.

This year, we have made tangible gains and disrupted the systems fueling greed and corruption by:

- ▶ **Protecting the Global Financial System:** Through our work on new sanctions programs, robust legislation, and improved enforcement of existing laws and regulations, coupled with our information sharing with the private sector, we are strengthening the ability of the global financial system to tackle corruption and money laundering.
- ▶ **Creating Accountability:** We are driving significant action against kleptocrats and their enablers through investigations and behind-the-scenes engagement with critical stakeholders in government, banks, and law enforcement.
- ▶ **Building Global Capacity:** We are growing and improving the resources focused on grand corruption by developing new partnerships with multilateral agencies, national governments, civil society groups, and the private sector. We are expanding our programs and leveraging the lessons learned in East and Central Africa to achieve global scale and impact.

The Sentry's growing, global impact is testimony to the tireless effort and dedication of our team. I am also deeply grateful to The Sentry's partners and donors for their generous support and commitment. Thank you all for standing with The Sentry in the fight against grand corruption and human rights abuses.



**John Prendergast**  
Co-Founder of The Sentry



## Protecting the Global Financial System

The Sentry has collaborated closely with the United States, United Kingdom, European Union, and other jurisdictions, advocating for policies that will strengthen the financial and regulatory systems designed to combat illicit finance. We have raised awareness, contributed to new legislation and policies, and pushed for stronger enforcement, expanding the existing suite of tools to be deployed against those

responsible for violent kleptocracy and war profiteering. Russian President Vladimir Putin's invasion of Ukraine has helped highlight and supercharge the power of financial pressure tools, and there are now a number of new mechanisms in place that will drive sustainable impact—not just against kleptocrats in Russia, but in all of the countries where we work.



The Sentry's Debra LaPrevotte and Anrike Visser at a global anti-corruption summit in Prague.

## **Governments have taken important steps to protect the global financial system by improving corporate transparency and closing major anti-money laundering loopholes.**

### **What did The Sentry do?**

We worked with policymakers to design smart, effective policy and executed [advocacy campaigns](#) to raise awareness and drive public demand on these issues, often in [coordination](#) with other organizations. Our team has provided expert testimony and critical evidence to decision makers which has helped advance key legislation, such as the ENABLERS Act and Corporate Transparency Act in the US and the Economic Crime Act in the UK. In particular, The Sentry has been at the forefront of confronting [the enablers of corruption](#)—those behind-the-scenes professionals, such as bankers, lawyers, and accountants, who drive the engine of global corruption while hiding behind the veneer of white collar respectability.

### **Why does this work matter?**

Combined, these measures reduce illicit financial flows from developing countries into offshore bank accounts, extravagant real estate, and luxury assets such as yachts or expensive art—making it harder for corrupt actors to launder their ill-gotten gains and severely limiting their ability to loot with impunity.

## **A growing number of governments are now using targeted network sanctions as a tool of financial pressure, and banks are strengthening their enforcement.**

### **What did The Sentry do?**

Building on the impact of the Global Magnitsky sanctions program in the US, which pioneered the use of targeted sanctions against individuals responsible for gross human rights violations and grand corruption, The Sentry implemented a two-pronged strategy to promote the use of similar sanctions programs globally. We provided technical expertise to key agencies in the UK, Australia, the EU, and several of its member states, and we executed a public advocacy campaign on the benefits of sanctions as a tool for accountability and human rights featuring articles in [Foreign Affairs](#) and [Nikkei Asia](#), [podcasts](#), and [numerous public appearances](#).

### **Why does this work matter?**

Targeted network sanctions are a powerful tool in the arsenal of the international community to tackle corruption and human rights abuses around the globe. However, for sanctions to be successful, they must be embedded in an overarching strategy that is aimed at fostering peace, good governance, and human rights, as well as being supported by a coalition of like-minded states. Additionally, financial institutions on the frontline of sanctions enforcement must be armed with the information needed for effective implementation.

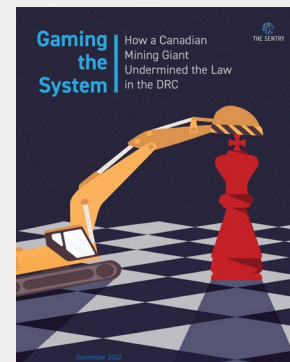
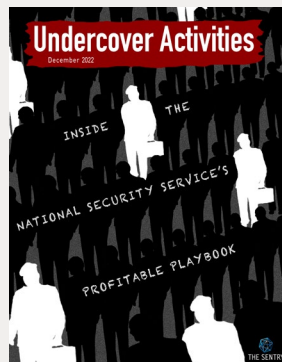
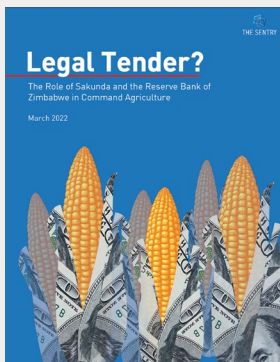


# Creating Accountability

Evidence brought forward by The Sentry's investigations provides governments, financial institutions, and law enforcement with the information they need to take tangible, punitive action against the individuals, institutions, and corporations funding or profiting from mass atrocities.

The Sentry delivered **over 50** investigative cases, briefings, and dossiers of evidentiary material, as well as screening data on **more than 200** individuals and entities,

to **more than 50** governmental and intergovernmental offices, law enforcement agencies, and private sector actors around the world. The more evidence our investigations can provide, the better positioned governments, banks, and law enforcement will be to impose sanctions, block transactions, or pursue criminal charges. Holding these people to account puts perpetrators and enablers worldwide on notice that war crimes don't pay.



Investigative reports published in 2022.

**In an important milestone towards corporate accountability, French prosecutors opened a criminal investigation into Castel Group companies and executives and their complicity in war crimes and crimes against humanity committed in the Central African Republic (CAR).**

### What did The Sentry do?

Last year, The Sentry exposed a shocking scandal in which a subsidiary of the Castel Group, a French-owned, multibillion-dollar conglomerate, allegedly [funded and provided support to a criminal militia](#) responsible for a reign of terror in CAR. Our investigation revealed how the Castel subsidiary forged a secret business deal with this brutal militia—the Union for Peace in CAR (UPC)—to secure its sugar operations and national monopoly. Since we first published these revelations, our team has been working behind the scenes with international law enforcement, sharing evidence in an effort to make sure that those potentially responsible for the business decisions that fueled death and devastation are brought to justice.










### Why does this work matter?

The United Nations has accused the UPC of a range of violent crimes, including mass murder, torture, rape, and child soldier recruitment. The decision by French authorities to open a criminal inquiry sends a strong signal to multinational companies and their executives that they will be held accountable—not just [forced into early retirement](#), but potentially faced with criminal charges—for their involvement in international crimes.

**Sanctions designations in 2022 to which The Sentry contributed evidence or recommendations.**

\*Flags indicate who issued the designation.

#### INDIVIDUALS

- **Alain Goetz**    
Belgian gold trader
- **Aung Moe Myint**   
Myanmar arms dealer
- **Hwang Kil Su**   
North Korean businessman
- **Kyaw Min Oo**   
Myanmar arms dealer
- **Naing Htut Aung**   
Myanmar arms dealer
- **Obey Chimuka**   
Zimbabwean businessman
- **Pak Hwa Song**   
North Korean businessman
- **Sandra Mpunga**   
Zimbabwean businesswoman

#### ENTITIES

- **African Gold Refinery**   
Ugandan company
- **Congo Aconde**   
Congoese company
- **Dynasty Group**   
Myanmar company
- **Fossil Contracting**   
Zimbabwean company
- **International Gateways Group**   
Myanmar company
- **Sky Aviator**   
Myanmar company
- **Wagner Group**   
Russian mercenary company

**The United States and the European Union imposed sanctions on Belgian gold trader Alain Goetz for his role in the illicit gold trade, which is a major revenue source for Congolese armed groups.**

### **What did The Sentry do?**

As far back as 2018, The Sentry raised concerns about the role of Alain Goetz and the Uganda-based African Gold Refinery (AGR) in the illicit trade of Congolese conflict gold. In particular, our investigative report “[The Golden Laundromat](#)” raised concerns that the corporate network controlled by Goetz had refined illegally-smuggled gold from the eastern Democratic Republic of Congo (DRC) worth hundreds of millions of dollars, resulting in an illicit outlet for conflict gold to the global market and supply chains of major companies. Since then, The Sentry has continued to provide briefings and share the evidence surfaced by our investigations into Goetz and his network of companies. Much of this investigative and advocacy work does not make headlines, but it requires careful research, analysis, and follow up from our investigators and policy specialists, often over the course of several years.

### **Why does this work matter?**

In the eastern DRC, the gold trade is a major driver of conflict. Armed groups use illegally mined and exported gold to finance their violent exploits, depriving the DRC of tax revenue while devastating local communities as well as the environment. The [US Department of the Treasury](#) earlier this year confirmed, following its own review and investigation, that Alain Goetz and his network of companies were involved in the illicit movement of Congolese conflict gold. In December, the European Union followed by imposing its own sanctions on Goetz, thereby further depriving him of access to the global financial system. By taking this step against a citizen of one of its member states, the European Union signals its recognition that Europeans, too, [exploit the armed conflict, instability and insecurity in the DRC](#). The network sanctions imposed on Alain Goetz and his companies will make it harder for him to continue this illicit work. This is an important step toward removing a key driver of armed conflict in the DRC and reforming the conflict gold trade to a more sustainable model.

*AGR and Goetz deny the claims against them and filed a defamation lawsuit in Uganda against The Sentry. The court rejected AGR's effort to force The Sentry to take down its report. Despite this important preliminary ruling for The Sentry, AGR continues to pursue the case, which is pending.*



## SPOTLIGHT INVESTIGATION

This year, The Sentry exposed a \$1bn corruption scandal in South Sudan. Funds that were made available for the country to purchase much-needed food, fuel, and medicine were instead diverted to businesses with links to military officials and family members of President Salva Kiir. Most of these businesses pocketed the cash and never delivered the goods, leaving South Sudan's people to starve and its government to foot the bill.

The individuals and businesses implicated in the scandal are still receiving government contracts today, leaving the door open for continued, unchecked corruption. The Sentry is briefing and sharing evidence with banks and governments, including the UK Foreign Office and the US Departments of State and Treasury, to make sure that the people responsible for this wanton cash grab are held to account.

# CASH GRAB

How a Billion-Dollar Credit Scam Robbed South Sudan of Fuel, Food, and Medicine



THE SENTRY





# Building Global Capacity

Data sharing, investigative trainings, and joint advocacy campaigns are just some of the ways in which The Sentry collaborates with local and global partners. We work to ensure that our partners and peers have sophisticated expertise and access to critical evidence and tools to help keep governments accountable

and generate public demand for transparency and accountability.

Investigations and policy analysis by The Sentry appeared in **at least 424** news articles, interviews, and special features across top national and international media outlets in **more than 14** languages.

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**ARGUMENT**  
An expert's point of view on a current event.

## Targeted Sanctions Can Help Restore Democracy in Sudan

Focusing on key military leaders and their networks can force the regime to change course.

By **Chris Coons**, a U.S. senator from Delaware and a member of the Senate Foreign Relations Committee, and **John Prendergast**, the Co-Founder of The Sentry and the senior advisor to the Clooney Foundation for Justice.




**DAILY MAVERICK**

AFRICA

**NORTHERN EXPOSURE**

Mnangagwa crony made about \$90m in dodgy central bank deal, reveals explosive report by The Sentry



Illustrative image | Zimbabwean President Emmerson Mnangagwa. | Kudakwashe Tagwirei. (Photos: Waldo Sulegers / Bloomberg | Getty Image / JHEKESAI NJIKIZANA)

By Peter Fabricius  
18 Mar 2022 Follow

Kudakwashe Tagwirei, close adviser to Zimbabwean President Emmerson Mnangagwa, used some of the profits to buy gold mines and a platinum mine, according to a report published on Thursday by The Sentry, a US-based anti-corruption watchdog.

**Le Monde** S'abonner

**Le Monde Afrique** • DÉBATS

## Guerre en Ukraine : « L'OTAN devrait appliquer des sanctions ciblées contre les kleptocraties africaines alliées du Kremlin »

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**TRIBUNE**

Nathalia Dukhan  
analyste à The Sentry

Certains « Etats criminels » du continent sont utilisés par Moscou comme « réservoirs de ressources naturelles et humaines pour soutenir son effort de guerre », analyse Nathalia Dukhan, de l'organisation The Sentry.

**TIME** SUBSCRIBE

IDEAS • RUSSIA

## Putin's Exploitation of Africa Could Help Him Evade Sanctions



Russian President Vladimir Putin chairs a meeting with members of the Russian government via teleconference in Moscow on March 10, 2022. Mikhail Klimentyev—SPUTNIK/AFP/Getty Images

BY **GEORGE CLOONEY, JUSTYNA GUDZOWSKA, AND JOHN PRENDERGAST**

## **We have built new partnerships across the public and private sector to deliver sustainable impact.**

The Sentry launched a partnership with [Justice for Myanmar \(JFM\)](#), a group of covert activists and investigators fighting for a free and just Myanmar. The dual objective of this investigative partnership is to strengthen JFM's capacity by sharing data and expertise and providing analytical support, and to collaborate on targeted investigations and [joint advocacy](#) aimed at holding the perpetrators of gross human rights violations in Myanmar to account. Together, JFM and The Sentry have submitted sanctions dossiers to the US, UK, and EU on a network of Myanmar companies linked to the military junta. We are coordinating with the UN Independent Investigative Mechanism for Myanmar on how to collect and share information that enables them to prosecute human rights offenders.

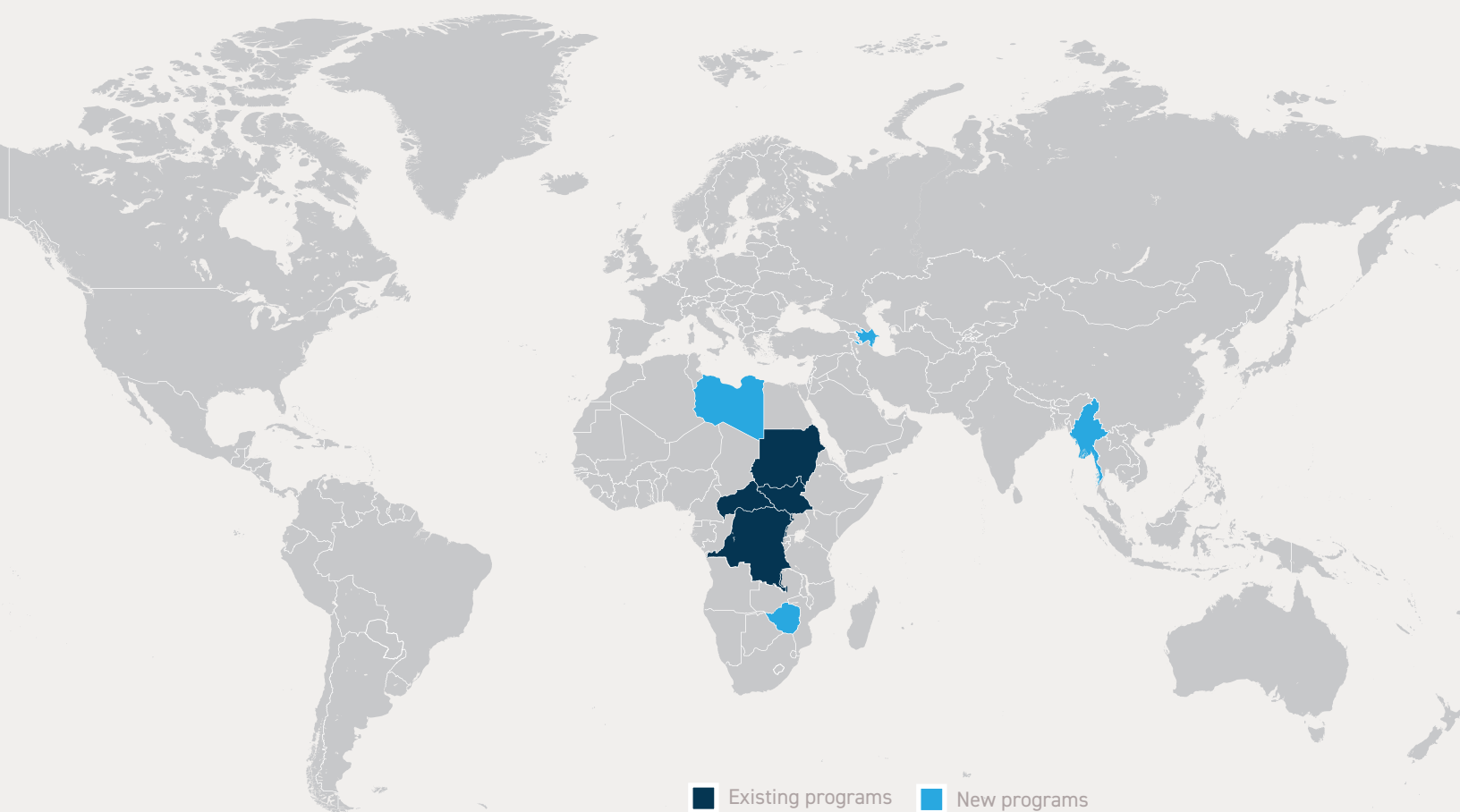
We also entered into data-sharing agreements with [Castellum.AI](#) and [Moody's Analytics](#), two global providers of financial data to banks and investors. This collaboration will facilitate the real-time sharing of incriminating evidence and other data surfaced by our investigations. While tools such as sanctions or legal action can often take years to materialize, these partnerships will achieve immediate impact in the form of frozen accounts and blocked transactions.

Partnerships with the media continue to be central to The Sentry's strategy. By telling compelling stories in print, video, and podcasts, we help governments, banks, and the interested public understand the root causes and systemic issues that require our collective response. This year, we worked with local and international media partners, from [Bloomberg](#) and [Le Monde](#) to South Africa's [Daily Maverick](#) and Kenya's [East African](#).



**The Sentry has scaled its work to additional regions around the world where people are suffering from similar greed-fueled devastation—starting with Azerbaijan, Myanmar, Libya, and Zimbabwe.**

Since The Sentry's founding in 2016, we have exposed the corrupt activity of some of Africa's deadliest war criminals and their international accomplices, delivering dozens of investigative cases and contributing to sanctions, asset freezes, and travel bans on some of the worst human rights offenders and major facilitators of corruption in Africa. Building on the evidence that our approach is working, The Sentry is now expanding its programs to achieve global impact. Over the past year, we have recruited UN investigators, regional experts, and former journalists, to launch new programs focused on Azerbaijan, Myanmar, Libya, and Zimbabwe, while evaluating needs and responding to opportunities for engagement elsewhere.



# Thank You

The Sentry's work is made possible thanks to the generous support of our close partners and donors. We are grateful for their continued investment in our mission.



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