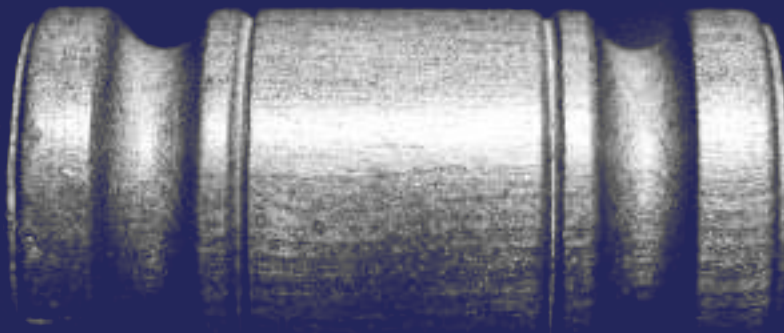


# The Capacity to Combat Corruption (CCC) Index

Assessing Latin America's ability to detect, punish  
and prevent corruption amid COVID-19

# 2020



**Roberto Simon**  
Senior Director of Policy at AS/COA

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**BY ROBERTO SIMON**, Senior Director of Policy at AS/COA  
**AND GEERT AALBERS**, Partner at Control Risks

**C**OVERD-19 is posing unprecedented challenges to Latin America, including its efforts to combat corruption. All countries in the region have been forced to swiftly mobilize massive resources to fight the virus and to mitigate its economic fallout. Governments have been scrambling to import ventilators from around the globe, expand ICU capacity, roll out enormous financial stimulus packages, help large swathes of the private sector to stay afloat, and more. In this environment of emergency spending, relaxed controls and remote working, the risk of corruption and mismanagement of funds has increased.

The timing of the pandemic is also particularly troubling. COVID-19 is hitting Latin America at a moment when the region-wide anti-corruption wave of recent years is losing force and, in some places, is dangerously receding.

Corruption has historically been a hurdle for Latin America, undermining growth, democracy and governance, and violating the rights of millions. But starting around 2015, we began witnessing something new: from Brazil's Lava Jato to Guatemala's La Línea, anti-corruption operations targeted members of political and business elites previously treated as untouchables. These major investigations emerged at the same time not by coincidence, but because they were the result of common, deep and systemic changes. Key Latin American countries developed an environment conducive, for the first time, to better tackling corruption. This environment was based on a variety of elements: from more independent and efficient courts and law enforcement agencies to stronger democratic systems and better investigative journalism. Progress was driven by parallel and long-term improvements in government, business and civil society.

More recently, however, the region's anti-corruption wave has faded. In the two largest Latin American countries, Brazil and Mexico, anger against corruption opened the way to the election of anti-establishment leaders in 2018 and the selective use of anti-corruption to target political foes, with enforcement agencies becoming increasingly politicized. In other places, like Peru or Guatemala, the political establishment fought back to prevent change, causing significant damage to anti-corruption efforts in the latter case. Questions about judicial and law enforcement overreach, abuse of power and partisanship also came to the fore. And public perceptions changed. After a number of years seeing major anti-corruption operations, Latin America started to experience enforcement fatigue. Attention shifted to economic issues and social rights, which were at the forefront of massive protests in several countries in late 2019. Having voted a large number of self-declared anti-corruption crusaders into government offices, many Latin Americans also felt ready to move on to focus on other priorities. And then the pandemic hit.

## A DATA-DRIVEN ANALYTICAL TOOL

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Against this backdrop, Americas Society/Council of the Americas (AS/COA) and Control Risks are launching the second edition of the **Capacity to Combat Corruption (CCC) Index**. The index was first launched in 2019 to assess Latin American countries' ability to uncover, punish and prevent corruption.

Rather than measuring perceived levels of corruption, **the CCC Index evaluates and ranks countries based on how effectively they can combat corruption**. Countries with a higher score are deemed more likely to see corrupt actors prosecuted and punished. Continued impunity is more likely in countries at the lower end of the scale.

The CCC Index looks at 14 key variables, including the independence of judicial institutions, the strength of investigative journalism, and the level of resources available for combating white-collar crime. The index relies on extensive data and on a proprietary survey conducted among leading anti-corruption experts from Control Risks, academia, civil society, media and the private sector. For the 2020 edition, we expanded the coverage of the CCC Index from 8 to 15 countries, which together represent almost 95% of Latin America's GDP.

The country with the highest score in the 2020 CCC Index is Uruguay (7.78 out of 10). Uruguay was followed by Chile (6.57), Costa Rica (6.43), Brazil (5.52), Peru (5.47), Argentina (5.32), Colombia (5.18), Mexico (4.55), Ecuador (4.19), Panama (4.17), Guatemala (4.04), Paraguay (3.88), Dominican Republic (3.26), Bolivia (2.71) and Venezuela (1.52). The score was composed of three sub-categories: *Legal Capacity*, *Democracy and Political Institutions* and *Civil Society, Media and the Private Sector*.

The CCC Index's goal is not to shame or single out countries, but to foster a policy-driven discussion, helping governments, civil society and the private sector identify—through data and a robust methodology—areas of success and deficiencies to be addressed.

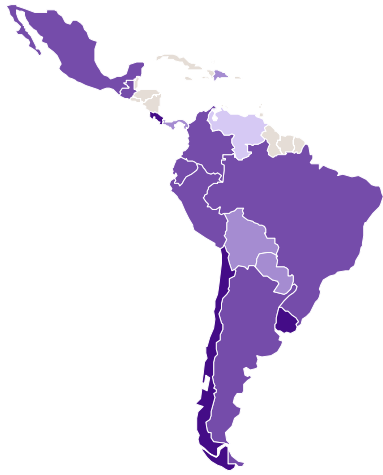
# Overall Score



## Overall Ranking

|    |                    |      |
|----|--------------------|------|
| 1  | Uruguay            | 7.78 |
| 2  | Chile              | 6.57 |
| 3  | Costa Rica         | 6.43 |
| 4  | Brazil             | 5.52 |
| 5  | Peru               | 5.47 |
| 6  | Argentina          | 5.32 |
| 7  | Colombia           | 5.18 |
| 8  | Mexico             | 4.55 |
| 9  | Ecuador            | 4.19 |
| 10 | Panama             | 4.17 |
| 11 | Guatemala          | 4.04 |
| 12 | Paraguay           | 3.88 |
| 13 | Dominican Republic | 3.26 |
| 14 | Bolivia            | 2.71 |
| 15 | Venezuela          | 1.52 |

### Legal Capacity



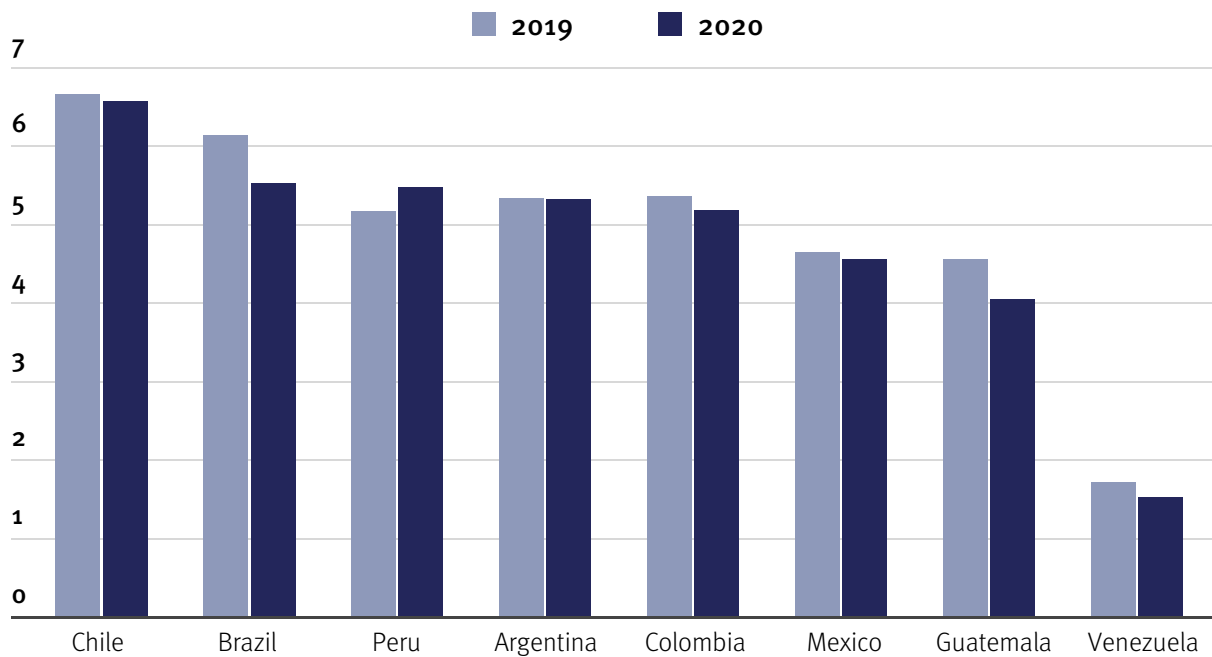
### Democracy and Political Institutions



### Civil Society, Media and the Private Sector

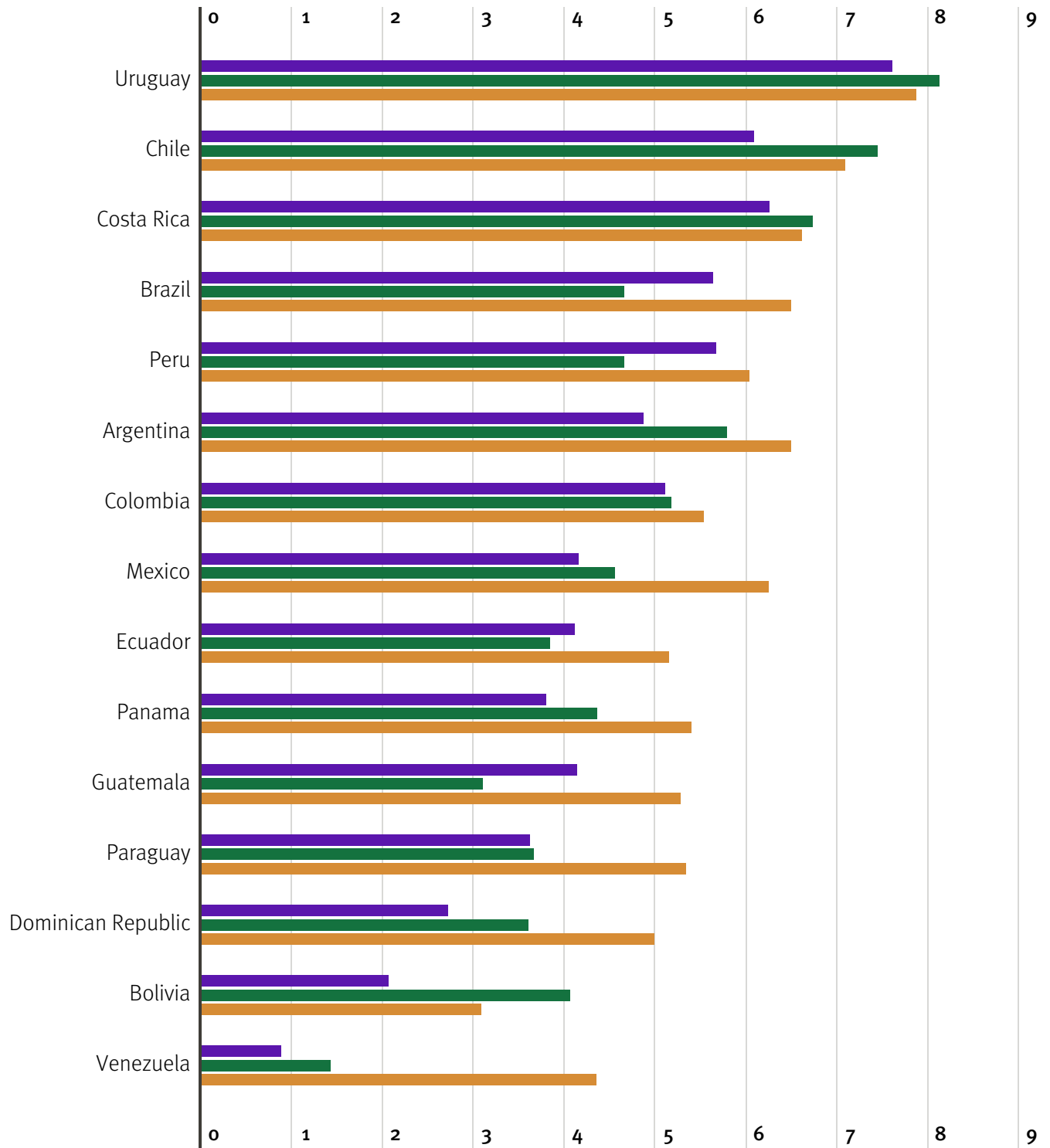


## Comparison with Last Year's Results



## Results by Sub-category

- Legal Capacity
- Democracy and Political Institutions
- Civil Society, Media and the Private Sector





1

RANKING

# URUGUAY

7.78

2020 Overall Score

n/a

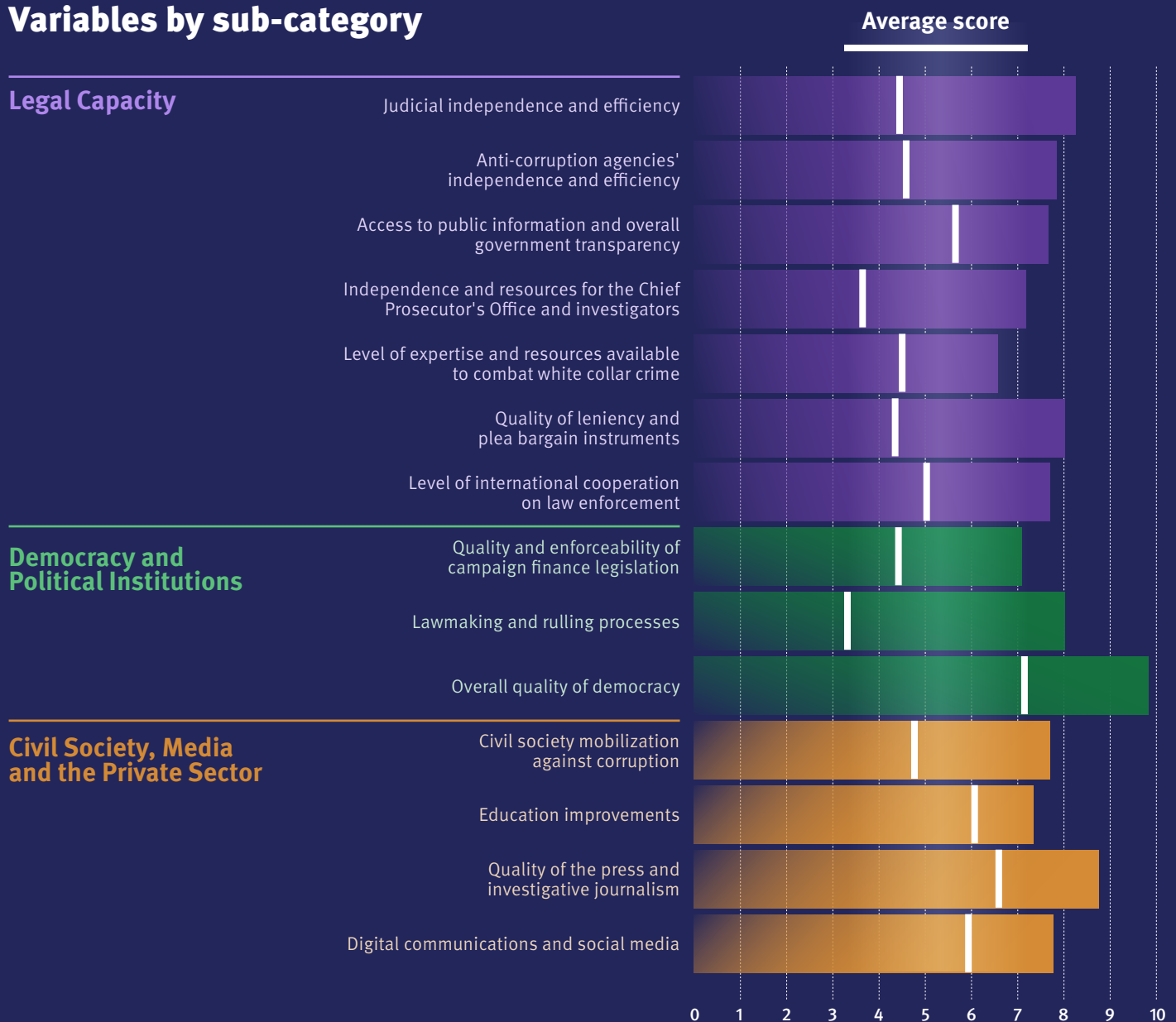
2019 Overall Score

7.61 Legal Capacity

8.12 Democracy and Political Institutions

7.87 Civil Society, Media and the Private Sector

## Variables by sub-category





1

RANKING

# URUGUAY

Uruguay leads the 2020 CCC Index in the overall ranking and in all three sub-categories—in some cases with a considerable edge over Chile, the second-best ranked country. The reasons for Uruguay's success range from strong enforcement mechanisms across the public sector and well-established democratic institutions to an active civil society and a vigilant press. Also, the country's size and higher level of development represent unique advantages compared to its Latin American peers.

The 2019 edition of the CCC Index did not include Uruguay, and Chile came first in the overall ranking and in two of the three sub-categories.

Uruguay stands out in the *Legal Capacity* sub-category, outperforming the other countries by at least 1.35 points. Its score in all the most important variables in this sub-category—including the efficiency and independence of courts, law enforcement agencies and anti-corruption bodies—is the highest among all 15 countries analyzed. Money laundering has historically been a concern for Uruguay, one of South America's main financial hubs. Yet Congress passed new controls in 2018 and the available data also put Uruguay's anti-money laundering (AML) capabilities ahead of the other countries.

The presidential elections in October and November 2019—which ended 15 years of center-left governments—have confirmed the maturity of Uruguay's democracy and party system. While most of the region suffers from deep polarization, center-right President Luis Lacalle Pou came to power with a promise of working with the opposition. Uruguay has the highest scores in all three variables in the *Democracy and Political Institutions* sub-category: campaign finance legislation, lawmaking and ruling processes, and overall quality of democracy.

## CRITICAL ISSUES TO MONITOR

The Transparency and Public Ethics Board (JUTEP)—the decentralized system in charge of fighting corruption and promoting transparency—is undergoing an important leadership change after the resignation of its chairman, vice-chairman and two directors. President Lacalle Pou is expected to fill these positions with technocrats.

Uruguay was already in an increasingly weak fiscal position before the COVID-19 crisis, with the new administration promising to cut spending. Plans to expand Uruguay's enforcement capacity seem unlikely to move forward in view of budget constraints.

Congress passed new controls over financial activities in 2018, in line with recommendations from international organizations. Yet law enforcement and the financial community are still adapting to the new rules.



2  
RANKING

# CHILE

## 6.57

2020 Overall Score

## 6.66

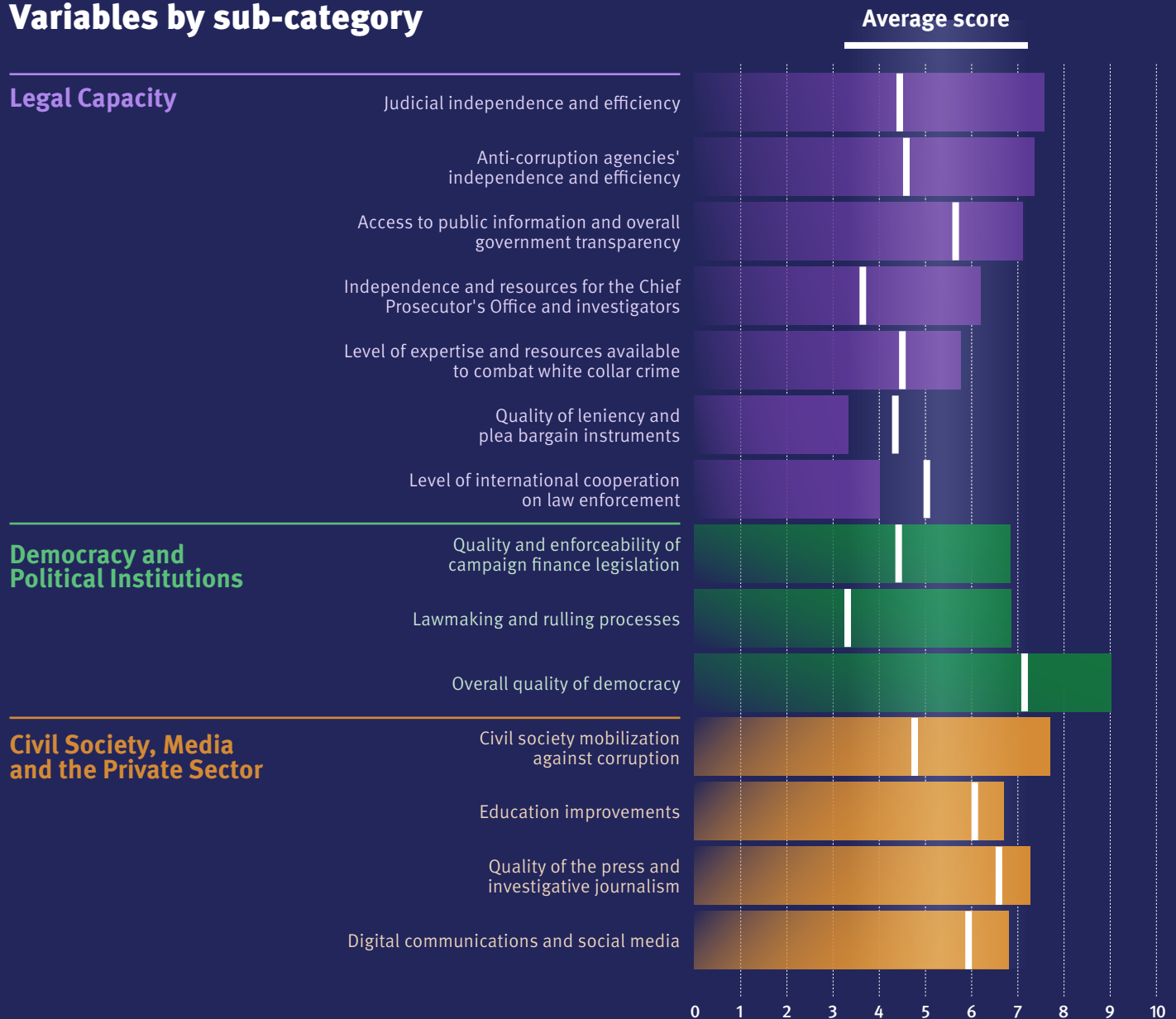
2019 Overall Score

6.08 Legal Capacity

7.45 Democracy and Political Institutions

7.09 Civil Society, Media and the Private Sector

## Variables by sub-category





# CHILE

From mid-October 2019 until the COVID-19 pandemic, Chile faced an unprecedented wave of social unrest and its worst political crisis in three decades of democracy. Yet the 2020 CCC Index reveals that the storm has not significantly impacted Chile's ability to fight corruption—at least for now. The country's overall score, as well as its performance in all three sub-categories, remained remarkably stable. If it were not for the inclusion of Uruguay in this year's edition, Chile would again be leading the ranking.

Chile's strength in the CCC Index is related to deep institutional achievements, including the quality of its judicial system, the rules governing Chilean democracy and the strength of its civil society. These elements are less vulnerable—in the short run—to political shocks. Therefore, Chile's resilience is not particularly surprising.

The crisis likely affected 3 of the 14 variables, but only marginally. The score for overall quality of democracy declined by 4% and the lawmaking process fell by 6%. Social mobilization against corruption dropped by 14% as demonstrations shifted attention to issues ranging from access to healthcare to gender equality. These variations were offset by slight improvements in other variables, including the efficiency of anti-corruption agencies and the judicial system.

However, in the longer-run, the unrest may have stark consequences for Chile's anti-corruption environment. This will depend on how the Chilean constitution, regulatory environment and political system will evolve moving forward.

## CRITICAL ISSUES TO MONITOR

Rescheduled for October, a national referendum will likely trigger a year-long drafting of a new constitution, replacing the current Pinochet-era one. Corruption will be an important topic in this process, particularly regarding discussions about new government controls over the private sector. However, based on the demands in the streets, the focus will likely be on social rights.

Since June 2019, Chile has been debating pioneering changes to the appointment of judges and prosecutors, including the use of independent panels with legislators and academics to reduce political interference. These discussions are on standby, but they could resume in the drafting of a new constitution.

In line with the 2015 Engel advisory commission on anti-corruption, President Sebastián Piñera proposed bills increasing penalties against price-fixing, changing the statute of limitations for campaign finance violations and strengthening protections for whistleblowers. The political crisis and COVID-19 suspended these negotiations and their future remains unclear.



3  
RANKING

# COSTA RICA

6.43  
2020 Overall Score

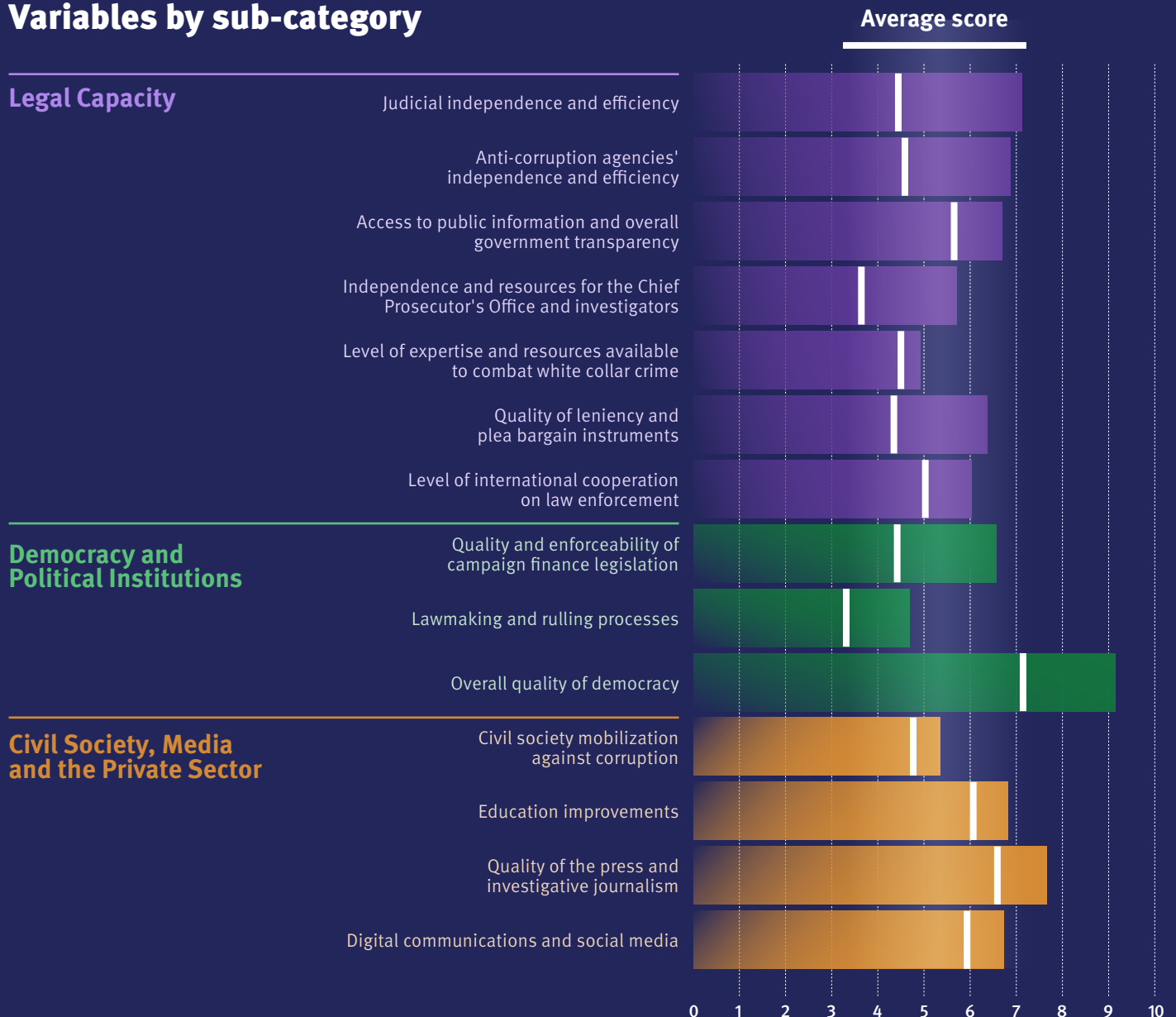
n/a  
2019 Overall Score

6.26 Legal Capacity

6.73 Democracy and Political Institutions

6.61 Civil Society, Media and the Private Sector

## Variables by sub-category





# COSTA RICA

Ranking in third in the 2020 CCC Index, Costa Rica is in the same group as Uruguay and Chile, and stands out when compared to other Central American countries analyzed. In fact, Costa Rica is marginally above Chile in the *Legal Capacity* sub-category, which includes 7 of the 14 variables that comprise the CCC Index.

Of course, Costa Rica has not been immune to embarrassing scandals, such as the *Cementazo* (more information below) and the alleged violation of data privacy by the government. But our research shows that the country has the third-most efficient and independent court system and anti-corruption agencies, as well as robust government transparency practices and well-established channels for international collaboration. Congress has recently passed a new corporate liability framework, which could contribute to more transparent relations between the private and public sectors in coming decades.

Costa Rica's main challenges in the anti-corruption space lie outside the *Legal Capacity* sub-category. For instance, poor regulations governing lobbying activities slightly drove down Costa Rica's score in the *Democracy and Political Institutions* sub-category. A bill on this particular topic is currently being debated in Congress.

Also, compared to some countries in the ranking, Costa Rica has fewer NGOs dedicated specifically to the issue of corruption, transparency and accountability, marginally reducing its score in the *Civil Society, Media and the Private Sector* sub-category. Ironically, this limitation is in part due to Costa Rica's relative successes in addressing corruption.

## CRITICAL ISSUES TO MONITOR

Costa Rica was invited to join the OECD on May 15, and its membership will be complete following the signing of an accession agreement, as well as legislative and executive approval. OECD membership may push the country to deepen institutional reforms in several areas related to anti-corruption, such as government procurement and anti-money laundering.

New corporate liability legislation, which came into force in June 2019, was aligned with Costa Rica's efforts to join the OECD. The question moving forward is how the new legislation will be enforced.

The probe into the *Cementazo* corruption case—an alleged scheme involving state officials, a public bank and imports of cement from China, first reported in 2017—continues to move forward, albeit slowly. The Public Prosecutor's Office is investigating former senior officials and the outcome of the operation is uncertain.



4  
RANKING

# BRAZIL

5.52  
2020 Overall Score

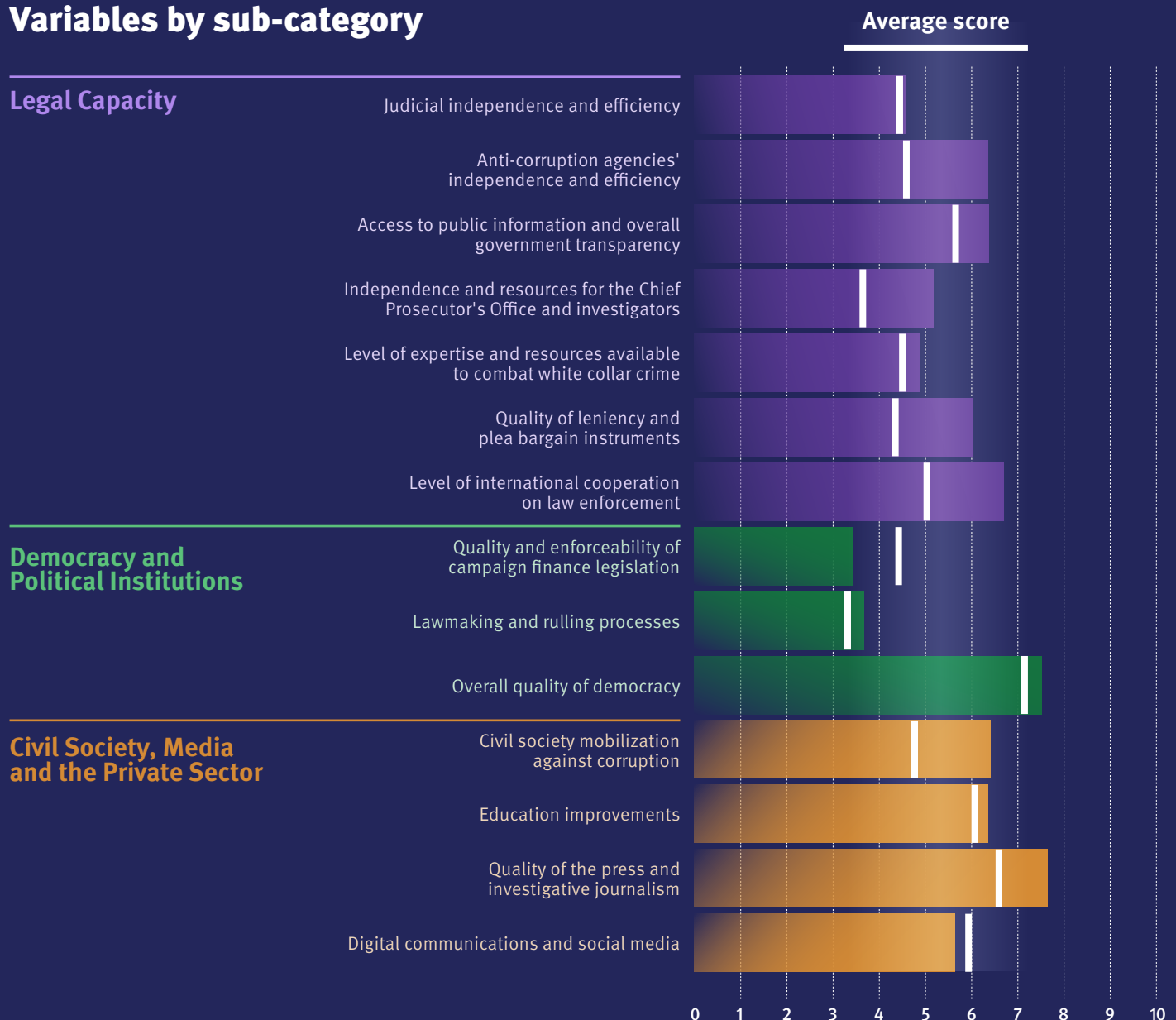
6.14  
2019 Overall Score

5.64 Legal Capacity

4.66 Democracy and Political Institutions

6.49 Civil Society, Media and the Private Sector

## Variables by sub-category





4

RANKING

# BRAZIL

**B**razil continues to demonstrate relatively solid anti-corruption credentials, ranking fourth in the 2020 CCC Index. However, it displays one of the most concerning trajectories in the region, with a 10% decline in its overall score, particularly due to setbacks in the *Legal Capacity* sub-category, which dropped 14% year-on-year. A perceived decline in the independence of law enforcement agencies, and recent judicial decisions that negatively impacted investigations of white-collar crime, are the leading causes for the downward trajectory.

President Jair Bolsonaro broke tradition by circumventing established nomination procedures when appointing an attorney general, choosing instead someone “aligned” with him, in the president’s words. The president has also allegedly attempted to interfere in the workings of the Federal Police. These factors contributed to a 20% decline in Brazil’s score for law enforcement institutions. These moves occurred while members of Bolsonaro’s family were under investigation for money laundering, graft and other crimes.

Developments in the judicial branch also undermined Brazil’s performance. The 2019 leaks of messages among protagonists of the Lava Jato investigation dealt a blow to the credibility of that landmark case. Amid a turbulent political climate created by the leaks, the Supreme Court ruled that sentenced defendants can exhaust all their appeals while out of prison, reversing its own decision from 2016. The ruling led to the release of high-profile targets of Lava Jato, including former President Lula. Scores for collaboration instruments and judicial strength decreased by around 20%, although on the former Brazil still ranked fourth in the region.

Bolsonaro’s initial break with extreme pork-barrel practices led to an increase in the lawmaking and ruling processes variable, benefiting Brazil’s score in the *Democracy and Political Institutions* sub-category. However, over the long run, this disruption raises serious questions about governability. The index also highlights a deterioration in the Civil Society, Media and the Private Sector sub-category, driven by lower levels of citizens’ mobilization against corruption and the more challenging environment for reporters.

## CRITICAL ISSUES TO MONITOR

Progress in investigations against Bolsonaro’s sons will increase political volatility and polarization, including with calls for impeachment based on obstruction of justice charges. Failure to investigate may reinforce perceptions that enforcement has been politically selective.

The independence of the Federal Public Ministry and Federal Police under Bolsonaro’s administration will remain a critical issue. The president has invested in leadership changes to consolidate his power, but most officials in these institutions are determined to resist interference.

Bolsonaro will appoint at least two Supreme Court Justices before July 2020, as well as one member of the Superior Justice Tribunal (STJ). The selection of political figures closely aligned with the government would raise new questions about judicial independence.



# PERU

**5**  
RANKING

## 5.47

2020 Overall Score

## 5.17

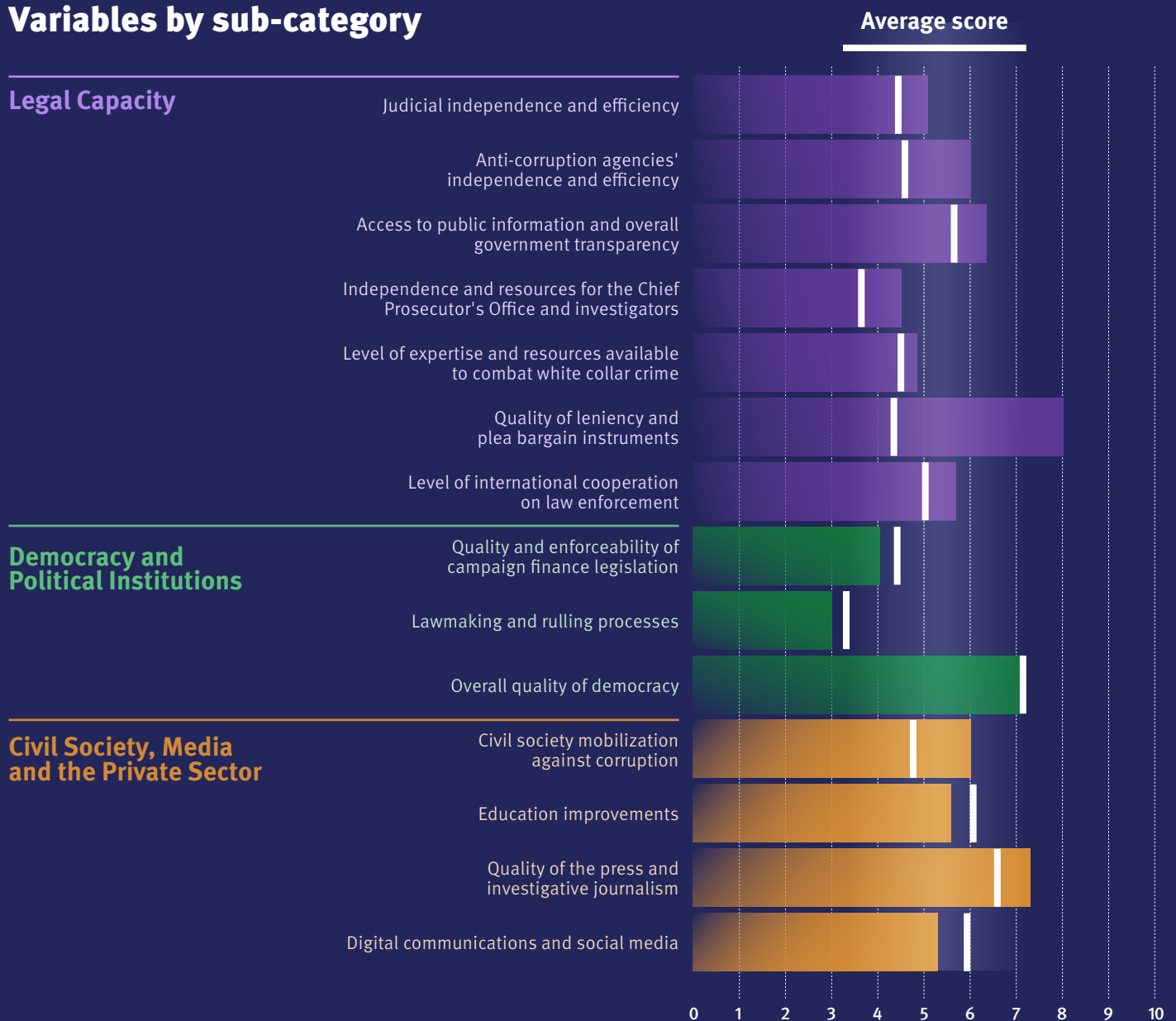
2019 Overall Score

**5.67** Legal Capacity

**4.65** Democracy and Political Institutions

**6.03** Civil Society, Media and the Private Sector

### Variables by sub-category





# PERU

5

RANKING

Peru is the most positive story in the 2020 CCC Index, with clear improvements in two sub-categories: *Legal Capacity* and *Democracy and Political Institutions*. The change reflects gains in law enforcement capacity and the court system, as well as the importance of anti-corruption in President Martín Vizcarra's agenda.

These advances, combined with some adverse outcomes in other countries, have put Peru almost on par with Brazil and ahead of Argentina and Colombia in this year's ranking. Last year, Peruvians lagged behind all three.

Peru has improved its scores in 6 of the 7 variables in the Legal Capacity sub-categories. The newly created National Justice Junta (JNJ) – now a powerful agency, targeting judges and public ministry officials accused of corruption or undermining probes – contributed to gains in the judicial system and in law enforcement. Progress in the mammoth Lava Jato investigation also underscored improvements in areas like the usage of plea bargain instruments and in international collaboration. The probe continues to move forward, rattling Peruvian politics.

Relative gains in campaign financing practices became evident in the January legislative elections, although this area remains a critical challenge for Peru. Congress is expected to improve the current legislation over the next months. Prompted by Vizcarra's decision to dissolve Congress, the January elections dealt a serious blow to Fuerza Popular and other traditional parties that were blocking anti-corruption reforms, including efforts to reduce legislative immunity. However, the weakening and fragmentation of Peru's party system may hinder governability and efforts to reform the political system.

## CRITICAL ISSUES TO MONITOR

Political reform—including increased controls over parties and campaigns, and further changes to parliamentary immunity—can keep Peru on the right track. Yet COVID-19 has changed policy priorities for now. Also, the new legislature promised to make corruption a priority, but support for Vizcarra's reforms in this area remains uncertain.

Peru will likely have its major Lava Jato trials over the next year, including of former President Ollanta Humala and *Fuerza Popular's* Keiko Fujimori. Former President Alejandro Toledo is also expected to be extradited from the U.S. Strong convictions based on sound cases presented by prosecutors would become a landmark in Peru's fight against impunity.

The JNJ will continue its efforts to “clean up” courts and the Public Ministry. Action against the so-called “supreme prosecutors” accused of corruption will be a critical test for the board, as they remain very powerful within the Public Ministry and Peru's political system.



6  
RANKING

# ARGENTINA

5.32

2020 Overall Score

5.33

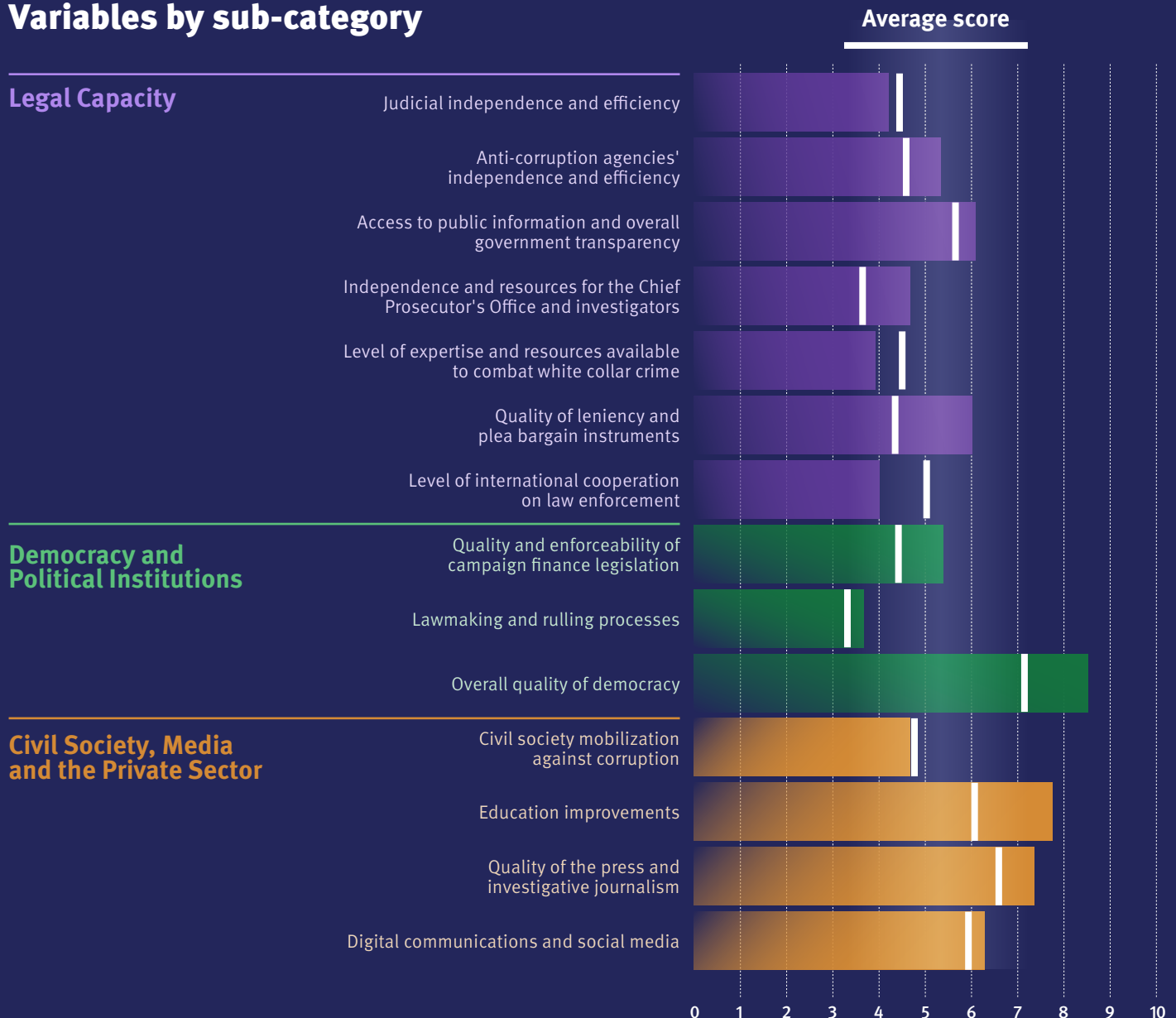
2019 Overall Score

4.86 Legal Capacity

5.78 Democracy and Political Institutions

6.50 Civil Society, Media and the Private Sector

## Variables by sub-category





6

RANKING

# ARGENTINA

Argentina went through critical changes over the past year, with presidential elections bringing *peronismo* back to power and the country enduring another sovereign default. Its overall score in the CCC Index, however, remained stable. Argentina is ahead of countries like Brazil and Colombia in the *Democracy and Political Institutions* and in the *Civil Society, Media and the Private Sector* sub-categories. However, Argentina still faces a series of challenges related to *Legal Capacity*, ranking below Peru, Brazil and Colombia.

Following the October elections, the smooth transition of power from Mauricio Macri to Alberto Fernández underscored the maturity of Argentina's democracy. Congress had passed new campaign financing regulations earlier last year, which were implemented for the first time in the general elections. Consequently, the Argentine score for campaign financing increased 14% from 2019, although it is still below Costa Rica, Chile and Uruguay.

Argentina also performs well above the regional average in the *Civil Society, Media and the Private Sector* sub-category—particularly regarding the quality of the press and investigative journalism. However, the data indicates a sharp decline in the social mobilization against corruption variable, as changes in government and the deterioration of the economy shifted part of the general public's attention away from the fight against corruption.

The most significant challenges to Argentina are in the *Legal Capacity* sub-category, in which the country scores only slightly above the regional average. With Vice President Cristina Fernández de Kirchner facing multiple graft accusations, some have raised concerns about the future of anti-corruption agencies—including the Anti-Corruption Office (OA). Argentina had an 11% decrease in this particular variable. The chronic politicization of courts has also further undermined judicial independence and efficiency, with an 8% drop since 2019.

## CRITICAL ISSUES TO MONITOR

Government allies now occupy leadership positions in anti-corruption agencies. Any efforts to control oversight institutions or pressure prosecutors and magistrates, including in the cases involving Kirchner, would represent a serious blow to Argentina's anti-corruption environment.

President Fernández and several government officials have been vocal critics of plea bargain instruments in Argentina, and it remains to be seen if they will try to change the existing legal framework. The government has reversed Macri's plans to create an autonomous witness protection agency.

The emergency decrees introduced by national and provincial governments due to COVID-19 have suspended some governance controls. The change may hamper Argentina's capacity to identify and combat corruption in the coming year.



7  
RANKING

# COLOMBIA

5.18

2020 Overall Score

5.36

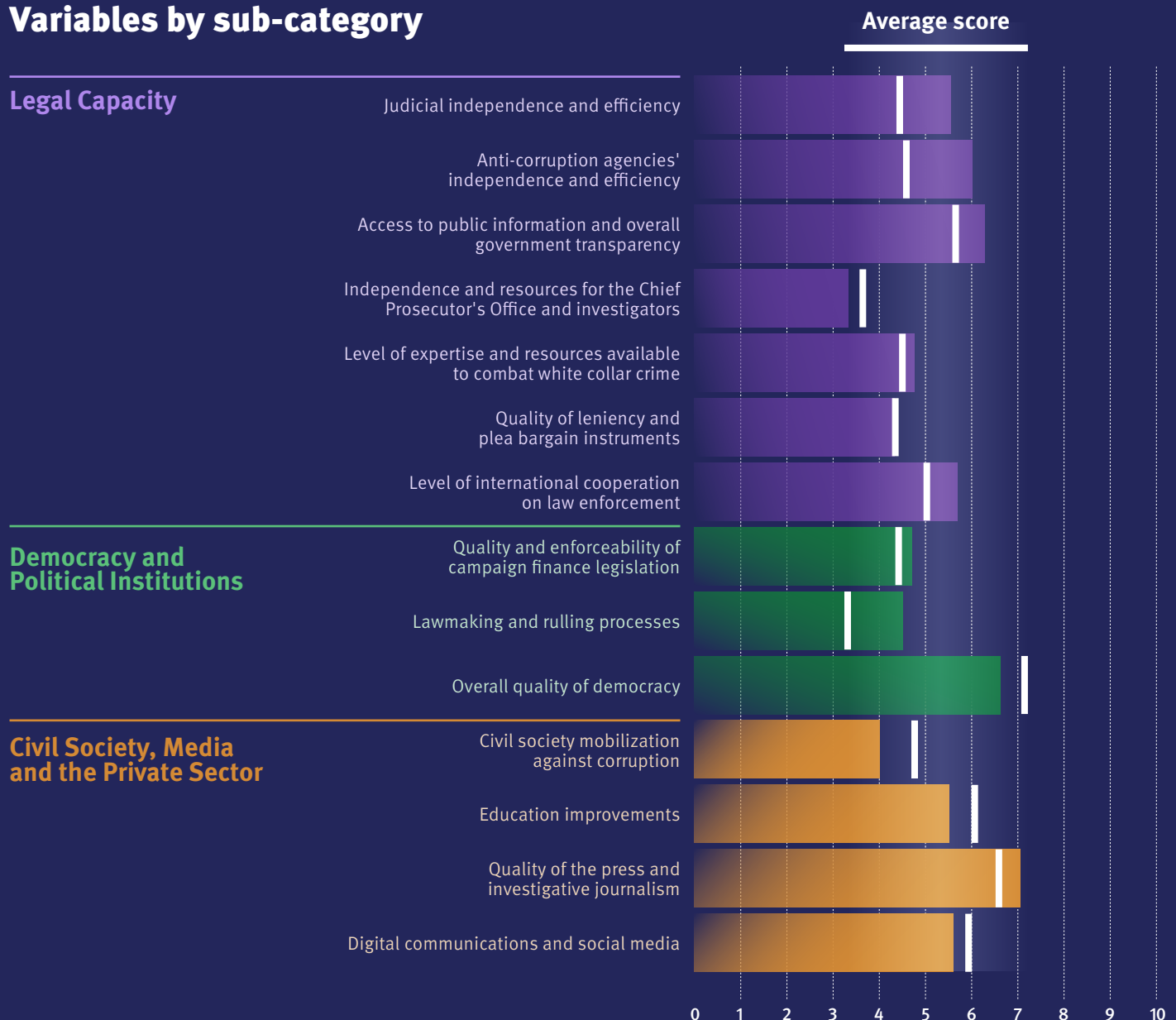
2019 Overall Score

5.10 Legal Capacity

5.18 Democracy and Political Institutions

5.53 Civil Society, Media and the Private Sector

## Variables by sub-category





# COLOMBIA

Colombia has faced a series of unprecedented challenges over the past year, including the continuing influx of Venezuelan refugees, widespread street protests and, more recently, the COVID-19 crisis. However, Colombia's score in the CCC Index has remained relatively stable since 2019. Colombia had slight decreases in its scores for the *Legal Capacity* and the *Democracy and Political Institutions* sub-categories. But they were offset by marginal gains in the *Civil Society, Media and the Private Sector* sub-category.

A lack of enforcement collaboration with other countries, including in the context of the Odebrecht case, has hindered Colombia's performance in *Legal Capacity*. Other factors also contributed to this relative decline. With the resignation of Néstor Humberto Martínez amid conflict of interest accusations, Colombia had an opportunity to appoint a new attorney general with ample independence and credibility. President Iván Duque's decision to fill the position with Francisco Barbosa, a close associate of his, frustrated many independent observers. Colombia's score for the independence and resources for investigators has slightly gone down. But the increased use of plea bargain and leniency instruments in white collar and other investigations was a positive development.

Meanwhile, Colombia has seen positive developments in the *Civil Society, Media and the Private Sector* sub-category. Compared to 2019, Colombia had higher scores in social mobilization against corruption, education improvements, digital communications and social media, and quality of the press and investigative journalism.

## CRITICAL ISSUES TO MONITOR

Following a large-scale constitutional reform in September 2019, the Office of the Comptroller General—under Carlos Felipe Córdoba—gained broad new powers and capabilities to conduct investigations. It remains to be seen how the agency will contribute to enforcement and prevention of corruption.

As COVID-19 continues to threaten Colombia, authorities have opened investigations into alleged overcharging in state contracts for Personal Protective Equipment (PPE), medical supplies and the construction of new health facilities. One should expect more accusations related to contracting and procurement to emerge over the next months.

Colombia has several ongoing high-profile investigations. Frustration is growing due to slow progress in the Odebrecht probe, despite the abundant evidence available. The Colombian military has also been involved in scandals related to the improper use of surveillance tools to monitor politicians, activists and journalists.



# MEXICO

8  
RANKING

**4.55**  
2020 Overall Score

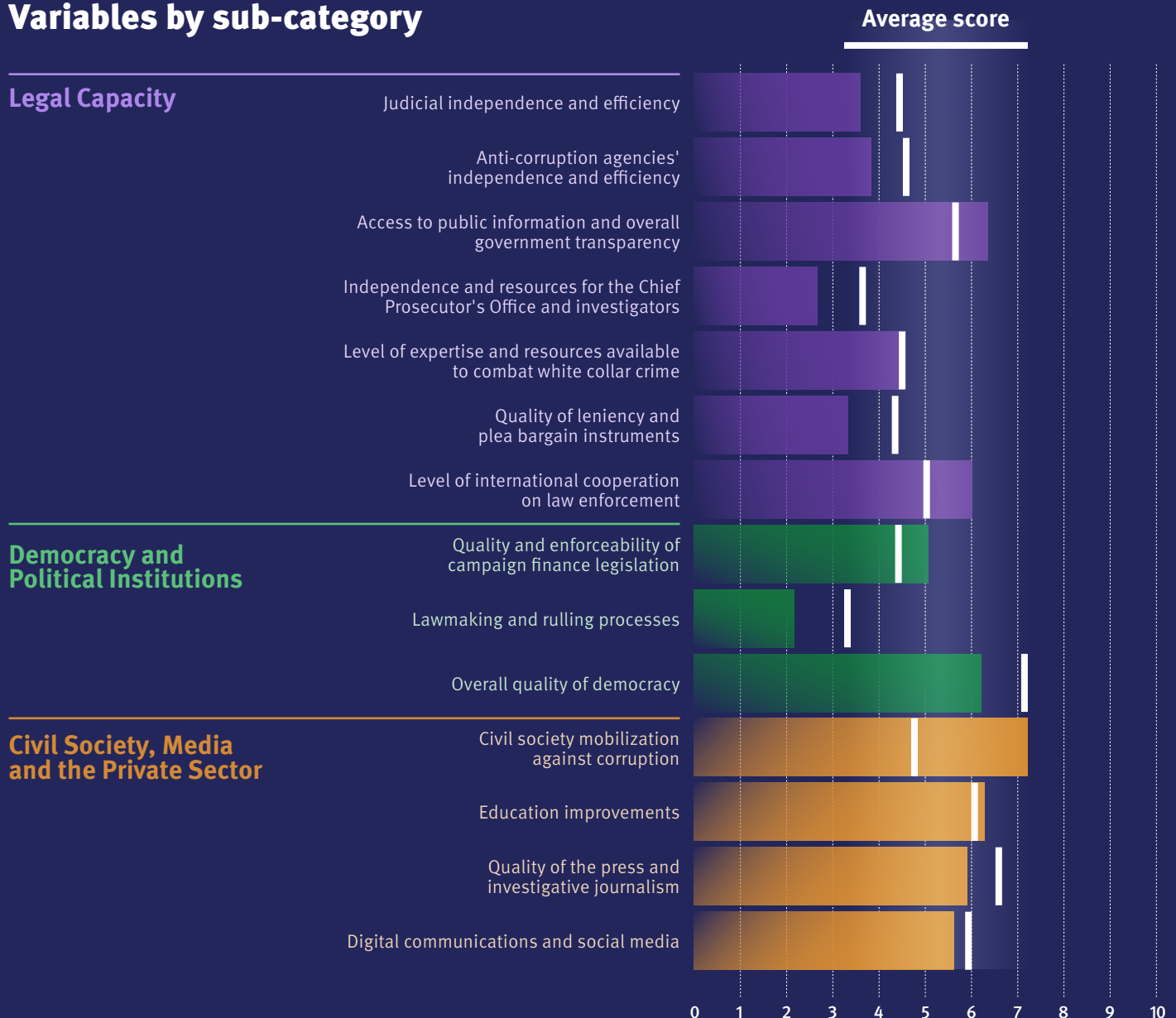
**4.65**  
2019 Overall Score

**4.15** Legal Capacity

**4.55** Democracy and Political Institutions

**6.24** Civil Society, Media and the Private Sector

## Variables by sub-category





8

RANKING

# MEXICO

President Andrés Manuel López Obrador (AMLO) came to power with a promise of “ending corruption”, and the topic has firmly remained at the top of his government’s agenda. However, the 2020 CCC Index shows that, in practice, not much has changed for Mexico—in fact, the country has stagnated and maintains a poor ability to detect, punish and prevent corruption. Mexico’s overall score, as well as the scores for all three sub-categories, remained notably similar to last year’s.

There are several reasons behind Mexico’s stagnation, but one of the most important is the lack of progress in long-term institutional reforms. AMLO has mostly cast his anti-corruption campaign around his personal ability to eradicate the problem. Meanwhile, the president has practically ignored the National Anti-corruption System (SNA), increased the use of discretionary spending in public contracts, and disregarded controls to improve governance, among other worrisome trends.

On the enforcement side, Mexico’s AML agency (UIF) has drastically expanded its activities, unveiling alleged corruption cases involving members of opposition parties, the Supreme Court and others. However, observers have raised questions about the extent of AMLO’s control over the UIF. Accordingly, Mexico’s score for the independence and efficiency of anti-corruption agencies went down. In some variables under *Legal Capacity*, such as the independence and efficiency of the judicial system, Mexico ranks significantly below countries like Brazil, Colombia or Peru, and closer to others like Guatemala and the Dominican Republic.

Outside government, the civil society campaign against corruption has also lost some of its steam over the past two years—as reflected in a lower score for this variable. This is likely due to two main factors: AMLO’s success in appropriating the anti-corruption cause and his rhetorical attacks against NGOs and other independent groups.

## CRITICAL ISSUES TO MONITOR

Several former senior officials accused of corruption—such as PEMEX CEO Emilio Lozoya, Veracruz Governor Javier Duarte and Public Security Secretary Genaro García Luna—are currently under investigation or have been sentenced. Whether these probes will ultimately advance, as well as their potential political fallout, remains uncertain.

Mexico is expected to move forward in the implementation of an accusatory criminal system, closer to the U.S. model. This may over time lead to important changes in anti-corruption enforcement, including the increased use of plea-bargaining instruments.

The AMLO administration has removed controls and increased discretion for government contracts, while pushing forward major infrastructure projects and increasing health-care spending due to COVID-19. This combination will further increase corruption risks.



**9**  
RANKING

# ECUADOR

**4.19**  
2020 Overall Score

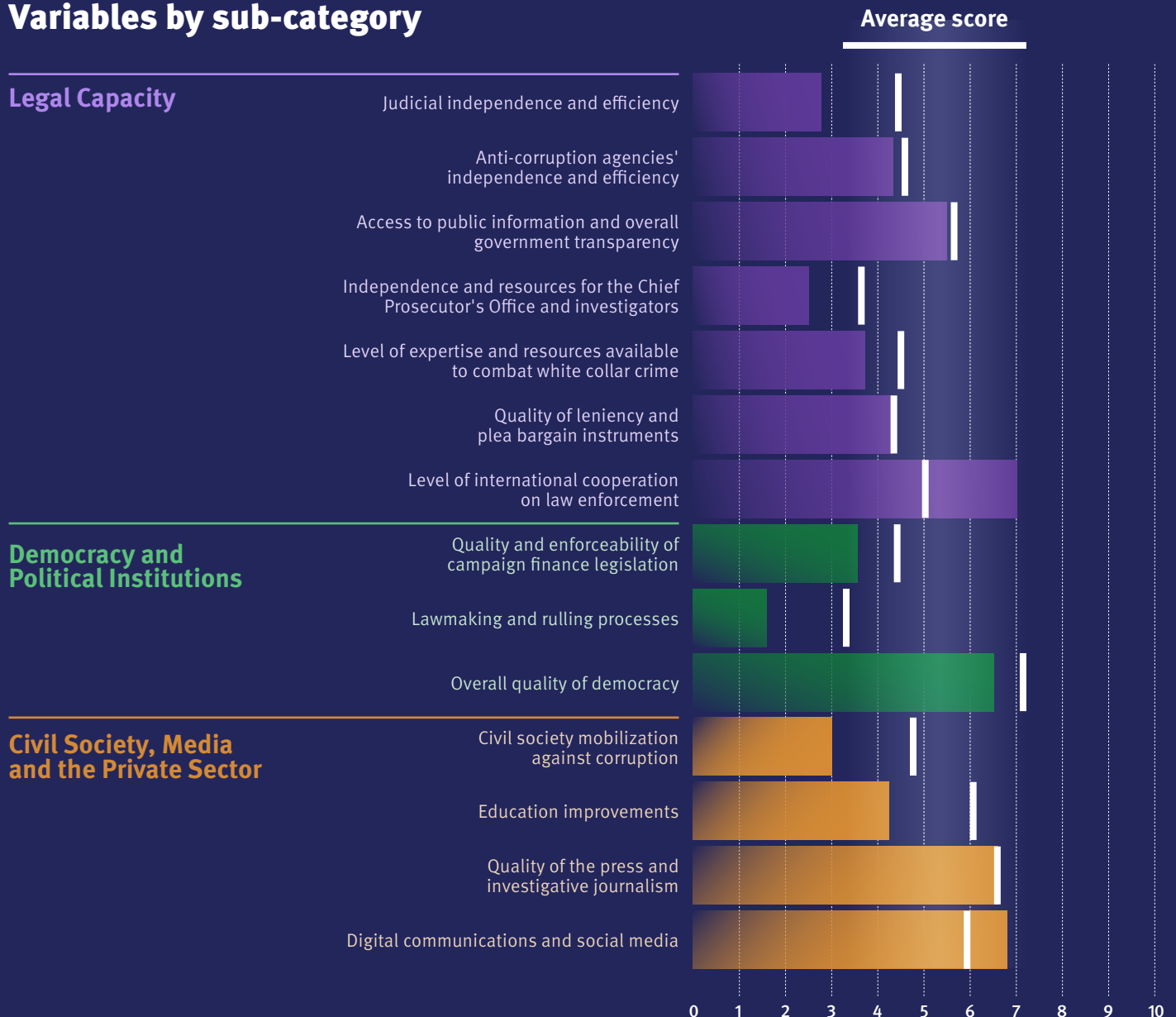
**n/a**  
2019 Overall Score

**4.11** Legal Capacity

**3.84** Democracy and Political Institutions

**5.15** Civil Society, Media and the Private Sector

## Variables by sub-category





# ECUADOR

Despite significant progress in the fight against corruption under the Lenín Moreno administration, Ecuador's overall score is still below the regional average. The Ecuadorian system performs particularly poorly in critical areas under the *Legal Capacity* sub-category, such as judicial independence and efficiency, and resources to fight white collar crime.

Still, Ecuador had positive developments in variables measured on the *Legal Capacity* front, particularly in enforcement, with unprecedented actions against former political and business leaders. Ecuador scores a full two points above the regional average on international collaboration, driven by exchanges such as in the Odebrecht case. Key judicial decisions have been handed down, such as the April sentencing of former President Rafael Correa and former Vice President Jorge Glas in the so-called "Caso Sobornos" (Kickbacks Case). Another Vice President, María Alejandra Vicuña, was sentenced for corruption in a separate investigation.

Created after a referendum in 2018, the new Council of Citizen Participation and Social Control (CPCCS) is attempting to reduce the politicization of the Judicial Council and the Constitutional Court. The body may play a critical role in judicial reform moving forward.

In some aspects of the *Civil Society, Media and the Private Sector* sub-category, such as quality of the press and investigative journalism, Ecuador displays higher than average scores. Data for freedom of the press indicate a substantial improvement in the post-Correa years. However, Ecuador performed poorly in the *Democracy and Political Institutions* sub-category, ranking in 11th place, ahead only of Venezuela, Guatemala, the Dominican Republic and Paraguay.

## CRITICAL ISSUES TO MONITOR

Ecuador's economy will remain highly vulnerable, with high debt ratios, collapsing revenues due to the fall in oil prices and COVID-19, and a stark recession. Also, the risk of social unrest remains and may grow. These adversities threaten to dominate Ecuador's policy agenda, pushing anti-corruption to the side.

Court battles involving Correa and other former high-ranking officials accused of corruption will continue, as the defendants will likely appeal their convictions from earlier this year. Ecuador's Attorney General will also likely move forward in other high-profile cases, such as the Odebrecht and Petroecuador investigations.

Ecuador will have presidential elections in February 2021. Moreno doesn't have a clear political heir, and *correístas* remain a powerful force (Correa himself cannot run unless his conviction is overturned).



**10**  
RANKING

# PANAMA

**4.17**  
2020 Overall Score

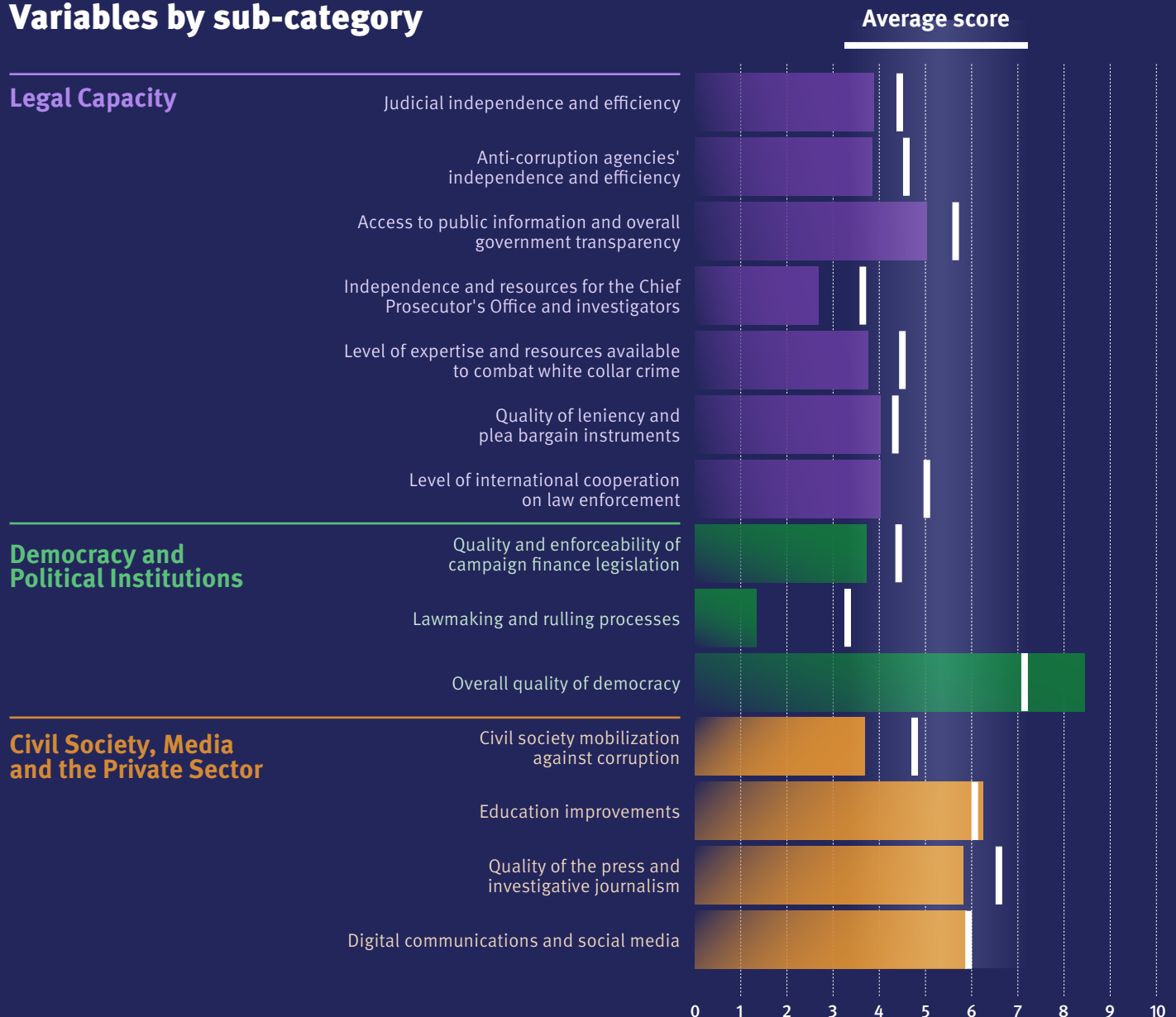
**n/a**  
2019 Overall Score

**3.80** Legal Capacity

**4.36** Democracy and Political Institutions

**5.39** Civil Society, Media and the Private Sector

## Variables by sub-category





# PANAMA

The 2020 CCC Index highlights Panama's uneven anti-corruption landscape. As a financial secrecy jurisdiction where major scandals took place over the past years, including the Panama Papers and the Odebrecht case, Panama's score in the *Legal Capacity* sub-category is one point below the regional average. Panama also performs below regional averages in the *Democracy and Political Institutions* and in the *Civil Society, Media and the Private Sector* sub-category, although by a smaller margin.

President Laurentino "Nito" Cortizo came to power in July 2019 after campaigning on a platform largely based on "ending a decade lost to corruption." His initial agenda included several policies to boost anti-corruption capacity, from designating an independent and anti-corruption-focused attorney general to changing the selection process of magistrates in the Supreme Court of Justice (CSJ). However, his anti-corruption push quickly lost steam. Congress and most political players, including some from his own party, undermined constitutional reforms that would have reduced legislative immunity and changed reelection laws.

Consequently, Panama's *Legal Capacity* has problematic areas. In the government transparency variable, the Panamanian score is below countries like Ecuador, Guatemala and the Dominican Republic. The data puts Panama behind countries like Ecuador in areas such as the strength of anti-corruption agencies and the use of collaboration instruments.

However, Panama also has a clear advantage in some areas. For instance, the overall quality of democracy in Panama is higher than in Brazil, Peru, Colombia and Mexico, and is closest to Argentina.

## CRITICAL ISSUES TO MONITOR

Panama's status as a global money laundering hub will remain a dominant issue for the country—and beyond. The Financial Action Task Force (FATF) 2019 gray list includes Panama and international organizations point to its deficiencies in anti-money laundering (AML) and combating the financing of terrorism (CFT). Without broad reforms, including controls against shell companies and transparency regarding beneficial owners, Panama will remain listed as a secrecy jurisdiction.

Panama recently passed new legislation regulating public infrastructure contracts. Some civil society organizations are raising concerns about the new rules, which allegedly loosen controls and could open the way to price-fixing and other types of corruption. The country has yet to fully investigate the Odebrecht case, which included multi-million-dollar bribes to build the Panama City subway.

President Cortizo will likely continue to face challenges convincing the National Assembly to pass his proposed judicial and political reforms.



# GUATEMALA

**11**  
RANKING

**4.04**  
2020 Overall Score

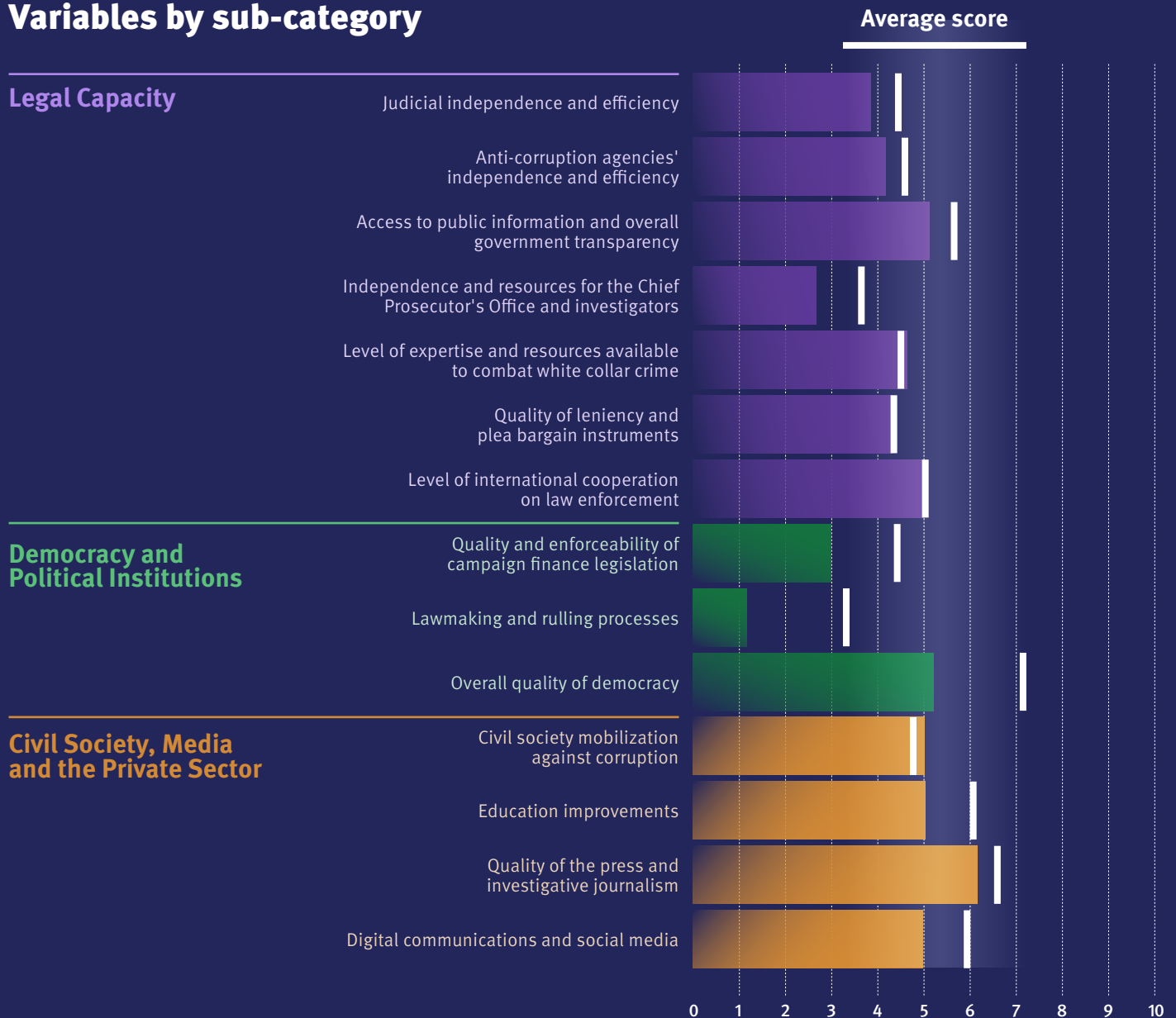
**4.55**  
2019 Overall Score

**4.13** Legal Capacity

**3.10** Democracy and Political Institutions

**5.28** Civil Society, Media and the Private Sector

## Variables by sub-category





11

RANKING

# GUATEMALA

Following the departure of the UN-backed International Commission Against Impunity in Guatemala (CICIG), Guatemala's anti-corruption environment suffered a rapid deterioration over the past year. The country's overall score in the CCC Index dropped by 11% since 2019. This setback was mostly driven by a 15% fall in the *Legal Capacity* sub-category.

After his inauguration in January, President Alejandro Giammattei announced the creation of a new Presidential Commission against Corruption, promising that the fight against corruption would not be abandoned after the expulsion of CICIG. However, whereas the UN-backed agency enjoyed ample autonomy to assist in enforcement actions and anti-corruption policies, the new commission operates under the executive branch and its actions in support of the Attorney General's Office (MP) will be much more limited. Also, law enforcement agents involved with CICIG continue to be harassed. As a consequence, scores for efficiency and independence of anti-corruption agencies, prosecutors, and court systems have all declined. The most significant change was a 33% decrease in the score for international cooperation on law enforcement, an area in which CICIG featured as a unique experiment.

Guatemala's scores in the *Democracy and Political Institutions* and in the *Civil Society, Media and the Private Sector* sub-categories also went down, although only marginally. Regarding the former, the country was already in a weak position in the 2019 CCC Index, during the last months of the Jimmy Morales presidency. On the positive side, Guatemala has a vibrant civil society, with increasingly strong local NGOs, and—unlike some other countries—the issue of anti-corruption has remained front and center for citizens over the past several years.

## CRITICAL ISSUES TO MONITOR

Most independent anti-corruption analysts believe that the backlash from the political establishment against CICIG and its Guatemalan partners is not over, and Congress will likely move to further undermine anti-corruption investigations. The effort may include reducing sentences for white collar crimes, campaign financing violations and tax fraud.

The selection of magistrates for key courts will remain a highly sensitive issue. The new Constitutional Court judges will be picked sometime in 2020. In March, the session in Congress to elect judges to the Supreme Electoral Tribunal was closed to the press. Last year, the selection process for the Supreme Court of Justice (CSJ) was suspended amid corruption accusations.

The Giammattei administration has been rolling out an unprecedented \$1.4 billion assistance fund to fight COVID-19. Given Guatemala's chronic weaknesses in public procurement and related areas, corruption risk is likely to increase.



**12**  
RANKING

# PARAGUAY

**3.88**

2020 Overall Score

**n/a**

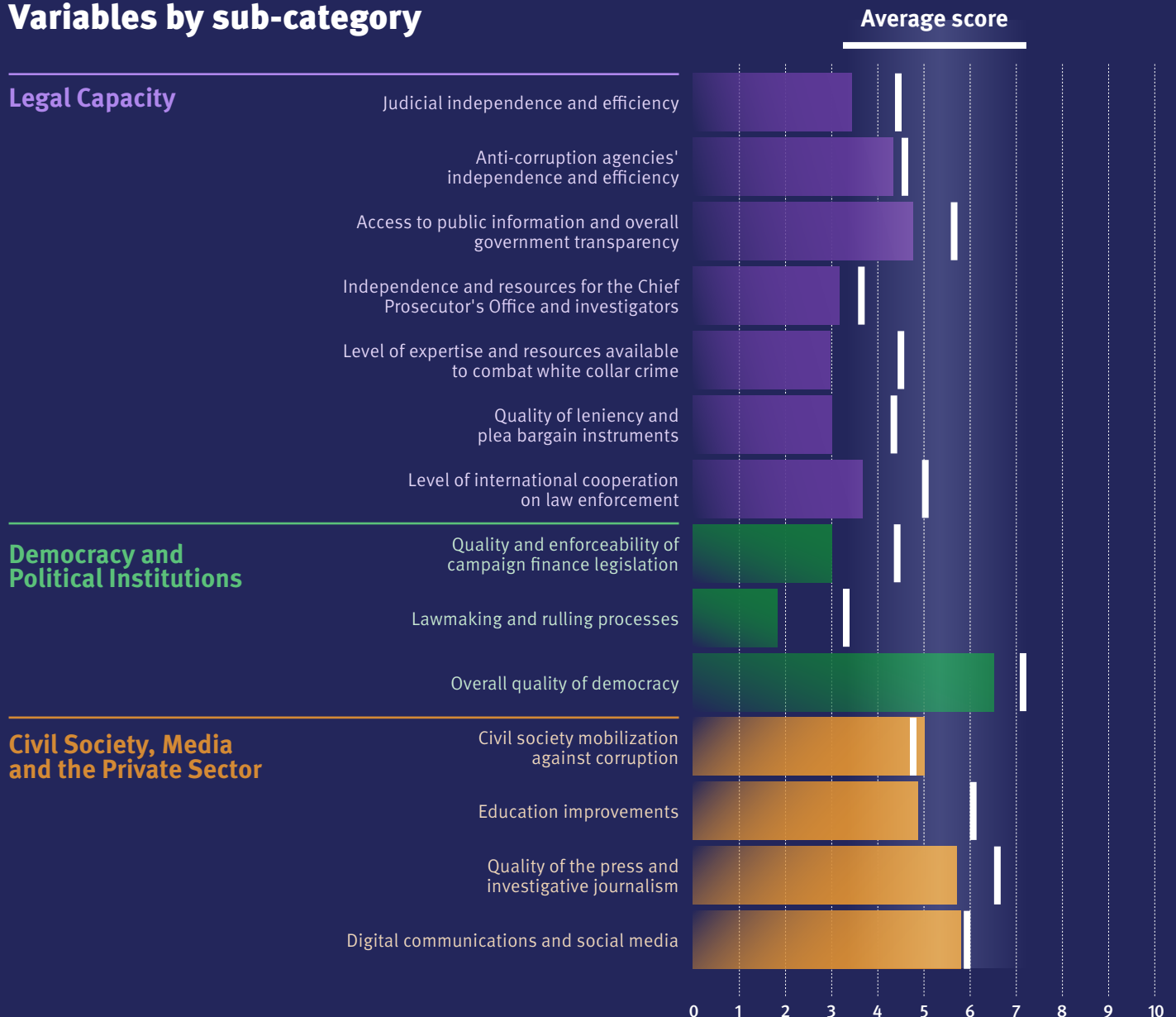
2019 Overall Score

**3.62** Legal Capacity

**3.66** Democracy and Political Institutions

**5.34** Civil Society, Media and the Private Sector

## Variables by sub-category





# PARAGUAY

Paraguay is among the lower performing countries in the overall ranking and in all three sub-categories of the CCC Index, faring particularly poorly in the *Legal Capacity* sub-category. In this particular area, Paraguay is only ahead of Venezuela, Bolivia and the Dominican Republic.

Multiple factors contribute to Paraguay's weakness in the *Legal Capacity* sub-category. Virtually all judicial institutions remain heavily politicized from the top to the bottom, with justices selected mostly along party lines. Access to public information and government transparency is another critical challenge: Paraguay lags behind countries like Guatemala and the Dominican Republic. Paraguay also has a pronounced lack of expertise and resources to fight white-collar crime, ranking last in this particular variable.

Some of Paraguay's problems are well known. The sheer scale of its illicit economy—including contraband, drug trafficking and money laundering—poses a unique challenge for strengthening anti-corruption institutions. There are reports that drug cartels have penetrated several spheres of government. President Mario Abdo Benítez came to power in 2018 with the promise to focus on the fight against corruption and drug trafficking, implying that his predecessor (and party colleague) Horacio Cartes lacked political will to act in these areas.

However, not much has happened in the anti-corruption space since 2018. In August, Abdo Benítez was almost impeached when information about secret dealings with Brazil regarding the Itaipú Dam emerged.

One of the most promising areas for Paraguay is the *Civil Society, Media and the Private Sector* sub-category, where it scores ahead of countries like Ecuador and Guatemala. NGOs and mobilization through social media have driven most of this relative progress.

## CRITICAL ISSUES TO MONITOR

Brazilian organized criminal groups—particularly the First Command of the Capital (PCC)—are rapidly transforming Paraguay into their operational hub for South America. The expansion of organized crime will have nefarious consequences for Paraguay's anti-corruption environment.

Paraguay will remain under intense scrutiny for its role as a global center for money laundering. The country has been implementing new legislation since 2016, but some remain skeptical about meaningful progress in enforcement. The Financial Action Task Force of Latin America (GAFILAT) was preparing a report on this matter, but the analysis has been postponed to 2021 due to the COVID-19 emergency.

Congress is in the process of creating an Anti-corruption Observatory, an independent initiative under the legislative branch that could increase oversight on enforcement and prevention mechanisms.



13  
RANKING

# DOMINICAN REPUBLIC

3.26

2020 Overall Score

n/a

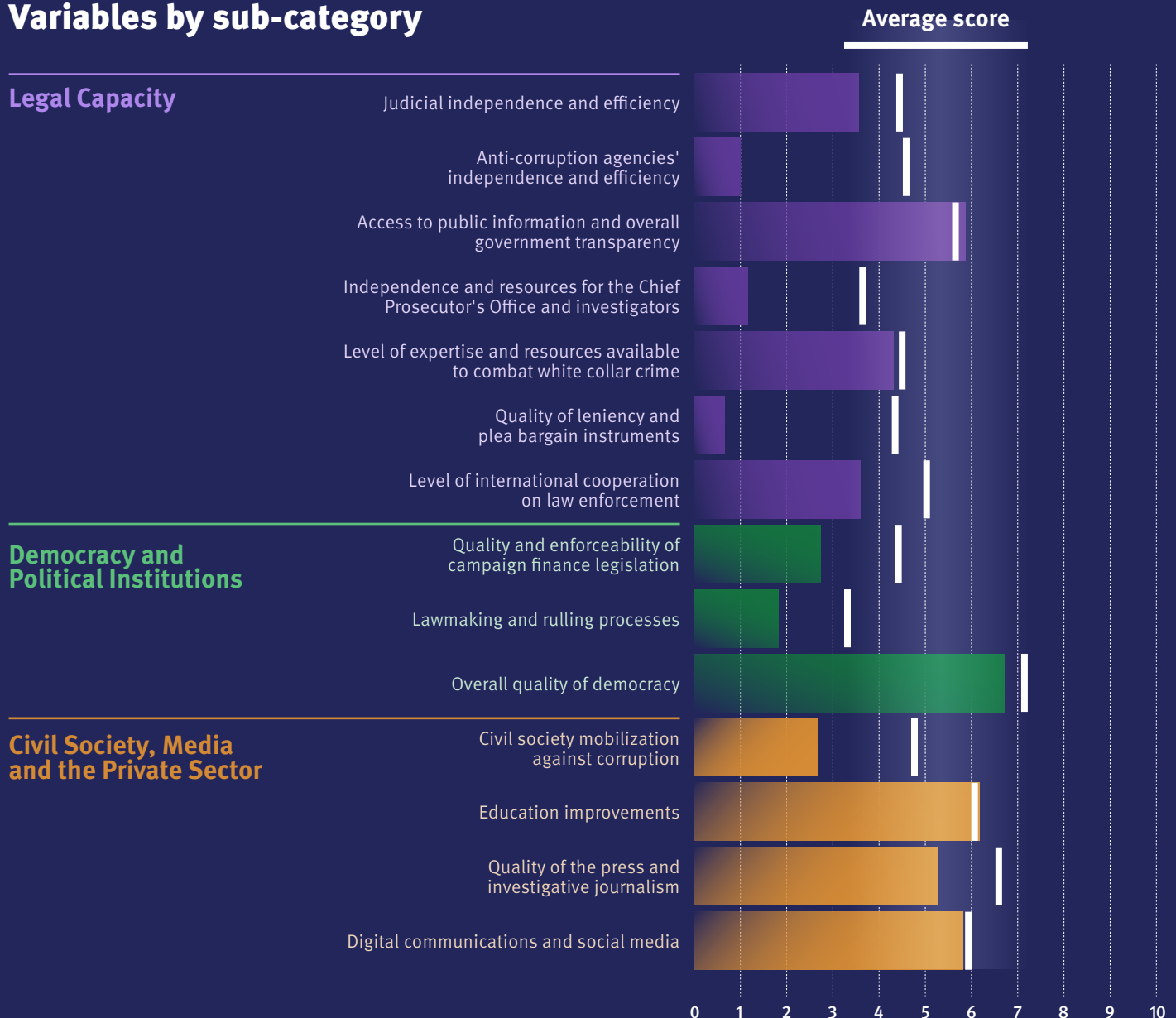
2019 Overall Score

2.71 Legal Capacity

3.61 Democracy and Political Institutions

4.98 Civil Society, Media and the Private Sector

## Variables by sub-category





# DOMINICAN REPUBLIC

The Dominican Republic ranks near the bottom of the CCC Index mainly due to its low score in the *Legal Capacity* sub-category. The country is behind the regional average in six of the seven *Legal Capacity* variables, particularly regarding the independence of anti-corruption agencies, the use of plea bargaining and collaboration instruments, and institutional strength of investigative bodies.

A perception of impunity still dominates the Dominican Republic as high-profile corruption cases — including Odebrecht’s alleged \$92 million bribes scheme in the country — remain unresolved. Last year, the Brazilian construction company included in a bankruptcy filing the \$184 million fine imposed by Dominican authorities, in practice ending the collaboration between the two sides. The Dominican Republic scores below Bolivia and Paraguay in the international collaboration on law enforcement variable.

The Dominican performance in the *Civil Society, Media and the Private Sector* sub-category is relatively better. Scores for anti-corruption education and digital communications are closer to the CCC Index average. These factors likely contributed to the rise of the *Marcha Verde*, a multi-constituency movement against corruption. The movement gained force in 2017 and 2018 following the Odebrecht scandal, but pressure for the implementation of anti-corruption reforms has since diminished.

## CRITICAL ISSUES TO MONITOR

The Dominican general elections are scheduled for July, amid increasing doubts about whether this will be possible due to the COVID-19 crisis. Following its successes in the contested March regional elections, the Partido Revolucionario Moderno (PRM) may build momentum and unseat from the presidency the Partido de la Liberación Dominicana (PLD), which has been in power since 2004.

Mobilization against corruption is taking new forms, as seen in the recent Plaza de la Bandera protests. Younger middle-class Dominicans dominated the demonstrations, but polls indicate the topic is a top priority for the country across virtually all constituencies. It remains to be seen if and how the COVID-19 crisis will shift the public’s attention.



# BOLIVIA

**14**  
RANKING

**2.71**  
2020 Overall Score

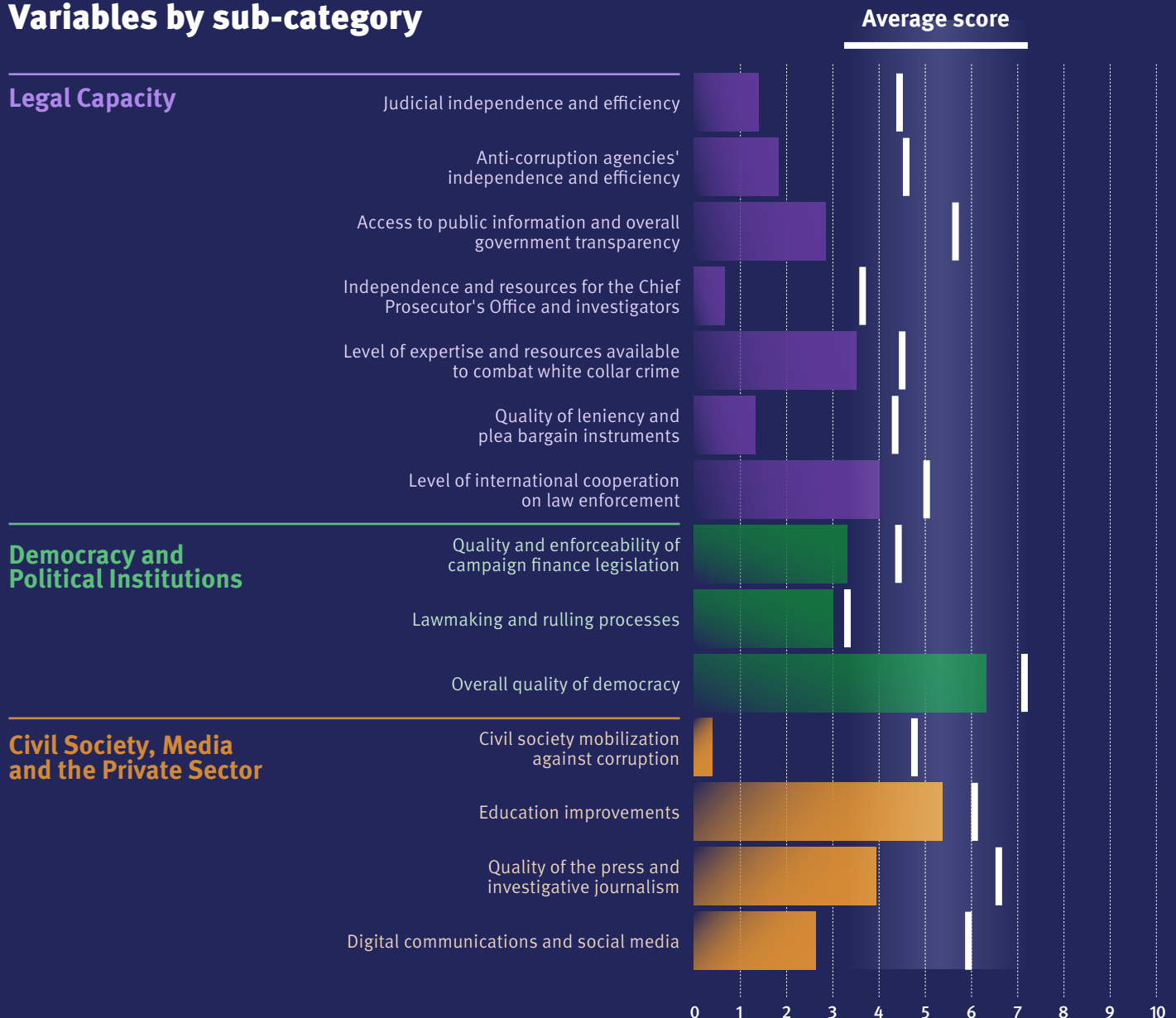
**n/a**  
2019 Overall Score

**2.06** Legal Capacity

**4.07** Democracy and Political Institutions

**3.08** Civil Society, Media and the Private Sector

## Variables by sub-category





14

RANKING

# BOLIVIA

Excluding Venezuela, Bolivia scored lowest in the CCC Index, with areas of concern across all three sub-categories. More importantly, the country is going through rapid changes since the eruption of protests and the ousting of President Evo Morales last year, making its trajectory in the anti-corruption space still very uncertain.

Bolivia scores below the regional average by at least 2.5 points in the most important variables in the *Legal Capacity* sub-category, such as the independence and efficiency of courts, anti-corruption agencies and prosecutorial entities. This underperformance is due to historically weak institutions, but also to Morales' legacy of executive dominance over the legislative and judicial powers. High court judges are elected through popular vote, an initiative from Morales' MAS party that ostensibly sought to democratize the judicial system (although the primary elections are conducted by the Plurinational Assembly). The MAS' consecutive supermajorities in the assembly has allowed Morales to expand his influence over lower levels of Bolivia's court system as well.

Bolivia also faces critical challenges related to civil society and democracy. For instance, investigative journalism in the country appears to be improving, but insufficient resources and the intimidation of independent press has put Bolivia behind even Venezuela in this particular area. Bolivia has higher scores in the *Democracy and Political Institutions* sub-category. However, this is mostly due to relatively low levels of fragmentation in Congress, which may change as the country's party system evolves in a post-Morales era.

## CRITICAL ISSUES TO MONITOR:

Political volatility will likely remain very high as Bolivia tries to organize new presidential elections under the interim government of Jeanine Áñez—herself a candidate—and amid the COVID-19 crisis. A contested victory by a MAS or another candidate could result in further political uncertainty and polarization. This would in turn further undermine Bolivia's standing in several critical areas for anti-corruption.

Bolivians have seen high-profile corruption accusations against former MAS officials and, more recently, against members of the Áñez government. These stories may likely continue to flare up in the media, but risks are high that investigations may be instrumentalized for political purposes.



**15**  
RANKING

# VENEZUELA

**1.52**

2020 Overall Score

**1.71**

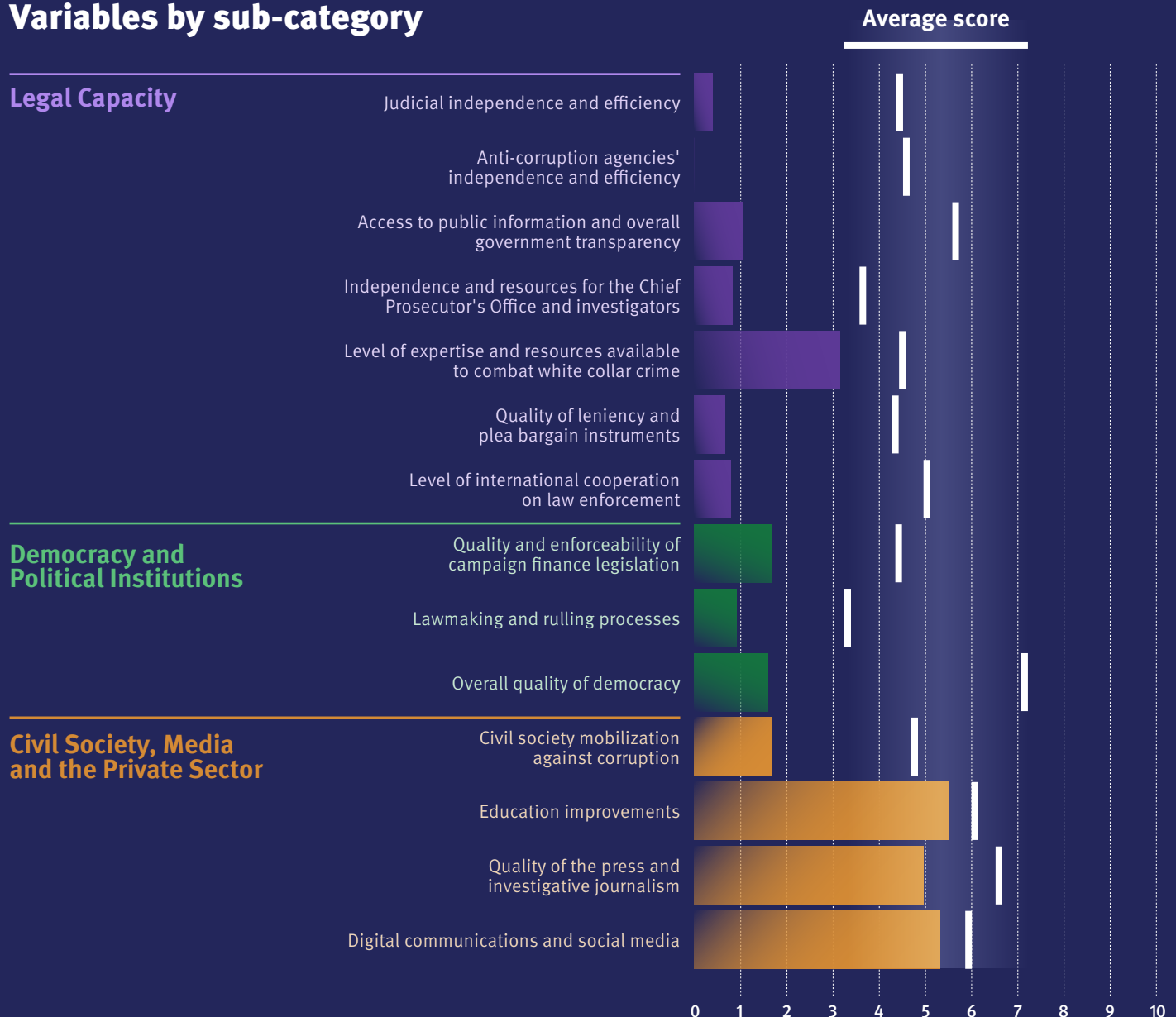
2019 Overall Score

**0.88** Legal Capacity

**1.43** Democracy and Political Institutions

**4.35** Civil Society, Media and the Private Sector

## Variables by sub-category





# VENEZUELA

Venezuela remains the exception in the CCC Index for the second year, isolated at the bottom of the ranking and lagging far behind the rest of the region in most of the variables analyzed. More importantly, the situation continues to deteriorate: Without any real prospects of a democratic transition and amid the further erosion of government institutions, the Venezuelan overall score dropped by 11% since last year. The second-worst performing country in the 2020 CCC Index—Bolivia—has a score that is 1.2 points higher than Venezuela's.

The reasons for this systemic failure are well known. As a kleptocracy and dictatorship, Venezuela had a disastrous performance in the *Legal Capacity* and *Democracy and Political Institutions* sub-categories. CCC Index data indicates that an already precarious situation in areas like government transparency or the independence and resources of law enforcement agencies has further worsened since 2019.

The CCC Index evaluates the *de facto* Nicolás Maduro regime, not the National Assembly-led *de jure* interim government.

Venezuela is closer to the regional average—and in fact, slightly ahead of Bolivia—in the *Civil Society, Media and the Private Sector* sub-category. This is mostly driven by the work of independent investigative journalists and NGOs that still operate in the country, despite several government-imposed restrictions, and some educational achievements, such as high literacy rates compared to the regional average.

As highlighted last year, Venezuela's results point to challenging times ahead. The most critical variables in the CCC Index, such as courts and law enforcement agencies' independence and efficiency, depend on long-term institutional improvements. Even in the case of a democratic transition, Venezuela is unlikely to rapidly catch up to other countries.

## CRITICAL ISSUES TO MONITOR

The regime's strength will remain the most important issue for anti-corruption in Venezuela. A negotiated transition seems unlikely for now. Meanwhile, the COVID-19 crisis, U.S. pressure and episodes of rebellion will keep political volatility high and likely lead to further state failure.

The U.S. is targeting Venezuelan corruption and money laundering at an unprecedented scale—from a major FCPA case in Florida to sweeping sanctions. Although these actions are unlikely to have immediate effects on Venezuela's anti-corruption environment, they could prove decisive in future prosecutions in the country.

The opposition-led National Assembly and the Juan Guaidó government will continue to focus on the regime's corruption, including with a global campaign to seize assets allegedly obtained through corruption. Yet opposition members have also faced graft accusations. New scandals risk undermining the fight against the regime's corruption.

# METHODOLOGY

## STRUCTURE OF THE RESEARCH

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**T**he CCC Index encompasses different aspects of countries' anti-corruption environment—from the independence of the judiciary and law enforcement agencies, to the quality of laws governing lobbying and campaign financing. The overall CCC Index score is composed of three sub-categories:

Legal Capacity (I)

Democracy and Political Institutions (II); and

Civil Society, Media and the Private Sector (III).

These sub-categories are in turn broken down into the following 14 variables:

## LEGAL CAPACITY

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Judicial independence and efficiency

Anti-corruption agencies' independence and efficiency

Access to public information and overall government transparency

Independence and resources for the Chief Prosecutor's Office and investigators

Level of expertise and resources available to combat white collar crime

Quality of leniency and plea bargain instruments

Level of international cooperation on law enforcement

## DEMOCRACY AND POLITICAL INSTITUTIONS

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Quality and enforceability of campaign finance legislation

Lawmaking and ruling processes

Overall quality of democracy

## CIVIL SOCIETY, MEDIA AND THE PRIVATE SECTOR

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Civil society mobilization against corruption

Education improvements

Quality of the press and investigative journalism

Digital communications and social media

Collectively, these 14 variables provide a comprehensive and detailed view of countries' anti-corruption environment – in other words, their ability to uncover, punish and deter corruption.

We understand that the 14 variables influence countries' capacity to combat corruption differently, so the variables receive different weightings in the scoring to reflect this reality. For example, we considered judicial independence and efficiency to be more critical than the free flow of information on social media. Consequently, the former variable has a higher weighting in the score of the CCC Index.

## **DATA COLLECTION**

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The data fed into the index's model was drawn from two sources: publicly available data generated or gathered by renowned institutions, and a proprietary survey of Control Risks' and other leading anti-corruption experts on the ground.

## **THE PUBLIC DATA USED FOR THE INDEX WAS DRAWN FROM**

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World Bank  
World Economic Forum  
World Justice Project  
International Budget Partnership  
Basel Institute on Governance  
Harvard Electoral Integrity Project  
Freedom House  
UNESCO  
Reporters Without Borders  
International IDEA  
Newzoo Smartphone Penetration

The index relies on the latest available data from these institutions. In some cases, specific data within the dataset was carved out—for instance, the index only uses the Open Government factor in the World Justice Project database and only the campaign financing variables in the Harvard Electoral Integrity Project repository.

Alongside the publicly available data, we conducted a fact-based survey with anti-corruption experts working on the ground. The survey questionnaire serves two purposes. Firstly, to complement the publicly available data, which in itself does not comprehensively cover all of the areas we intended to assess. And secondly, to gather more specific and detailed information unavailable in the public domain. The end result is a methodology that is a hybrid of “hard” and survey data, granting the necessary flexibility and accuracy to perform the analysis.

In the first edition of the index, in 2019, we surveyed two analysts per country: one from Control Risks and one independent anti-corruption expert. The external experts had various backgrounds, stemming from

academia, civil society, the private sector and media. To avoid potential conflicts of interest, no experts directly working for governments were employed. In 2019, the survey data was based on the average between the responses given by the two experts in each of the countries. When experts gave very different answers, we reverted to them to seek further clarification, and in some instances, this led to a modification of the responses.

For the 2020 edition, we increased the number of experts per country from two to three: one Control Risks analyst plus two independent analysts. The methodology used was similar to that used in 2019. However, with the advantage of having an additional expert, we were able to track outliers: when one expert diverged significantly from the other two (by more than two points), we invited the expert to clarify the reasoning behind the response provided. Where the divergence continued, the response was considered an outlier, and consequently, excluded. This occurred in only a few instances.

With more survey data, we were also capable of performing better regional comparisons to spot anomalies. For example, we analyzed the correlation between the “hard” data and the survey data and escalated cases of major divergence to a detailed analysis. When clear inconsistencies were identified, we consulted the three experts to precisely determine the best correction, based on a three-level scale. Only in one case, a correction was effectuated.

The survey was conducted between mid-March and early April and included the following experts: Mauricio Alarcón Salvador (Fundación Ciudadanía y Desarrollo), Fabiano Angélico (Fundação Getulio Vargas), Miguel Carter (DEMOS- Centro para la Democracia, la Creatividad y la Inclusión Social), Marielos Chang (Universidad del Valle de Guatemala, Universidad Francisco Marroquín), Camilo A. Enciso Vanegas (Anticorruption Institute), María Laura Escuder (independent consultant), Benjamín Fernández Bogado (Fundación Libre), Mercedes De Freitas (Transparencia Venezuela), María Jaraquemada (Espacio Público), María Paula Garat (Brum Costa Abogados), Sergio García Rendón (CIEPS Panamá), Paula Henríquez (consultant), Sergio Herra (Nassar Abogados Centroamérica), Theodore Kahn (Fedesarrollo), Fabiola Medina Garnes (Medina Garrigó), Eduardo Mello (Fundação Getulio Vargas), Pablo Montes Mendoza (IMCO), Gustavo L. Morales Oliver (Marval, O’Farrell & Mairal), Rodrigo Mora (Fundación Chile 21), Valeria Moy (México, ¿cómo vamos?), Carolina Muñoz (Dentons Muñoz), Olga de Obaldía (Fundación para el Desarrollo de la Libertad Ciudadana), Alfredo Ortega Franco (Universidad Rafael Landívar), Raúl Peñaranda U. (*Brújula Digital*), Rafael Piñeiro Rodríguez (Universidad Católica del Uruguay), Samuel Rotta Castilla (Proética), Lindsay Sykes (Ferrere), and Simeon Tegel (journalist and analyst). Two external experts requested not to be identified – one senior anti-corruption analyst working in Venezuela and a lawyer working in the anti-corruption space in Ecuador. The Control Risks analysts who participated include Gabriel Brasil, Thomaz Favaro, Raúl Gallegos, Francisco García González, Leandro Lima, Claudia Navas, Adriana Thomas and Nicolás Urrutia.

The above-mentioned experts don’t necessarily agree with all the conclusions and opinions expressed in this report.

## METHODOLOGICAL LIMITATIONS

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All indices measuring human behavior are imperfect, as they can never capture all elements of a given phenomenon. The CCC Index is necessarily a partial representation based on the model discussed above, with 14 variables, based on limited public and proprietary data.

The index's model has some limitations, including subjectivity, overlapping and endogeneity (a causal relationship between some of the variables). Questionnaires to country experts were as factual as possible, but some degree of subjectivity inevitably remained. To reduce subjectivity, we applied rigorous analysis to test consistency of responses and requested that experts interpret and compare the data against regional averages. Overlapping relates to the fact that some variables include the same elements: for instance, the Freedom House score also includes measures of judicial independence. In the few cases in which the public data from the institutions was not available for all the countries, we used proxies, or statistical approximations. Regarding endogeneity, although we recognize that it may be present in the methodology, it does not undermine the consistency of the results. The same variables, using the same data sources, were analyzed for all countries, so any endogeneity would affect all countries in largely the same way.

Last but not least, it is impossible to analyze all elements affecting a country's ability to fight corruption. We selected 14 variables that cover a wide array of topics and which we believe are the key elements shaping the anti-corruption environment. But some aspects may have been left out. In cases where we believed this posed a limitation, we highlighted this factor in the country profile.

## ACKNOWLEDGMENTS

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The 2020 CCC Index is the work of over fifty people and we are profoundly grateful to all of them. On AS/COA's side, Vice President of Policy and Editor-in-Chief of *Americas Quarterly* Brian Winter was one of the CCC Index's proponents and a constant source of support and ideas. Policy Associate Emilie Sweigart and Policy Intern Leonie Rauls worked long hours assisting with research and logistics. Creative Director Donald Partyka and Assistant Creative Director Nikita Kataev designed this report and the online data visualizations. Media Relations Manager Pía Fuentealba helped amplify the index's media repercussion.

At Control Risks, Thomaz Favaro, Director, was instrumental in coordinating the responses from the firm's country experts, as well as for providing thoughtful insights throughout the undertaking. Renato Akamine, Manager, brought his data science skills to bear to the project. He developed a robust data base to host the growing volume of data obtained from the various sources and ran the scoring and analytics across that data. Kate Rallis and Julia Livick, respectively Partner and Senior Manager of Marketing, worked energetically to ensure the publication stayed on track and collaborated closely with AS/COA's media team to coordinate media coverage and planning of post launch events.

# Sub-categories

|                                             | Argentina | Bolivia | Brazil | Chile | Colombia | Costa Rica | Dominican Republic | Ecuador | Guatemala | Mexico | Panama | Paraguay | Peru | Uruguay | Venezuela |
|---------------------------------------------|-----------|---------|--------|-------|----------|------------|--------------------|---------|-----------|--------|--------|----------|------|---------|-----------|
| Legal Capacity                              | 4.86      | 2.06    | 5.64   | 6.08  | 5.10     | 6.26       | 2.71               | 4.11    | 4.13      | 4.15   | 3.80   | 3.62     | 5.67 | 7.61    | 0.88      |
| Democracy and Political Institutions        | 5.78      | 4.07    | 4.66   | 7.45  | 5.18     | 6.73       | 3.61               | 3.84    | 3.10      | 4.55   | 4.36   | 3.66     | 4.65 | 8.12    | 1.43      |
| Civil Society, Media and the Private Sector | 6.50      | 3.08    | 6.49   | 7.09  | 5.53     | 6.61       | 4.98               | 5.15    | 5.28      | 6.24   | 5.39   | 5.34     | 6.03 | 7.87    | 4.35      |

# Variables

| Legal Capacity                                                                 | Argentina | Bolivia | Brazil | Chile | Colombia | Costa Rica | Dominican Republic | Ecuador | Guatemala | Mexico | Panama | Paraguay | Peru | Uruguay | Venezuela |
|--------------------------------------------------------------------------------|-----------|---------|--------|-------|----------|------------|--------------------|---------|-----------|--------|--------|----------|------|---------|-----------|
| Judicial independence and efficiency                                           | 4.20      | 1.40    | 4.57   | 7.55  | 5.54     | 7.08       | 3.56               | 2.77    | 3.85      | 3.59   | 3.86   | 3.43     | 5.08 | 8.24    | 0.41      |
| Anti-corruption agencies’ independence and efficiency                          | 5.33      | 1.83    | 6.33   | 7.33  | 6.00     | 6.83       | 1.00               | 4.33    | 4.17      | 3.83   | 3.83   | 4.33     | 6.00 | 7.83    | 0.00      |
| Access to public information and overall government transparency               | 6.07      | 2.85    | 6.35   | 7.08  | 6.26     | 6.65       | 5.86               | 5.49    | 5.11      | 6.34   | 5.00   | 4.75     | 6.34 | 7.64    | 1.04      |
| Independence and resources for the Chief Prosecutor’s Office and investigators | 4.67      | 0.67    | 5.17   | 6.17  | 3.33     | 5.67       | 1.17               | 2.50    | 2.67      | 2.67   | 2.67   | 3.17     | 4.50 | 7.17    | 0.83      |
| Level of expertise and resources available to combat white collar crime        | 3.92      | 3.50    | 4.85   | 5.75  | 4.75     | 4.89       | 4.30               | 3.71    | 4.63      | 4.44   | 3.74   | 2.97     | 4.84 | 6.55    | 3.14      |
| Quality of leniency and plea bargain instruments                               | 6.00      | 1.33    | 6.00   | 3.33  | 4.33     | 6.33       | 0.67               | 4.33    | 4.33      | 3.33   | 4.00   | 3.00     | 8.00 | 8.00    | 0.67      |
| International cooperation                                                      | 4.00      | 4.00    | 6.67   | 4.00  | 5.67     | 6.00       | 3.60               | 7.00    | 5.00      | 6.00   | 4.00   | 3.67     | 5.67 | 7.67    | 0.80      |

| Democracy and Political Institutions                         | Argentina | Bolivia | Brazil | Chile | Colombia | Costa Rica | Dominican Republic | Ecuador | Guatemala | Mexico | Panama | Paraguay | Peru | Uruguay | Venezuela |
|--------------------------------------------------------------|-----------|---------|--------|-------|----------|------------|--------------------|---------|-----------|--------|--------|----------|------|---------|-----------|
| Quality and enforceability of campaign financing legislation | 5.38      | 3.30    | 3.42   | 6.82  | 4.69     | 6.53       | 2.74               | 3.55    | 2.99      | 5.05   | 3.70   | 3.00     | 4.04 | 7.08    | 1.67      |
| Lawmaking and ruling processes                               | 3.67      | 3.00    | 3.67   | 6.83  | 4.50     | 4.67       | 1.82               | 1.60    | 1.17      | 2.17   | 1.33   | 1.83     | 3.00 | 8.00    | 0.91      |
| Overall quality of democracy                                 | 8.50      | 6.30    | 7.50   | 9.00  | 6.60     | 9.10       | 6.70               | 6.50    | 5.20      | 6.20   | 8.40   | 6.50     | 7.20 | 9.80    | 1.60      |

| Civil Society, Media and the Private Sector       | Argentina | Bolivia | Brazil | Chile | Colombia | Costa Rica | Dominican Republic | Ecuador | Guatemala | Mexico | Panama | Paraguay | Peru | Uruguay | Venezuela |
|---------------------------------------------------|-----------|---------|--------|-------|----------|------------|--------------------|---------|-----------|--------|--------|----------|------|---------|-----------|
| Civil society mobilization against corruption     | 4.67      | 0.40    | 6.40   | 7.67  | 4.00     | 5.33       | 2.67               | 3.00    | 5.00      | 7.20   | 3.67   | 5.00     | 6.00 | 7.67    | 1.67      |
| Education improvements                            | 7.73      | 5.35    | 6.33   | 6.67  | 5.50     | 6.78       | 6.16               | 4.24    | 5.01      | 6.26   | 6.22   | 4.85     | 5.57 | 7.33    | 5.48      |
| Quality of the press and investigative journalism | 7.33      | 3.93    | 7.62   | 7.24  | 7.04     | 7.62       | 5.27               | 6.59    | 6.14      | 5.89   | 5.79   | 5.70     | 7.28 | 8.73    | 4.95      |
| Digital communications and social media           | 6.27      | 2.63    | 5.62   | 6.78  | 5.59     | 6.69       | 5.80               | 6.78    | 4.97      | 5.61   | 5.86   | 5.79     | 5.28 | 7.75    | 5.30      |

# WHO WE ARE

## AS/COA

Americas Society and the Council of the Americas bring together the public and private sector to discuss the most important issues affecting the Western Hemisphere and advance their common agenda of economic and social development, open markets, the rule of law, and democracy in the region.

## Control Risks

Control Risks is a global specialist risk consulting firm that helps create organizations that are secure, compliant, and resilient.

Operating in Latin America for over 40 years, Control Risks has unparalleled expertise on the regional business environment.

Our experts across 36 offices—including in São Paulo, Bogotá, Mexico City, and a technology hub in Panama—help clients investigate wrongdoing and resolve crises, and provide the strategic insight and intelligence companies need to realize opportunities and grow.