



## Political Exposed Persons and Buhari's Anti-Corruption Crusade in Nigeria

Eme, Okechukwu Innocent<sup>1</sup>, Ugwu, Christian Chibuike<sup>2</sup>, Richard A. Onuigbo<sup>3</sup>, Okeke, Martin<sup>4</sup>

<sup>1</sup>Department of Public Administration and Local Government University of Nigeria, Nsukka  
Email: okechukwu.eme@unn.edu.ng, okechukwunnent@gmail.com,

<sup>2</sup>Division of General Studies (Social Sciences). University of Nigeria, Nsukka,  
Department of Political Science

<sup>3</sup>Enugu State University of Science and Technology. Email: ifeifeonuigbo@yahoo.com

<sup>4</sup>Department of Political Science Nnamdi Azikiwe University Awka

**Abstract:** *Invigorated by President Muhammadu Buhari administration's zero tolerance to corruption, the two major anti-graft agencies-the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices and other Related Offences Commission (ICPC)-have stepped up investigation and prosecution of corrupt current and former public officers. There is palpable fear and concern everywhere in Nigeria now, especially among public treasury looters because there is certainly no hiding place for them as the war against corruption rages. Many who hitherto had been treated as untouchables have either been quizzed, arrested or facing prosecution in courts. The anti-graft agencies' dragnet has so far caught many. Indeed, it is judgement day for yesterday's men and women of impunity who made corruption a way of life. Perhaps, the most mind-boggling case is the one involving Sambo Dasuki, immediate past National Security Adviser (NSA) who is currently standing trial for allegedly mismanaging \$2.1billion meant for arms procurement. It has opened a Pandora's Box which has tainted many serving and former military personnel and public servants as well as top politicians. Dasukigate, as the arms scandal is now known, is just one of the grand scams the anti-corruption agencies are tracking. Inspired by the President's body language, the EFCC's Chairman, Ibrahim Magu, has vowed that more influential Nigerians on the commission's radar would soon be arrested to face prosecution in the reinvigorated anti-corruption crackdown. President Muhammadu Buhari re-echoed recently that the high level of indiscipline and corruption in government and other social places are the main reasons he has pledged to fight graft. This paper examined the list of who is who in EFCC's net, provided insights into the antecedents of some of the personalities under probe, the allegations against them and their prosecution. Also on the list are other alleged treasure looters who are still under the EFCC's radar and would likely be apprehended and prosecuted after preliminary investigation by the anti-graft agency.*

**Key words:** *Corruption and Anti-Corruption Crusade, Political Exposed Persons, Corruption, Anti-graft Agencies, Financial and Economic Crime and Nigeria.*

### INTRODUCTION

Suddenly, the two well-known anti-corruption agencies, the Economic and Financial Crimes Commission (EFCC) and the Independent Corrupt Practices and other related offences Commission (ICPC), have found their voices and teeth: Telling those who care to listen to them, in the last few months that they can bark and as well bite. For instance, unlike the tail-end of former President Goodluck Jonathan administration when the anti-corruption agencies were only interested in arresting and prosecuting those involved in minor corruption cases, they have in the last few weeks dragged prominent politicians and businessmen to court for

alleged fraud-related offences. In other instances, they have filed fresh cases against those powerful politicians and businessmen cleared before now. As a testament to President Buhari's vow to tackle corruption, the budget of the nine anti-graft agencies has been increased to N27.7 billion in the 2016 budget from N26.8 billion in 2015. The EFCC gets 40 percent, being the most important. It is on this pedestal that Magu is now taking the fight to the door-steps of politically-exposed and corrupt persons guided only by the "fear of God, national interest and the rule of law".

The EFCC since the coming of the Buhari administration has investigated more cases than the five years of the previous administration. Most of these 'persons of interest' remain on security watch even as investigation continues to determine their culpability. Magu seems particularly irked by the brazenness shown by treasury looters given that he served as a member of the committee instituted by the current National Security Adviser (NSA) Babagana Munguno that probed procurement of arms between 2011 and 2015. Since the Buhari administration declared war on corruption, hitherto untouchable Nigerians have been hauled into the EFCC's net. Once powerful men now sit in detention facilities of the agency and prisons across the country. High ranking politicians and former and serving military chiefs now take turns at the EFCC's interrogation facilities while awaiting formal arraignment in court.

With the full understanding that the agency cannot win the fight without the support of key constituencies, the EFCC Chairman appeals to critical stakeholders to join the fight against corruption. He challenges the law profession to join the crusade, and is also lobbying the media and other interest groups.

The EFCC has taken the ongoing anti-corruption war further by sending officers of the global police organization, INTERPOL after suspects who have been indicted for graft. Sources say such indicted persons who have escaped from Nigeria would certainly be caught and prosecuted.

Support is also coming in endorsements of the anti-graft war from within and outside the country. Earlier in the year, UN Secretary General Ban Ki Moon commended President Buhari's anti-corruption war and the fight against insecurity as well as his effort in developing the economy. Nobel Laureate and human rights activist Professor Wole Soyinka notes the sincerity of the administration. Professor Itse Sagay, Chairman of the Presidential Anti-corruption Advisory Committee is also a believer in the President. His summation reflects the general view in the country. The clergy are not left out in the fight against corruption as they have thrown their weight behind the battle. Enoch Adeboye, General Overseer of the Redeemed Christian Church of God has called for total support for the war on graft.

And prominent Nigerians have reminded Buhari in the last few days about those promises, especially his determination to fight corruption. Archbishop Emeritus of the Catholic Archdiocese of Lagos, Anthony Cardinal Okogie, recently advised the president to beware of sycophants if he is actually ready to right the wrongs of the past. He said now that the euphoria of electoral victory is over, Buhari should get to work and hit the ground running without further delay. The cleric added that before the elections, Buhari during his campaign promised to fight corruption, provide security and deliver on the economy, saying these are key areas that he must address with immediate alacrity. As the anti-corruption agencies grill many serving and former public officers, including former ministers, erstwhile governors, serving others who have questions to answer on their stewardship while in office, this paper did an indepth analysis on the cases under EFCC's probe. It explored who is who in EFCC's net and provided insights into the antecedents of some of the personalities under probe, the allegations against them and their prosecution. Also on the list are other alleged treasure looters who are still under the EFCC's radar and would likely be apprehended and prosecuted after preliminary investigation by the anti-graft agency.

### **Contextualising Politically Exposed Persons**

Indeed, Buhari's campaign was deliberately predicated on two issues: Corruption and insecurity – rightly so, because there was huge perception that the Jonathan-led government was very corrupt. To be sure, apart from well meaning Nigerians, some members of the international community have continued to talk about the massive socio-economic potential of the country – with a diplomat emotionally saying recently, "Imagine a Nigeria without corruption!" (Eme, 2015:6). By their suggestions, they have blamed corruption for the present-day state of Nigeria and appear to be telling Nigerians bluntly: Tackle corruption and every other thing shall be added unto you. Every extreme critic of Nigeria today sees every Nigerian as a thief. In their estimation, Nigeria spits out and rejects almost every notion of what constitutes the word "normal". And, based on this impression, some foreigners fussily bite their fingernails whenever they step their foot into the country or whenever Nigeria is mentioned. But, can anybody really blame these critics who believe that all Nigerians are corrupt? They do not want to hear that there are still some decent and incorruptible Nigerians

in spite of a few dubious ones who have by their messy deals damaged the country's reputation both at home and abroad.

However, the perception that Nigeria and Nigerians are very corrupt is huge. The vexed matter has become a subject of much discussion within and outside the country. Indeed, several seminars and workshops have been held on the subject with prominent Nigerians, including many of those who have cornered the nation's commonwealth in the past, mounting the podium and speaking in a classy and fashionable manner of how corruption has tumble-down the foundation of the country. Like somebody said recently: *"Just imagine former President Olusegun Obasanjo and some shameless serving and former governors consistently talking about corruption in our country. That is how bad corrupt practices have become in our nation today"*(Eme,2015:7). However, the popular view remains that because of the dubious activities of some of the political elite, businessmen and women, the so-called social and anticorruption crusaders, ordinary people, corruption has become a seemingly pandemic in Nigeria. Many government officials now openly ask for bribe to do the job they are employed to do. Police and traffic wardens collect bribe from traffic offenders in broad daylight and let them go free. Politicians have looted and are still looting the nation's treasury in billions to the extent that many of the state governors are unable to pay workers' salaries.

These corrupt leaders drive expensive cars on the streets; they own private jets and pompously display their ill-acquired wealth. A few of them have been exposed in the past but nothing has happened to them; they have graduated from being governors to senators. There is no internationally agreed-upon definition of politically exposed persons. As a result, understanding who these "customers" are and how far the definition of PEPs should stretch is a difficult and politically sensitive topic (UNDOC and World Bank, 2007:25). Standard setters generally agree that PEPs are individuals who are, or have been, entrusted with prominent public functions, such as Heads of State or government (World Bank, 2007:25). The standards setters and a considerable number of jurisdictions also expect financial institutions to treat prominent public official's family and close associated as PEPs (UNDOC and World Bank, 2007:25). Attempts to provide increased clarity to the definition have resulted in some standard setters limiting the scope of the PEP definition to exclude domestic PEPs, family members beyond immediate family, junior or middle ranking PEPs.

In some cases, countries have issued a limited list of positions that financial institutions are obliged to consider as politically exposed. Some of these restrictions may be designed to allow for greater efforts to be expended on more exposed PEPs (Limitations on Junior or middle – ranking). Flexibility on this issue also seems to make sense for each individual jurisdiction. At the same time, core definitions that are too restrictive (for example, including only immediate families and close associates) are likely to create loopholes, as evidenced on actual corruption cases (UNDOC and World Bank, 2007:25). Specifically, the ACAMS International Glossary of key Money Laundering Terms and Acronyms (2001), the Wolfsberg Global Anti-Money Laundering Guidelines for private Banking (2001) and Swiss Federal Banking Commission (2001) define politically exposed persons as *"individuals holding or having held positions of public trust, such as government officials, senior executives of government corporations, as well as their families and close associates"*(Wolfsberg, 2001:2).

While there is no global definition of PEP, the Financial Action Task Force (FATF) (2005) issued guidelines in which the term politically exposed Person was defined. The Revised Financial Action Task Force's (FATF) 40 Recommendations define PEPs as individuals who are or who have been entrusted with prominent public functions in a foreign country for example Head of State or of Government, senior politicians, judicial or military officials. This definition is not intended to cover middle ranking or more junior individuals in the foregoing categories. The FATF document also says that business relationships with family members or close associates of PEPs involve reputational risks similar to those of PEPs themselves.

The Wolfsberg Group (2008), World Compliance (2008) Don Jones (2010) and World Check (2010) add that the term should be understood to include person whose current or former position can attract publicity beyond the borders of the country concerned and whose financial circumstances may be subjected to additional public interest. In specific cases, local factors in the country concerned, such as the political and social environment, should be considered when deciding whether a person falls within the definition.

UNCAC (2003), FATF and The Third European Union Directives have stretched the definition of PEPs. The former defines PEPs as individuals who are, or have been, entrusted with prominent public functions, and their family members and associates. The latter adds that they are natural persons who are or have been entrusted with prominent public functions and immediate family members, or person known to be close

associates of such persons. The AML rules are set by the Financial Action Task Force (FATF) and by the European Commission. The FATF has recently expanded its definition of PEPs by including domestic PEPs and international organisations. The full definition is:

Foreign PEPs are individuals who are or have been entrusted with prominent public functions by a foreign country, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials.

Domestic PEPs are individuals who are or have been entrusted domestically with prominent public functions, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials. A People who are or have been entrusted with a prominent function by an international organisation refer to members of senior management, i.e. directors, deputy directors and members of the board or equivalent functions. The definition of PEPs is not intended to cover middle ranking or more junior individuals in the foregoing categories. The under listed examples are intended to serve as aids to interpretation:

1) Head of state government and cabinet ministers, (2) Influential functionaries in nationalized industries and government administration; (3) Senior judges 4) Senior party functionaries; (5) Senior and /or influential officials, functionaries and military leaders and people with similar functions in international or supranational organizations; (6) Members of ruling royal families; (7) Senior and /or influential representatives of religions organizations (if these functions are connected with political, judicial, military or administrative responsibilities (Wolfsberg Group, 2008:1).

Through these definitions did not specifically separate foreign and domestic politically exposed persons but have identified guidelines, in which the term politically exposed persons was defined. The interpretation of each of these layers varies from one country to another .Some jurisdictions focused only on foreign political figures .Some countries limit the definition to the national level, some include regionally politically exposed persons. While there might be slight variation of the five layers above, the expectations of an organization doing business with politically exposed persons are universally similar. The United Kingdom Money Laundry Regulations (2007) define PEP as a persons who is or has, at any time in the preceding year entrusted with a prominent public function by a state other than the united kingdom, a (European) community institution or an international budget or a family member, known close association of such a person Section 312 of the USA Patriot Act, Foreign Corrupt Practices Act, United Nations Convention against corruption (2003) among others did not include middle ranking and junior individually in the categories in the above definitions. However, the term PEPs is not used in FinCen's regulation. According to FinCen's regulation, PEPs describes a person who has been entrusted with a prominent public function, or an individual who is closely related to such a person. The Canadian Anti-money Laundering Regulation shows a large degree of overlap with the PEP definitions used in most other countries of the world; and is also comparable to the "senior foreign political figure" as outlined in the USA patriot Act.

The Canadian Act definition is:

Is a person who or holds or has ever held one of the following positions in or behalf of a foreign state. The list includes:

- a. Head of State or head of government
- b. Member of the executive council or government or member of a legislature;
- c. Deputy minister or equivalent rank
- d. Ambassador or attaché or counsellor of an ambassador
- e. Military officer with a rank of General or above;
- f. President of state owned company or a state owned bank;
- g. Head of a government agency;
- h. judge
- i. Leader or president of a political party represented in a legislature; or
- j. Holder of any prescribed office or position (Wikipedia, 2009:1)

This definition includes any prescribed family member of such a person. Although there is no global definition of PEP, most polities have based their definition on the FATF definition:

1. Current or former senior official in the executive, legislature, administrative, military or judicial branch of a foreign government (elected or not)

2. A senior official of a major foreign political party;
3. A senior executive of a foreign government owned commercial being a corporation, business or other entity formed by or for the benefit of any such individual
4. An immediate family member of such individual; meaning spouse, parents, siblings ,or children and spouse's parents or siblings
5. Any individual publicly known (or actually known by the relevant financial institution) to be close personal or professional associate.

The Wolfsberg Group (2008) PEPs definition applies to persons who perform important public functions for a state. This definition used by regulators or in governance is usually way general and leaves room for interpretations. For example, the Swiss Federal Banking Commission in its guidelines on money laundering uses the term “*person occupying an important public function*”, the US interagency guidance uses *senior foreign political figures*” and the BIS paper customer due diligence for bank says “*potentates*” In real life, it may be difficult to identify someone as PEP; this designation is chiefly aimed at preventing those who have been in a position of authority from making use of their plundering of state funds. Some countries have passed laws aimed at preventing “capital flight”. Nigeria for instance, prohibits its states Governors from holding bank account in other jurisdictions.

But the likelihood is that of someone has amassed funds illegally, they will somehow find a way or ways of transferring them out of their country ahead of their own fight: Perhaps even as school fees or pocket money” for a child. For our purpose, PEPs are individuals who are or have been entrusted with prominent public functions, including members of the executives legislature, judiciary, military administrative officers, appointed local and international officers representing their countries in domestic and international fora and celebrated political, banking and financial institutions and extra-ministerial appointees as well as members of their nuclear and extended families and close associates in a polity who are involved in grand corruption. And like many troubled people have asked: When did Nigeria get to this stage? The next section of the paper will address it.

#### **Understanding why Corruption Thrives in Nigeria**

Experts and anti-corruption crusaders have robustly discussed the issue of corruption. And, in their estimation, the fundamental factors that are engendering and promoting corruption, which some people have described as “the most lucrative and flourishing business” in the nation today, are many. According to them, there will be corruption when political offices at all levels of governance have become primary sources of acquiring huge dubious wealth in the nation. Corruption will blossom when the social and governmental enforcement mechanisms are very weak. As we have seen over the years, the Code of Conduct Bureau and the Tribunal established by the 1999 Constitution to help rein in the conduct of public officers have been more of laggards. Were the organs to be alive to their responsibilities, all the state officers named in Part 2 of the fifth Schedule to the Constitution, would “immediately after taking office” declare their “properties, assets and liabilities and those of unmarried children under the age of eighteen”. This should be followed with another declaration “at the end of every four years” or “at the end of term of office” as provided by the Constitution.

The idea behind the Constitutional provision is to create a public trail of the assets of public officers while they are in public service. As provided in the fifth Schedule, an unexplainable acquisition, while in public service, has serious consequences. In paragraph 18(2), these include vacation of office by the culprit, disqualification from membership of legislative house, and from holding any public office for 10 years or less, and seizure and forfeiture to the state of any property acquired in abuse or corruption of office. The polity will continue to celebrate corrupt practices when there is swelling conflict between changing moral codes and very notable lack of strong sense of national community. Yes, corruption is not peculiar or restricted to Nigeria but it is fast and obviously becoming a viable business in the nation.

The dividends of corruption can be seen everywhere: Many political office holders have acquired huge wealth and properties within and outside the country. In Abuja, Lagos, United Kingdom, Singapore, South Africa, Dubai and other countries – some of the big and expensive mansions are owned by Nigerian politicians and businessmen, especially serving and past governors who have today become anti-corruption crusaders. The huge perception out there is that President Buhari has the magic wand to switch off the problem of corruption, going by his manifesto during his campaign and his public utterances in the last few months. Cardinal Okogie believes Buhari will succeed if he remains focused and keeps to his promises. But there are other voices who strongly believe that Buhari cannot go far in his determination to fight

corruption. And their reasons are predicated on the assumption that many of his political and business associates and those currently surrounding him are the same people, who the president must fight if he wants to succeed in fighting corruption.

Those who know have said that the conspiracies that led to the recent election of the National Assembly leadership were triggered by the calculation that Buhari cannot be trusted to protect his party's members when it comes to fighting corruption and agreed there was need to elect a leadership that can call the president to order when he crosses the red light. Perhaps, this is what Pat Utomi referred to recently when he said "our change has been hijacked." (Eme, 2015:43). The composition of the Buhari's cabinet and the restructuring of the anti-corruption agencies will give direction to the determination of the president to fight graft. This is why the most prominent of Buhari's promises to Nigerians is his readiness to fight corruption within the government circles. At every opportunity, Buhari expressed his determination to eliminate corruption in Nigeria, promising to inaugurate the National Council on Procurement as stipulated in the Procurement Act. He also promised to work with the National Assembly towards the immediate enactment of a Whistle Blower Act. According to him,

We will work with the National Assembly to strengthen the Independent Corruption Practices and other related Offences Commission and the Economic and Financial Crimes Commission by guaranteeing institutional autonomy, including financial and prosecutorial independence and security of tenure of officials. We will also make the Financial Intelligence Unit of the EFCC autonomous and operational; encourage proactive disclosure of information by government institutions in the spirit of the Freedom of Information Act" (Eme,2015:65).

In demonstration of his desire and readiness to run a "clean government" the retired General also promised to openly declare his assets and liabilities. In a document titled "I pledge to Nigeria", Buhari said within his first 100 days in office, he will not only disclose his assets and liabilities, but will also make it mandatory for all political appointees in his administration to do the same thing. In his solemn pledge in the document he said "I pledge to publicly declare my assets and liabilities, encourage all my appointees to publicly declare their assets and liabilities as a pre-condition for appointment. Promising to run his government on strict budget, he also declared that no one will be allowed to take money from government purse without budgeting saying "All political appointees will only earn the salaries and allowances determined by the RMFAC (Eme,2015:67).

The information that President Muhammadu Buhari has declared his assets four times in the course of his public career is soothing, considering that many public officers circumvent this constitutional requirement. Even more ennobling is that the declarations of assets by the President and the Vice President, Yemi Osinbajo, have been made public. Unfortunately, the Code of Conduct Bureau (CCB) provided for by the Third Schedule, Part 1a, to maintain standards and ensure public morality and accountability; and The Code of Conduct Tribunal established by the Fifth Schedule, Part 1, paragraph 15, of the 1999 Constitution, to enforce those standards, have not lived up to their obligations. President Buhari stated the number of declarations while in Ghana, last year. He also challenged the media to seek out his declarations, as he has discharged his constitutional obligations. The President further stated that the governors, ministers and permanent secretaries must declare their assets, as required by the Constitution. How can it tackle the problems? The final section of the paper will address the options available before the Presidency

#### **Addressing PEP Challenges**

To show his determination to rid Nigeria of corruption, the President General Mohammadu Buhari, after his inauguration last year, unveiled his anti-corruption strategy. The Strategy was such that will put Nigerians with corruption baggages on their toes and make them to return their loots back to the federal government coffers even less persuasion.

To realize this objective the Presidency indicated that there is likely to be an establishment of a high powered anti-corruption panel with a mandate to investigate corrupt government officials and private individuals who had swindled the country. The panel shall also have the responsibility of tasking the corrupt individuals on making valuable returns in the form of plea bargain. He promised that time will be given for the returns of looted funds and once it expires; there will be full probes of the persons who had returned their ill gotten wealth and also of others who refused to return theirs. This, was learnt is to ascertain whether such returns were commensurate with history of looted money. The investigations would also touch on all

other government properties which included buildings. It was however, not restricted to the outgoing government of President Goodluck Jonathan which ceased to exist on May 29, 2005.

He however stated that the conventional anti-corruption agencies like the Economic and Financial Crimes Commission, EFCC and the Independent Corrupt Practices and Other Related Offenses Commission, ICPC, would be reorganized and reactivated to play the lead role in the fight against graft. He has lived up to this expectation. As far as the President is concerned, if allowed to persist, corruption will completely destroy the country. Addressing world leaders at the 70th General Assembly of the United Nations, President Buhari also urged his counterparts to do more to return stolen funds and assets to their countries of origin. On one of those early official trips where he met with President Barrack Obama of United States in Washington, President Buhari revealed that not less than \$150billion in funds have been stolen from Nigeria in the last decade and that the held in foreign bank accounts on behalf of former corrupt officials. As a mark of seriousness in prosecuting the fight, the president on August 11, 2015, appointed a seven-man presidential advisory committee against corruption.

The Committee which is headed by Prof. Itse Sagay is to advise the administration on the prosecution of the war against corruption and the implementation of required reforms in the country's Criminal Justice System. Members of the committee were drawn largely from the academia and include Prof. Femi Odekunle, a professor of Criminology at the Ahmadu Bello University; Dr. (Mrs) Benedicta Daudu of the University of Jos; Prof. Etannibi Alamika, a professor of Criminology and Sociology from the University of Jos; and Prof. Sadia Radda, also a professor of Criminology. Others are Prof. Bolaji Owasanoye, also a professor of Law at the Nigerian Institute of Advanced Legal Studies; and Mrs. Hadiza Bala Usman. The presidency has also showed that his government would reorganize the nation's security apparatus including the paramilitary especially those whose offices are not tenured starting with the Nigerian Army down to the EFCC.

But the reorganization include relieving the current Heads of the institutions and agencies their present appointments. Perhaps, the most mind-boggling case is the one involving Sambo Dasuki, immediate past National Security Adviser (NSA) who is currently standing trial for allegedly mismanaging \$2.1billion meant for arms procurement. It has opened a Pandora's Box which has tainted many serving and former military personnel and public servants as well as top politicians. Dasukigate, as the arms scandal is now known, is just one of the grand scams the anti-corruption agencies are tracking. As a testament to President Buhari's vow to tackle corruption, the budget of the nine anti-graft agencies has been increased to N27.7billion in the 2016 budget from N26.8 billion in 2015. The EFCC gets 40 percent, being the most important. It is on this pedestal that Magu is now taking the fight to the door-steps of politically-exposed and corrupt persons guided only by the "fear of God, national interest and the rule of law".

The EFCC since the coming of the Buhari administration has investigated more cases than the five years of the previous administration. Most of these 'persons of interest' remain on security watch even as investigation continues to determine their culpability. Magu seems particularly irked by the brazenness shown by treasury looters given that he served as a member of the committee instituted by the current National Security Adviser (NSA) Babagana Munguno that probed procurement of arms between 2011 and 2015. Since the Buhari administration declared war on corruption, hitherto untouchable Nigerians have been hauled into the EFCC's net. Once powerful men now sit in detention facilities of the agency and prisons across the country. High ranking politicians and former and serving military chiefs now take turns at the EFCC's interrogation facilities while awaiting formal arraignment in court. The table below captures those under investigation:

**Table 1:** List of PEPs in the EFCC's net who are either in detention or helping the anti-graft agency with its investigation on sundry corruption charges.

| S/N | Names  | Case Status   | Comment            |
|-----|--|---|--------------------|
| 1   | <b>Colonel Sambo Dasuki</b> , Former National Security Adviser | Charged for alleged diversion of \$2.1 billion budgeted for arms.   | Still in detention |
| 2   | <b>Chief Raymond Dokpesi</b> , Founder DAAR Communications.    | Charged for alleged money laundering and criminal breach of public procurement law to the tune of N2.1 billion. | Trial ongoing      |
| 3   | <b>Chief Olisa Metuh</b> , National Publicity                  | Charged for corruption, breach of   | Trial ongoing      |

|    |   |   |                     |
|----|---|---|---------------------|
|    | Secretary of PDP  | trust, criminal diversion of public funds and money laundering. He is alleged to have collected N400 M through Destra Invest. Ltd |                     |
| 4  | <b>Attahiru Baffarawa</b> , Former Sokoto State Governor  | Arrested on 22 count charges of alleged diversion of N13b meant for purchase of arms.   | Trial ongoing       |
| 5  | <b>Alex Badeh</b> , Former Chief of Defence Staff   | Quizzed over \$930m contracts awarded when he was chief of defence staff.   | Yet to be arraigned |
| 6  | <b>Air Marshal Adesola Amosu</b> , Former Chief of Air Staff  | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 7  | <b>Col. N. Ashinze</b> , Former Special Military Assistant to Dasuki, Ex-Nsa                              | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 8  | <b>Air Chief Marshal M.D. Umar</b> , The Most Senior Air Force Officer                                    | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 9  | <b>AVM A. M. Mamu</b> , The Chief of Administration   | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 10 | <b>AVM O.T.O. Oguntoyinbo</b> , Former Director Of Production, Defence Headquarters.                      | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 11 | <b>AVM R.A. Ojuawo</b> , Former Director of Operations, Defence Headquarters                              | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 12 | <b>AVM J.B. Adigun</b> , Former Chief of Accounts and Budgeting in NAF                                    | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms  | Granted bail        |
| 13 | <b>AVM J.A Kayoed-Beckley</b> , Director, Armament Research in Air Force Research and Development Centre. | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 14 | <b>AVM T. Omenyi</b> , MD, NAF Holdings   | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms  | Granted bail        |
| 15 | <b>Air Commodore A.O Ogunjobi</b> , Top Officer at the Defence Headquarters                               | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 16 | <b>Air Commodore GMD Gwani</b> , Top Officer at the Defence Headquarters                                  | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms  | Granted bail        |
| 17 | <b>Air Commodore S.O. Makinde</b> , Top Officer at the Defence Headquarters                               | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms.   | Granted bail        |
| 18 | <b>Air Commodore A.Y. Lassa</b> , Top Officer at the Defence Headquarters                                 | Arrested in connection with alleged diversion of the \$2.1 b money budgeted for arms  | Granted bail        |
| 19 | <b>Colonel Ojogbena Adegbe</b> , Former ADC to Ex-President Jonathan                                      | Allegedly disbursed more than N10b oil proceeds to PDP convention delegates, collected \$47m and some Euros from the              | Granted bail        |



|    |   |   |   |
|----|---|---|---|
|    |   | office of the NSA.  |   |
| 20 | <b>Brigadier General Abubakar Sa'ad</b> , Former Director of Military Intelligence  | Accused of involvement in the \$2.1b arms fund.   | Granted bail  |
| 21 | <b>Waripamowei Dudafa</b> , Former Special Assistant to Ex-President Jonathan.  | Allegedly disbursed more than N10b oil proceeds to PDP convention delegates, collected \$47m and some Euros from the office of the NSA. | Believed to either be in Dubai or somewhere on Caribbean Islands.           |
| 22 | <b>Mohammed Bello Haliru</b> , Former National Chairman of PDP  | Arrested with his son, Abbah for allegedly laundering N300m from the office of the NSA.   | Trail ongoing   |
| 23 | <b>Adamu Mu'azu</b> , Immediate Past National Chairman of PDP   | Accused of being central in the disbursement of money to six zonal PDP Chairmen.  | His whereabouts are unknown.  |
| 24 | <b>Chief Tony Anenih</b> , Former Chairman, BOT of PDP  | Allegedly received N260m from money budgeted for arms   | On EFCC's radar   |
| 25 | <b>Rasheed Ladoja</b> , Former Governor of Oyo State  | Allegedly received N100m from money budgeted for arms   | On EFCC's radar   |
| 26 | <b>Chief Olu Falae</b> , Chieftain of Social Democratic Party (SDP) and Former Secretary to Govt. of the Federation (SGF) | Allegedly received N100m from money budgeted for arms   | On EFCC's radar   |
| 27 | <b>Dr Peter Odili</b> , Former Governor of Rivers State   | Allegedly received N100m from money budgeted for arms   | On EFCC's radar   |
| 28 | <b>Chief Jim Nwobodo</b> , Former Governor of Old Anambra State   | Allegedly received N500m from the office of the NSA   | On EFCC's radar   |
| 29 | <b>Chief Olabode George</b> , PDP Chieftain   | Allegedly received N100m/\$30,000 from money budgeted for arms  | On EFCC's radar   |
| 30 | <b>Brigadier General Jafaru Isa</b> , Former Military Administrator of Kaduna State                                       | Arrested for his alleged involvement in the arms procurement scam, to the tune of N170m.  | He has refunded the sum of N100m with an undertaking to refund the balance. |
| 31 | <b>Dr Iyorchia Ayu</b> , Former Senate President  | Allegedly collected the sum of N345m from office of NSA.  | On EFCC's radar   |
| 32 | <b>Ambassador Basher Yuguda</b> , Former Minister of State for Finance  | Allegedly received large chunk of the diverted arms fund (about N1.1 billion)   | Granted bail  |
| 33 | <b>Musiliu Obanikoro</b> , Former Minister of State for Defences.   | Wanted in connection with alleged N1.45b payments made to his companies.  | Reportedly hiding abroad.   |
| 34 | <b>Nduka Obaigbena</b> , Publisher of <i>Thisday</i> Newspapers.  | Alleged to have collected N670m from the office of the NSA  | Granted administrative bail   |
| 35 | <b>Alhaji Tanko Yakassai</b> , PDP Chieftain  | Allegedly pocketed N63m for campaign purposes   | On EFCC's radar   |
| 36 | <b>Patrick Akpobolokemi</b> , Former DG, NIMASA.  | In EFCC's net for allegedly laundering N3.7 billion   | Still in EFCC custody   |
| 37 | <b>Government Ekpemupolo (A.K.A Tompolo)</b> , Former Niger-Delta Militant.   | Wanted by EFCC for alleged conspiracy and illegal diversion of N34 billion and N11.9 billion belonging to NIMASA.                       | Still at large  |
| 38 | <b>Farouk Lawan</b> , Former Member of the Federal House of Representatives   | For alleged bribery in oil subsidy scam.  | On trial  |
| 39 | <b>Senator Ahmad Sani</b> , Former Governor   | Facing trial for alleged gross  | On trial  |

|    |   |  |   |
|----|---|--|---|
|    | of Zamfara State.   | mismanagement of funds during his reign as governor.   |   |
| 40 | <b>Sule Lamido</b> , Former Governor of Jigawa State.   | Standing trial for alleged money laundering and stealing of public funds to the tune of N1.35 billion. | Facing trial                                    |
| 41 | <b>Steve Oronsaye</b> , Former Head of Service of the Federation  | Arrested on a 24-count charge of stealing, obtaining by false pretence and money laundering.           | Facing trial                                    |
| 42 | <b>Stella Oduah</b> , Former Aviation Minister  | Over alleged purchase of two cars at N225 million for the Nigerian Civil Aviation Authority            | Trial to reportedly commence soon               |
| 43 | <b>Babalola Borishade</b> , Former Aviation Minister  | For alleged mismanagement of N5.2 billion aviation safe tower contract.                                | Trial ongoing                                   |
| 44 | <b>Damian Dodo (SAN)</b> , Lawyer,  | Quizzed by EFCC over Halliburton scam.   | On EFCC's radar                                 |
| 45 | <b>Emmanuel Okala</b>   | May be invited by EFCC over Halliburton scam.  | On EFCC's radar                                 |
| 46 | <b>Godwin Obia</b>  | Quizzed by EFCC over Halliburton scam.   | On EFCC's radar                                 |
| 47 | <b>Rowland Ewubare</b>  | Quizzed by EFCC over Halliburton scam.   | On EFCC's radar                                 |
| 48 | <b>Olajide Omokore</b> , A Close Associate of Former Petroleum Minister Diezani Alison-Madueke and Chairman of Atlantic Drilling Concept Ltd. | In EFCC's net over allegedly controversial approvals made for his companies by the ex-minister.        | Granted bail                                    |
| 49 | <b>Alison Madueke</b> , Former Chief of Naval Staff and Husband of Diezani.   | Quizzed by EFCC following alleged discovery of \$600,000 in his personal accounts.                     | Granted bail, travelling documents confiscated. |
| 50 | <b>Abdulasheed Maina</b> , Former Chairman of Pension Reform Task Force   | Wanted by EFCC over Police Pension scam  | Still at large                                  |
| 51 | <b>Essai Dangabar</b> , retired Director of the Police Pension Office   | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 52 | <b>Mrs Uzoma Cyril Atteng</b> , former Chief accountant of the Police Pension Office  | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 53 | <b>Christian Madubuiké</b> , Grade level 6 officer at the Police Pension Office.  | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 54 | <b>Mrs Veronica Uloma Onyegbula</b> -Civil servant in the Police Pension Office.  | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 55 | <b>Atiku Abubakar Kigo</b> , former permanent secretary in the Office of the Head of Service of the Federation.                               | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 56 | <b>Ahmed Wada</b> , former deputy director, Police Pension Office.  | Charged with others for alleged N24 billion police pension fraud                                       | Still standing trial.                           |
| 57 | <b>Abba Moro</b> , former Minister of Interior  | Charged with alleged money laundering, obtaining under false pretext                                   | Still in EFCC custody                           |
| 58 | <b>Anastasia Daniel-Nwaobia</b> , former Permanent Secretary, Ministry of Interior  | Charged with alleged money laundering, obtaining under false pretext                                   | Still in EFCC custody                           |
| 59 | <b>Samuel Ibi Geke</b>  | Accused of involvement in the N5.2b Rural Electrification Fund Scam                                    | Still standing trial.                           |
| 60 | <b>Abdullahi Aliyu</b>  | Accused of involvement in the  | Still standing trial.                           |

|    |  |  |                       |
|----|--|--|-----------------------|
|    |  | N5.2b Rural Electrification Fund Scam  |                       |
| 61 | <b>Simon Kirdi Nanle</b>   | Accused of involvement in the N5.2b Rural Electrification Fund Scam  | Still standing trial. |
| 62 | <b>Lawrence Kayode Orekoya</b>                                   | Accused of involvement in the N5.2b Rural Electrification Fund Scam  | Still standing trial. |
| 63 | <b>Abdulsamad Garba Jahun</b>                                    | Accused of involvement in the N5.2b Rural Electrification Fund Scam  | Still standing trial. |
| 64 | <b>Kayoed Oyedeji</b>  | Accused of involvement in the N5.2b Rural Electrification Fund Scam  | Still standing trial. |
| 65 | <b>Sani Lulu</b> , former President of NFF                       | Arrested in court for allegedly misappropriating over N105 billion released by government to NFF for the 2010 World Cup in South Africa. | Still standing trial. |
| 66 | <b>Amanze Uchegbulam</b> , ex-NFF 1 <sup>st</sup> Vice President | Arrested in court for allegedly misappropriating over N105 billion released by government to NFF for the 2010 World Cup in South Africa. | Still standing trial. |
| 67 | <b>Taiwo Ogunjobi</b> , ex-NFF exco member                       | Arrested in court for allegedly misappropriating over N105 billion released by government to NFF for the 2010 World Cup in South Africa. | Still standing trial. |
| 68 | Bolaji Ojo-Oba, ex-NFF scribe                                    | Arrested in court for allegedly misappropriating over N105 billion released by government to NFF for the 2010 World Cup in South Africa. | Still standing trial. |
| 69 | <b>Uche Secondus</b> , PDP Deputy National Chairman              | Quizzed by EFCC for allegedly receiving car gifts worth N310 million   | On EFCC's radar       |

**Source:** The Economy, March 2016.

With the full understanding that the agency cannot win the fight without the support of key constituencies, the EFCC Chairman appeals to critical stakeholders to join the fight against corruption. The Presidency challenges the law profession to join the crusade, and is also lobbying the media and other interest groups. The EFCC has taken the ongoing anti-corruption war further by sending officers of the global police organization, INTERPOL after suspects who have been indicted for graft. Sources say such indicted persons who have escaped from Nigeria would certainly be caught and prosecuted.

Support is also coming in endorsements of the anti-graft war from within and outside the country. Earlier in the year, UN Secretary General Ban Ki Moon commended President Buhari's anti-corruption war and the fight against insecurity as well as his effort in developing the economy. Nobel Laureate and human rights activist Professor Wole Soyinka notes the sincerity of the administration. Professor Itse Sagay, Chairman of the Presidential Anti-corruption Advisory Committee is also a believer in the President. His summation reflects the general view in the country.

The clergy are not left out in the fight against corruption as they have thrown their weight behind the battle. Enoch Adeboye, General Overseer of the Redeemed Christian Church of God has called for total

support for the war on graft. We urge all the public officers listed in Part 2, paragraphs 1 to 16 of the Schedule of CCB, to immediately declare their assets, in accordance with the law, if they have not done so by now. The 1999 Constitution makes the declaration mandatory ‘immediately after taking office’; so there should be no further delay. The officers listed include the president, vice president, Senate President, deputy senate president, speaker and deputy speaker, House of Representatives, speakers of states houses of assembly, members and staff of legislative houses, governors and deputy governors of states, justices of the Supreme Court and Court of Appeal, ministers, commissioners, permanent secretaries, director-generals, chairmen and members of local councils, police and military chiefs, among others.

As provided in paragraph 18(3), the sanctions that can be meted out by the tribunal shall not prejudice ‘the penalties that may be imposed by any law where the conduct is also a criminal offence’. In our view, a vibrant bureau and tribunal will help reduce corrupt practices, and even preclude corrupt persons from further accessing public offices. It would also create employment, should they build the necessary capacity to perform their constitutional obligations, which include verifying the assets declared by the public officers, at the beginning and the end of public tenures. With president and vice president as shining lights in this case, the Senate President and House Speaker should do same as well as governors. So others can follow.

### **Conclusion**

Endemic corruption in Nigeria has become an issue of major political and economic relevance in recent years. This has led to a resurgence of interest in analyzing the phenomenon and the diverse forms that it assumes in developing polities with an expectation that democratization and economic liberalization offer potential routes to dealing with the problem. As Nigeria moves towards her 56th independence anniversary, the polity is at crossroads in its fight against graft. Aside from its internal battle to fight corruption, recent revelations on mega bribery scandals being perpetrated by the ruling elites have confirmed that corruption is a cancer that may stunt the nation’s growth. In spite of the efforts of the Economic and Financial Crime Commission (EFCC) and the Independent Corrupt Practices and other related Offences Commission (ICPC) stem the rising tide of corruption in the country. The socio-economic menace has continued to maintain its upwards trend, especially among politicians, public servants and political appointees. Critiques of the anti-corruption agencies blame the ugly trend on the mode of operation and of the agencies, which according to them should be restructured. Some observers have also put the threshold on the criminal justice system and call for the creation of a separate court with the jurisdiction to try all allegations of corruption.

The recent clampdown by security operatives and past government officials alleged to have looted the nation’s treasury is fast gaining local and international attention. The development, however, is coming on the heels of the anticorruption crusade instituted by President Muhammadu Buhari. Obviously, the President has not hidden his disdain for corruption. Recently, President Muhammadu Buhari underscored his commitment to the battle against corruption with the announcement that the prosecution of treasury looters would begin in a matter of weeks. At every given opportunity, he speaks strongly against the act. Indeed, engaging in a battle against corruption is not new to the President. The paper examined the activities of politically Exposed Persons in a thematic form the various forms and types of corruption. The article also identifies various reasons that inhibit the graft war in Nigeria, how the Buhari Presidency has been tackling and the implications on the Nigerian state. The paper concluded by positing that the recent political history of corruption in Nigeria suggested that corruption is not new, and that, indeed, corrupt practices have been part and parcel of Nigerian politics from inception and need to be addressed.

### **References**

Agomuo, Z. (2012), “The Waziri-Lamorde Complaints Any Substance? *Business Day*, Thursday 29, November, P. 44.

Ali, Y (2010), “Mega Bribes: Can Jonathan Touch the Untouchables” *The Nation on Sunday*, July 4, Pp 18 & 56.

Directive 2005/60/EC of the European Parliament and of the Council of October 26, 2005, on the prevention of the use of the financial system for the purpose of money laundering and terrorist financing (“Dir 2005/60/EC”); Commission Directive 2006/70/ED of August 1, 2006, laying down implementing measures for Directive 2005/60/EC with regard to the definition of “politically exposed person” and the technical criteria

for simplified customer due diligence procedures and for exemption on grounds of a financial activity conducted on an occasional or very limited basis (“Dir 2006/70/ED”).

Ehirim C. (2006) “Why EFCC is After Nnamani”, *Sunday Independent*, July 29, P.B8

Eme, O.I et al. (2009) “Corruption in Nigeria: The National Assembly Experience, 199-2006”, in Tony Edoh and Terhemba William (eds), *Democracy, Leadership and Accountability in Post-Colonial Africa: Challenges and Possibilities*, Makurdi: Aboki Publishers.

Eme, O.I.(2010) “Corruption in Nigerian Government Institutions: A case of Police Equipment Fund, *Journal of Liberal Studies*, University of Nigeria, Nsukka, Pp, 440-458.

Eme, O.I. and Okoh, C.I. (2011), “The Role of EFCC in Combating Political Corruption,” *Oman Chapter of Arabian Journal of Business and Management*, Vol.1. No 3 (October), Pp 45-68.

Eme O.I (2012), “Politically Exposed Persons and April 2011 General Elections in Nigeria: Challenges before Anti-Corruption Agencies,” paper read at the International Political Science Association Conference held at Madrid between 7 and 11 June, 2012.

Eme, O.I et al. (2012), EFCC and Politically Exposed Politicians in Post 2011 Elections: an Analysis of Governors who lost Elections, *Arabian Journal of Business and Management Review (OMAN Chapter)*, Vol. 1, No. 8, (March) Pp. 74-98

Eme, O. I, Oji, R.O. & Onyishi, A. O (2014), “Implications of Politically Exposed Persons participation in 2015 Elections in Nigeria”, *Mediterranean Journal of Social Sciences MC SER*, Vol. 5, No. 27, December, Pp. 207-221.

Eme, O. I.(2015), *Politically Exposed Persons and the Nigerian State*, Germany, LAP Academic Publishing

Emmanuel, A. (2015),”Buhari’s Anti-Corruption War”, *New Telegraph*, Monday December 14, Pp. 11-12.

Fabiyi, O. & Adetayo, O. (2014), “Nigeria Winning Corruption War under Jonathan-Presidency”, Monday 8, Daily Punch, 8, P. 12

Falana, F. (2014), “How Courts Frustrate Corruption Cases”, *TheNation*, Thursday, April 24, Pp. 40-41.

Federal Republic of Nigeria (1999), *Constitution of the Federal Republic of Nigeria*, Lagos: Federal Government Press.

Federal Republic of Nigeria (2000), *ICPC Act*, Abuja: Federal Government Press.

Federal Republic of Nigeria (2004), *EFCC Act*, Abuja: Federal Government Press.

Federal Republic of Nigeria (2007), *Police Reform Act*, Abuja: Federal Government Press.

Financial Action Task Force (*FATF*), (2003), *40 Recommendations*:

Recommendation 6 (for financial institutions) and Recommendation 12 (for DNFBPs) Financial Action Task Force(FATF), Anti-Money Laundering/Combating Terrorist Financing Methodology( 2004) (updated June 2009. FATF, Paris, France, [www.fatf-gafi.org/recommendations.html](http://www.fatf-gafi.org/recommendations.html)

Financial Action Task Force(FATF) (2012), *International Standards on Combating Money Laundering and the Financing of Terrorism & Proliferation*, updated October 2015, FATF, Paris, France, [www.fatf-gafi.org/recommendations.html](http://www.fatf-gafi.org/recommendations.html)

Global Programme against Corruption (2001), “Empowering the Victims of Corruption Go.

Greenberg, T.S., Gray, L., Schantz, D., Latham, M. and Gardner, C. (2009) “Stolen Asset IRIS, (1996), ‘Governance and the Economy in Africa: Tools for Analysis and Reform of Corruption’, Centre for Institutional Reform and the Informal Sector (IRIS), University of Maryland.

Odoemenam, C. (2007), “Anti-Corruption Act: The Independent Corrupt Practices Commission and Economic Development in Nigeria,” in *Legal Papers*, Vol. 2, Pp. 61-71.

Odufowokan, D. (2015), “Corruption: Will 2015 elections bring respite?” *The Nation*, Monday, Feb. 2, P. 36-38.

Ogannah, A. (2015), “Presidential Election: Corruption is the big issue”, *Daily Pilot*, Tuesday, January 6, P. 10.

Ogundare, G. (2013), “A Nation’s Cancer”, *National Standard*, Friday, March 1, Pp. 8-14.

Ogundipe, J. (2004), “Enforcement of Economic Crimes’ Paper Presented during the NBA annual General Conference, Abuja, 22-27 August.

Okonkwo, C. and Adeyemi, A.A. (1979), “An Appraisal of Corrupt Practices Decree No. 32 of 1975” Being Paper Delivered during a Workshop on the Role of Corrupt Practices Investigating Bureau under a Presidential System, August.

Okoronoye, I. (2012), “The Legal Framework of the Fight against Corruption in Nigeria-Issues, Controversies and Suggestions,” *Journal of Nigerian Government and Politics*, Vol. 4, No. 1, March, Pp. 50-57.

Olaleye, O. Akosile, A. et al (2012), “Transparency International Ranks Nigeria 35<sup>th</sup> most Corrupt Nation”, December 6, *Saturday This Day*, Pp. 8-9.

Olanipekun, W. (2007), *The Guardian*, October 5, P. 45.

Olusegun, O. (2000), ‘Address Presented on the Occasion of the Formal signing into Law of the Corrupt Practices and other Related Offences Act 2000’ at Abuja, Tuesday, 13 June.

Oluwajuyitan, J. (2015), “How PDP ruined Nigeria” *The Nation*, Sunday, Feb. 15, P. 63-72.

Osipitan, T. (2001), *The Corrupt Practices and other Related Offences Act 2000-The Role of NYSC and Effects on National Development*, Bing a Paper Presented during an NYSC Organized Conference at Ikeja Airport Hotel, July 31, P. 3.

Owete, F. (2014), “Falana Slams Nigeria’s Senior Lawyers, Judges, accuses them of Frustrating corruption trials”, *Premium Times*, Friday, April 18, P 12.

The UNCAC definition is in Article 52(1) and (2), UNCAC. Although not explicitly referenced in Article 52, the definition “public official” in Article 2 of UNCAC can be of assistance: “... (i) any person holding a legislative, executive, administrative or judicial office of a State Party, whether appointed or elected, whether permanent or temporary, whether paid or unpaid, irrespective of that person’s seniority; (ii) any other person who performs a public function, including for a public agency or public enterprise, or provides a public service, as defined in the domestic law of the State Party and as applied in the pertinent area of law of

that State Party; (iii) any other person defined as a ‘public official’ in the domestic law of a State Party. However, for the purpose of some specific measures contained in chapter II of this Convention, ‘public official’ may mean any person who performs a public function or provides a public service as defined in the domestic law of the State Party and as applied in the pertinent area of law of that State Party.”.

UNODC and The World Bank,(2007), “Stolen Asset Recovery (StAR) Initiative: Challenges, Opportunities, and Action Plan” Washington, DC: World Bank

Wikipedia Free Encyclopedia (2009), “Politically Exposed Persons”

Wolfsberg Group(2011), “Anti-Corruption Guidance”.

Wolfsberg Group (2005), *Wolf bergs Anti-Money Laundering*, Principles on Private Banking,

Wolfsberg Group (2008), “Frequently Asked Question on Politically Exposed Persons”

World Bank (2007), *Politically Exposed Persons – A Policy Paper on Strengthening Preventive Measures*, Washington DC: World Bank.

WorldCheck(2008), *Refining the PEP Definition*, USA: Global Objectives Limited.