

**House Foreign Affairs Committee  
Tom Lantos Human Rights Commission**

Hearing  
On

The Global Magnitsky Human Rights Accountability Act: Taking Stock

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**Combating Transnational Authoritarian Kleptocracy:  
Cracking Down on Western Professional Enablers**

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Co-Chair McGovern, Co-Chair Smith, and distinguished members of the Tom Lantos Human Rights Commission, my name is Tutu Alicante. I am from Equatorial Guinea, a West-Central African nation ruled by the world's longest serving Head of State. I direct EG Justice, a nonprofit, non-governmental organization based in the United States, that promotes human rights, the rule of law and transparency in Equatorial Guinea.

Thank you for inviting me to testify on the effectiveness of the Global Magnitsky Human Rights Accountability Act, a law that I consider critical to the future of my country, and indeed of the world, as we seek to combat transnational authoritarian kleptocracy.

In 2013, I had the privilege of testifying in front of the House Subcommittee on Africa, Global Health and Global Human rights. I spoke then about Equatorial Guinea as a textbook case for the resource curse. Today's invitation to once again address U.S. lawmakers is especially significant to me, for two reasons: First, unlike most human rights and anticorruption advocates that appear before you, I cannot carry out my work from my country, where the president has labeled me a "traitor" and "enemy of the state." I cannot return home, where my family still resides.

Secondly, in 2010 I attended my very first congressional hearing in the U.S. It was held by the Senate Permanent Subcommittee on Investigations (of the Committee on Homeland Security and Governmental Affairs.). That hearing was entitled: Keeping Foreign Corruption out of the United States. I watched the witnesses: lawyers, bankers, and accountants plea the fifth and walk out of the room. None of the Western professionals who had enabled millions of dollars to flow into the U.S. for the purchase of assets in violation of banking and Anti-Money Laundering laws face accountability. I realized that the U.S. could not honestly fight kleptocracy around the world unless it was willing to start at home, with the unscrupulous professionals who facilitate illicit financial flows into this country.

The Global Magnitsky Act is perfectly suited to address the deeply entrenched corruption, impunity, and human rights violations endemic to Equatorial Guinea's kleptocracy because it allows for sanctions against kleptocrats and human rights violators, and because it allows for sanctions against Western professional enablers who materially assist sanctionable persons and offenses.

Earlier this month, on March 7, we suffered in Equatorial Guinea a deadly tragedy. Five major blasts at a military camp in a densely inhabited area in the country's largest city, killed over one hundred people, injured countless people, and left entire families in the street, homeless.

Sadly, this is characteristic of the authoritarian kleptocracy that governs Equatorial Guinea, the lack of transparency and accountability that has prevailed since this deadly incident; the government's rush to bury the bodies without accounting for all the missing; and the apparent determination to turn the page without compensating victims of what amounts to a criminally negligence or reckless disregard for civilians' life by the military.

### **Why is Equatorial Guinea the perfect Authoritarian Kleptocracy?**

Freedom House's 2020 Freedom in the World Report ranks Equatorial Guinea among the "worst of the worst" as "Not Free," with a score of 5 out of 100, outdone only by North Korea, Turkmenistan, Eritrea, and South Sudan. The report opens with this overview:

Equatorial Guinea holds regular elections, but the voting is neither free nor fair. The current president, who took power in a military coup that deposed his uncle, has led a highly repressive authoritarian regime since 1979. Oil wealth and political power are concentrated in the hands of the president's family. The government frequently detains the few opposition politicians in the country, cracks down on civil society groups, and censors journalists. The judiciary is under presidential control, and security forces engage in torture and other violence with impunity.<sup>1</sup>

In effect, President Teodoro Obiang Nguema—who repeatedly claims electoral victories of between 93 and 99% of the votes—controls all branches of government. As the nation's First Magistrate, he presides over and appoints every member of the judiciary. There is no rule of law. The ruling Democratic Party of Equatorial Guinea (PDGE), chaired by the president, holds all 75 Senate seats and all 100 seats in the lower chamber. Nepotism and cronyism, instead of a discernible political ideology, govern political relations. Political opposition parties are harassed, persecuted, imprisoned.

President Obiang's son, the vice president, Teodoro Nguema Obiang (known popularly as "Teodorín"), is in charge of defense and all security forces who systematically kidnap, torture, and arbitrarily detain human rights and political activists. Harsh prison conditions have often led to life-threatening illnesses, death in detention, or disappearance.

The government severely restricts the rights of peaceful assembly, freedom of expression, and freedom of association. Trafficking in persons; crimes involving violence or threats of violence targeting lesbian, gay, bisexual, transgender, or intersex persons (LGBTI); and violence against women and girls, including rape, are endemic.

In the early 1990s, U.S. companies discovered oil off the coast of Equatorial Guinea. Soon, billions of dollars in oil revenues had transformed it from an impoverished country to that with the highest per-capita GDP on the African continent. Yet the people of Equatorial Guinea have seen little benefit from this windfall, in large part due to the mafia-like organized criminal syndicates run by President Teodoro Obiang, his family, and the ruling elite. The latest available World Bank figures confirm that over three fourth of the people live below the poverty line.<sup>2</sup>

Transparency International's 2020 Corruption Perception Index ranks Equatorial Guinea 174th out of 179, flanked at the bottom of the list by North Korea, Libya, Sudan and Venezuela.<sup>3</sup> Additionally, all recent Country Reports issued by the U.S. Department of State, including the last one covering Y2019, have consistently recapped:

Officials frequently engaged in corrupt practices with impunity. There were numerous reports of government corruption during the year, as the president and members of his inner circle continued to amass personal fortunes from the revenues associated with monopolies on all domestic commercial ventures, as well as timber and oil exports. Corruption at all levels of government was a severe problem.<sup>4</sup>

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<sup>1</sup> <https://freedomhouse.org/country/equatorial-guinea/freedom-world/2021>

<sup>2</sup> <https://data.worldbank.org/indicator/SI.POV.NAHC?locations=GQ>

<sup>3</sup> <https://www.transparency.org/en/cpi/2020/index/gnq>

<sup>4</sup> <https://www.state.gov/reports/2019-country-reports-on-human-rights-practices/equatorial-guinea/>

A U.S. Senate investigation in 2004 found that between 1995 and 2004, Riggs Bank in Washington, DC managed more than 60 accounts controlled by President Obiang, a son and a nephew, with an aggregate balance ranging between \$400 and \$700 million. It also found that at least \$35 million were transferred to shell companies believed to be controlled by President Obiang.<sup>5</sup>

Six years later, in 2010, a separate U.S. Senate investigation found that between 2004 and 2008 President Obiang's eldest son, Teodorín—assisted by U.S. lawyers, real estate agents, and escrow agents—moved more than \$110 million in potentially illicit funds into the U.S. in violation of US banking and anti-money laundering regulations.

Then, in 2017, the U.S. Department of Justice reached a \$238 million settlement with a Netherlands-based oil drilling company that pled guilty to bribing at least nine Equatoguinean officials between 2008 and 2012, including the Minister of Oil and Energy, not coincidentally another son of President Obiang.<sup>6</sup>

Concurrent with these investigations in the U.S., inquiries by law enforcement and judicial authorities against members of the Equatoguinean presidential family progressed in Spain, France, Brazil, South Africa, and Switzerland.

Indeed, the sharp convergence of poor governance, systematic grand corruption, flagrant repression and rampant human rights violations make Equatorial Guinea a singular paradigm of an authoritarian kleptocracy in Africa and probably the entire world.

### **Why Should Global Magnitsky Sanctions be Issued Against PEPs from Equatorial Guinea?**

While corruption is systemic and pervasive among Equatorial Guinea's ruling elite, President Obiang's children are among the most brazen in accumulating personal gain from the nation's oil wealth.

Money laundering investigations have documented that, in the decade after eldest son Teodorin was appointed Minister of Forestry in 1998, he spent well over \$500 million on a private jet; luxury yachts; mansions in California, Paris, and elsewhere; dozens of exotic cars; millions of dollars' worth of art, jewelry, watches, and clothes; and, most infamously, a million-dollar collection of Michael Jackson memorabilia that includes the crystal-covered glove the pop star wore on his Bad tour.<sup>7</sup> Prosecutors in the United States, France, and Switzerland have successfully seized over \$200 million from Teodorín, and a French court convicted him *in absentia* of laundering more than \$120 million stolen from the public treasury.

Moreover, recent reporting by the Organized Crime and Corruption Reporting Project (OCCRP) details an elaborate labyrinth of corruption schemes managed by Equatorial Guinea's Oil Minister and son of the president, Gabriel Obiang, to extort, steal, and launder away million into offshore shell companies in the Netherlands, Portugal and Cyprus, among other foreign jurisdictions.<sup>8</sup> Other children of President Obiang,

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<sup>5</sup> US Senate Permanent Subcommittee on Investigations, Committee on Governmental Affairs, Money Laundering and Foreign Corruption: Enforcement and Effectiveness of the Patriot Act – Case Study Involving Riggs Bank [US Senate Riggs Bank report], July 15, 2004, p. 3.

<sup>6</sup> <https://www.justice.gov/opa/pr/sbm-offshore-nv-and-united-states-based-subsiary-resolve-foreign-corrup-practices-act-case> and <https://www.justice.gov/opa/press-release/file/1014801/download>.

<sup>7</sup> [https://www.justice.gov/sites/default/files/press-releases/attachments/2014/10/10/obiang\\_settlement\\_agreement.pdf](https://www.justice.gov/sites/default/files/press-releases/attachments/2014/10/10/obiang_settlement_agreement.pdf)

<sup>8</sup> <https://www.occrp.org/en/investigations/equatorial-guineas-oil-minister-allegedly-siphoned-off-millions-from-public-construction-project>

including Francisca Nguema and Ruslan Obiang, as well as brothers in-laws and other relatives, have been linked to corruption-related crimes.<sup>9</sup>

These cases and media reports are significant achievements in highlighting the systemic corruption in Equatorial Guinea and wresting a sizable amount of the Presidential family's ill-gotten gains, yet they have been largely unsuccessful at holding anyone fully accountable. Equally disturbingly, the dozens of Western lawyers, bankers, accountants, and other shady professionals who metaphorically drive the get-away cars have faced even less legal or media scrutiny.

### **A) Kleptocracy robs Equatoguineans of health and education**

Corruption is never a victimless crime, but its consequences are especially devastating in Equatorial Guinea, due to the scale of corruption and poverty of the population. In 2016, Human Rights Watch published a report, *"Manna from Heaven"?: How Health and Education Pay the Price for Self-Dealing in Equatorial Guinea*, documenting how corruption by the ruling elite directly contributes to severe neglect of public health and education, leading to outcomes that lag far behind much poorer countries in the region.<sup>10</sup> Some social indicators, such as vaccination rates, have declined since the oil boom.<sup>11</sup>

Self-dealing, such as orchestrating kickbacks and officials awarding inflated public contracts to their own companies, enriches the ruling elite at the expense of ordinary Equatoguineans, and the presidential family stands out as a central hub of the corrupt crime syndicate. Teodorín, for example, owns SOCAGE, a company nominally involved in road construction, but a US investigation produced evidence that it was in fact a shell company to which companies paid kickbacks in exchange for being awarded public infrastructure contracts, the value of which they grossly inflated expressly for that purpose.<sup>12</sup> French prosecutors found that this company was one of the primary sources of money funding Nguema's €110 million shopping spree in that country.<sup>13</sup> To put that figure into perspective, it is more than the country's entire health budget in 2011, the last year for which civil society had access to the numbers.<sup>14</sup>

By designing the government budget to enrich the presidential family and their cronies, the government robs an impoverished people of their basic rights to health and education. A 2011 household survey – the most recent reliable source of health data on the country – found that one in four children are physically stunted due to poor nutrition, and two-thirds are anemic, as are half of women. It also found that half the population lacks access to safe drinking water in or near their homes, a rate that has not changed since 1995. Education outcomes are similarly poor. Enrollment rates have steadily worsened over the last decade; in 2015, the most recent year for which there is data, more than half of primary school-aged children were not in school.<sup>15</sup> Only three countries—Eritrea, Liberia, and South Sudan—fared worse.

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<sup>9</sup> <https://www.publico.pt/2018/10/11/economia/noticia/estado-da-15-milhoes-em-isencoes-a-empresas-misterio-da-filha-do-ditador-obiang-na-madeira-1847099> <https://www.publico.pt/mundo/interactivo/rede-tentacular-obiang>  
<https://www.justiceinitiative.org/litigation/apdhe-v-obiang-family>

<sup>10</sup> <https://www.hrw.org/report/2017/06/15/manna-heaven/how-health-and-education-pay-price-self-dealing-equatorial-guinea>.

<sup>11</sup> [http://apps.who.int/immunization\\_monitoring/globalsummary/timeseries/tswucoveragebcg.html](http://apps.who.int/immunization_monitoring/globalsummary/timeseries/tswucoveragebcg.html)

<sup>12</sup> <https://www.hrw.org/report/2017/06/15/manna-heaven/how-health-and-education-pay-price-self-dealing-equatorial-guinea>.

<sup>13</sup> <https://www.hrw.org/report/2017/06/15/manna-heaven/how-health-and-education-pay-price-self-dealing-equatorial-guinea>.

<sup>14</sup> <https://www.hrw.org/report/2017/06/15/manna-heaven/how-health-and-education-pay-price-self-dealing-equatorial-guinea>.

<sup>15</sup> <http://data.uis.unesco.org/>.

## **B) Corruption is enabled by systematic human rights violations and civil society repression**

The systematic targeting of activists who expose corruption and call for greater transparency and accountability—by security forces under the command of Teodorín as Vice President in charge of Defense and Security—enables the presidential family to use the public treasury as their private ATM, with impunity.

For example, in 2017, security forces arbitrarily detained human rights defenders Alfredo Okenve and Enrique Asumu for several weeks without charges until they agreed to pay a fine of more than \$3,000. Then, in October 2018, four men who appear to have been security officials forced Mr. Okenve from his car at gunpoint and took him to a remote area, where they severely beat him and then abandoned him.<sup>16</sup> Six months later, police detained him at the airport and confiscated his passport and phone for several days. He spent several months under house arrest without charges.<sup>17</sup>

Okenve’s organization represented civil society in an effort to make Equatorial Guinea a member of the Extractive Industries Transparency Initiative (EITI), the multi-stakeholder initiative (supported by the U.S. Government and joined by U.S. oil and mining companies) that commits resource-rich countries to make key financial information public as a means of reducing opportunities for corruption.<sup>18</sup>

Also, in 2017, police arrested cartoonist Nze Ramón Esono E bale for using his art to criticize corrupt senior government officials.<sup>19</sup> He was held for more than six months until he was finally freed following intense international pressure.<sup>20</sup> Soon after, anticorruption activist Joaquin Elo Ayeto was arrested and imprisoned for 12 months, wrongfully charged with attempting to kill the president.

## **C) Kleptocracy harms U.S. interests**

The US has a strong economic interest in promoting good governance, which is essential to creating stable societies and an operating environment for American businesses that both secures their investment and reduces their risks of contributing to serious human rights abuses. This objective should be especially the case in Equatorial Guinea, where U.S. oil companies such as ExxonMobil, Kosmos Energy, Marathon Oil and Noble play a dominant role in the economy. According to the US Department of Commerce, US companies owned almost \$22 billion worth of assets in Equatorial Guinea in 2016, the most recent year for which data is available.<sup>21</sup>

The US State Department’s 2017 Investment Climate Statement on Equatorial Guinea repeatedly warns that endemic corruption in the country puts these investments at risk: “Corruption exists throughout the government, including the judiciary, making it difficult for U.S. businesses to protect their investments, and raising the risk of doing business in Equatorial Guinea.”<sup>22</sup> The 2004 Senate investigation into Equatorial Guinea noted that the president and his family hold large stakes in the country’s economy, including companies that have a monopoly on entire sectors. This arrangement “compels foreign companies wishing to operate in Equatorial Guinea to do business with the E.G. President, his relatives, or the entities they control, at times

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<sup>16</sup> <https://www.hrw.org/news/2018/10/31/equatorial-guinea-prominent-activist-severely-beaten>

<sup>17</sup> <https://www.amnesty.org/en/latest/news/2019/03/equatorial-guinea-prominent-human-rights-activist-banned/>

<sup>18</sup> <https://www.hrw.org/news/2017/04/21/equatorial-guinea-free-human-rights-defenders>

<sup>19</sup> <https://www.hrw.org/news/2017/09/19/equatorial-guinea-political-cartoonist-arrested>

<sup>20</sup> <https://www.hrw.org/news/2018/03/07/equatorial-guinea-artist-freed-prison>

<sup>21</sup> <https://apps.bea.gov/international/factsheet/factsheet.cfm>

<sup>22</sup> <https://www.state.gov/e/eb/rls/othr/ics/2017/af/269729.htm>

providing them with lucrative returns.”<sup>23</sup> Private conversations with oil company representatives confirm that this situation persists and puts U.S. companies at an uncomfortable and unsustainable positions as they navigate this family kleptocracy.

As the US State Department and Senate investigation make clear, the problem of corruption in Equatorial Guinea is a manifestation of a government whose legal, financial and political organization is built around enriching a family that has ruled with an iron fist for four decades.

Teodorín is especially deserving of Global Magnitsky sanctions because his exorbitant international spending has spurred legal cases and detailed evidence of large-scale corruption, impunity and the power he enjoys as the son of the president. Moreover, his habit of publicizing his purchases – including two yachts that each cost as much as the entire nation’s annual health budget; or, brashly posting Instagram videos of him driving luxury cars previously confiscated from him and auctioned off as part of a legal settlement with Swiss law enforcement, has turned him into a global symbol of kleptocracy. Thus, by holding him accountable for his corruption, the US government would send a powerful message to the Equatorial Guinea kleptocracy and to other corrupt regimes around the world that they will not be tolerated.

Genuine U.S. leadership in combating transnational authoritarian kleptocracy and keeping foreign corruption out of the US means wielding concrete preventative measures—such as the Global Magnitsky Act and Executive Order 13818 to deter lawyers and other professionals based in rule of law jurisdictions from facilitating the illicit flows of hundreds of millions of dollars annually<sup>24</sup>.

### **Why We Must Prioritize Sanctioning Western Professional Enablers**

Transnational kleptocracy—committing sophisticated financial crimes in the US—is only possible with the intentional assistance of Western-based lawyers, bankers, accountants, real estate agents, and public relations firms who know US laws and know how to circumvent them by creating “offshore vehicles” to facilitate the transfer, stashing and spending of illicit funds. It is a landscape so complex that, as a Hudson Institute report focused on the enablers points out, it “cannot be navigated by anyone legally blind.”<sup>25</sup>

The vast majority of professionals in the legal, banking, or accounting field are law-abiding and work to ensure that their clients understand and comply with the law. But, as Teodorín’s case illustrates, unscrupulous lawyers, bankers, accountants, real estate agents and other experts are the fulcrum, without which complex financial crimes could not be carried out.

The 2010 Senate Report found that two U.S. lawyers, Michael Berger and George Nagler, helped Teodorín circumvent anti-money laundering and PEP controls at U.S. banks, allowing him to secretly use a series of accounts—attorney-client, law office Interest on Lawyers Trust Account (IOLTA), and shell company accounts—as conduits for bringing more than \$110 million of suspect money into the United States. When a bank closed one account it suspected was being used for corrupt purposes, the lawyers helped Teodorín open another one at a different bank. The lawyers incorporated dozens of U.S. shell companies including Beautiful Vision, Inc.,

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<sup>23</sup> US Senate Permanent Subcommittee on Investigations, Committee on Governmental Affairs, Keeping Foreign Corruption Out of Foreign Hands: Four Case Studies, February 4, 2010. p. 99.

<sup>24</sup> <file:///Users/tutualicanteleon/Downloads/2021-2-25%20OECD%20rpt-ending-the-shell-game-cracking-down-on-the-professionals-1.pdf>

<sup>25</sup> <https://s3.amazonaws.com/media.hudson.org/files/publications/EnablersFINAL.pdf>

Unlimited Horizon, Inc., Sweetwater Malibu, LLC, Sweetwater Management, Inc., and Sweet Pink, Inc. for the purpose of facilitating the transfer of funds and purchasing of assets by their client.<sup>26</sup>

Additionally, two real estate agents, Neal Baddin and John Kerrigan, helped Teodorín buy and sell high-end real estate in California, including his purchase of a \$30 million Malibu residence with funds wire transferred from Equatorial Guinea. Teodorín also used a U.S. escrow agent to purchase a \$38.5 million U.S.-built Gulfstream jet. When one escrow agent, as a voluntary anti-money laundering precaution, refused to proceed without information about the source of the funds for the purchase, another escrow agent, International Airline Title Services Inc., stepped in and completed the transaction with no questions asked.<sup>27</sup>

In 2016, to highlight the essential role lawyers play in enabling kleptocracy, undercover investigators from Global Witness approached New York law firms, posing as advisors to a wealthy African minister who wanted to get millions of dollars into the U.S. without detection to acquire a Gulfstream jet, a brownstone and a yacht. Lawyers from 12 of the 13 firms eagerly suggested using anonymous companies or trusts to hide the minister's assets. All but one of these firms recommended using American companies. Several lawyers suggested using their law firms' own bank accounts to help prevent U.S. banks from realizing whose money it really was or having the lawyer act as the trustee of an offshore trust in order to open a bank account.<sup>28</sup>

These lawyers, all members of a state bar association, are familiar with the American Bar Association's "Voluntary Good Practices Guidance for Lawyers to Detect and Combat Money Laundering and Terrorist Financing."<sup>29</sup> But the fact that these guidelines are voluntary means lawyers, including members of the ABA, would face no consequences for ignoring them. The brazen words and attitude of some of the lawyers interviewed, boasting about how powerful US lawyers are, and about how easy it would be to skirt the law, constitute a powerful rationale for approving a broad range of enforceable preventative measures, including sanctions pursuant to the Global Magnitsky Act, against material enablers of kleptocracy.

Executive Order 13818 expands the scope of the Global Magnitsky Act to apply sanctions to "any person" determined to have "materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of" otherwise sanctionable persons and offenses; or "to be owned or controlled by, or to have acted or purported to act for or on behalf of, directly or indirectly, any person whose property and interests in property are blocked pursuant to this order."

Teodorín and other kleptocrats would be effectively barred from bringing any stolen assets into the United States, if, consistent with this EO, lawyers like Michael Berger and George Nagler knew that facilitating the transfer of illicit funds into U.S. banks and moving those funds through shell companies and shady trust accounts would subject them to sanctions under the Global Magnitsky Act.

Similarly, tax experts, accounting firms, banking, and real estate professionals would be deterred from advising or assisting such sanctionable clients' circumvention of the laws if they knew their assets, including bank accounts, could be frozen or seized, because of their support or assistance with a "sanctionable activity." No kleptocrat or serious human rights abuser can navigate the U.S. incorporation, tax, banking, and other laws

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<sup>26</sup> <https://www.hsgac.senate.gov/imo/media/doc/FOREIGNCORRUPTIONREPORTFINAL710.pdf>

<sup>27</sup> <https://www.hsgac.senate.gov/imo/media/doc/FOREIGNCORRUPTIONREPORTFINAL710.pdf>

<sup>28</sup> <https://www.cbsnews.com/news/anonymous-inc-60-minutes-steve-kroft-investigation/>

<sup>29</sup> [https://www.americanbar.org/content/dam/aba/publications/criminaljustice/voluntary\\_good\\_practices\\_guidance.pdf](https://www.americanbar.org/content/dam/aba/publications/criminaljustice/voluntary_good_practices_guidance.pdf)

required to move their illicit assets into the United States without the help of unscrupulous professionals. The U.S. Government should use the Global Magnitsky Act to hold these enablers accountable.

### **In Summary:**

Safeguarding the tremendous gains of the Global Magnitsky Act means using its proven effective sanctions regime against the worst of the worst: authoritarian kleptocrats that stand out due to their penchant for systematic corruption, widespread human rights abuses, and absolute impunity. This responsibility is particularly crucial when the corrupt human rights violators continue to eye the U.S. as a destination for their illicit funds or vacationing.

Enhancing the Global Magnitsky act and significantly deterring transnational kleptocracy should compel the US Government to act decisively—in light of the fallacy of professional self-regulation—to apply EO13818 and impose sanctions on the professional enablers, lawyers, accountants, and any other professionals who materially assist kleptocrats and human rights abusers in furthering sanctionable activities.

Sanctioning Teodorín and other members of the Obiang family under the Global Magnitsky Act offers the potential for piercing the impunity with which they have corruptly amassed a fortune at the expense of ordinary Equatoguineans. It would send a powerful message to the ruling elite in Equatorial Guinea, and kleptocrats around the world, that the United States is unwilling to do business as usual with government officials who abuse their power to rob the public.