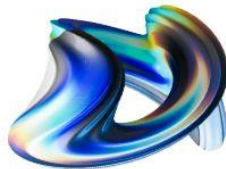
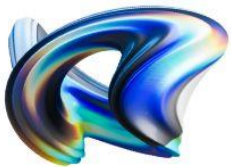
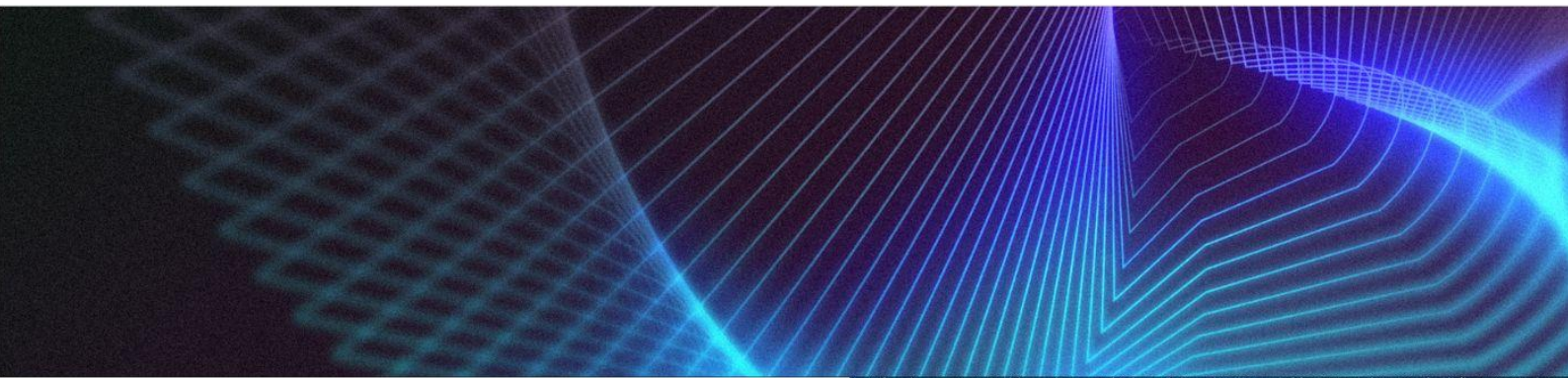


# Ending Global Corruption:

**NEW STANDARDS FOR ACCOUNTABILITY,  
ANTI-CORRUPTION AND HUMAN RIGHTS**



By

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## Preface

Five years ago, a seemingly isolated incident sparked a journey that would consume my life. A state contract for a Strategy Execution System, based on the Balanced Scorecard framework, was awarded to a suspicious company—one lacking the proper Balanced Scorecard licenses, expertise, or relevant experience. Instead, their ties to corrupt political figures, intel officers and high-level officials seemed to be their primary qualification. This blatant disregard for meritocratic criteria, combined with that company's history of laundering money from previous offenses, filled me with a sense of injustice.

As a certified Balanced Scorecard Professional with a Master's degree in Strategy and extensive experience working with international investment groups, I initially dismissed this incident as an anomaly.

However, as I examined more closely, I uncovered a disturbing pattern—a systemic web of corruption woven into the fabric of Romania's institutions, and extending to EU institutions. I realized that the highly-paid external "experts" and consultants drafting national anti-corruption strategies were often the same individuals members of organized criminal groups, posing as qualified professionals in other very specialized industries they had no relevant and convincing credentials. The senior public officials involved in crafting these incomplete and flawed strategies were either complicit or grossly incompetent, intentionally maintaining vulnerabilities that allowed organized crime to siphon off billions in public funds each year. This led me to include the following practice of "awarding of million-dollar strategic and anti-corruption projects to organized criminal groups" in the category of major global and national corruption risk.

Not only did these groups secure billions of euros annually through public procurement fraud, depriving honest businesses and experts of economic opportunities, but they also used their illicit gains to inflict harm on those who opposed them. This included defamation campaigns, discrediting tactics, astroturfing, and even assassination attempts.

Alarming, the Romanian National Anti-Corruption Strategy failed to address this alarming reality. It neglected to support individuals actively fighting corruption, a key element in any successful anti-corruption effort. Instead, public funds were funneled towards organized criminal groups contracted to develop flawed strategies within strategic ministries, further illustrating the extent of state capture.

Driven by a sense of injustice and a commitment to upholding accountability, I embarked on an even more extensive investigation.

What began as a single case study evolved into a comprehensive examination of the systemic factors that enable and perpetuate corruption – both at a global level and a national level.

This document, created entirely without private or public funding and through years of personal sacrifice and dedication to developing expertise in anti-corruption and anti-fraud, presents a system that serves as the basis for criminal complaints against organized criminal groups and their enablers. It is the result of extensive research and analysis, undertaken to address the failures of bureaucrats and consultants who, despite receiving vast sums of public funds, have been unable to effectively prevent and combat corruption.

I've been working pro-bono in the past years to identify and document the REAL corruption risks in Romania, risks intentionally ignored by profiteering organized criminal groups and their consultants, who are paid hundreds of millions from public funds. I've also drafted strategic initiatives and actions to effectively combat these risks and bring justice to the Romanian people.

As a multidisciplinary expert, I dedicated considerable pro bono time and effort to research, studying thousands of documents to identify corruption vulnerabilities and comparing them with extensive legal and public procurement data (at the level of EU institutions and Romanian public authorities - strategic ministries) to observe corruption in practice, identify corruption vulnerabilities and develop preventive measures.

This strategic document, along with my proposed improvements to the Convention against Corruption, addresses these vulnerabilities, outlines strategic initiatives to combat them, identifies priority areas, provides a realistic sequence for implementing reforms to effectively combat corruption, and aims to achieve public interest goals. It also forms the basis of criminal complaints against individuals and entities suspected of engaging in organized crime and related activities.

I will seek to recover the investment of my time, competencies and personal resources by holding accountable the paid public officials and external consultants responsible for developing incomplete and incorrect strategies riddled with corruption vulnerabilities that I identified and presented throughout this document.

To combat the devastating global impact of high-level corruption, public procurement fraud, and aggressive tax optimization—amounting to trillions of dollars in losses annually—I am actively working on:

1. Identifying and addressing legislative vulnerabilities in anti-corruption laws at both national and international levels.
2. Proposing legislative reforms that incentivize corruption investigations and provide remedies for victims of corruption.
3. Developing strategic anti-corruption systems to tackle high-level corruption more effectively.
4. Establishing an anti-corruption working group within civil society.
5. Documenting the role of professional enablers in facilitating corruption, including their methods and impact on human rights.
6. Enhancing financial integrity frameworks for sustainable development.
7. Holding corrupt individuals and organizations accountable through legal action.

By identifying gaps in the implementation of the UN Convention Against Corruption and proposing solutions, I aim to strengthen the fight against corruption globally.

**Endemic corruption among government officials, political party leaders, judges, and bureaucrats is the most corrosive force in undermining political stability and the rule of law, disadvantaging honest and ethical companies, distorting free and fair markets, threatening national security, hindering sustainable development, and eroding public trust.**

This report is not merely an academic exercise; it is a call to action. It lays bare the corruption risks that have been intentionally ignored by profiteering organized criminal groups and their enablers within the government. It proposes concrete solutions and preventive measures aimed at dismantling these networks of corruption and bringing justice to the direct and indirect victims of corruption.

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## Disclaimer:

**This report, including its systemic corruption investigations, findings, and proposed solutions, is the result of independent research and solution design of the author. The research and its findings have not been funded by any grants, public funds, NGO contracts, donations, or private contracts with third parties. The author declares no conflicts of interest.**

## Author's Note:

This research explores the concept of a new social contract, wherein payment for services rendered to the public good is based on results achieved, regardless of the existence of a formal contract with the state. This model is a result of the author's independent **solution design** and reflects their perspective on how to address the challenges of corruption and underperformance in public service.

The current system, in which fiscal agencies collect taxes but often fail to deliver on public interest goals, is characterized by contracts being monopolized by underperforming individuals and entities, many of whom engage in corrupt practices. This new social contract, as envisioned by the author, aims to prioritize accountability and reward those who genuinely contribute to the public good, regardless of whether a formal contract exists or not.

I believe this approach, born out of independent research and solution design, is essential for fostering a more equitable and effective system of public service, where results are valued over connections and transparency and accountability are essential.

## INTRODUCTION

Every year,

- \$2 trillion are lost to corruption,
- \$1 trillion are lost to aggressive tax optimization,
- \$1.5 trillion are lost to fraudulent public procurement,

These are Illicit Financial Flows (IIFs). In addition, one-tenth of the world's wealth (10% of \$105 trillion global GDP) is hidden offshore, stemming from corruption, tax evasion, and grave human rights violations.

A good percentage of the yearly 4.5 trillions IIFs, maybe even 50%, is used to protect this theft: to bribe public officials, to infiltrate governments, to lobby national and regional authorities, to pay enablers/facilitators: lawyers, consultants and accountants to structure and launder the money, to pay cybercriminals to defame, discredit, doxx, cyber troll the critics and anti-corruption advocates who oppose these fraudulent schemes and IIFs.

Armed with this ill-gotten wealth, they infiltrate governments, ministries, and regional authorities, twisting the very fabric of power to their will. They worm their way into professional associations, manipulating them from within.

They silence dissent by bankrolling lawyers who champion unjust causes, while simultaneously investing in both traditional and cybercrime. Their tactics are as diverse as they are insidious: defaming individuals, manipulating search results with negative SEO, harassing and discrediting targets, crafting defamatory autocomplete suggestions, and even launching fake advertising campaigns on platforms like Google and Bing. They weave webs of deceit by inserting names on websites with false links and derogatory words, creating entire websites indexed by Google solely to discredit specific individuals. Psychological operations ("psyops") and fabricated video materials ("deep fakes") are just a glimpse into their arsenal of manipulative tools. This is not an exhaustive list, but a chilling reminder of the vast and devastating impact of corruption on our world.

### **The Cancer of Corruption: Illicit Wealth Fuels Inequality and Threatens Our Future**

A tiny group of individuals, fueled by this unchecked flow of \$4.5 trillion illicit wealth each year, is accumulating unprecedented power. Transnational investment firms control mind-boggling sums, influencing everything from government policy to the very necessities of life.

Evidence of this imbalance is stark: the US stock market alone is valued at 190% of its GDP (\$54.1 trillion). This immense wealth and its resulting power are concentrated in the hands of an astonishingly small cabal:

- 17 transnational investment firms control over \$50 trillion.
- 200 board members shape investment policies that impact trillions of dollars.
- 300 billionaires employ money managers to secure returns on their fortunes.

This cabal wields immense influence, perpetuating cycles of exploitation.

And the human cost? While a small lives in unimaginable luxury, billions of people struggle in crushing poverty:

- Nearly 40% of the world's population lives below the **\$6.85 Poverty Line**.

- **8%** (648 million people): under \$2.15/day (extreme poverty)
- **6%** (486 million people): \$2.15 - \$3.65/day (poverty)
- **25%** (1.9 billion people): \$3.65 - \$6.85/day (low to lower-middle income)

- **22%** (1.7 billion people): live above \$6.85/day poverty line.

Breakdown of the group with income above the **\$6.85 Poverty Line**:

- **13%** (1.3 billion people): \$6.85 - \$13.20/day (low income)
- **30%** (2.9 billion people): \$13.20 - \$52.00/day (lower-middle income)
- **13%** (1.3 billion people): above \$52.00/day (upper-middle and high income)

Percentage of Global Population	Daily Income	Description	Number of People (approx.)
8%	< \$2.15	Extreme Poverty	648 million
6%	\$2.15 - \$3.65	Above extreme poverty, but still poor	486 million
25%	\$3.65 - \$6.85	Lower-middle and upper-middle income, challenges	1.9 billion
22%	> \$6.85	Higher standard of living	1.7 billion
22%	\$6.85 - \$13.20	Low-income, basic necessities	1.3 billion
57%	\$13.20 - \$52.00	Lower-middle income, some discretionary income	2.9 billion
12%	> \$52.00	Upper-middle/high income, comfortable life	1.3 billion

Source: Based on data from The World Bank's 2022 Poverty and Shared Prosperity report (<https://openknowledge.worldbank.org/server/api/core/bitstreams/b96b361a-a806-5567-8e8a-b14392e11fa0/content>), that I presented in a simplified format highlighting income distribution

88% of the global population is exploited for the benefit of the 12%, the ones involved in the yearly \$4.5 trillion lost yearly to corruption, public procurement fraud, aggressive tax optimisations schemes by corporations with money laundered (~ 10% of the 4.5 trillion laundered in the lawyers, multinational audit, accounting and consulting firms and tax advisors.

The vast majority lack the resources or time to fight for change, trapped in a cycle of survival.

All the while, this system funnels power and wealth UPwards. It strips nations of vital tax revenues while burdening the marginalized with unmanageable debt (public debt is a measurement of the value of a government's debt expressed in terms of the amount attributable to each citizen, but without

each citizens receiving its fair share of benenfits, because the decisions makers redistributed towards human beings who received more than ther fair share and the results and owners of corrupt financial capital towards each are awarded state contracts through fraudulent means.).

The public good is sacrificed as a corrupt few wield unfathomable influence.

This is why, in a unique and unprecedented manner, I decided to combine three distinct categories of information: the statistics regarding expansive corruption, data about the capital owners (especially that capital obtained through corruption offences, detailed below), and the enslavement of 90% of the human race through the creation of public debts/ per capita in their names, with the benefits funneled towards organized criminal groups.

The current capitalist model, driven by an insatiable hunger for profit, exacerbates the problem.

### **A System Designed to Exploit**

The transnational capitalist class, protected by their facilitators – the politicians, lawyers, financiers, multinational consulting, auditing and accounting firm who shape the very systems they exploit – perpetuate this cycle.

Policies are tailored to their benefit, while the well-being of the people and the health of the planet are sacrificed.

This is the fundamental corruption of 'pay for performance' within the private sector: when incentives become warped,ethics are discarded in the pursuit of profit. Entire organizations become criminogenic, rewarding those who commit fraud for the sake of corporate gain.

### **The Fiduciary Failure**

**The fiduciary duty of corporations to their investors** serves as a shield for their greed, allowing them to sidestep human rights obligations and prioritize profits derived from exploitation.

The irony is cruel: stolen wealth, laundered through corrupt channels, is then treated as a legitimate investment.

The fiduciary duty these individuals hold is often interpreted as primarily serving their investors, even if those investors include beneficiaries of corruption. This prioritization of financial gain can overshadow obligations towards human rights and societal well-being.

The Code of Ethics for accountants, CPAs, and other professionals often **prioritizes** the duty to the capital owner (investors), leading to human rights abuses.

This is particularly concerning when the capital was obtained by robbing the resources of people or communities and public funds (\$millions in state contracts obtained through public procurement fraud) and laundered through various stages with the help of consultants, lawyers, transnational consulting firms, and other professionals who often retain a significant portion of the stolen funds they integrate into economies, often through stock exchanges.

This realization led me to reflect, identify, and structure the mechanisms of systemic corruption as detailed below, and to draft solutions to address them.



## THE GLOBAL MECHANISMS OF SYSTEMIC CORRUPTION

There are dozens of major corruptions risks and mechanisms that maintain the suffering, injustice and exploitative systems in the world, but if you address with priority two of them, the root causes, you can directly create the most positive change and impact.

These two major corruption risks and insidious forces that perpetuate global corruption and injustice are:

1. **Decision-making positions in major global decision-making institutions, standards-setters and human rights defenders** (the World Bank, EU Commission, UN agencies, governments, etc.) are too often filled by the same individuals or networks who have facilitated or benefited from the exploitative systems that drain \$4.5 trillion annually. Many say they fight against the evil, but they are the exact ones who maintain the suffering and injustices in the world through their greed, corruption (including corruption through inaction), and/or incompetence.

This is **the Revolving Door of Complicity** to crimes against humanity and creates a self-perpetuating cycle, granting those complicit in past corruption the power to block change and protect their illicit gains. It represents an ongoing breach of human rights, silencing the voices of those with genuine solutions while rewarding those who caused the problems.

**The solution is:**

- **Quota on Earnings from Public Funds:** Establish a limit on how much a person can earn from public funds to prevent the theft of others' rights to economic opportunity.
  - **Individual Performance Evaluation:** Publicize the amount of public funds received by each individual versus the public interest goals achieved by each individual. This targets especially the individuals who have become \$multi-millionaires in a few years from state contracts but have provided no value or left dysfunctional systems behind. And there are plenty of such cases.
  - **New Retribution Institution:** Create a new institution to allow wronged and discriminated individuals, whose economic opportunities were stolen through corruption by illegally privileged individuals, to demonstrate that they achieved better public interest goals than those paid with millions/billions from public funds. The Public funds misused on them should be confiscated and redirected towards those who actually achieved the public interest goals.
2. **National and international reporting standards often fail to require disclosure of income derived from public funds (state contracts, grants, salaries, etc.).**

This deliberate opacity shields individuals and corporations who amass(ed) immense wealth from misappropriated public resources. The lack of transparency means that vast sums stolen from the majority can be disguised as legitimate private income, rendering fair redistribution of wealth impossible.

**These tactics effectively ensure that those responsible for creating this unjust system remain its ultimate beneficiaries.**

**Dismantling these corrupt structures will be one of the most significant challenges in the fight for a more equitable world.**

Once you have the right people empowered and financed, and the right standards focused on people and planet, everything else will follow.

**In more details:**

**Root Cause 1: Flawed Hiring Practices. Corruption & Human Rights Violations**

At the heart of this problem lies a deeply flawed hiring process within international organizations and governments. These institutions systematically favor individuals who have repeatedly demonstrated underperformance, and even involvement in perpetuating the very systems that lead to corruption. A select group of individuals, often with close ties to existing power structures, forms an exclusive talent pool. These individuals, despite their history of failures and complicity in corruption, are deemed the only eligible candidates for decision-making positions.

**In a world where \$4.5 trillion is lost annually to corruption, the very individuals responsible for this mismanagement and failure to achieve Sustainable Development Goals (SDGs) and human rights for 80% of the population are not only escaping accountability but are instead being rewarded with further lucrative positions. This perpetuates a vicious cycle of corruption and reinforces the power of a select few at the expense of the vast majority.**

Various agencies and other institutions with a mandate to serve the public good are plagued by a deep-seated problem of corruption and complicity in human rights violations. This is perpetuated by a combination of factors:

- **Flawed Hiring Practices:** Prioritizing connections and past titles over demonstrable results breeds a culture of ineffectiveness and enables the recycling of individuals who have repeatedly failed to achieve progress on SDGs or uphold human rights.
- **Ignoring Pro-Bono Solutions:** Systematically refusing to implement viable solutions offered pro-bono by individuals dedicated to public interest and human rights, who have to provide pro-bono solutions because those who are paid (salaries, contracts) are misusing public funds (hence the criminal complaints that will follow) is not only a missed opportunity, but a sign of corruption. Those in power directly benefit from maintaining the status quo.
- **Misuse of Public Funds. Self-Serving Bureaucracy:** These institutions consume billions in public funds yet often fail to deliver the impact those funds promise. This lack of accountability and focus on self-enrichment further erodes trust and fuels global inequality.

Excessive spending on internal bureaucracy, without prioritizing tangible impact, squanders public funds.

- **Misallocation of Resources:** The use of billions in public funds for salaries and administrative costs, without prioritizing the implementation of proven solutions to combat corruption and achieve public interest goals, is a misallocation of resources that hinders progress.
- **Refusal to Implement Solutions:** Ignoring or dismissing innovative solutions offered by qualified individuals, especially those focused on human rights protection, constitutes a form of corruption by inaction. This undermines the very mission of these organizations.
- **Systemic Breach of Human Rights:** The current systems and hiring practices perpetuate injustices against the 80% of the global population disproportionately affected by corruption and inequality. This constitutes a systemic human rights violation.

### The Corruption-Incompetence Paradox

The current hiring practices within international agencies tasked with anti-corruption goals and human rights initiatives present a disturbing paradox. Individuals directly responsible for failures to achieve global goals and uphold human rights are instead rewarded, not held responsible. This contradiction undermines the very missions these organizations are meant to fulfill, erodes public trust, and perpetuates a cycle of systemic dysfunction.

### Why This Persists

1. **Nepotism & Network-Based Hiring:** Decisions often favor individuals with connections to existing power networks, prioritizing loyalty and conformity over demonstrated competence or a commitment to public interest.
2. **Focus on Past Titles, not Outcomes:** Emphasis is placed on candidates' previous titles and institutional affiliations, rather than their track record of achieving tangible results for the public good.
3. **Lack of Transparency:** Hiring processes may lack transparency and public scrutiny, allowing decisions to be made behind closed doors, shielding those involved from accountability.
4. **Revolving Door with Private Sector:** Close ties between UN agencies and the private sector can create conflicts of interest. Officials may be motivated to secure future lucrative positions with corporations, influencing their decision-making during their time in public service.

### Direct Consequences

1. **Perpetuation of Ineffective Leadership:** Incompetent or corrupt individuals remain in power, leading to further mismanagement, the erosion of public funds, and hindering progress toward SDGs.
2. **Discouragement of Innovation:** Talented individuals with new ideas and a commitment to public interest are overlooked or actively excluded, discouraging those driven by a genuine desire to create positive change from even engaging with the system.
3. **Moral Hazard:** When failure and corruption are rewarded, it sends a signal that ethics and performance don't matter. This creates a perverse incentive structure, attracting the wrong kind of individuals to these institutions.
4. **Breach of Public Trust:** Taxpayers and citizens lose faith in the ability of these agencies to effectively use resources and fulfill their mandates. This can translate into reduced support, both financial and political, hindering these organizations' missions.

### Arguments for Systemic Change

- **Public Interest Mandate:** Organizations entrusted with protecting human rights and achieving global goals have a moral and ethical obligation to prioritize competence, integrity, and track records of success above all else in their hiring decisions.
- **Maximizing Impact:** Hiring the most qualified people, regardless of their networks, maximizes the potential of these institutions to achieve real-world results and utilize resources efficiently.
- **Accountability:** Establishing clear performance-based hiring criteria and transparent processes ensures that those entrusted with decision-making power are held accountable for their actions.
- **Restoring Trust:** Implementing ethical hiring practices is vital to restoring public trust in the ability of these agencies to carry out their mission and serve the global community fairly.

Continuing the current system of hiring within the UN and related organizations not only condones previous failures but actively fuels future corruption. It undermines the very purpose of these institutions. Systemic change is imperative - a radical rethinking of hiring criteria and processes focused on:

- **Merit and Performance-Based Evaluation**
- **Open and Transparent Processes**
- **Inclusion of Diverse Perspectives**

**Open Talent Pool:** Actively source candidates beyond the traditional elite, prioritizing qualifications and track records of public-interest achievements.

**These tactics effectively ensure that those responsible for creating this unjust system remain its ultimate beneficiaries.**

**Dismantling these corrupt structures will be one of the most significant challenges in the fight for a more equitable world.**

## **HOW CAN WE DISMANTLE THIS NETWORK OF CORRUPTION?**

Systemic corruption is a complex problem that requires a comprehensive solution. While criminal complaints against those who fail their duty of care are important, it's equally crucial to address the root causes and systemic vulnerabilities that allow corruption to flourish. Here's an enhanced approach:

**I. New Hiring Criteria:** to **break the cycle of corruption and empower those who truly serve the public good**, a fundamental restructuring of hiring criteria is necessary. This new standard must prioritize fairness, inclusion, and a commitment to human rights:

**NEW HIRING CRITERIA FOR ALL PUBLICLY FUNDED INSTITUTIONS, UN AGENCIES, and GOV AGENCIES:**

**“PRIORITY WILL BE GIVEN TO PEOPLE WHO HAVE NOT RECEIVED THEIR FAIR SHARE FROM PUBLIC FUNDS AND WHOSE EXPERIENCE, QUALIFICATIONS, SCORES, AND PERFORMANCE IN DESIGNING SYSTEMS, POLICIES, AND PROCEDURES FOR OBTAINING PUBLIC INTEREST RESULTS ARE BETTER**

THAN THOSE CURRENTLY OR PREVIOUSLY EMPLOYED/ CONTRACTED IN PUBLICLY-FUNDED INSTITUTIONS OR DONOR-FUNDED INSTITUTIONS.

CANDIDATES FROM UNDERREPRESENTED GROUPS WITHIN EXISTING POWER STRUCTURES, INCLUDING PEOPLE FROM RACIALIZED AND/OR INDIGENOUS GROUPS, MINORITY GENDER IDENTITIES AND SEXUAL ORIENTATIONS, AND PEOPLE WITH DISABILITIES, ARE ALSO STRONGLY ENCOURAGED TO APPLY.”

## II. Accountability to enact radical changes:

- **Hold Past Decision-Makers Accountable:** Investigate those who profited from the existing corrupt systems and failed to serve the public good.

Where proven, they should face consequences and be held financially liable for their mismanagement and its consequences.

- **Tax Excessive Earnings from Public Funds:** Just as companies are taxed for their negative impact on the environment, individuals who have accumulated excessive wealth from public funds, especially through suspicious or fraudulent public procurement processes, or extremely well paid jobs in companies where the state is a shareholder, must contribute a portion of that wealth to address the very problems they created or they failed to solve (the bureaucrats or consultants paid with \$millions but delivering only 10% value). This is a matter of both fairness and funding social programs.
- **Impose quota or limits on how much each human being is allowed to earn from public funds** (state contracts) to effectively achieve the objectives without complex programs very costly to manage and ensure in this way fairness in society and pay on performance for achieving public interest goals.

## III. Prioritization of Merit and Impact: Give preference to those who have:

- Historically been underrepresented and excluded from public funds distribution.
- Developed demonstrably superior systems, policies, and solutions.

**Reject the CORRUPT CURRENT "Talent Pool":** Seek talent beyond traditional networks, valuing proven results over past titles.

## Benefits of This Approach:

- **Justice:** Corrects past exploitation and prioritizes those who have been unfairly excluded.
- **Innovation:** Taps into the potential of individuals whose solutions have been overlooked or marginalized.
- **Effectiveness:** Prioritizes problem-solving and positive impact over the perpetuation of a failed status quo.

In addition to this:

**1. Establish a UN Human Rights Commission to audit Companies:** Model this powerful new entity after the SEC, with a mandate to set robust human rights standards for listed companies and grant it the authority to:

- Set clear human rights standards for all listed companies.
- Conduct rigorous audits of company practices.
- Impose substantial fines on companies that violate human rights standards, particularly those involved in money laundering stemming from corruption in underdeveloped and developing countries. Here, anti-corruption agencies are often under-resourced, under-performing, or susceptible to corruption themselves. Fines should focus on recouping funds stolen from the population and communities, especially in sectors like extractive industries, oil, and gas. These fines should target both the initial theft and the subsequent laundering (integration phase) facilitated through stock exchanges, real estate, tax havens, new companies that are awarded state contracts (creating unfair competition to the ethical capital).

**The UN should proactively generate revenue from fines levied against companies breaching human rights. This revenue would fund the commission and reward successful investigators, whistleblowers, and individuals and organizations who develop innovative systems and strategies to combat corruption.**

This will also address the risk that: **70% of humanity lacks the resources to effectively combat the rampant corruption and human rights violations costing the world \$4.5 trillion annually.**

The UN is underfunded for this task, and over-reliance on volunteers is unsustainable for those who have already suffered from corrupt systems.

- 2. Revise Accounting Ethics Codes:** The International Ethics Standards Board for Accountants must embed human rights as a core duty for Boards of Directors. This must stand alongside established fiduciary duty and duty of care.
- **A Human Rights Commission for Corporations:** The UN must create a commission with the authority to set enforceable human rights standards for listed companies. Like the SEC protects investors, this body would safeguard the rights of all stakeholders.
- **Self-Sustaining Enforcement:** A system where the UN proactively investigates and fines companies for human rights breaches would generate its own funding. This revenue should reward those who expose abuses and develop innovative solutions, driving a cycle of positive change.
- **Global Standards, Local Impact:** It's time the UN institutes international laws that directly penalize companies violating human rights. These laws must be robust and actionable.
- **Redefine Professional Ethics:** The International Ethics Standards Board for Accountants must incorporate human rights obligations as a core component of fiduciary duty and duty of care for boards of directors and committees.

#### **Arguments:**

- **Moral Imperative:** Protecting the rights of the global majority is a fundamental ethical obligation, not merely an investor concern.
- **Economic Stability:** Corruption erodes trust, destabilizes markets, and exacerbates poverty. Upholding human rights creates a fertile environment for sustainable economic development.



- **Sustainable Solutions:** A proactive, self-funding enforcement model ensures the UN has the resources to pursue this critical mission without relying solely on donations.

**It's time for the UN to act decisively to defend the rights of 90% of the world's population against exploitation and enslavement.**

### **3. Enhance SEC Regulations:**

- **Mandate human rights reporting for listed companies.** Impose significant fines to compensate victims of corporate human rights abuses.

## **2. REFORM ACCOUNTING AND FISCAL STANDARDS TRANSFORMING CORPORATE ETHICS:**

### **NEW STANDARDS proposed: Transparency, Restitution, and Limits on Exploitation**

- **Creation of a Fiscal Agency for Human Rights:** Establish an independent agency with the mandate to investigate and recover illicit wealth from corruption, public procurement fraud, aggressive tax optimisation schemes and redistribute it for sustainable development and human rights initiatives.
- Amend international accounting standards to incorporate mandatory human rights due diligence in major extractive projects and **other significant revenue-generating activities**. This amendment should elevate the duty of boards of directors towards human rights to be on par with traditional fiduciary duties, ensuring equal consideration for both stakeholders and the community. Currently, ethics exams for CPAs and accountants prioritize fiduciary duty (investors' interests) over duty of care (community interests), potentially leading to conflicts of interest and enabling unethical behavior.
- **Robust Annual Reporting and Auditing** for beneficiaries of state contracts or grants: **Companies and individuals receiving substantial public funds must disclose the following in their fiscal declaration**
  - Total annual revenue derived from public funds (contracts, grants).
  - Identities of the individuals who benefited most financially from public funds.
  - A detailed trace of how those funds were ultimately allocated.
  - Human rights impact reports for companies exceeding a threshold of public funding (e.g., over 300,000 Euro annually and where public funds represent over 50% of their turnover).
  - Transparency List: Under international human rights law, finance ministries and fiscal agencies in each country are obligated to publish an annual, publicly accessible list detailing the top 10,000 individuals who received the most public funds. This includes both direct payments and indirect benefits, such as dividends from companies awarded state contracts. This measure aims to expose the unjust enrichment of individuals and corporations who have profited from fraudulent public procurement practices and state contracts, enriching themselves with wealth stolen from the general population. These reforms expose corruption, facilitate the recovery of stolen assets, and hold beneficiaries of undue enrichment accountable, fostering a more just and equitable corporate landscape.

### **SAF-T: A Standard Designed to Protect Corruption, Not 90% of the global population and Taxpayers**

The SAF-T (Standard Audit File for Tax) purports to be an international standard for efficient electronic exchange of accounting data between organizations and tax authorities. However, it appears to be deliberately designed to protect the interests of those complicit in the \$4.5 trillion lost annually to corruption, tax evasion, and fraudulent public procurement, by not including at least one of the solutions I envisioned and presented above. The OECD defines the standard.

### **The Case of Romania: Corruption Embedded in SAF-T Implementation**

In Romania, the contract to implement SAF-T was awarded to known transnational criminal group of enablers of corruption – the consultants, accountants, and auditors who facilitate corruption.

**This implementation not only wastes public funds on a useless standard but creates further opportunities to steal taxpayer money by implementing it. This constitutes a criminal offense: misuse of public funds and the creation of wasteful bureaucracy.**

### **Consequences: Undermining the Fight Against Corruption**

By funneling scarce public resources into various useless/wasteful bureaucracy that fuels the bank accounts of some profiteers under the guise of SAF-T implementation, governments like Romania's deliberately undermine anti-corruption efforts. Legitimate opportunities for honest individuals to work on these projects are siphoned away by organized crime groups, leaving the good people of the country without the means to counter corruption.

Instead of this sham:

- These companies should be subject to independent audits by certified public interest human rights and anti-fraud and anti-corruption specialists.
- The specialists will be selected through a transparent process which allows a meritocratic transfer of decision-making towards demonstrably qualified independent experts, based on scores, results, and membership in recognized national and international professional associations. These measures link financial benefits to ethical conduct, protecting public resources and ensuring accountability for those who exploit the system for personal gain.

These measures expose the illicit enrichment of individuals and organized groups who profit from public funds while delivering minimal value. Enhanced transparency is crucial facilitating the recovery of stolen assets, deterring future abuse, and holding beneficiaries of undue enrichment accountable.

### **Initiative 2: Restorative Taxation for Past profiteering individuals and companies**

- **Public Wealth Limits:** Considering skyrocketing public debt levels, we must establish strict limits on how much any individual can profit from public funds. Performance and results must be benchmarked against earnings.
- **Restorative Taxation:** Those who have accumulated excessive wealth from public funds over the past several decades will be subject to restorative taxation.

This also includes individuals in extractive industries (oil, gas, etc.) who earn exorbitant salaries and rewards while polluting the environment and leaving communities impoverished.

**Rationale:** This initiative addresses the historical theft of public resources and helps prevent its recurrence.

### **Initiative 3: Human Rights Integration into Financial Standards**

For the past decades, finance and fiscal standards have not prioritized human rights. This must change. Transparency demands that every individual or company benefiting significantly from public funds disclose how they contribute to or undermine human rights.

**Rationale:** Linking financial benefits to human rights compliance creates a powerful incentive for ethical conduct and exposes those who exploit others for personal gain.

These reforms are essential to dismantle the systemic corruption that benefits a select few while exploiting the many. It's time to reclaim stolen public resources, ensure ethical use of taxpayer funds, and build a future where wealth creation aligns with the public good and respect for human rights for the past decades.

**The above initiatives and the hundreds mentioned below are the only ones that will transfer the decision making and financial power to those who deserve it and held accountable past profiteers and corrupts who allowed exploitative systems and human rights breaches against 90% of the global population.**

This will also address the risk that: **70% of humanity lacks the resources to effectively combat the rampant corruption and human rights violations costing the world \$4.5 trillion annually.**

The UN is underfunded for this task, and over-reliance on volunteers is unsustainable for those who have already suffered from corrupt systems.

### **Solutions:**

**1. Establish a UN Human Rights Commission for Companies:** Model this powerful new entity after the SEC, with a mandate to set robust human rights standards for listed companies and grant it the authority to:

- Set clear human rights standards for all listed companies.
- Conduct rigorous audits of company practices.
- Impose substantial fines on companies that violate human rights standards, particularly those involved in money laundering stemming from corruption in underdeveloped and developing countries. Here, anti-corruption agencies are often under-resourced, under-performing, or susceptible to corruption themselves. Fines should focus on recouping funds stolen from the population and communities, especially in sectors like extractive industries, oil, and gas. These fines should target both the initial theft and the subsequent laundering (integration phase) facilitated through stock exchanges, real estate, tax havens, new companies that are awarded state contracts (creating unfair competition to the ethical capital).

**2. Fund the Fight against corruption with fines applied to companies** where corruption in the supply chain breaches human rights. The UN should proactively generate revenue from fines levied against companies breaching human rights. This revenue would fund the commission and reward successful investigators, whistleblowers, and individuals and organizations who develop innovative systems and strategies to combat corruption.

**3. Revise Accounting Ethics Codes:** The International Ethics Standards Board for Accountants must embed human rights as a core duty for Boards of Directors. This must stand alongside established fiduciary duty and duty of care.

#### **1. ENHANCE SEC REGULATIONS:**

- **Mandate human rights reporting for listed companies.** Impose significant fines to compensate victims of corporate human rights abuses.

#### **2. REFORM ACCOUNTING AND FISCAL STANDARDS TRANSFORMING CORPORATE ETHICS:**

- Amend international accounting standards to incorporate mandatory human rights due diligence, placing it on par with traditional fiduciary duties for the board of directors and committees.

### **NEW STANDARDS: Transparency, Restitution, and Limits on Exploitation**

#### **Initiative 1: Robust Reporting and Auditing**

- **Annual Reporting Mandate:** Companies and individuals receiving substantial public funds must disclose the following:
  - Total annual revenue derived from public funds (contracts, grants).
  - Individuals who benefited the most financially from these funds.
  - Extend this reporting requirement retroactively for the past 20 years.
- **Human Rights Reporting:** Companies receiving over 300,000 euros annually from public funds, or where public funds comprise over 50% of their turnover, must submit detailed human rights reports.
- **Independent Auditing:** These companies will be subject to independent audits by qualified public interest human rights and anti-corruption specialists.

**Rationale:** These measures expose the illicit enrichment of individuals and organized groups who profit from public funds while delivering minimal value. Enhanced transparency is crucial for reclaiming misappropriated funds and deterring future abuse.

#### **Initiative 2: Restorative Taxation of Past Exploitation**

- **Historical Accountability:** Due to past failures in financial reporting, individuals who amassed excessive wealth through public procurement frauds and plundering public assets must be identified and taxed retrospectively. This restitution is particularly necessary in industries like oil and gas, where immense profits often correspond with environmental damage and disproportionate executive compensation.

#### **Initiative 3: Human Rights Integration**

- **Human Rights-Based Fiscal Standards:** Just as we tax carbon emissions, ethical standards must be integrated into financial practices. Reporting must track an individual's income from public sources for the past 60 years.
- **Limits on Unearned Wealth:** Caps must be placed on how much any individual can profit from public funds. Performance-based metrics will ensure that compensation aligns with the value delivered to society. Funds exceeding this cap should be redistributed towards those who have been denied their fair share.

### 3. CREATE A HUMAN RIGHTS COMMISSION UNDER UN, **AN INDEPENDENT INTERNATIONAL BODY WITH THE POWER TO:**

- **Set and enforce human rights standards** for listed companies.
- **Conduct audits and investigations** into alleged violations.
- **Impose substantial fines** on companies found in breach of human rights. This will allow Human Rights Commission to finance in a very equitable way the expansion of its operations and strengthen its capacity to defend human rights, at a global scale, prevent organised criminal groups and big corporations from harming people, stealing their livelihood, and establishing mafia networks of unfair competition and robbing public funds through public procurement frauds.
- A particular focus should be on those involved in money laundering stemming from corruption in underdeveloped and developing countries. Here, anti-corruption agencies are often under-resourced, under-performing, or susceptible to corruption themselves. Fines should focus on recouping funds stolen from the population and communities, especially in sectors like extractive industries, oil, and gas. These fines should target both the initial theft and the subsequent laundering (integration phase) facilitated through stock exchanges, real estate, tax havens, new companies that are awarded state contracts (creating unfair competition to the ethical capital).

**Fund the Fight against corruption with fines applied to companies** where corruption in the supply chain breaches human rights. The UN should proactively generate revenue from fines levied against companies breaching human rights. This revenue would fund the commission and reward successful investigators, whistleblowers, and individuals and organizations who develop innovative systems and strategies to combat corruption.

**Revise Accounting Ethics Codes:** The International Ethics Standards Board for Accountants must embed human rights as a core duty for Boards of Directors. This must stand alongside established fiduciary duty and duty of care.

#### **Strengthening Global Enforcement:**

- **Increase Investment in Human Rights Enforcement:** Significantly expand the number of skilled professionals (economists, anti-fraud experts, human rights specialists) dedicated to combating corruption and human rights abuses at all levels.
- **Shift the Burden of Proof:** Hold corporations responsible for demonstrating due diligence in their supply chains and operations to prevent human rights abuses.
- **Reward Innovation and Results:** Establish a system to reward individuals and organizations who develop effective strategies to combat corruption and human rights violations. Fund these rewards through penalties collected from corporations found guilty of misconduct.

#### **4. Global Public Prosecutor for Transnational Crime:**

- Establish a Global Public Prosecutor with the authority and resources to investigate high-level corruption, transnational white-collar crime, and human rights abuses.
- Staff this institution with a robust team of 10,000 specialized investigators, prosecutors, and experts.
- Secure funding through a special fund from taxpayer contributions (meaning from the taxes that are already collected by the fiscal agencies, instead of allowing them to continuously fuel

organised criminal groups through state contracts and fraudulent public procurement redirect them towards something 90% of the global population wants ) drawing on the widespread public desire to recoup the trillions lost annually to corruption.

- The pay will be for anti-corruption results and solved cases (detailed in a separate chapter).

#### **Reward Structure:**

- **Independent Experts:** Cases initiated by any individual, with significant contribution to prosecution, could result in awards of 1-30% of recovered funds (similar to the US SEC model).
- **Prosecutors / Teams:** Successful prosecutions could yield 0.8-29.2% of recovered funds, with percentages adjusted by deducting prosecution costs from the 1-30% range.

#### **Key Principles:**

- **Taxpayer Value:** Reward those achieving public interest goals using existing funds.
- **Challenging the Status Quo:** Break the pattern of mismanaged funds enriching corrupt institutions and contractors.
- This prosecutor would empower individuals and communities to hold powerful transnational mafia accountable, addressing a corruption risk and vulnerability where national institutions are often compromised or lack capacity.

### **Confronting the Legacy of Corruption**

The immense corruption of the 1990s in Romania allowed stolen wealth to be laundered and integrated into the global economy. This has created a system where the descendants of the corrupt maintain unfair advantages, using the robbed money as capital in exploiting workers and securing lucrative state contracts. This cycle fuels inequality and undermines honest businesses.

**We must break this cycle. Demanding transparency, restitution, and limits on excessive profiteering from public funds is critical to creating a more just and equitable world.**

### **THE MECHANISM OF SYSTEMIC THEFT FROM THE ROMANIAN POPULATION ORCHESTRATED BY THE FORMER AND CURRENT CORRUPT INTELL OFFICERS**

These individuals built their fortunes on crimes committed after the Romanian revolution in 1989, including:

- **Theft of assets and value created through the exploitation of the Romanian people during communism:** Former intell officers appropriated funds and assets accumulated through forced labor and the deliberate bankruptcy of state-owned enterprises.
- **Liquidation of the national economy:** Fraudulent privatizations and damaging economic decisions undermined Romania's economy for the benefit of a select few.
- **Plundering of natural resources:** The country's natural resources were exploited recklessly, harming the national interest and the environment, solely for the benefit of organized crime groups.



- **Sabotage of democracy:** Democratic political forces were undermined, and Parliament was controlled by a permanent majority composed of former Securitate officers and members of organized crime groups, protecting the interests of the Securitate and criminal organizations.

After plundering Romania of over 1,000 billion euros between 1989-2010, in complicity with politicians that they trained as undercover officers and propelled into key party and state positions, the Securitate mafia turned to business dealings with the state to continue enriching themselves by looting the country's resources.

This network built a veritable empire of organized economic and financial crime, with tentacles reaching into all the world's tax havens, particularly Dubai and Monaco.

#### How the Scheme Works:

- **Shadow Coordination:** Generals based abroad (Dubai, Monaco, Vienna, Switzerland, Israel, Cyprus, South Africa) direct operations, partnering with similar structures in other states.
- **Political Puppets:** These generals control puppet politicians who serve as intermediaries in the criminal scheme.
- **Front Companies and Shell Companies:** The politicians connect the generals' front companies (registered in tax havens) with their own political party-affiliated companies, which are already linked to public budgets through acts of corruption.
- **Misappropriation of Funds:** The party-affiliated companies secure state contracts through fraudulent public procurement, siphoning billions of euros annually from central and local budgets.
- **Money Laundering:** Stolen funds are laundered through front companies in tax havens, ensuring the continuation of the theft.

#### Consequences:

- **Impoverishment of the Population:** Stolen funds are resources that should have been invested in the country's development and the well-being of its citizens.
- **Undermining the Economy:** The national economy is weakened by diverting resources to organized crime networks.
- **State Capture:** State institutions are compromised and used for the benefit of criminal groups.

The money stolen from the Romanian population has been laundered through various new businesses, used to win state contracts, and create unfair competition for honest businesses. A significant portion of these stolen funds has been invested by organized criminal groups, protected by a corrupt judicial system, in Africa to exploit natural resources, leading to human rights abuses there. The fact that the corruption was not stopped at the source (when and where it happened, in Romania, 1989 -2000) and the money was not recovered and distributed to the Romanian population, allowed the financial capital owners (capital formed from corruption offences) to use that capital to do more harm in the world.

These groups also hold monopolies in state contracts, essentially becoming the final beneficiaries of the money currently stolen from the population through taxes by fiscal agencies.

This perpetuates a cycle of theft, where the same criminals who plundered trillions from Romania after the revolution continue to profit from the suffering and theft of the population.

Many of these white-collar criminals and organized crime groups pay facilitators and enablers, such as the Big Four consulting, legal, and accounting firms, to structure and launder their criminal proceeds through mergers and acquisitions and aggressive tax optimization (now recognized as illicit financial flows).

The Big Four firms are also financed, protected, and involved in decision-making processes within corrupt EU institutions, violating the rights of hundreds of millions of Europeans. This transnational mafia, which receives \$400 billion euros annually from this theft (their yearly global turnover is \$400 billions, mostly from helping predatory investors and various corporations in their \$4.5 trillion theft from the global economy (1.5 trillion aggressive tax optimisation schemes considered illicit financial flows, public procurement fraud, corruption in the extractive sectors, licensing, energy sector, etc.) is involved in human rights abuses and organized crimes, further perpetuating the cycle of corruption and exploitation that affects 90% of the global population.

**For that, I designed a new results-oriented reward system that will transfer decision-making power and financial power to the 90%, while simultaneously drafting risk mitigation initiatives and solutions for the other identified risks.**

## **ROMANIA'S ANTI-CORRUPTION STRATEGY: A CRITICAL ANALYSIS OF SYSTEMIC FLAWS AND DEFICIENCIES**

The National Anti-corruption Strategy in Romania is incomplete and incorrect due to a failure to conduct a comprehensive **preliminary diagnosis and situation analysis**.

Systemic corruption factors, corruption risks at the national level, and corruption challenges were not adequately evaluated. Consequently, the anti-corruption measures proposed in the National Anti-corruption Strategy are unlikely to effectively address the root causes of corruption prevalent in the country.

The strategy fails to prioritize areas of highest importance and lacks a clear sequence for implementing reforms or tackling various aspects of the corruption problem. While the strategic document aims to address these issues and achieve public interest goals, its development was flawed.

By failing to start with a correct and complete corruption diagnosis at the national level, the anti-corruption strategy makes it impossible to effectively combat a problem that is not fully understood.

Decision-makers involved in crafting the national anti-corruption strategy were either external consultants with links to organized criminal groups, paid with \$ millions of euro per person, or highly-paid senior employees in the public sector who lacked the necessary multidisciplinary knowledge and skills to approach a complex, multidimensional phenomenon like corruption.

The national anti-corruption strategy should have been developed by individuals with top-tier knowledge in economics, macroeconomics, strategy, sustainable development, anti-corruption, anti-fraud, with high scores in each domain and a passion for anti-corruption, human rights, and sustainable development, along with a proven track record of innovative thinking and tangible results reflected in their written reports and proposed solutions.

As a multidisciplinary expert, I dedicated considerable pro bono time and effort to research, studying thousands of documents to identify corruption vulnerabilities and comparing them with extensive legal and public procurement data (EU institutions and Romanian public authorities- strategic

ministries) to understand corruption in practice, identify corruption vulnerabilities and develop preventive measures.

*I will seek to recover the investment of my time, competencies and personal resources by holding accountable the paid public officials and external consultants responsible for developing incomplete and incorrect strategies riddled with corruption vulnerabilities that I identified and presented throughout this document.*

Endemic corruption among government officials, political party leaders, judges, and bureaucrats is the most corrosive force in undermining political stability, disadvantaging honest and ethical companies, threatening national security, hindering sustainable development, and eroding public trust.

This strategic document, along with my proposed improvements to the Convention against Corruption, addresses these vulnerabilities and aims to achieve public interest goals.

It also identifies priority areas and outlines a realistic sequence for implementing reforms to effectively combat corruption.

A recent review of national anti-corruption strategies in South-Eastern Europe highlighted the importance of prioritization, as failure to do so can result in comprehensive yet unrealistic plans.

In setting priorities, three factors should be considered for each potential reform:

- The significance of the problem targeted (the harm it inflicts on society and citizens);
- The likely effectiveness of the proposed policy reforms in reducing the problem;
- The expected cost of the proposed reform (including budgetary, economic, political, technical, and attentional costs).

The Romanian National Anti-Corruption strategy fails to:

- **Provide a correct diagnosis:** It lacks comprehensive evaluations, studies, and research regarding the types, causes, effects, and costs of corruption in Romania. It also fails to identify major national corruption risks.
- **Support committed individuals against corruption:** It does not mention or support individuals who actively oppose corruption, a key element in successful anti-corruption efforts. Instead, public funds are used to support organized criminal groups contracted to draft flawed strategies within strategic ministries.
- **Address the reduction of poverty and human rights abuses:** It does not acknowledge or discuss the impact of corruption on poverty levels and human rights violations in the country.

## 10 MAJOR CORRUPTION RISKS OVERLOOKED BY THE PAID DRAFTERS OF THE NATIONAL ANTI-CORRUPTION STRATEGY

The following overlooked corruption risks constitute significant obstacles to achieving the Sustainable Development Goals (SDGs) in Romania. Through extensive research and evaluation of thousands of pages of public procurement data, dozens of thousands of pages of legal documents, law articles, reports and firsthand observations, I have identified the following major corruption risks, evaluated their causes, effects, and impact, and developed the following solutions and anti-corruption preventive measures to address them:

### Corruption Risk 1: Grand/High-Level Corruption With Impunity

- Grand corruption, involving high-level officials, undermines the justice system. Powerful corrupt figures manipulate the government, obstruct investigations, and escape punishment for fraud, abuse of power, and other offenses.
- When the government itself is complicit, achieving justice through domestic institutions is nearly impossible.

### Solutions: International Assistance and Accountability

- **International Assistance:** In countries with endemic corruption, civil society should advocate for investigative support from international bodies such as:
  - **UNODC Bureau of Economic Crime:** Their expertise aligns with the UN Convention Against Corruption.
  - **UN Special Rapporteur on Financial Crime, Corruption and Human Rights:** Focused on the impact of corruption on human rights. This is probably the most important aspect that does not receive the importance it deserves although enslavement of 80% of the global population.
- **Third-Party Oversight:** When the judiciary is compromised, civil society can demand third-party monitoring by international organizations (like those listed above) to ensure investigations are impartial and adhere to international legal standards.
- **UNODC Technical Cooperation:** Leverage UNODC programs to strengthen the capacity of domestic institutions to investigate and prosecute complex corruption cases.
- **Civil Society as Watchdogs:** Empower civil society to monitor compliance with the UN Convention Against Corruption and the UN Convention Against Transnational Organized Crime and demand remedies for victims of corruption.
- **Corruption as a Human Rights Violation:** Establish a framework defining corruption as a human rights violation, creating stronger grounds for international intervention and accountability. This reframing empowers victims to seek justice beyond domestic systems.
- **Support for the Victims of Corruption:** Develop a comprehensive international framework outlining specific measures to support victims of corruption, with an emphasis on seeking redress and compensation. Suing corrupt individuals for damages is often lengthy and difficult.

The focus on seizing illicitly gained assets and creation of a fund to compensate victims on a broader scale.

- **Civil Lawsuits as a Tool:** Create pathways for individuals and businesses harmed by corrupt practices to file civil lawsuits against those who have enriched themselves through public funds (unjust enrichment).
- **Holding the Powerful Accountable:** Lawsuits targeting corrupt officials and their associates should focus on proving unjust enrichment from public funds. This attacks the financial foundation of systemic corruption.

Even well-documented cases often fail when corruption is endemic. This underscores the need for a multifaceted approach that empowers civil society, leverages international support, and targets the root benefits of corruption.

#### **RISK 01: Corrupts operate with impunity - Resolve the issue of impunity**

**Risk: Potential involvement of former intelligence officers in public procurement fraud and public asset fraud, misusing non-public (confidential or secret) information obtained during the employment, or using contacts/connections established during the employment to obtain contracts and information (influence peddling).**

Solutions: **Code of conduct and post-employment rules for intelligence officers.**

## **Corruption Risk 2 – Million-dollar Strategic and anti-corruption projects, intended to strengthen the public's capacity to investigate, prevent, and combat corruption - defiantly awarded to organized criminal groups**

Million-dollar strategic and anti-corruption projects, including sustainable development initiatives aimed at strengthening the public's ability to investigate, prevent, and combat corruption (a major impediment to sustainable development), are being awarded to organized criminal groups.

**These groups utilize illicit capital gained through past corruption and engage in money laundering and the exploitation of non-public information.**

### **Impact: Sabotage of Anti-Corruption Efforts, Economic Harm, and Infringement of Civil Society Rights**

- **Corruption Entrenchment:** Awarding critical projects to criminal networks strengthens their resources, influence, and ability to evade accountability. This undermines anti-corruption efforts, perpetuates a cycle of impunity, and erodes public trust.
- **Economic Damage:** Honest businesses are deprived of fair opportunities, stifling innovation, job creation, and healthy competition. This distorts markets, fuels inequality, and robs taxpayers of vital resources that could contribute to the nation's development.
- **Infringement of Fundamental Rights:** Denying civil society access to accurate and complete data contravenes Article 13 of the United Nations Convention Against Corruption.

This hinders civil society's role as a watchdog and increases the burden on already disadvantaged citizens forced to finance costly investigations for transparency and accountability.

- **Personal and Systemic Damages:** as a person with a solid moral compass, motivated by ethics and skilled in identifying corruption schemes, I had to work pro-bono to create this anti-corruption blueprint and strategy because all the available paid opportunities and public procurement contracts were awarded to organised criminal groups. In the same time, I cannot passively wait and see how the population is robbed and organised criminal groups flourish.
- These individuals, beneficiaries of strategic public procurements contracts, must not only repay the millions of dollars they receive for their malpractice but also the billions of dollars in damages their incompetence has caused to society. This situation represents a systemic failure that robs society of robust anti-corruption solutions while allowing incompetent firms to profit unjustly. I've documented and quantified the damages they created in over 10 pages.
- Strategic projects, strategy for sustainable development in Romania (a project that paid the consultants EUR 5 millions and the results are not worth neither 100.000 euro, with 4.9 millions being robbed), plus the national anti-corruption strategy - are undermined from the beginning when contracts are awarded to organized criminal groups. These groups often have illicit capital from money laundering, past corruption, and unfair advantages built on non-public information and influence peddling by former intelligence officers.



- This weakens anti-corruption efforts, perpetuates exploitative systems, enables further organized crime activity, and deprives honest professionals of both economic opportunities and the chance to contribute effectively to the public good.

### Quantifiable Harm: Economic and Social Costs of Corruption

- **Mass Emigration:** An estimated 30% of the Romanian population has emigrated due to corruption and lack of merit-based opportunities. This represents a severe loss of human capital and potential economic contributions.
- **Public Procurement Fraud:** Public Contracts and resource (oil, gas, forests, gold, etc.) exploitation rights have been systematically awarded to organized crime groups, denying opportunities to legitimate businesses. This has severe economic and societal costs.
- **Increased Public Debt:** Corruption has led to a ballooning of Romania's public debt. These RECENT borrowed funds, exceeding \$70 billion, have enriched criminal networks instead of serving the public good.
- **Lost Economic Potential:** Corruption stifles innovation, suppresses honest businesses, and distorts market dynamics. This diminishes GDP growth and undermines the development of a robust national economy.
- **Concentration of Wealth:** Corrupt practices funnel wealth into the hands of organized criminal groups. This exacerbates economic inequality, impoverishes substantial segments of the population, and reduces progress on the Sustainable Development Goals (SDGs).
- **This is** an attack on human rights and development goals by those seeking illegal enrichment.

### **Solutions:**

- **Enhanced Due Diligence - Proactive verification** before awarding strategic anti-corruption contracts
- Conduct thorough due diligence, potentially in collaboration with UNODC's Bureau of Economic Crime, which has expertise in implementing the UN Convention Against Corruption, for companies bidding on strategic and anti-corruption projects. This should include:
  - In-depth background checks with law enforcement collaboration.
  - Financial investigations to trace the source of assets and flag money laundering risks.
  - **Enhanced** Conflict of interest checks uncovering relationships with current or former officials.

- **International Support:** Partner with UNODC, INTERPOL, and other relevant international bodies for expertise and access to global intelligence. UNODC to: investigate ownership, trace asset flows, assess past contract performance.
- **Citizen Empowerment:** Create an accessible mechanism for citizens and NGOs to request investigations if they suspect corruption. Allow for independent oversight of the process. Citizens directly impacted by corruption, and who lack faith in domestic institutions, should have the right to request this scrutiny as a safeguard.
- **Public Disclosure:** Increase transparency by publishing the results of due diligence checks for strategic contracts.
- **Accountability for Professional Bodies:** Associations and professional training providers must also be contracted to verify the expertise and integrity of firms bidding on these sensitive projects.
- **Qualifications, Not Just Corruption:** It's important to disqualify corrupt firms, but equally important to ensure genuinely qualified ones remain eligible.
- **Capacity Building:** Ensure the country's investigators have the resources and training needed for this in-depth work.
- **Beyond Due Diligence:** Verification is one piece. Strengthen whistleblower protections, establish independent oversight bodies, and invest in investigative journalism for a holistic approach.

## **Damages Caused by Inadequate Due Diligence in EU Contract Criteria and Awards**

### **1. Damages to Honest Entrepreneurs and Professionals (Pre-Award and Award Stages of Contracts)**

- **Discrimination:** Ethical entrepreneurs and professionals who refuse to bribe are excluded from the market while organized crime groups win contracts.
- **Financial Losses:** Systemic corruption creates unfair competition, where bribery-driven awards prevent honest businesses from securing vital contracts. This leads to:
  - Direct revenue losses due to corrupt practices.
  - Business closures when ethical competitors cannot compete against bribe-paying entities.
  - Indirect losses when institutions mislead honest businesses into investing time and resources to draft tender technical offers for tender processes they don't know are rigged.
- **Lost Opportunities and Investments:** When contracts aren't based on merit, honest entrepreneurs miss out on the chance to grow their businesses, generate jobs, and contribute

to GDP growth. The stolen funds, often laundered and reinvested into criminal activities, further stifle the potential of legitimate Romanian capital.

This constitutes an undermining of the national economy and an abuse of human rights.

Capitalism without competition isn't capitalism. **It's a monopoly/cartel. It's exploitation. It's corruption that leads to extreme levels of exploitation of the population and human rights abuses if the country is corrupt.**

- **Reputational and Emotional Damages:** After being shut out by corruption, honest firms and individuals who expose such activity face:
  - Defamation campaigns by corrupt networks and their protectors in government.
  - Blacklisting, discrediting, cybercrime, and threats.

This aims to discredit and silence those who expose wrongdoing.

I wrote and structured these damage categories based on the personal harm I've suffered as a result of the proliferation of organized criminal groups in Romania. These groups consist of corrupt politicians working alongside current and former corrupt intelligence officers. They collaborate with accountants, lawyers, and multinational consultancies that leverage their expertise in audit, accounting, law, and tax, along with affiliated marketing agencies, to assist the criminal groups. They also use their headhunting agencies to place corrupt individuals in executive management teams in corporations profiting of resources they robbed from the communities, enabling these networks of organised criminal groups to continue their theft.

## **2. Damages to the Population (Taxpayers) - Post-Project Implementation Stage – Quality Assessment/Acceptance of Deliverables (Works and Services) in public procurement:**

- **Subpar Deliverables:** Corruptly awarded contracts often result in works or services that are significantly below expected quality or functionality. This is due to profiteering by companies that prioritize bribes over performance, potentially endangering lives.
- **Safety Risks:** Poorly executed projects can endanger lives as funds are diverted and standards ignored.
- **Inflated Costs - Wasted Investment - Economic Damage:** Taxpayers pay full price for services worth significantly less. This represents significant economic loss and a betrayal of public trust. The funds lost to corruption could be vital for social programs or infrastructure development. Instead, the funds intended for public benefit are wasted, enriching criminal networks and starving honest businesses of the resources to grow and innovate.

### **Framing the Issue:**

- **Economic Sabotage:** Corruption in public contracting directly undermines Romania's economic development and competitiveness.
- **Human Rights Violation:** Denying honest businesses equal opportunities through corruption is a breach of fundamental rights.

### **SOLUTIONS:**

- **Human Rights Framework:** Enforce a new framework that explicitly criminalizes corruption as a human rights violation.

- **Victim Compensation:** Develop a universal framework to compensate individuals and businesses harmed by corruption, including lost opportunities and investments. While important, suing corrupt individuals for damages is often lengthy and difficult. **Focus on seizing illicitly gained assets to compensate victims on a broader scale.** Use a portion of assets seized from corrupt actors to create a fund that compensates honest businesses for lost contracts and investments.
- **Anti-Corruption Procurement Standards:** Mandate strict due diligence, transparency, and independent quality assessments for all EU-funded projects.
- **Whistleblower Protections:** Strengthen laws safeguarding those who report corruption, including protection from retaliation by corrupt networks.

## **LAWS BREACHED**

### **Romanian Constitution:**

- **Article 135(2)a, b, c, d, e, f (Economy):** This article guarantees the right to a healthy and balanced development of the Romanian economy. The violation of this article includes actions that harm the economy, such as corruption, mismanagement, or economic sanctions.
- **Article 16(1) and (2) (Equality in Rights):** This article guarantees the right to equality in rights and opportunities for all Romanian citizens. The violation of this article includes actions that discriminate against individuals or groups, such as racism, or discrimination on the basis of political beliefs.
- **Article 47 (Standard of Living):** This article guarantees the right to a decent standard of living. The violation of this article includes actions that reduce the standard of living for Romanian citizens, such as poverty, unemployment, or inflation.
- **Penal Code: Article 165 (Undermining the National Economy):** This article prohibits actions that undermine the national economy. The violation of this article includes any actions that harm the economy, such as espionage, sabotage, or economic warfare.

**Regarding the breach of Article 16(1) and (2) (Equality in Rights) in the Constitution:** per definition, corruption represent the human rights abuses of honest people.

When an individual secures preferential treatment through bribery (such as in the context of public procurement where the bribe makes him win the contracts), law-abiding competitors who don't bribe and have a "zero bribes" policy face discrimination. **In this case, no other human right is affected except the right to equality (the right to be treated equally.)**

Firstly, definitions of discrimination are broad ("any distinction, exclusion, restriction or preference"). Acts of corruption inherently differentiate, exclude, or favor certain individuals.

Secondly, grounds for discrimination (race, religion, etc.) are not exhaustive. The "or other status" clause demonstrates that discrimination based on any factor is prohibited (in this case the factor is: honest professionals/entrepreneurs who don't bribe and are discriminated against).

Thirdly, discrimination encompasses acts with a discriminatory "purpose or effect." Corruption, by its very nature, fulfills both criteria.

Fourthly, discrimination often nullifies or impairs other human rights such as the right to life, education, or health. Corruption frequently creates situations where individuals are disadvantaged in exercising these rights.

In essence, every person deserves fair treatment by public officials. When someone resorts to bribery, they gain an unfair advantage over those who REFUSE to participate in such corrupt practices.

### **Corruption Risk 3: Exploitation of State Contracts by Organized Criminal Groups**

**Organized criminal groups (OCGs) with capital obtained through prior corruption exploit access to non-public information and connections with former intelligence officers to secure lucrative state contracts. They use offshore companies, bribes, and bid manipulation to gain unfair advantages.**

**Impact:** This results in low-quality public services, inflated costs, and undermines public trust.

**Solution:** Establish a mechanism through national anti-corruption agency whereby citizens or NGOs with well-founded suspicions about a bidder can request verification by UNODC. This verification would include:

- Beneficial ownership investigations to check for links to past corruption.
- Financial forensics to trace the origin of company capital.
- Review of past contract performance for red flags.
- Expert assessment of the company's actual qualifications for the project.

## Corruption Risk 4 - Abuse of Power by Former Intelligence Officers

Former intelligence officers pose a significant risk of misusing secret and confidential information and networks obtained during their tenure for personal gain. This manifest in several ways:

- **Public Procurement Fraud:** Ex-officers establish firms to secure state contracts, using insider knowledge for unfair advantage, and colluding with corrupt officials.
- **Facilitating money laundering for organized crime:** Their connections and expertise is used to launder illicit funds derived from public procurement fraud or resource exploitation.
- **Blackmail using sensitive information:** Former officers threaten individuals or entities with the release of compromising information, obtained during their service, for financial gain. Types of information these officers exploit: technical data, classified procurement plans, personal data on individuals.

**Types of Corruption Offences Facilitating these abuses:**

- **Bribery for Confidential Information:** Public and private sector employees are bribed to disclose sensitive information that undermines national security, compromises industrial secrets, or provides an unfair market advantage.
- **Bribery for unfair competitive advantage:** Officials involved in public procurement are bribed to favor specific companies, receiving kickbacks from the contract proceeds.
- **Bribery to Evade Criminal Liability:** Law enforcement, prosecutors, and judges are bribed to obstruct investigations, prosecutions, or to ensure favorable outcomes in criminal cases.

## SOLUTIONS:

- **Post-Retirement Code of Conduct:** A strict code outlining restrictions and ethical responsibilities for former intelligence officers, preventing them from misusing clasified information or networks gained during service, for personal gain.
- **Revised Post-Employment Procedures:** Enhance post-employment regulations, including mandatory review periods and limitations on the industries where former intel officers can work.
- **Anti-Corruption Procedures:** Implement robust procedures targeting the misuse of clasified/non-public data for personal gain by intelligence agents, both during and after their service.
- **Compliance, Accountability and Enforcement:** Ensure **existing anti-corruption frameworks** (anti-corruption procedures, anti-bribery measures, risk registries, and the Code of Conduct as a combined framework that supports state-level compliance with human rights protection obligations) **are actively monitored and breaches lead to swift prosecution.**

## **Corruption Risk 5 - Romania: Lack of Civilian and Parliamentary Oversight of intelligence agencies enables Corruption within these institutions**

With a budget of \$1 billion (opportunity for corruption) and a lack of civilian and parliamentary oversight (corruption vulnerability), Romania's intelligence agencies present a significant corruption risk. These agencies have been captured at the decision-making level and are financially exploited by organized criminal groups, often led by former intelligence officers who leverage, as their personal financial capital, the 1 trillion euros stolen from the Romanian population over the past 34 years.

This institution operates with no internal control or transparency, denying independent certified anti-corruption and anti-fraud experts access to information regarding identified corruption in their public procurement processes and how they may be financing corrupt individuals and organized criminal groups.

An analysis of the procurement processes and beneficiaries of state contracts reveals that the institution awards contracts for internal audit, strategy execution systems, and anti-corruption policies and procedures exclusively to organized criminal groups lacking top-level certifications in audit, anti-corruption, and anti-fraud. Subsequently, with this initial experience in their portfolio, they secure a monopoly on similar projects in other strategic institutions, such as the Ministry of Internal Affairs and the Ministry of Justice.

These groups, often beneficiaries of past corruption, utilize financial capital obtained from previous corruption offenses to launder and integrate it with new public funds obtained through public procurement fraud. This fraud includes breaches of preventive measures like anti-corruption procedures, due diligence, and anti-money laundering (AML) controls. The groups then implement dysfunctional strategies and anti-corruption policies, procedures, and codes of ethics, creating vulnerabilities that perpetuate further corruption and consolidate their ability to steal public funds. This is the very definition of systemic corruption.

### **Consequences and Culpability**

Due to these opportunities for corruption and the existing vulnerabilities, these intell agencies presents the highest corruption risk in the country. It is the root cause of numerous offenses, including human rights abuses, and is responsible for the theft of over 1,000 billion euros from 1989 to 2010, and an additional 10 billion euros annually from taxpayer funds.

**Beyond the theft of its own budget, the institution is involved in further misappropriation of public funds, using classified information for personal gain (informational fraud), connecting the front companies of generals (registered in tax havens) with political party-affiliated companies, already linked to public budgets through corruption.**

**This is the definition of organised criminal groups that rob the population and work for their personal interest, not public interest/national interest.**

### **The Criminogenic Nature of Romanian Public Institutions**

The problem of systemic corruption extends beyond the intelligence agencies. Public institutions in Romania are inherently prone to criminal activity due to their politicization, anti-corruption and anti-fraud programs developed with organised criminal groups (in strategic institutions) and the lack of pay-for-performance systems. The absence of rewards for achieving public interest goals creates an environment where corruption thrives.

Rational choice theory suggests that criminal activity occurs when the opportunity presents itself, and the perceived benefits outweigh the perceived risks.

In Romanian public institutions, the lack of oversight, combined with personal gain incentives, reduces the perceived personal risk of engaging in corruption and increases the potential rewards.

When the risk of engaging in corruption is high (meaning individuals believe there is a high probability of being caught and prosecuted, a perception often formed based on historical data), they are less likely to engage in fraudulent activities. However, in the current practice when anti-corruption and anti-fraud programs, along with internal controls, are implemented by or in collusion with organized criminal groups, this creates a false sense of security and reduces the perceived personal risk of engaging in corruption. This can lead to these intelligence agencies becoming criminogenic, meaning they foster an environment conducive to criminal behavior.

Addressing this systemic corruption requires urgent action. Implementing robust oversight mechanisms, increasing transparency, and creating incentives for ethical conduct are crucial steps in ensuring that public institutions serve the public good, not the interests of organized crime.

The individuals, members of the organised criminal groups that captured the intell agencies (directors and high-ranked public officials listening their orders, not the public interest), ministries, strategic public institutions and the Supreme Council of National Defense - built their fortunes on corruption committed after the Romanian revolution in 1989.

### **The Mechanism of Systemic Theft from the Romanian Population Orchestrated by the Former and Current Corrupt Intell officers**

- **Theft of assets and value created through the exploitation of the Romanian people during communism:** Former intell (Securitate) officers appropriated funds and assets accumulated through forced labor and the deliberate bankruptcy of state-owned enterprises.
- **Liquidation of the national economy:** Fraudulent privatizations and damaging economic decisions undermined Romania's economy for the benefit of a select few.
- **Plundering of natural resources:** The country's natural resources were exploited recklessly, harming the national interest and the environment, solely for the benefit of organized crime groups.
- **Sabotage of democracy:** Democratic political forces were undermined, and Parliament was controlled by a permanent majority composed of former Securitate officers and members of organized crime groups, protecting the interests of the Securitate and criminal organizations.

After plundering Romania of over 1,000 billion euros between 1989-2010, in complicity with politicians that they trained as undercover officers and propelled into key party and state positions, the Securitate mafia turned to business dealings with the state to continue enriching themselves by looting the country's resources.

This network built a veritable empire of organized economic and financial crime, with tentacles reaching into all the world's tax havens, particularly Dubai and Monaco.



### How their Scheme Works:

- **Shadow Coordination:** Generals based abroad (Dubai, Monaco, Vienna, Switzerland, Israel, Cyprus, South Africa) direct operations, partnering with similar structures in other states.
- **Political Puppets:** These generals control puppet politicians who serve as intermediaries in the criminal scheme.
- **Front Companies and Shell Companies:** The politicians connect the generals' front companies (registered in tax havens) with their own political party-affiliated companies, which are already linked to public budgets through acts of corruption.
- **Misappropriation of Funds:** The party-affiliated companies secure state contracts through fraudulent public procurement, siphoning billions of euros annually from central and local budgets.
- **Money Laundering:** Stolen funds are laundered through front companies in tax havens, ensuring the continuation of the theft.

### Consequences:

- **Impoverishment of the Population:** Stolen funds are resources that should have been invested in the country's development and the well-being of its citizens.
- **Undermining the Economy:** The national economy is weakened by diverting resources to organized crime networks.
- **State Capture:** State institutions are compromised and used for the benefit of criminal groups.

The money stolen from the Romanian population has been laundered through various new businesses, used to win state contracts, and create unfair competition for honest businesses. A significant portion of these stolen funds has been invested by organized criminal groups, protected by a corrupt judicial system, in Africa to exploit natural resources, leading to human rights abuses there. The fact that the corruption was not stopped at the source (when and where it happened, in Romania, 1989 -2000) and the money was not recovered and distributed to the Romanian population, allowed the financial capital owners (capital formed from corruption offences) to use that capital to do more harm in the world.

These groups also hold monopolies in state contracts, essentially becoming the final beneficiaries of the money currently stolen from the population through taxes by fiscal agencies.

This perpetuates a cycle of theft, where the same criminals who plundered trillions from Romania after the revolution continue to profit from the suffering and theft of the population.

Many of these white-collar criminals and organized crime groups pay facilitators and enablers, such as the Big Four consulting, legal, and accounting firms, to structure and launder their criminal proceeds through mergers and acquisitions and aggressive tax optimization (now recognized as illicit financial flows).

The consultant and auditing firms so called “big four” are also financed, protected, and involved in decision-making processes within corrupt EU institutions, breaching the rights of hundreds of millions of Europeans. This transnational mafia, which receives \$400 billion euros annually from this theft (their yearly global turnover is \$400 billions, mostly from helping predatory investors and various corporations in their \$4.5 trillion theft from the global economy (1.5 trillion aggressive tax optimisation schemes considered illicit financial flows, public procurement fraud, corruption in the extractive sectors, licensing, energy sector, etc.) is involved in human rights abuses and organized

crimes, further perpetuating the cycle of corruption and exploitation that affects 90% of the global population.

**The responsibility and accountability for these frauds (exceeding \$1 trillion) are with those who were paid well to achieve public interest goals but failed to do so. Public funds misused on them should be confiscated and redirected towards those who actually achieved the public interest goals.**

**The following categories of individuals within these institutions will be held criminally liable:**

- **Members of the Board of Directors in public institutions and ministers**, from 2005 to the present, all with decision-making power and the greatest benefits. They must be held criminally liable, in accordance with internal control legislation, corporate governance, and international and national anti-corruption legislation. They have received salaries throughout their lives from money stolen from the population through taxes, exceeding 1 million euros per person, for which they have not achieved results.
- **Members of procurement committees** who allowed fraudulent public procurement.
- **Internal control specialists, internal and external auditors, external consultants** (especially the real beneficiaries, shareholders of consulting firms paid with millions of euros, who left behind dysfunctional systems and corruption vulnerabilities to be exploited by them), who allowed the theft of over 800 billion euros from the Romanian people.
- **External consulting firms contracted for strategy execution and performance management, anti-corruption strategies** – tools that were the unique levers through which the interests of the population were protected and through which the population could exercise control (verification of indicators, etc.) – were imposed by the SRI (Romanian Intelligence Service) and intentionally created dysfunctional systems with corruption vulnerabilities to continue the theft. These members of the organized group, with a budget of 1 billion euros for which they are not accountable, exploit, through corrupt companies and criminal associates, the procurement budgets of other public institutions. They represent the theft from over 18 million Romanians who have not received their fair share of public funds. The most efficient and least costly solution is to recover 50% of the salaries received by these individuals who have worked against the national interest and for corrupt purposes.
- **Contractors chosen through fraudulent procurement**, based on turnover and financial capital obtained through corruption offenses, money laundering, and projects without respecting anti-corruption and due diligence procedures, who have created dysfunctional systems to worsen the situation of the 18 million affected citizens.

The recovery of billions of euros spent on incompetent and corrupt consultants, members of organized crime groups (white-collar) who have created their financial capital and project portfolios through corruption offenses, will be requested.

The absence of robust civilian and parliamentary control over the Romanian Intelligence Service (SRI) and the Special Telecommunications Service (STS) has created an environment conducive to corruption. This lack of oversight has allowed them to:

- **Breach Laws and Anti-Corruption Procedures:** The SRI and STS have bypassed due diligence investigations and other anti-corruption measures, enabling them to engage in corruption and misuse of public funds and information.
- **Contract Organized Crime Groups:** These agencies have directly awarded lucrative contracts to organized criminal groups, providing them with credibility and a source of illicit funds.

## The Corruption Mechanism identified by investigating public procurement data about the companies contracted by these institutions

- **Corrupt Companies:** Companies with shareholders linked to tax evasion and other financial crimes are awarded contracts by the SRI and STS.
- **Money Laundering:** These contracts serve as a means to launder money from previous corruption offenses.
- **Profits used to rob the Taxpayers:** The laundered funds are then invested in new ventures, often with the support of corrupt factions within the intelligence services, further enriching criminal networks at the expense of taxpayers.
- **Exploitation of Public Funds:** Despite their vast budgets, the SRI and STS fail to provide meaningful support to legitimate anti-corruption bodies like the DNA. This undermines the fight against corruption and suggests a possible misappropriation of funds.

### Consequences:

This systemic corruption within the intelligence services represents a form of national betrayal. It allows organized crime to flourish while diverting resources away from those actively fighting

### Dynamics of Corruption:

- **Unaccountable Power:** Without effective oversight, the SRI and STS have exploited their positions to award contracts to corrupt companies involved in money laundering. These companies have evaded taxes on a massive scale, reinvesting illicit profits through intermediaries and corrupt factions within the intelligence services.
- **Misuse of Public Funds:** These agencies receive billions of euros from the state budget, with a significant portion going towards salaries. This represents a betrayal of public trust, as these resources are meant to protect national security, not to enrich criminals or fund the agencies' own corruption.
- Romania has many citizens who tirelessly fight against systemic corruption, often without compensation. Prioritizing funding for dedicated anti-corruption bodies, rather than perpetuating corruption within intelligence services, is crucial.

### Patterns of Exploitation in public procurement:

- **Initial Boost:** Corrupt companies receive direct contracts from the SRI and STS, enabling them to launder money from previous offenses.
- **Escalating Profits:** These companies then secure tens of millions of euros in contracts from other state law enforcement institutions (Ministry of Internal Affairs, Ministry of Justice, Health Ministry, etc.), deepening complicity with organized crime and undermining state integrity.

### SOLUTIONS:

Systems with robust transparency measures are inherently less susceptible to corruption. This includes:

- **Freedom of Information Policies:** Ensure public access to relevant information about contracts, spending, and decision-making processes within the SRI and STS.

- **Independent Oversight and Ethics Board (civil society):** Establish a body with the power to investigate potential misconduct, impose sanctions, and advise on ethics-related matters involving former intelligence officers.
- **Transparency and Public Disclosure:** Require a public registry of former intelligence officers involved in lobbying or procurement-related businesses, including disclosure of their past roles within the intelligence community.
- **Proactive Investigations:** Conduct regular audits and risk assessments of public procurement processes, especially in sectors prone to corruption or with known links to former intelligence officers.
- **Enhanced Whistleblower Protections:** Encourage and protect those who report suspicious activities involving former intelligence officers.
- **International Cooperation:** Collaborate with other countries facing similar issues to share best practices and intelligence on potential illicit activities.

## Corruption Risk 6: Lack of Incentives to investigate complex corruption cases

When stolen funds cross international borders, law enforcement faces significant challenges.

These include long and costly investigations, uncertainty of outcomes, and the potential for recovered funds to be repatriated elsewhere. Despite commitments under the UN Convention against Corruption, many developed nations have done little to proactively investigate foreign corruption within their financial systems.

Collaboration between relevant agencies within both source and haven countries remains hampered. Anti-corruption, anti-money laundering, and tax authorities, each with specialized skills, often face bureaucratic disincentives towards cooperation.

Historically, scandals like those revealed in the Panama Papers, 1MDB case, and others, have first been exposed by journalists, NGOs, and whistleblowers. Regulators and law enforcement have been slow to react or, in some cases, even obstruct these investigations. Pressure from the media and source countries often acts as the primary catalyst for action by haven countries.

### SOLUTIONS: Reward-Based System to Incentivize Results

As I mentioned in the open letter to the UN Secretary-General, a proposed solution is:

- **Reward System:** Distribute a percentage of recovered corruption funds to independent journalists, investigators, and prosecutors whose work was instrumental in the identification, documentation, and successful prosecution of these cases.

#### Reward Structure:

- **Independent Experts:** Cases initiated by any individual, with significant contribution to prosecution, could result in awards of 1-30% of recovered funds (similar to the US SEC model).
- **Prosecutors / Teams:** Successful prosecutions could yield 0.8-29.2% of recovered funds, with percentages adjusted by deducting prosecution costs from the 1-30% range.

#### Key Principles:

- **Taxpayer Value:** Reward those achieving public interest goals using existing funds.
- **Challenging the Status Quo:** Break the pattern of mismanaged funds enriching corrupt institutions and contractors.

#### Motivation:

- **Performance-Driven:** Motivate results-oriented actions that serve the public interest, addressing the current imbalance that often rewards corrupt actors involved in maintaining exploitative systems.
- **Level Playing Field:** Acknowledge that formal contracts or institutional affiliations do not guarantee outcomes. Independent expertise can outperform corrupt or inefficient agencies.

## Call to Action

- **Justice Redefined:** Prioritize those who achieve tangible outcomes, regardless of formal affiliations. This model demands better use of the very funds that corruption drains from the public.
- **Recognizing Excellence:** Individuals whose evidence-based actions lead to the recovery of stolen assets have earned their place as true public servants.
- **Ending Complacency:** Corrupt contractors have profited from taxpayer money for too long. It's time to reward those who prove their dedication to the public good, even if it means challenging the established system.

**Example:** If a billion-dollar fraud is exposed through independent efforts, while agencies spent billions with minimal results, the principle of taxpayer value demands recognition for the successful party.

## Corruption Risk 7: Network Corruption in Romanian Public Procurement

**Description of the RISK:** Systemic public procurement corruption in Romania involves entrenched networks of colluding individuals/firms within and outside of government.

This corruption thrives on established relationships, lasting for years and dominating entire market segments.

The illicit gains fuel political campaigns and allow economic and political elites to maintain power and control.

This systemic abuse extends from high-value contracts to all levels where public funds are dispersed.

Corrupt politicians manipulate institutions and regulations to secure lucrative contracts, laundering money through seemingly legitimate channels.

Patronage politics further enable these structures, allowing corrupt money to flow freely. Bribery and coercion are common tactics used by corrupt officials and corporations to secure benefits or distort supply chains, facilitating illicit markets and money laundering.

Long-term, this manipulation of political, legal, and financial systems undermine the nation's ability to provide essential services, leading to potential state failure. Such environments fail to distribute wealth equitably, stifle innovation, and result in rampant poverty.

The recovery of stolen assets, especially in cases of vast political corruption, is critical. These funds are desperately needed to rebuild broken systems.

Corrupt officials often hide illicit gains overseas, creating complex legal and jurisdictional barriers to recovery.

New governments must simultaneously establish their credibility and secure international cooperation to pursue these complex investigations. Effective solutions must target both corruption and the money laundering mechanisms that perpetuate it, requiring a coordinated, global approach.

### **Dynamics of the Corruption Network:**

- **Illicit Funding of Politics:** Proceeds from public procurement fraud fuel political parties, creating a corrupt cycle of power and illicit enrichment.
- **Capture of Institutions:** Political elites use their influence to manipulate institutions and regulations, positioning themselves as gatekeepers who facilitate the flow of illicit funds through seemingly legitimate channels.
- **Prevalence Across All Levels:** This network-based corruption is not limited to high-value national contracts. It exists at all levels of government where authority over public spending resides.

### **Risks and Impacts:**

- **Weakened State Institutions:** Corruption undermines the state's ability to provide essential services and security, potentially leading to state failure.

- **Impoverished Society:** Corruption stifles innovation, investment, and development, creating an environment where wealth and opportunity cannot flourish.
- **Links to Money Laundering:** Corrupt individuals utilize complex supply chains to launder illicit funds, further fueling the criminal economy.

Identifying and recovering stolen assets is important, particularly in cases of "grand corruption", where the amounts are large and often needed by a new Government trying to remedy problems arising from past corruption.

Very senior officials involved in corruption generally find it necessary to transfer looted proceeds abroad, making identification and recovery in most cases a multinational project.

The legal and logistical difficulties of pursuing complex investigative and legal proceedings while rebuilding national institutions and infrastructures are great. Not only that, successor Governments usually have to establish their own international credibility and integrity before obtaining the necessary legal assistance and cooperation from abroad.

## **SOLUTIONS**

- **Specialized GLOBAL Anti-Corruption Task Force:** Establish an Anti-Corruption and Money Laundering Coordination Centre, bringing together law enforcement specialists under one roof to investigate these crimes effectively.
- **Expert Investigative Unit – PUBLIC PROCUREMENT:** Create an Anti-Corruption Expert Office in each country, with dedicated resources, to investigate public procurement fraud, a source of significant financial loss (\$1 trillion globally per year).
- **Global Collaboration:** Asset recovery and anti-corruption efforts must transcend national borders.
- **Focus on Financial Enablers:** Target networks within both the public and private sectors that facilitate money laundering or participate in corrupt procurement schemes.



## Corruption Risk 8: A Thriving Market For Corruption And Money Laundering

This illicit market fuels corruption and is exploited by:

- **Corrupt National Networks:** Intelligence officers and political figures enrich themselves through public procurement fraud, exploitation of state-owned companies, and theft of natural resources (oil, gas, forests, minerals).
- **Transnational Criminal Groups:** These groups collaborate with professional enablers (lawyers, accountants, multinational consulting and accounting companies, etc.) to facilitate complex money laundering schemes and aggressive tax optimisation schemes.

### SOLUTIONS

1. **Expose the Market:** Create a comprehensive EU database of corruption and money laundering cases. This provides detailed documentation of amounts, methods, and underlying crimes, giving policymakers crucial insights for developing targeted responses.
2. **Tailored Anti-Corruption Measures:** Different corruption patterns necessitate distinct strategic and programmatic approaches. Current anti-corruption measures often lack this necessary differentiation.
3. **Global Asset Register:** Establish an international registry documenting high-value assets and their true beneficial owners. This combats tax evasion and concealment of illicit funds that fuel corruption.
4. **Targeting Enablers:** Focus pressure on financial intermediaries like private and global banks, lawyers, and accountants, consultants who facilitate tax havens and money laundering. These actors are crucial to dismantling the corrupt system.

### Key Statistics:

- \$21-32 trillion in private wealth hidden in secrecy jurisdictions.
- \$4.5 trillion in illicit financial flows annually.

## Corruption Risk 9 - Illicit Financial Flows (IIFs) rob 4.5 trillion yearly from achieving the SDGs

- Estimated annual losses: \$4.5 trillion • Forms of Illicit Flows: Corruption (\$2 trillion), tax evasion and aggressive tax optimisation schemes (\$1.5 trillion), money laundering, and human rights abuses.

### Operational Risks Contributing to Illicit Financial Flows

- Exploitation of Legal Loopholes: individuals are actively manipulating the legal system for their benefit.
- Inadequate Enforcement of Sanctions.
- Misaligned Bank Incentives: They don't report money laundering if they are not incentivized to do so.
- Political Corruption and Regulatory Weakening: power structures enable illicit activity. • Lack of capacity to use information submitted by enablers.
- Limited Protection for Whistleblowers and Civil Society: This emphasizes the vulnerability of those who try to expose these practices.

### Additional Risk Identified Through Analysis of Organized Crime Operations (not yet addressed in World Bank and UN reports):

- Money Laundering via Stock Exchanges: Corrupt individuals (predatory investors) often with the aid of multinational professional enablers (consultants, lawyers, accountants), launder money through stock exchanges. This is particularly prevalent with funds obtained from extractive industries (mining, oil, and gas).
- Exploiting Legislative Loopholes: These individuals and multinational corporations strategically infiltrate governments and engage in lobbying to exploit legal loopholes, enriching themselves at the expense of communities.

### Solutions:

- Responsible Investment Frameworks: Integrate standardized human rights and ESG indicators into the Principles for Responsible Investment.
- Mandatory ESG Disclosures for Listed Companies: Require disclosures covering all financial activities (including money laundering schemes, tax haven activities, and involvement of professional enablers: auditors, lawyers, consultants in these schemes) for all companies listed on stock exchanges, with special emphasis on extractive industries.
- Enforce Business and Human Rights Guidelines: Implement mandatory due diligence and risk management procedures in alignment with the UN Guiding Principles on Business and Human Rights: Human rights due diligence and Management of human rights / risk impacts.
- Robust Legal Frameworks: Enact comprehensive legislation addressing: • Corporate ESG disclosures (including modern slavery) • Investor due diligence • Investor ESG regulations • Sustainable taxonomies • National sustainable finance strategies • National Action Plans on Business and Human Rights.

**Disclaimer:** For the purposes of Sustainable Development Goal indicator 16.4.1, the aggressive tax avoidance practiced by corporations and their big four consultants and accountants is considered an

illicit financial flow. Aggressive tax avoidance practiced by corporations with the help of multinational consultancies (audit and accounting) is detrimental to sustainable development.

### **Corruption Risk 10: Carbon Tax, Carbon Quota, And Limits On Income Per Human Being From Public Funds Benchmarked With Results**

CARBON TAX and CARBON QUOTA but no quota on how much a human being is allowed to earn from public funds, many earning millions, dozens of millions, and yielding no results compared to discriminated individuals offering solutions free of cost.

Taxpayers pay for results.

### **MISINFORMATION, DISINFORMATION, SUSTAINABLE DEVELOPMENT AND CLIMATE CHANGE INITIATIVES FUNDING**

There's widespread misunderstanding about the true meaning of the SDGs and Agenda 2030. These misconceptions, sometimes even among intellectuals, may be strategically fueled by vested interests seeking to undermine progress and keep their exploitative systems in place.

Achieving the Sustainable Development Goals (SDGs) means: reducing poverty, hunger, ensuring decent work and economic opportunity for all, tackling climate change (including air pollution that affects us all), etc. not some conspiracy theory about the enslavement of the human race.

To achieve the SDGs, I developed a new, holistic approach that focuses on tackling the root cause of underfunding: Corruption.

Additionally, it establishes robust safeguards to minimize risks throughout the entire funding process, to ensure resources are ethically sourced and used to directly benefit the intended goals.

### **Addressing Illicit Financial Flows for SDG Achievement**

**Currently, Illicit Financial Flows (IIFs) cause staggering losses:**

- **\$2 trillion lost to CORRUPTION annually**
- **\$1 trillion lost to AGGRESSIVE TAX EVASION**
- **\$1.5 trillion lost to FRAUDULENT PUBLIC PROCUREMENT**
- **10% of the world's wealth (10% of \$105 trillion global GDP) is hidden offshore, stemming from corruption, tax evasion, and human rights abuses.**
- 

These illicit flows represent a massive drain on the estimated \$5-7 trillion annually needed to achieve the SDGs, including food security, infrastructure, health, and education.

This massive loss of potential funding highlights the urgent need for a comprehensive anti-corruption strategy like the one I've developed.

The current pursuit of achieving the Sustainable Development Goals (SDGs) faces two key challenges.

First, I identified there's THE RISK of focusing solely on middle-class taxation to fund SDGs and green initiatives, overlooking the significantly larger potential source of funding: tackling the estimated \$4.5 trillion lost annually to corruption and tax dodging. This risk is already happening.

Second, there's a concern/RISK that even if funds are gathered from any source, they could be misdirected towards entities with vested interests in "green businesses," creating monopolies and benefiting corrupt groups instead of truly serving the SDGs. This risk is already happening.

Businesses should hold Accountable all executives, staff and board members that foster or tolerate illicit financial flows in the name of their businesses.

**Risk 10.1: Instead of tackling the massive losses from corruption and tax evasion (estimated at \$4.5 trillion annually), the burden falls on the middle class through increased taxes and/or reduced /low quality public services. We already see this in practice.**

**Proposed Solution:** Prioritize recovering these illicit financial flows by strengthening anti-corruption measures like mandatory human rights reporting in ESG for publicly listed corporations and reforming public procurement processes, as extensively detailed in this report.

**Risk 10. 2. Captured Sustainability Efforts. Money redirected from the middle class disproportionately benefit corrupt interests involved in so-called "green businesses."**

Even with funding, corruption can undermine SDG efforts.

**Proposed Solution:** Implement transparent funding allocation mechanisms for sustainability initiatives. Prioritize independent oversight and public participation to ensure funds are directed towards legitimate projects, not captured by corrupt individuals.

Fairer taxation systems that target tax havens and wealthy individuals who benefit most from the current economic structures not the middle class.

Green investments/businesses as opportunities to create new jobs and stimulate the middle class, as opposed to a monopoly enriching corrupt groups.

Increased transparency and public oversight can prevent funding from falling into the wrong hands.

**Focus on Inclusivity:** Policies that promote green businesses and initiatives that benefit all levels of society, not just special interests.

It's crucial to move beyond GDP as the sole indicator of a nation's PROSPERITY, as the GDP fails to capture essential factors like human well-being, environmental sustainability, and the value generated by the informal economy.

**A comprehensive set of Sustainable Development Goals (SDGs) offers a much better metric for the overall well-being of people and the planet.**

## CORRUPTION CONTEXT AT A GLOBAL AND EUROPEAN UNION LEVEL

**Context:** Governments collect 30% of the GDP as taxes, and 40%-50% of that is spent on public procurement.

Yearly, +\$ 1.5 trillion is lost globally to public procurement fraud from which EUR 200 billion in the European Union.

In addition to the public procurement fraud, another +\$1 trillion is lost due to tax dodging schemes operated by the big four consultants and auditor's cartel and their multinational clientele, from which EUR 200 billion is extracted from the E.U. economies.

Tax dodging practiced by the multinational consultancies are considered "Illicit Financial Flows" under the new UN standards (Sustainable Development Goal indicator 16.4.1).

**The consequences:** Millions of people are deprived of fair economic opportunities, adequate standard of living, and many key domains are under-financed such as: education, pensions, security, healthcare, clean water initiatives, and social and transport infrastructure necessary for living fulfilling lives.

**Professional enablers of corruption, fraud and money laundering** (bankers, Big Four accounting firms, consultants, auditors, and lawyers) are also financed by the EU institutions (by awarding them profitable contracts worth billions of euros).

This goes against the global pact for financial integrity for sustainable development, against the values for integrity such as: accountability, transparency, legitimacy and fairness, against the Convention against Corruption and human rights detailed below.

The issue isn't the lack of EU funding for member states. The problem is that 50% of these funds end up with organized criminal groups (white-collar mafia) who exploit them for illicit gains.

The EU has failed to invest in addressing pre-bidding corruption: discriminatory criteria, tailored specifications that prioritize turnover (often built on corrupt practices, including from the Big four consultants who captured the EU institutions and maintain corrupt, exploitative systems and human rights abuse), and a lack of focus on project quality, impact, and the ultimate beneficiaries.

This perpetuates a system lacking in meritocracy.

### Damages Caused by Inadequate Due Diligence in EU Contract Criteria and Awards

#### 1. Damages to Honest Entrepreneurs and Professionals (Pre-Award and Award Stages of Contracts)

- **Discrimination:** Ethical entrepreneurs and professionals who refuse to bribe are excluded from the market while organized crime groups win contracts.

- **Financial Losses:** Systemic corruption creates unfair competition, where bribery-driven awards prevent honest businesses from securing vital contracts. This leads to:
  - Direct revenue losses due to corrupt practices.
  - Business closures when ethical competitors cannot compete against bribe-paying entities.
  - Indirect losses when institutions mislead honest businesses into investing time and resources to draft tender technical offers for tender processes they don't know are rigged.
- **Lost Opportunities and Investments:** When contracts aren't based on merit, honest entrepreneurs miss out on the chance to grow their businesses, generate jobs, and contribute to GDP growth. The stolen funds, often laundered and reinvested into criminal activities, further stifle the potential of legitimate Romanian capital. This constitutes an undermining of the national economy and a violation of human rights.
- **Reputational and Emotional Damages:** After being shut out by corruption, honest firms and individuals who expose such activity face:
  - Defamation campaigns by corrupt networks and their protectors in government.
  - Blacklisting, discrediting, cybercrime, and threats.

This aims to discredit and silence those who expose wrongdoing.

## 2. Damages to the Population (Taxpayers) - Post-Project Implementation Stage – Quality Assessment/Acceptance of Deliverables (Works and Services)

- **Subpar Deliverables:** Corruptly awarded contracts often result in works or services that are significantly below expected quality or functionality. This is due to profiteering by companies that prioritize bribes over performance, potentially endangering lives.
- **Safety Risks:** Poorly executed projects can endanger lives as funds are diverted and standards ignored.
- **Inflated Costs - Wasted Investment - Economic Damage:** Taxpayers pay full price for services worth significantly less. This represents significant economic loss and a betrayal of public trust. The funds lost to corruption could be vital for social programs or infrastructure development. Instead, the funds intended for public benefit are wasted, enriching criminal networks and starving honest businesses of the resources to grow and innovate.

## CORRUPTION CONTEXT IN ROMANIA

Capitalism that thrives on unfair competition and corruption isn't capitalism; it's exploitation. This is the capitalism that exists in Romania - **a country colonized through the bribing of its (fake) "elite"**.

**High-level corruption (uninvestigated and unpunished) has turned the country into a colony. (please see the chapter "Mechanisms Of Corruption" in this document for more details)**

In such a system, where unfair practices and corruption are the pillars, genuine competition and economic fairness become casualties.

This distorted version of capitalism undermines the principles of a free and equitable market, perpetuating a cycle of exploitation and injustice.

If a government collects taxes from its citizens and then uses that money to finance state contracts awarded to organised criminal groups through public procurement fraud initiated and protected by corrupt politicians and bureaucrats, corrupt fake elite, and a captured justice systems then those taxes are considered embezzled money from the population.

This is because the government has a legal obligation to use tax money for the benefit of the public, not for its own enrichment or to support criminal activity.

When a government uses tax money in this way, it is essentially stealing from its citizens.

I repeat. When a government is corrupt and uses tax money to finance organized crime, it is essentially stealing from the population. Taxes are collected from the people to fund public services, such as education, healthcare, and infrastructure.

When these funds are redirected to organized crime who built their capital on sentenced corruption offences and now provide services and products only at 10% value and quality of the 100% money they receive in state contracts obtained through public procurement frauds, those money are diverted from their intended purpose and instead used to support illegal activities, which can harm society in many ways.

The Romanian National Agency for Fiscal Administration (ANAF) collects 29% of Romania's GDP in taxes.

Between 14% and 19% of the GDP (and half of the collected taxes) goes to public procurement (half of which falls prey to public procurement fraud).

The money end up in the accounts of corrupt people who have become each millionaires from fraudulent public procurement.

This means 10 to 15 billions every year, 350 billions in 33 years, are money robbed from the population and redistributed in the bank accounts of organised criminal groups.

In addition to this theft, for each €19 million robbed through projects / state contracts obtained through public procurement frauds, they leave behind dysfunctional systems that are causing other €billion damages to the population (i.e, the health system that does not work, the IT infrastructure of the fiscal agency who doesn't archive fiscal declarations causing additional dozens of hours of admin work for entrepreneurs, in a context where time means money).

The next issue is that this capital (usually over EUR 200.000 euro per person) obtained through public procurement fraud in state contracts funded with money robbed from the population is placed, layered, and integrated in the economy in new business that launder the criminal proceed and **create unfair competition** to honest entrepreneurs and businesses.

## LACK OF RESOURCES FOR CIVIL SOCIETY TO DEFEND THEIR RIGHTS

22.000 employees from the fiscal agency take money from the population (through taxes), keep some money in their bank accounts (as salaries), without assuming the accountability and responsibility for

the fact those money, through public procurement frauds and discriminatory and fraudulent state aids and grants, are redistributed in the accounts of corrupts and organised criminal groups.

**These officials demand paperwork from the victims of their schemes (from the people they rob, especially for the cases where the taxes go beyond the level the individual can afford an adequate standard of living). In contrast, the population lack the resources to hold the collectors accountable for how public funds are spent.**

**The National Anticorruption Agency has only 900 employees, State Audit Authority 900 employees,**

**Issue: Lack of representation:** The population lacks a comparable force to investigate the \$200 billion public procurement frauds and theft of natural resources, unlike the vast apparatus that works *against* the interests of the people.

**Conclusion:** We need a system where 22,000 citizens become watchdogs, not just 900 employees in an institution under political capture.

### **Systematic Corruption in Public Procurement**

Corruption in procurement involves lasting networks of corrupt actors within and outside of government, dominating entire markets.

Money from corrupt procurement sustains political parties and keeps corrupt elites in power.

Controlled institutions and regulations are designed to launder illicit money while enriching and protecting the powerful.

Systemic corruption fuels illicit trade, hinders equitable wealth distribution, stagnates development, and can even destabilize entire countries.

For the money they are robbing from the population they are requesting justification documents instead of the population to request extensive data for each euro these people spend on their cornies and corrupt contractors who have received more money than they deserve, mor money than their results which are at 10% of the 100% money they received from the population.

The population does not have 22.000 represenattives to evaluate how those money are spent and to defend their rights. Not viceversa.

National Anti-corruption agency has 900 employees, the State Audit Institution has 900 employees and all are under political patronage. The other public institutions are campletly captured, meaning they are working to harrass the robbed population and protect the 50.000 thieves.

#### **•Typology of corruption in Romania in public procurement:**

Corruption in procurement takes place systematically via a network involving multiple firms and individuals both inside and outside of government. Corruption networks is strong and entrenched, lasting many years and involving the entire market for a good or service.

In these instances, corruption is systematic and is a function of the relationships among parties.

The money obtained through systematic relational corruption in public procurement fuels political parties and plays an essential role in financing politics.

In these situations, public procurement serves as a way for economic elites to capture contracts and public funds and for political elites to finance their continued power and authority.



Network domination of procurement is not exclusive to high-value national markets. It can be found at all levels where power and the authority to spend public money through procurement exist. This allows the political actors to establish institutions and regulations that place them as gatekeepers responsible for ensuring that illicit proceeds go undetected through legitimate channels. Also, in countries where patronage politics influence political relationships and interactions, these structures allow the proceeds of corruption and money laundering to flow through them. Controlled and uncontrolled corruption can also occur between officials and corporations seeking to obtain benefits or procurement contracts. their illegal supply chains. It is within these supply chains that corruption proceeds are used to further the development of illicit markets conducive to money laundering. In the long run, these economic manipulations of the political institutions, legal and financial sectors can lead to potential state failure, where the state is unable to provide any security or services to its people. Such economic environments are unable to distribute wealth equally nor drive innovation, investment, and reinvestment towards development finance. They lead to impoverished societies.

#### **Why is important to act now and address these issues:**

- Public procurement fraud (EUR 10 billions yearly) in Romania is the primary method through which organized crime groups maintain their control on power and wealth in Romania. By manipulating public procurement processes, these groups are able to siphon off billions of euros from the public funds yearly, enriching themselves and naming their corrupt politicians in the Parliament, while depriving the Romanian people of essential services and infrastructure (decent investments in education, health, research conducted by top professionals and firms with Romanian (honest) capital, infrastructure, etc.).

**The priority should be cutting off the financing sources of these white-collar mafia networks that perpetuate this exploitation system through public procurement fraud (EUR 10 billion yearly) and the looting of state-owned companies and start recovering the EUR 800 billion that were lost through these fraudulent schemes and tax dodging by corporations in the past 34 years.**

**Tax dodging is considered “Illicit Financial Flows” under the new UN regulations (please see the evidence I structured in the attached table)**

- The damage to the Romanian population is not merely limited to the millions of dollars these individuals steal from public funds.

**The major issue is that the most corrupt and incompetent firms (who launder money from previous criminal proceeds and prosecuted corruption offences) are:**

- granted exclusive access to key strategic data and population's private and confidential data (data is the new gold),
- are the sole entities compensated for implementing highly strategic systems such as Balanced Scorecard and anti-corruption strategies. However, they design these systems with significant flaws and vulnerabilities in order to exploit them and inflict further billion-dollar damages upon the Romanian population. They leave behind these dysfunctional systems while simultaneously pressuring, lobbying, bribing, and extorting decision-makers to create requests for new dysfunctional systems that enrich the same mafia.
- rob the rights of citizens to access detailed monthly reports related to the institutional performance and individual performance for everyone receiving more than EUR 5.000 gross revenue per month from public funds.

The reporting mechanisms in the public sector must mirror the rigorous standards imposed on entrepreneurs and freelancers, who are required to present comprehensive fiscal and financial documentation for the money that is being robbed from them.

The Ministry of Justice and Ministry of Interior, two institutions entrusted with upholding the law and combating corruption, have failed to provide transparent, relevant, and accurate performance reports (at institutional, team and individual level) regarding their public expenses, which are ultimately funded by money robbed from the population through taxes and by increasing the public debt per capita.

This lack of transparency in public reporting stems from the flawed implementation of strategic systems like Balanced Scorecard and anti-corruption strategies, which they developed with organized criminal groups who received millions of euros in public funds for disastrous results, causing billions of dollars in losses to the Romanian population.

In contrast, genuine experts from civil society have developed superior performance reporting systems at no cost to the taxpayer.

The choice of the Ministry of Justice, Ministry of Interior, and other key institutions to perpetuate the monopoly of organized criminal groups on strategic state contracts highlights their complicity in perpetuating systemic corruption.

The money that was misused on these flawed systems must be redirected to the genuinely capable experts who can deliver meaningful results. Additionally, those responsible for this corruption must be held accountable and forced to compensate the Romanian people for the damage they have caused.

**Moreover, the beneficiaries behind these companies don't pass basic integrity due diligence checks.**

- The shareholders of these incompetent and corrupt firms have enriched themselves, each of them making millions of euro per year at the expense of the Romanian people, while the dysfunctional systems they left behind caused EUR billion in widespread damage to the Romanian population, including loss of life.
- The systemic corruption perpetuated by these firms (alongside numerous other crony and politically connected corrupt firms) has crippled the public sector and impoverished the nation.
- **The shareholders of these companies and corrupt bureaucrats have obtained from public funds:  
more money than they deserve, more than the results they obtained, more than they fair share / quota from public funds, stealing from millions of Romanians, in a human rights violation scheme that surpasses any corrupt unlawful fiscal rules they impose to rob money from the private property of honest citizens and transfer it in the bank accounts of these leaders of organized criminal groups (see the definition of organized criminal groups).  
The issue is not only that they receive the funds through corruption but that the value provided is only 10% of the +\$ 1 million paid to them (with the shareholder keeping a profit of 80% without doing any work), the rest being theft.**

- These organized criminal groups use corruption, bribery, extortion and money laundering to infiltrate the Parliament and governments (ministries, public institutions) and hide the revenues of their activities.

Complicating the situation is the involvement of corrupt and incompetent private contractors who have been awarded contracts to monitor, investigate, and audit corruption within the public institutions, central ministries and governments. These firms, rather than fulfilling their intended purpose, have actively colluded with corrupt officials to protect their illicit activities. Their incomplete and corrupt audits have allowed the ministries to continue their fraudulent practices, while they themselves have exploited their positions to have a monopoly on state contracts, to perpetuate systemic corruption and exploitative practices.

- **The Failure of Publicly-Financed Authorities to Tackle Systemic Corruption demands an active involvement of the Civil Society**

The only publicly funded authorities tasked with investigating and prosecuting systemic corruption (high-level or "grand" corruption) are often reluctant to do so, citing the complexity, time commitment, and financial resources required. This inaction, coupled with their poor performance – detecting only 20% of corruption cases and prosecuting only 7% of actual corruption on the market –shifts the burden of addressing systemic corruption and unfair competition onto the already vulnerable, **harassed, intimidated**, and exploited population (professionals and entrepreneurs). This is a form of abuse of power and betrays the public's trust in these institutions.

To address this critical corruption factor, respectively the refusal of publicly-financed authorities to investigate systemic corruption, I have proposed comprehensive anti-corruption systems and legal measures that I have submitted to the United Nations Office on Drugs and Crime (UNODC). These measures aim to strengthen the capacity of law enforcement agencies, enhance transparency and accountability, and empower individuals and organizations to participate in the fight against corruption. By adopting these measures, we can create a more just and equitable society where everyone has a fair chance to succeed without fear of exploitation or discrimination.

- The public officials breached their fiduciary duty: loyalty (they don't pursue the best interest of 95% of the romanian people) and care (mismanagement).

**Corruption is a major problem that is costing Romania dozens of billions of euros each year and is a major obstacle to economic development.**

**These cases (of organised criminal groups) are a serious threat to Romanian democracy, human rights, and rule of law, and constitutes high treason, complicity to organized criminal groups, corruption, and attack to the national and economic security from those who are in power through fraudulent means (deception and fraud).**

**They use the wealth obtained through public procurement frauds to maintain the system of exploitation and corruption:**

- The corruption schemes in public procurement practiced in Romania (with damages of over €300 billion in the past 34 years),
- the aggressive tax optimization schemes practiced by corporations through which over €20 billion are extracted annually from national wealth at a GDP of €300 billion) with the help of their professional enablers, Big Four consulting companies, creating unfair competition to the overtaxed individuals who work in SMEs who can't use tax heavens,

The high-level corruption (systemic corruption) and the methods by which it has been and is protected have led me to donate /dedicate 90% of my time in 2023 and my competencies (related to studies accumulated over +3 years beyond PhD level, including multiple certifications that I have obtained through my own time, effort, and funding) to draft the below-mentioned solutions.

### **MECHANISMS OF SYSTEMIC CORRUPTION AND HUMAN RIGHTS ABUSES**

1. The Romanian National Agency for Fiscal Administration (ANAF) collects 29% of Romania's GDP in taxes.

Between 14% and 19% of the GDP (and half of the collected taxes) goes to public procurement (half of which falls prey to public procurement fraud).

The money end up in the accounts of corrupt people who have become each \$millionaires from fraudulent public procurement, a fact that makes the real decision makers leading ANAF, the Ministry of Finance, MJ, MAI, CSAT, STS, CSM in breach of the UN Convention against Corruption and the UN Convention against organised criminal groups. There is even a breach of the UN Declaration of Human Rights because they are forcing the population to finance organised criminal groups. The fact that they are breaching fundamental laws surpasses any corrupt rule and fiscal law they impose to rob the private property of honest human beings to finance corrupt people and organised criminal groups.

This means EUR 10 to 15 billions every year (EUR 350 billions in 33 years) are money robbed from the population and redistributed in the bank accounts of organised criminal groups.

Data analysis (of final, real beneficiaries benefiting each of \$ millions from the money robbed from the population) including their subpar competences and education, financial capital invested initially in the company sourced from previous corruption offences, subpar project results in state contracts) indicate obvious public procurement frauds, financed with the money robbed from the population. Moreover, they are launched in the corrupt business of "protected public procurement frauds" through direct acquisitions initiated by STS, CSAT, etc, some institutions populated with cursed devils who destroyed (with their grand thefts and high-level corruption) the lives of 18 millions Romanians and think they are above the law. What these individuals have done is corruption, high-treason and theft from 18 millions Romanians.

These cases were not investigated by the judicial systems and have gone unpunished.

In addition to this theft, for each €10 million robbed through projects / state contracts, the corrupts leave behind dysfunctional systems that are causing other €billion damages to the population (i.e, the health system that does not work, the IT infrastructure of the fiscal agency who doesn't archive fiscal declarations causing additional dozens of hours of admin work for entrepreneurs, in a context where time means money).

(If a corrupt incompetent entrepreneur is making 1 million euro, for 10 hours of work per year, from state contracts obtained through public procurement fraud, why the honest entrepreneurs (better than the corrupts fueled by the corrupt government) who waste 10 hours because of the dysfunctional systems created for the ministries should not sue for the same amount (i.e. 1 million euro) ?

2. If a government collects taxes from its citizens and then uses that money to finance state contracts awarded to organised criminal groups, through public procurement frauds, initiated and protected by corrupt politicians and bureaucrats, by a corrupt fake elite, and a captured justice system - then those taxes are considered embezzled money from the population.

This is because the government has a legal obligation to use tax money for the benefit of the public, not for its own enrichment or to support criminal activity.

I repeat. Taxes are collected from the people to fund public services, such as education, healthcare, and infrastructure.

When these funds are redirected to corrupt firms who provide services and products only at 10% value and quality of the 100% money (\$ millions) they receive in state contracts obtained through public procurement frauds, they are diverted from their intended purpose and instead used to support illegal activities, which can harm society in many ways.

3. There are 100,000 multi-millionaires in euros in Romania, but over 50% of them are from state contracts obtained through public procurement fraud schemes, money robbed from the population. The corrupt shareholder keeps between 80% and 50% of the contract money without doing anything, leaving the subcontractor to always deliver sub-standard work for taxpayers.

The sub-contractor usually delivers more than he is paid for and often is forced to cut corners and provide sub-standard work to meet the artificially low prices that have been set by the corrupt shareholder.

This not only harms the quality of public services, but it also cheats taxpayers out of the value of their money.

The issue is with the corrupt shareholder of the company who signed the state contracts with the public institution, contracts obtained through public procurement fraud. This corrupt individual keeps the 70% profits and provides no value in exchange, the taxpayers being the ones who lose that value of the money robbed from them by the ministry of finance.)

4. The next issue is that this capital (any amount over EUR 200.000 euro per person obtained through public procurement fraud in state contracts funded with money robbed from the population) is placed, layered, and integrated in the economy in new businesses that launder the criminal proceeds and create unfair competition to honest entrepreneurs and companies.

5. Romania surrendered its valuable natural resources (gas, oil, forests, etc.), estimated at over €500 billion, as an unofficial bribe (quid pro quo) for votes to adhere to the European Union and secure access to EU funds.

6. Instead of compensating the people (nation) that were robbed of their resources, the EU funds have become a financing mechanism and enabler for corrupt officials and businesses.

The corrupt officials and the organized criminal groups have refused to distribute yearly dividends to the Romanian population (like in Dubai or Sweden), nor have they established a sovereign wealth fund like Norway's, which is now worth \$1.9 trillion.

Instead, they have pocketed the profits, hired their incompetent relatives on exorbitant salaries, and signed contracts with corrupt companies.

Romania has surrendered its natural resources to receive EU funds, which are now being used to finance the corrupt businesses.

This has had a devastating impact on honest Romanians, who have been robbed of the dividends they should have received from their country's resources, face unfair competition from firms enriched with EU funds and state contracts obtained through public procurement fraud, are overtaxed per capita compared to corrupt corporations, and have seen their national debt per capita skyrocket to €8,000.

The EU funds are also enriching with high salaries the fake elite of corrupt and incompetent bureaucrats who robbed the opportunity and money from other people (more intelligent, more educated than them (with better scores at the same exams and who achieved more public interest goals (at zero costs from public funds or private donations).

Their actions have perpetuated a system of exploitation and inequality, benefiting only themselves and their cronies at the expense of the Romanian people.

The list with the first 20.000 people (highest earners from state contracts financed with the 90 billion EU funds given to Romania) in whose bank accounts the EU funds have reached from state contracts financed by EU, to evaluate their credentials, results and impact – will prove this.

## **II. Why addressing Systemic Corruption, the Root Cause of Mass Discrimination and Human Rights Violations, should be the priority of the human-centered reforms?**

### **1. Public procurement fraud (EUR 10 billions yearly) in Romania is the primary method through which organized crime groups maintain their control on power and wealth in Romania.**

No public sector job can make so much money for a human being as a state contract obtained through public procurement fraud. Corrupt Individuals with minimal qualifications, subpar performance, and mediocre intellectual ability are reaping millions of euros in net profit per year, while honest, hard-working public servants earn a mere €15,000 net annually.

By manipulating public procurement processes, these groups are able to siphon off billions of euros from the public funds yearly, enriching themselves and naming their corrupt politicians in the Parliament, while depriving the Romanian people of essential services and infrastructure (decent investments in education, health, in research conducted by top professionals and firms with Romanian (honest) capital, in infrastructure, etc.).

The EUR billions spent yearly by corrupt bureaucrats in central agencies (not from their bank accounts but from money robbed from others through taxes) on new irrelevant strategies and conferences drafted with the same representatives of companies who profit of the systemic corruption, will never

obtain the same results (for the 80% discriminated and robbed population to enrich some corrupts) as the below-mentioned priorities:

- cutting off the financing sources (from state contracts and EU funds) of these white-collar mafia networks that perpetuate this exploitation system through ongoing public procurement fraud (EUR 10 billion yearly) and the looting of state-owned companies.
- recover the EUR 800 billion lost a) through fraudulent schemes that enriched politically connected corrupt firms (also known as crony firms) and b) through tax evasion practices by corporations in the past 34 years.

2. The damage to the Romanian population is not merely limited to the millions of dollars these individuals steal from public funds through public procurement frauds.

The major issue is that the most corrupt and incompetent firms (who launder money from previous criminal proceeds and prosecuted corruption offences):

- are granted exclusive access to key strategic data and population's private and confidential data (data is the new gold),
- are the sole entities compensated for implementing highly strategic systems and anti-corruption strategies which design these systems with significant flaws and vulnerabilities in order to exploit them and inflict further billion-dollar damages upon the Romanian population.

**They leave behind these dysfunctional systems while simultaneously pressuring, lobbying, bribing, and extorting decision-makers to create requests for new dysfunctional systems that enrich the same mafia. They rob the rights of citizens to access detailed monthly reports related to the institutional performance and individual performance for everyone receiving more than EUR 5.000 gross revenue per month from public funds.**

**This means complete capture of the state by organized criminal groups and protection of the exploitative corrupt systems.**

3. The reporting mechanisms in the public sector must mirror the rigorous standards imposed on entrepreneurs and freelancers, for the money that is being robbed from them, who are required to present comprehensive fiscal and financial documentation.

The civil society deserves immediate access to the published ranked list of the first 100,000 individuals who have received the most money from public procurement contracts or grants funded by E.U. funds over the past 17 years at EU institutions level and in each EU state.

This list should be the number one priority in terms of investments toward government transparency and accountability.

By adopting this approach, the civil society can effectively monitor public institutions and safeguard human rights at a lower cost.

### **III. Romania surrendered its valuable natural resources (gas, oil, forests, etc.), estimated at over €200 billion, as an unofficial bribe (quid pro quo) for votes to adhere to the European Union and secure access to EU funds.**

Instead of compensating the people (nation) that were robbed of their resources (EUR 200 billion), the EU funds (EUR 90 billions) have become a lifeline, financing mechanism, and enabler for corrupt officials and businesses, causing double damage to the honest entrepreneurs faced now with the unfair competition posed by the corrupt businesses.

The corrupt officials and the organized criminal groups have refused to distribute yearly dividends from the exploited national resources to the Romanian population (like in Dubai or Sweden), nor have they established a sovereign wealth fund like Norway's, which is now worth \$1.9 trillion.

These unscrupulous individuals have not only pocketed the profits but have also appointed their unqualified relatives to positions of power, rewarding them with exorbitant salaries far exceeding their merit.

They have colluded with corrupt companies and transnational white-collar consulting companies, handpicking the corrupt and incompetent executive management teams through affiliated corrupt headhunting firms. The corrupt individuals named in power positions then awarded lucrative contracts to organized criminal groups, the so-called white-collar mafia. Together, they have orchestrated a grand theft, depriving Romanians of their rightful share of the nation's wealth. For this systemic corruption, grand theft, and human rights violation all the parties will pay.

The audacity of this scheme extends to the political sphere, where those who have benefited from this illicit wealth have colluded with bureaucrats to safeguard their ill-gotten gains and shield the transnational white-collar mafia from accountability.

This unholy alliance continues to perpetuate a system of exploitation that has robbed 18 million Romanians of their fundamental rights.

Romania has surrendered its natural resources to receive EU funds used to finance the corrupt businesses.

This has had a devastating impact on honest Romanians, who:

- have been robbed of the dividends they should have received from their country's resources,
- face unfair competition from firms enriched with EU funds and state contracts obtained through public procurement fraud,
- are overtaxed per capita compared to corrupt corporations, and
- have seen their national debt per capita skyrocket to €8,000.

The list of the ranked, first 10.000 individuals who have received these funds (through state contracts, grants, or consulting services) provides irrefutable evidence of this systemic corruption. This entrenched corruption violates fundamental human rights.

This insidious and exploitative system of corruption is perpetuated and fortified by the very institutions that are supposed to safeguard against it.



The visible systemic risk - the public institutions who are entrusted with oversight are vulnerable to political capture - is amplified by the fact that even the external investigative and auditing contracts are disproportionately awarded to those who facilitate the tax dodging practiced by corporations (the yearly EUR 200 billions that are extracted from EU countries and EUR 20 billions from Romania) and white-collar criminal networks.

**The issue is not that the European Union does not provide funds to its member states. The issue lies in the fact that 90% of these funds end up in the hands of organized criminal groups (white-collar mafia), who then utilize them for their own illicit purposes.**

**And there will be no RO-Exit because the European Union must pay damages to the 15 millions Romanian who were robbed of their country resources and faced unfair competition from the corrupt businesses financed by the European Union and its corrupt bureaucrats. The fact that some human beings received more from public funds than they deserves and than the results they obtained - breached the fundamental human rights of 18 millions robbed Romanians.**

It is imperative that the European Union take immediate action to rectify this situation. The EU must hold accountable those responsible for the theft of EU funds and ensure that these funds are redirected to projects that benefit the Romanian people. The Romanian people deserve justice and restitution for the plunder of their country's wealth.

**The only EU funds that must be prioritised for Romania at this moment, must be related to providing financial assistance to independent private investigators, auditors (not the professional enablers of tax dodging, big four companies), and independent media to identify, investigate, document, and recover the EUR 800 billions robbed by the corrupts through public procurement frauds and from state companies, from the Romanian population.**

**This high-level corruption, perpetuated by a nexus of corrupt politicians, organized criminal networks, and complicit judicial and intelligence officials, systematically robbed and robs honest Romanian citizens of their hard-earned money and rights.**

**At an EU institution level and in each EU state, the Governments must publish a ranked list of the first 100,000 individuals who have received the most money from public procurement contracts or grants funded by E.U. funds over the past 17 years.**

**The civil society deserves immediate access to this list. This list should be the number one priority in terms of investments toward government transparency and accountability.**

**The cost for providing this information should be covered, with priority, from the money already collected from taxpayers money which are meant to serve the public interest (and work for the interest) of the taxpayers, not to protect the data of some individuals (a percentage of the total from the list above) who have enriched themselves with millions of euros through public procurement fraud without providing a tangible value in return.**

This transparency-related measure will reduce the cost of investigations and public oversight, prevent corruption, and help address **the mechanisms and corruption vulnerabilities and opportunities** that enable these individuals to perpetuate the EUR 200 billion in public procurement fraud at the EU level

and EUR 10 billion in Romania. Additionally, the list should include their CVs, qualifications, results obtained, solutions provided, and independent quality evaluations/audits of their results and impact.

## **A CALL FOR ACTION: URGENT SYSTEMIC ANTI-CORRUPTION SAFEGUARDS IN THE UN CONVENTION AGAINST CORRUPTION**

**Given the context presented above, the major systemic corruption factors identified, and the corrupt practices that cause trillions of dollars in damages every year, these new anti-corruption and transparency measures can only effectively address systemic corruption if they are included in the UN Convention Against Corruption as a legally binding instrument, specifically in Article 9 (Public procurement and management of public finances) and Article 10 (Public reporting).**

**1. Enforce a legally-binding proactive disclosure for all public procurement regarding the actual beneficiaries of state contracts and grants (individual beneficiaries in whose bank accounts the money ends up), down to the level of individual shareholders and beneficiaries in whose bank accounts those funds end up, from 2008 – present.**

**Governments must publish a ranked list of the first 100,000 individuals who have received the most money from public procurement contracts or grants funded by E.U. funds over the past 17 years at EU institutions level and in each EU state.**

**The civil society deserves immediate access to this list. This list should be the number one priority in terms of investments toward government transparency and accountability.**

**The cost for providing this information should be covered, with priority, from the money already collected from taxpayers, money which are meant to serve the public interest and work for the interest of the taxpayers, not to protect the data of some individuals (a percentage of the total from the list above) who have enriched themselves with millions of euros through public procurement fraud without providing any tangible value in return.**

**This transparency-related measure will reduce the cost of investigations, prevent corruption, and help address the mechanisms and corruption vulnerabilities and opportunities that enable these individuals to commit EUR 200 billion in public procurement fraud at the EU level and EUR 10 billion in Romania.**

**Additionally, the list should include their CVs, qualifications, results obtained, solutions provided, and independent quality evaluations/audits of their results and impact.**

**The issue is not only that they receive the funds through corruption but that the value provided is only 10% of the +\$ 1 million paid to each of them.**

**This initiative can be achieved by working with the UN to improve and update the UN Convention Against Corruption, specifically Article 9 (Public procurement and management of public finances) and Article 10 (Public reporting) with these new anti-corruption and transparency measures.**

## **2. Extend the area of public procurement fraud to include money laundering in the following forms:**

a) "individuals who utilize a portfolio of projects obtained through corrupt means to secure state contracts for their new or existing firms - engage in fraudulent behavior" and

b) "the use of capital obtained through corrupt means, such as salaries earned in previous projects that an organization obtained through public procurement frauds, to finance new businesses that are then awarded (the most significant share of state contracts), should be considered money laundering and fraud".

These are corruption vulnerabilities.

**Reason: Currently, 50% of the public procurement fraud was and is happening by exploiting these corruption vulnerabilities in legislation, creating systemic corruption and unfair competition on honest entrepreneurs and undermining national economies.**

These vulnerabilities can be addressed by improving the **UN Convention Against Corruption, specifically Article 9 (Public procurement and management of public finances)**.

**3. Implement a reward system that distributes a percentage of the value of recovered funds from corruption cases to the independent journalists and investigators who identified, documented, and contributed to the successful prosecution of those cases.**

**Motivation:** This system aims to motivate individuals to obtain results and achieve high performance in the public interest and address the current corrupt and discriminatory practices that pay only the corrupts who maintain exploitative and corrupt systems in place.

**Reward Structure:**

- **Private Investigators, Civilians, Investigative Journalists:** For cases they initiated and where their work significantly aided prosecution, award 1% to 30% of the recovered funds (similar to the SEC model in the US).
- **Prosecutors and Teams:** For cases they successfully prosecute, award 0.8% to 29.2% of the recovered funds. This percentage is calculated by subtracting the costs of prosecution (salaries, administrative expenses, technology) from either 1% or 30% of the recovered funds.

**Reward results**, not institutions that can be captured by corrupt interest groups.

Reward the people who obtain the public interest goals (results) even if they have a formal contract or not.

Taxpayers pay for results.

Independent experts who achieve public interest goals even without having a contract with a formal public institution should be compensated from taxpayers' money already collected by the ministry of finance. They should be paid for their investigations and the positive impact they create, especially when their results surpass those of institutions that are paid to achieve these same goals.

These institutions block the access to "be paid for results" to: employees, most of them hired based on corrupt practices, and to their corrupt private contractors who enrich themselves with millions of euros from public funds each year while providing subpar results.

Why shouldn't independent experts be funded from the same public funds that are currently being drained by underperforming institutions and their corrupt associates?

These fraudulent schemes, orchestrated by corrupt firms, have resulted in hundreds of billions of euros in losses for the Romanian people. This corruption and high treason must be brought to an end.

Issues addressed:

**Key Points. Call To Action To Protect Human Rights: A New Standard For Justice And Financial Integrity For Sustainable Development**

- **Reward those who deliver results and achieve public interest goals, regardless of their title or affiliation. Taxpayers demand outcomes, not the perpetuation of inefficient institutions riddled with corruption.**
- **Independent expertise (experts outside of the group of the professional enablers of corruption and illicit financial flows aka the big four multinational companies) can outperform bloated, corrupt agencies. If someone produces evidence leading to recovered funds, they've done more for the public than highly paid bureaucrats who squander taxpayer money.**
- **Corrupt contractors line their pockets with public funds meant to benefit citizens. This high-level theft must end. Why not use those same funds to reward those who prove their results and truly fight for the public good?**

**Examples:** Taxpayers spent \$10 billion on agency X and external consultants to find corruption. Independent initiative like this one, with no funding, exposed a \$1 billion fraud and created anti-corruption systems to address the \$2 trillion yearly corruption and \$1 trillion public procurement fraud to the protect public interest and human rights. Justice demands I must be rewarded.

Experts who deliver exceptional results for the public, even without formal contracts, deserve to be compensated from the very funds they helped save.

**Why should taxpayer money keep enriching corrupt institutions and their cronies, instead of rewarding those who get results?**

**4. Limit the amount of public funds** a person can obtain if they receive N times more than the results they obtained, their competences, the value provided and positive impact created.

If the above initiatives are too complex to implement, and the risk that the same high level corruption and transnational mafia will continue to rob the taxes paid by the population (the human beings create the profits, not some invisible entity, and distributing the profits to corrupt entities through public procurement frauds privileging corrupt turnover is the way billions are kept in poverty and state breach their rights), then this is the a least human rights initiative that should be implemented.

There should be a maximum amount of public funds that a person can receive from state contracts. This would help to prevent the concentration of wealth and power in the hands of a few corrupt individuals.

It will also put an end to the theft of economic opportunities and human rights from honest highly-skilled professionals whose pro-bono work is more valuable than the results obtained by those with million-dollar state contracts obtained through fraudulent means.

The above mentioned legal measures and tech infrastructure meant to enhance transparency and accountability are not impossible to achieve.

I estimate they are achievable at an estimated cost of €100 billion, meaning less expensive than many irrelevant EU funded initiatives that provide no value to the EU citizens and enrich organized criminal groups.

Otherwise, this straightforward rule “capped limit on public funds receivable from state contracts per individual” can effectively address systemic corruption.

This will help achieve the Specific objective **Eliminate inequalities and discrimination and promote equality for all.**

**5. Provide upfront funds for evaluators and investigators to identify and document the theft of \$200 billions form EU funds and national funds (throgth public procuremet frauds) in the past 17 years, and stop fueling mafia networks from EU funds that provide no value to communities. The issue is not that the European Union does not provide funds to its member states. The issue lies in the fact that 90% of these funds end up in the hands of organized criminal groups (white-collar mafia), who then utilize them for their own illicit purposes:**

- **Money laundering:** Corrupt individuals use EU funds to launder their ill-gotten gains from previous public procurement frauds, enriching themselves at the expense of legitimate businesses and citizens.
- **Creating unfair competition:** Corrupt individuals use their ill-gotten wealth (financial capital and portfolio of projects obtained through corruption) as an unfair advantage over honest businesses. This creates a distorted and unjust market environment.
- **Leaving behind dysfunctional systems:** Corrupt individuals often prioritize their own personal gain over the public interest, leading to the implementation of inefficient and ineffective infrastructure.
- **Cyberattacks against whistleblowers:** Criminals spend the EU funds on firms that launch defamatory campaigns or cyberattacks against individuals who dare to speak out against their corruption. This intimidation tactic silences dissent and perpetuates the cycle of abuse.
- **Tax evasion:** A significant portion of the EU funds ends up in offshore tax havens (EU-funded state contracts awarded to companies with shareholders in tax heavens), depriving communities of the resources they need to thrive.

## **6. End financial abuses to save people and planet:**

- A corrupt and failing fiscal and financial systems coupled with the redistribution of the wealth robbed from human beings (through taxes) to organised criminal groups enriched by states through the method of fraudulent public procurement empowered by the criteria “award contracts/money based on turnover” (when that capital is obtained from frauds and human

rights abuses and EU institutions don't verify it), instead of awarding per human beings who are benefiting of those funds, perpetuates poverty, and robs the world of the resources desperately needed to tackle poverty and the climate crisis.

**Captured governments and EU institutions funnel contracts and public funds to organised criminal networks. On my time and on my money I have conducted an investigation and I have the list of these companies (as a rule, 80% of all EU- funded contracts enriched some cursed human beings with million of euro per person by the EU institutions, with money robbed from hundres of millions of europeans).**

**This happens through rigged bidding processes that prioritize wealth over merit, with no checks to ensure the legitimacy of bidders' funds/welath. As a result, communities desperately needing resources are robbed, and efforts to fight poverty and achieve the SDGs are starved of funding.**

- To transform our global economy for the common good, we must close the legal and operational loopholes that enable money laundering, corruption, and tax abuse. We must hold accountable those professionals - bankers, accountants, auditors, consultants, and lawyers, especially the multinationals consultants-accountants-lawyers - who facilitate these crimes.
- The recent pandemic and wars have pushed new hundreds of million into poverty while billionaires' wealth skyrocketed. This is morally unacceptable when a huge portion of the world's wealth remains hidden offshore, denying governments the tax revenue necessary to fund essential services.
- The consultants paid by the governments to create the fiscal systems are the multinationals who advice these billionaires and corporations on how to avoid taxes.

The current financial system enriches a few at the expense of the many, hindering efforts to eradicate poverty and achieve the sustainable development goals.

## **7. Address the professional enablers of frauds, corruption, tax dodging and money laundering**

When plutocrats, criminals and corrupt individuals seek to conceal or "clean" their stolen gains, they often turn to professional intermediaries. These enablers are the ones who make funds appear legitimate through complex schemes.

The multinational consultancies Big Four offer the whole package to these corrupt individuals both to orchestrate frauds to rob communities of their resources (see the examples: African countries, fraudulent privatisation of Petrom where E&Y was the financial consultant who undervalued the assets causing a \$10 billion loss to the romanian people, now helping fraudsters to rob \$2-6 billions from the Romanian population through Rosia Montana case: E&Y and PwC are consultant) and b) to launder the money:

Lawyers craft intricate corporate structures, accountants devise tax strategies, the bankers (in alliance with the Big Four accountants and consultants), move money using anonymous offshore accounts, art dealers and realtors handle untraceable cash deals, and even educational or charitable organizations might turn a blind eye to the criminal origins of donations.

Without the expertise of these enablers, laundering illicit wealth would be far more challenging.

Despite years of regulations and ethical codes, leaks and investigations reveal disturbingly high levels of complicity from these professionals. Their services are now vital for the flow of illegal money – what we call Illicit Financial Flows (IFFs).

New laws, like those from the U.S. Financial Crimes Enforcement Network or the UK's Economic Crime and Corporate Transparency Bill, are aimed at curbing these practices. Yet, the global, adaptive, and concealed nature of money laundering makes it hard to measure progress. Researchers offer estimates on the staggering scale of this problem, but the true extent remains hard to quantify.

### **The Evidence**

Data leaks and investigations, including the FinCEN Files, Panama Papers, Pandora Papers, Paradise Papers, and others like the Cullen Commission Report in Canada, have shed light on the extent of corruption and the central role of enablers. As scrutiny increases, more cases emerge. Following Russia's 2022 invasion of Ukraine, for example, evidence surfaced of Kremlin-linked figures hiding illicit wealth through global real estate transactions, a process in which PWC has been implicated.

**Solicitor-client privilege.** Lawyers typically enjoy solicitor-client privilege, ensuring their communications with clients remain confidential. Accountants, however, do not have this protection. This gets tricky when lawyers and accountants work together for a single client within the same firm. If an accountant represents the client when meeting with the lawyer, a gray area emerges – the lines of privilege blur. Accountants gain a level of protection through their association with the lawyer, allowing for seamless collaboration and secrecy around client affairs.

**Safe Havens (shelters/retreats) for the Corrupt:** Countries offering high levels of stability and wealth become appealing destinations for the illicit wealth of fraudsters and corrupt officials. Ironically, these havens are often developed nations perceived as financially secure. Sophisticated techniques for hiding illegal transactions are designed by a network of enablers, including lawyers, accountants, multinational big four consultants and auditors and financial institutions, who also frequently operate within these havens.

Vested interests like banks and multinational facilitators like the Big Four consultants and accountants possess significant sway over national policies and international decision-making, including capturing the EU institutions that not only did not block them for their lobby, but paid them \$4 billion to take illegal and non-democratic control of strategies, investigations, data.

This disproportionate power overtakes the ability of small businesses and civil society groups to influence policy or enforcement.

## **Transnational Mafia And The Multinational Facilitators Of Corruption, Fraud, Tax Evasion, Illicit Financial Flows And Human Rights Abuses (The Lawyers, The Big Four Firms Of Consultants, Accountants, Auditors, Bankers)**

### **Some examples of how Big Four audit and consulting companies have been involved in corruption and fraud:**

- **PWC supported Russia with \$billions during the 2022-2024 war in Ukraine. PWC has served dozens of oligarchs through its Cyprus branch, undermining global efforts to punish Putin's allies and stymie support for Russia's war machine (NOV 2023):** <https://www.icij.org/investigations/cyprus-confidential/pwc-cyprus-russia-oligarchs-ukraine-sanctions/>

- **Looting Romania and stealing from Romanians together with Gabriel Resources (Roșia Montană gold mine):**

- PwC and E&Y are paid by Gabriel Resources, with money stolen from Romanians. They are paid from the 2-4 billion euros that Gabriel Resources is now demanding from Romanians (although they have provided nothing of value for Romanians, only robbed +\$200 billions in the past decades through providing tax evasion, fraudulent business structuring and money laundering services to their clients).
- They created a fraud around the Rosia Montana gold mine to pay themselves tens of millions of euros per person with money stolen from Romanians, without any activity. They as damages with which they actually want to cover their stock market fraud:
- Proof of the BIG Four transnational mafia - gabriel resources: <https://www.accesswire.com/758163/gabriel-resources-ltd-2023-first-quarter-results>.
- I also have proof of these intermediary consultants being involved in all projects in Africa, robbing their resources there and perpetuating human rights abuses.

- **E&Y was paid 20 million for the FRAUDULENT PETROM PRIVATIZATION:** Report on the financial fraud of tens of billions of euros in damages to Romanians: <https://ioncoja.ro/privatizarea-petrom-a-fost-un-jaf-colosal/>

### **THE HISTORICAL FRAUD WITH DAMAGES OF TENS OF BILLIONS OF EUROS:**

From the consortium of consultants, the financial consultant, the one who caused the damages of hundreds of billions of euros to the Romanian people through the financial fraud and undervaluation of Petrom's assets was Ernst & Young (facilitators of tax evasion and corruption of 20 billion euros stolen from Romanians every year).

- PwC, Deloitte, E&Y, KPMG are involved in an yearly \$1 trillion tax evasion (they call it aggressive tax optimisation schemes because they infiltrate governments and practiced illegal lobby to keep these loopholes in legislation to be exploited by them).

However, **aggressive tax avoidance is included as an illicit financial flow by the UNODC.**

**These Big Four consulting and audit companies were awarded \$4 billion dollars by the EU institutions based on their turnover (there is no other reason, as their top partners are not better than top highly educated, highly intelligent and highly ethical independent professionals that are discriminated by the EU institutions and robbed of their rights and economic opportunities) in a context the turnover of these multinational consultancies big four auditors and accountants is capitalized from enabling illicit financial flows, corruption, mass human rights abuses.**



\*For the purposes of Sustainable Development Goal indicator 16.4.1, **aggressive tax avoidance is included as an illicit financial flow**. Aggressive tax avoidance is detrimental to sustainable development by the **United Nations Office on Drugs and Crime (UNODC) and United Nations Conference on Trade and Development (UNCTAD) and UN FACTI Panel report Financial Integrity For Sustainable Development**.

- PwC, Deloitte, E&Y – obtained in a fraudulent manner gold, oil and gas exploitation rights. This is human rights abuses because the population remains only with some eur millions while they and the corrupt corporations pocket EUR dozens of billions from the exploitation rights and lobbying and bribing corrupt politicians to not increase the royalties for the oil and gas exploitations.

- **Big four accounts and auditors allowed the 1MDB fraud to happen in Malaysia while being paid handsomely by this firm.** <https://www.theguardian.com/world/2018/oct/25/1mdb-scandal-explained-a-tale-of-malysias-missing-billions>

- **EY validated the €2 billion fraud at Wirecard, as the sole auditor of, for over a decade.** EY failed for more than three years to request crucial account information from a Singapore bank where Wirecard claimed it had up to €1bn in cash — a routine audit procedure that could have uncovered the vast fraud.

Source: <https://www.ft.com/content/a9deb987-df70-4a72-bd41-47ed8942e83b>

- Cheating on Exams. Ernst & Young to Pay \$100 Million Fine After Auditors Cheated on Ethics Exams. The S.E.C. said the cheating involved hundreds of the firm's workers from 2017 to 2021, resulting in the agency's largest penalty against an auditing firm.

Source: <https://www.nytimes.com/2022/06/28/business/ernst-young-sec-cheating.html>

- 40% fraudulent audits. In a report released in 2023, the Public Company Accounting Oversight Board said that roughly 40% of audits it inspected in 2022 had such significant deficiencies that the audit firm did not have sufficient evidence to support the opinion it rendered on clients' financial statements or financial reporting.

Source: <https://www.icij.org/investigations/deforestation-inc/accounting-firms-accused-of-operating-with-impunity-as-regulator-flags-growing-number-of-flawed-audits/>

- Big Four are enablers of organised criminal groups mentioned in Cyprus Confidential, LuxLeaks, The Panama Papers, and the Paradise Papers. They facilitate \$1 trillion in theft from economies through tax dodging. Source: <https://www.icij.org/investigations/>

- Big Four are involved in public procurement fraud: CNMC proposes a total fine of €47 million for Deloitte, PwC, and KPMG, among other consulting companies, for participating in a bid-rigging cartel, manipulating and allocating public tenders in the consulting services market between 2009 and 2018. Source: <https://www.twobirds.com/en/insights/2020/spain/cnmc-proposes-a-total-fine-of-47-million>

- Ernst & Young and its partners fined \$10m in S.E.C. probe of bid violations (2021).

Source: <https://www.sec.gov/news/press-release/2021-144>

- The Australian Accounting Standards Board (AASB), which provides oversight of how companies are audited, commissioned Peter Carey and George Tanewski from Deakin University to study the quality of financial reports. After more than a decade of research, Carey and Tanewski told the inquiry they

believed some of the audits performed by the so-called big four – KPMG, Deloitte, EY, and PwC – "did not uphold quality."

Source: <https://www.theguardian.com/australia-news/2023/nov/24/academic-peter-carey-censored-study-partners-board-pwc-kpmg-deloitte-ey>

- **Auditors failed to raise alarm before 75% of UK corporate collapses.**

Audit firms - **Deloitte, PricewaterhouseCoopers (PwC), Ernst & Young (EY), and KPMG** - failed to raise the alarm before three-quarters of big UK corporate collapses since 2010, according to research, raising concerns that auditors are failing to perform one of their core functions: <https://www.ft.com/content/14a63c36-ba27-495c-96c0-3d34460d73cc>

### **Exploitative Practices and Systemic Failures by Big Four Accounting Firms**

The "Big Four" accounting firms – Deloitte, PricewaterhouseCoopers (PwC), Ernst & Young (EY), and KPMG – wield significant influence in the global economy. Unfortunately, evidence indicates a concerning pattern of ethical lapses, facilitation of corruption, and disregard for the consequences of their work.

- **Exploiting Natural Resources:** PwC, Deloitte, and EY have been accused of assisting in the fraudulent acquisition of gold, oil, and gas exploitation rights in developing nations. They are alleged to have colluded with corrupt officials, resulting in populations receiving minimal compensation while corporations reap billions in profits. This pattern suggests a disregard for human rights and the economic well-being of local communities.
- **Enabling Financial Fraud:** The Big Four have been repeatedly linked to major financial scandals:
  - **1MDB (Malaysia):** Auditors were handsomely compensated while overlooking red flags in the 1MDB fraud, facilitating the theft of billions (<https://www.theguardian.com/world/2018/oct/25/1mdb-scandal-explained-a-tale-of-malaysias-missing-billions>)
  - **Wirecard (Germany):** EY, as Wirecard's sole auditor for over a decade, repeatedly failed to follow routine procedures, allowing a €2 billion fraud to persist (<https://www.ft.com/content/a9deb987-df70-4a72-bd41-47ed8942e83b>)
- **Undermining Professional Standards:** Ernst & Young was fined \$100 million in 2022 for widespread cheating on ethics exams, casting doubt on the firm's integrity (<https://www.nytimes.com/2022/06/28/business/ernst-young-sec-cheating.html>).
- **40% flawed audits.** A 2023 Public Company Accounting Oversight Board (PCAOB) report found roughly +40% of inspected audits so flawed they lacked sufficient supporting evidence (<https://www.icij.org/investigations/deforestation-inc/accounting-firms-accused-of-operating-with-impunity-as-regulator-flags-growing-number-of-flawed-audits/>).
- **Aiding Tax Evasion and Organized Crime:** The Big Four have been exposed in leaks like the Panama Papers for designing complex tax avoidance schemes, costing governments trillions (<https://www.icij.org/investigations/>)
- **Bid-Rigging and Collusion:** In Spain, the CNMC fined Deloitte, PwC, and KPMG a total of €47 million for bid-rigging and manipulating public tenders (<https://www.twobirds.com/en/insights/2020/spain/cnmc-proposes-a-total-fine-of-47->

million). Ernst & Young was fined \$10 million in 2021 for similar violations (<https://www.sec.gov/news/press-release/2021-144>)

E&Y:

### **Ernst & Young (EY) and Systemic Corruption: A Pattern of Misconduct**

**McDonald's Billion-Dollar Tax Fraud:** On June 16, 2022, McDonald's agreed to pay 1.25 billion euros (\$1.3 billion) in France to avoid prosecution for tax evasion between 2009 and 2020.

Evidence shows that EY served as McDonald's auditor since 1964, as confirmed in a 2023 report.

EY had audited and validated McDonald's (France) financial statements for over a decade. This is fraud.

**Systemic Implications:** The pattern of misconduct and the scale of these scandals raise serious questions about the Big Four accounting firms' ethics and business practices. Reform, increased oversight, and potential breakups of these firms may be necessary to prevent further harm to investors, economies, and public trust in financial systems.

Ernst & Young (EY), the sole auditor of Wirecard for over a decade, failed to identify a massive 2 billion euro fraud. For three years, EY neglected to request crucial information about accounts at a Singaporean bank where Wirecard claimed to hold up to 1 billion euros in cash – a standard audit procedure that could have uncovered the fraud.

Given that Germany and France are major contributors to the EU budget (25.6 billion euros and 12.4 billion euros, respectively), and both Germany and France banned EY for its involvement and cover-up of the frauds in the Wirecard scandal in Germany and the McDonald's tax evasion case in France, the fact that EU institutions, the EU Commission, and public authorities in EU nations continue to award lucrative contracts to EY and other Big Four firms, despite their involvement in fraudulent activities, constitutes a conflict of interest and raises suspicions of corruption within EU institutions.

This practice by European and national public officials discriminates against qualified and ethical entrepreneurs who are not affiliated with organized crime, hindering economic development.

The fact that the paid bureaucrats in the European Competition Council and in the relevant Directorate-General of the European Commission have failed and continue to fail to address these corrupt practices, where these Big Four companies generate over 20% of their turnover from servicing organized criminal groups, predatory investors involved in money laundering, and aggressive tax optimization schemes (considered illicit financial flows by UNODC, see SDG indicator 16.4.1), and these specific individuals (50-100) benefit from money robbed from millions of Europeans through taxes and by taking country loans that increase the public debt per capita, transferring these funds to organized criminal groups to which they grant access to strategic data and strategic decision-making, constitutes abuse of office and complicity with organized criminal groups.

The issue here is twofold:

1. **EY's Conduct:** EY's repeated failures in detecting and preventing major financial fraud cases call into question the company's commitment to ethical practices and the effectiveness of its auditing procedures. Their continued involvement in lucrative government contracts, despite these failures, raises concerns about potential collusion and conflicts of interest.
2. **EU Institutions' Complicity:** The awarding of contracts to companies like EY, despite their history of financial misconduct, suggests a potential lack of due diligence and transparency within EU institutions. This raises the possibility of favoritism, undue influence, or even corruption in the procurement process.

## Conclusion

This situation demands a thorough investigation into EY's practices and the EU's procurement procedures. It is crucial to ensure that public funds are not being misused and that contracts are awarded based on merit and ethical considerations, not on corrupt relationships or political influence.

## In Romania

### The Roșia Montană Case in Romania:

In Romania, EY has been involved in questionable activities related to the Roșia Montană mining project, including contracts with Gabriel Resources (May 2023-present) and the Ministry of Finance (2021-present).

These contracts raise concerns of conflict of interest, as EY is simultaneously involved with both the government and the mining company, which is currently in a legal dispute with the Romanian state.

This situation can be seen as a betrayal of national interests, undermining the Romanian economy and honest Romanian capital.

From the perspective of anti-corruption legislation, this is abuse in service of the high-level officials paid to work for public interest and they finance the facilitators and consultants of organised criminal groups, work in the interest of organised criminal groups and undermine Romanian honest capital.

### Ernst & Young (EY) and the Petrom Privatization Scandal: A Case of Systemic Corruption

EY was part of the consultant consortium paid 20 million euros for the fraudulent privatization of Petrom.

EY, as the financial consultant, was directly responsible for undervaluing Petrom's assets, resulting in a financial fraud costing Romanians tens of billions of euros. The analysis report detailing this can be found online: <https://ioncoja.ro/privatizarea-petrom-a-fost-un-jaf-colosal/>

Furthermore, EY has a 20-year contract with OMV, which could be interpreted as a bribe for favors or benefits granted to groups enriched by the harm inflicted on Romanians.

This represents a reward for defrauding the Romanian population, whose fundamental human rights have been abused

The Petrom privatization is a historic fraud with damages amounting to tens of billions of euros.

Instead of using market values (2004 market values), Petrom's assets were assessed at historical accounting values, enabling the perpetrators to steal tens of billions of euros.

The subsequent failure to increase royalties further exacerbated the theft from Romanians, orchestrated by corrupt politicians (deputies and senators). These politicians received more than their fair share of public funds, despite delivering zero results for the Romanian people, so they don't have any right to make decisions that will cause prejudices to 15 million Romanians related to their rights.

Fifteen million Romanians were deprived of their rightful share of public funds (50,000 euros each), and they should have been the ones to decide on the royalties, not corrupt parliamentarians who gifted them to foreigners and criminal networks in acts of high treason, abusing human rights, and undermining Romanian capital.

Despite substantial evidence suggesting E&Y's involvement in organized criminal activities, the Romanian Ministry of Finance awarded them contracts funded by the EU. This raises concerns about potential breaches of anti-corruption procedures and laws, as EU contributor countries have fined E&Y for similar offenses. In Romania, the company aided organized crime in exploiting oil and gas resources, evading taxes amounting to 200 billion euros over 34 years, and continuing to defraud the Romanian population through state contracts obtained with the help of corrupt officials. These actions undermine the national economy, harm honest Romanian businesses, and violate anti-corruption legislation.

The Ministry of Justice, seemingly captured by organized criminal groups, has failed to address these issues due to complicity or incompetence. Public procurement fraud within the ministry, along with evidence of bribery and breaches of human rights, further support this claim. The ministry has neglected to prosecute former intelligence officers responsible for stealing billions of dollars from the Romanian population between 1989 and 2010, allowed their illicit funds to be laundered through companies now monopolizing state contracts, and established the Asset Recovery Agency, which has been infiltrated by organized crime. This agency awarded state contracts and paid exorbitant consulting fees, have failed to implement even basic internationally recognized systems and best practices. Members of public procurement teams, high-level officials, and million-dollar paid externally contracted consultants should be held criminally accountable.

Despite all these proofs that make E&Y an accomplice to organized criminal group, the Romanian Ministry of Finance contracted and paid them with EU funds. This constitutes a breach of anti-corruption procedures and laws, as the EU funds come from countries that have fined this company.

In Romania, E&Y has helped organized criminal groups rob the Romanian population (oil and gas) and evade taxes (EUR 200 billion in 34 years).

They continue to rob the Romanian population even through state contracts with the help of corrupt public officials, undermining the national economy, honest Romanian capital, and complicit or incompetent oversight authorities and authorities tasked with corruption prevention in the Ministry of Justice.

This Ministry of Justice has been captured by organized criminal groups, as evidenced by public procurement frauds and breached laws observed while evaluating the beneficiaries of their awarded contracts, and bribes they received disguised as special pensions to breach human rights and rob 80% of the Romanian population by:

1. Not prosecuting ex-intelligence officers who robbed \$1,000 billion from the Romanian population from 1989 until 2010.
2. Allowing the corrupt capital of ex-intelligence officers to be laundered in firms that now monopolize state contracts and continue to rob the population, benefiting from taxes collected by ANAF and distributed into their accounts. The top 100 enriched individuals from state contracts (millionaires) are corrupt individuals laundering previous corruption proceeds.
3. Creating the assets recovery agency and allowing it to be captured by organized criminal groups by awarding them state contracts, paying huge consulting fees to these impostors for dysfunctional systems, and allowing them access to strategic data and decision-making. These incompetents are interested only in money and implementing dysfunctional systems with vulnerabilities to be exploited by them. These companies did not implement even 0.1% of the systems and best practices already developed at an international level.

The members of the public procurement teams, high-level officials, and consultants paid millions for nothing must be held criminally accountable.

### **Transnational Mafia BIG Four and Corruption in Romania: Evidence and Implications**

Ernst & Young (EY):

- Contracts with Gabriel Resources (May 2023 - Present): Evidence of a potential transnational conspiracy. The contractual relationship: <https://www.accesswire.com/758163/gabriel-resources-ltd-2023-first-quarter-results>.
- Contracts with the Ministry of Finance (2021 - Present):
  - Members of organized crime groups who have seized the decision-making process in the Ministry of Finance support organized criminal groups, steal from the population, and blocked my access only to come and harass, threaten, and attempt to extort additional money through fines:
  - Contracts signed by the Ministry of Finance with organized criminal groups:
    - CAN1061219: Consultancy services for electronic archiving (500,000 RON)
    - 4221306: Software development services for the SAF-T system (2,082,450 RON)

### **Laws breached:**

- Article 367 of the Penal Code: Establishment of an organized criminal group.
- Article 242 of the Penal Code: Fraudulent management.
- Law no. 78/2000: Prevention, discovery, and sanctioning of corruption acts. Article 12 - The following acts are punishable by imprisonment from 1 to 5 years if committed to obtaining for oneself or for another person money, goods, or other undue benefits:
  - a) Carrying out financial operations as acts of commerce incompatible with the function, duty, or assignment performed by a person, or entering into financial transactions using information obtained by virtue of their function, duty, or assignment.

#### Implications:

- PETROM OMV Fraud: EY is suspected of complicity in the theft of billions of euros from Romanians.
- Undermining the National Economy: Dubious contracts and potential acts of corruption severely affect Romania's economy.

#### Conclusions:

**The activities of EY in Romania raise serious questions regarding the integrity and legality of its operations. A thorough investigation is necessary to establish the truth and hold those responsible accountable.**

#### Legal Implications:

This systemic corruption, which has resulted in tens of billions of euros in damages, could potentially be prosecuted under Article 367 of the Romanian Penal Code (2009), which addresses the formation of an organized criminal group, and Article 242, which covers fraudulent management and dozens of international laws mentioned in the criminal complaints.

**Responsibility of Anti-Corruption Agencies:** It is the responsibility of anti-corruption agencies and competition councils to investigate, fine, and prosecute members of organized criminal groups who have captured EU institutions and individuals paid for decision-making in public institutions that goes against the human rights of hundreds of millions of Europeans and meritocratic criteria.

## **Probing Questions: The Big Four Multinational Consultants – Complicity in Illicit Financial Flows, State Capture, and the Cost to Society**

**Question 1:** How is it possible that the Big Four audit and consulting companies, Deloitte, Ernst & Young, KPMG, and PwC, have been linked to allegations of enabling organized criminal groups and complicity in money laundering, as reported in Cyprus Confidential, Panama and Pandora Papers, LuxLeaks, etc., **yet continue to operate with impunity?**

**Question 2:** Why has the Big Four's involvement in an estimated annual \$1 trillion of tax dodging (aggressive tax optimization schemes) for their corporations and clients not been addressed despite raising concerns about their ethical standards and potential harm to communities (by robbing money from education, healthcare, investments in R&D and infrastructure)?

**Question 3:** How can these audit and consulting multinationals (the big four) justify their 50% botched audit rate, which suggests potential gaps in their quality control processes - and yet still receive the biggest share of consulting state contracts? Not to mention they are involved in an annual \$1 trillion of tax dodging, considered illicit financial flows by UNODC. Isn't this a triple theft from the population/civil society/individuals?

**Question 4:** Is it fair that the Big Four receive preferential treatment, unfairly disadvantaging more qualified, smart, and ethical independent professionals than their top partners?

**Question 5:** What role do the U.N. and E.U. play in enabling the Big Four to maintain their dominant position, potentially constituting public procurement fraud? (This is a rhetorical question, mostly for civil society to answer.)

**Question 6:** Why is it that the Big Four consulting and audit companies are not subject to appropriate sanctions for their anti-competitive behavior and regulatory capture despite their wrongdoings harming the economy and abusing the human rights of those affected by their actions?

**Question 7:** What concrete steps do the U.N. and E.U. take to hold the Big Four accountable and correct the injustices created to the victims of their corrupt practices?

**Question 8:** When will civil society have access to a ranked list of the first 10,000 individuals who have received the most money from public procurement contracts or grants funded by E.U. funds over the past six years? What about the past 17 years? The list should include their C.V.s, qualifications, results obtained, solutions provided, and quality evaluations/audits of their results and impact.

**Question 9:** Why aren't there legal measures to unveil the consultants and facilitators of tax optimization, shell companies, and organized criminal groups contracted by large corporations in extracting wealth from the economy through aggressive tax optimization schemes? The aggressive tax optimization schemes are already considered **illicit financial flows** (IFFs) by UNODC, yet corrupt governments who rob the population through taxes beyond the individual can afford an adequate standard of living (for them and their family) offer strategic state contracts to firms in tax offshore of international fraudsters.

Why aren't these results compared to the state contracts and EU-funded contracts awarded to the partners in these firms? **This will help evaluate the extent of theft and corruption.**



In practice, the ones who rob most of a nation's wealth and pay the least taxes compared to their market share are the ones who rob the opportunities and state contracts (through corruption, unfair competition and regulatory capture, including at an EU level) from the ones who pay the most taxes for their market share and who are more deserving to obtain those contracts in terms of credentials, certifications, ethics, skillset, knowledge and potential to obtain results.

**Question 10.** How can you justify only sanctioning a politician who received a €1 million bribe from Qatar and middle eastern countries while turning a blind eye to the yearly \$billions flowing to these Big Four Consulting And Audit companies from the same sources from which they cover marketing and administrative costs for all their global networks of affiliated consulting companies? Isn't this worse than lobbying and undue influence?

**Question 11.** Why do EU institutions pay billions of dollars for strategy, consulting (activities that fundamentally influence decision-making processes in EU institutions), and investigations to these companies, facilitators or corruption, tax evasion, illicit financial flows and human rights abuses - instead of sanctioning them? Moreover, why must genuine experts register as lobbyists to present their superior anti-corruption systems and strategies when their strategies are demonstrably 1,000 times more effective than the flawed systems implemented by these companies, which contain vulnerabilities intentionally exploited for illegal self-enrichment. This constitutes a clear misuse of public funds.

Doesn't this preferential treatment of these companies suggest that they have undue influence over EU institutions? This highlights the discrepancy between the punishment meted out to a single individual for a relatively small bribe compared to the lax response to the vast sums of money being transferred to multinational consulting companies with questionable practices and professional enablers of organised criminal groups, financial frauds, undermining the economies and involved in human rights abuses.

**Question 12.** Is it acceptable for multinational companies, with billions of euros in revenue from dubious sources (+10% of their revenue is the final stage of money laundering of their clientele) to simultaneously receive billions of euros in contracts from EU institutions?

**Question 13.** Did EU institutions award audit and investigation contracts to Big Four consulting firms and dubious companies, allowing these transnational criminal networks to gain illegal control over EU institutions and use their influence to harm European citizens' interests?

**Question 14.** Why does the EU allow these companies to profit from the suffering of others while taking no action to protect its citizens? \$2 trillion is lost yearly to corruption, \$1 trillion to public procurement fraud, and \$1 trillion to aggressive tax optimization schemes—and these transnational consulting and audit Big Four companies play an active role in enabling these schemes that steal resources (\$4 trillion annually) from sustainable development goals and human rights.

**Question 15.** Isn't it time for EU institutions to take a stand against these transnational criminal networks and their corrupt partners?

## About the Author

Diana Radoane is a business strategist, Certified Fraud Examiner, and tech enthusiast with over 15 years of international experience in strategy development and execution, business improvement, IT, and compliance (anti-corruption and integrity).

### Research and Publications:

- **Anti-corruption systems for a meritocratic democracy (2023):** This independently conducted research delves into systemic corruption and public procurement fraud, proposing innovative regulatory and IT solutions to address the root causes of corruption.
- **The Code of Consciousness – a scientific approach (2020):** This book explores the potential for human bioenergetic evolution in harmony with nature and technology. However, subsequent observations of unaddressed corruption inspired the 2023 research on anti-corruption systems.
- **Dozens of technical reports and article on technical areas.**

## EDUCATION



• **Massachusetts Institute of Technology - Sloan School of Management.** 2018-2019. **Artificial Intelligence.** Computer Vision, Machine Learning, NLP, RPA, A.I. strategy, A.I. roadmap.

Grade: Excellent. Credential ID: 1519134556.

• **Palladium Group and Harvard Business School- Strategy Management,** 2012-2013. Balanced Scorecard, The Execution Premium Process (XPP). License number: 13-693.



• **The Academy of Economic Studies - Master of Business Administration, Bucharest,**

2008 – 2010. Dissertation Thesis: **Strategic Management** and Balanced Scorecard. Grade: 9.7.

• **The Academy of Economic Studies - B.Sc. in Commerce and Economics,** 2004 – 2008. Grade: 10.

### Main Areas of Expertise:

- Strategy Development and Execution
- Corporate Performance Management and Key Performance Indicators (KPIs)
- Corporate Governance and Compliance
- Policies and Procedures / Process Improvement
- Risk Management systems
- Anti-Corruption, Anti-Fraud, Anti-Bribery

- Artificial Intelligence
- Digital Transformation
- Data protection and privacy rights. Intellectual Property
- IT Competencies: Python, C, JS. Php, HTML, MS Office, BI
- Research and Innovation
- Fraud Investigations and Fraud Risk Management Programs
- Strategies to address Climate Change

### Credentials and professional training relevant to the expertise mentioned above:

#### Compliance and Law

❖ **Certified Fraud Examiner** – ACFE, March 2023.  
Credential ID ACFE Membership: #1038759. Score: 96.

#### Technology (Computer skills)

❖ **Artificial Intelligence** – MIT (2019). Score: Excellent.

#### Strategy and Sustainable Development

❖ **Certified “Balanced Scorecard Professional”** (Kaplan – Norton), License number: 13-693 – 2013. Score: 100.

- ❖ Advanced Anti-corruption – UNODC, November 2023.
- ❖ Understanding Transnational Organized Crime – UNODC, Nov. 2023.
- ❖ **Data Protection and Privacy Rights** – Council Of Europe, September 2022.
- ❖ **Intellectual Property certification** – WIPO, June 2022.
- ❖ **Certified expert in preventing and combating corruption & Anti-bribery Management System (ISO 37001:2016).** 2022. Credential ID: N/0121923.
- ❖ **ADIT - Advanced Diploma in International Taxation**, Paper I - June 2009. Score: 100 (max).
- ❖ **Python for Data Science and Machine Learning.**
- ❖ **The Complete Cyber Security Course: Network Security.**
- ❖ **CompTIA Security+**
- ❖ **Power BI Top Skills**
- ❖ **Digital Transformation 2022** - Credential ID: UC-b9521a94-198-413d-ba2e-eb103d38879c
- ❖ **IT Certificate**, Licence number: A /0066279
- ❖ **Certified “Corporate Trainer” and “Coach”.** Issuer: Ministry of Education, Romania, 2019. Credential ID: M/0086496.
- ❖ **Agile (scrum) project management certificate.** Credential ID: UC-4cc45607-8189-4bc4-bfe6-faf9856f5510
- ❖ **Climate Action: Solutions for a Changing Planet**  
**Valid Certificate ID**  
4360b339a7c642888311ef56179e442a  
Score: 100% (proof)
- ❖ **SDGs - Measuring Sustainable Development** – 2022. Credential ID: ec4c566c84f74f6488f5340ba62bc859. Score: 100.

This report focuses on practical analysis and innovative solutions to prevent and combat corruption. While no direct citations are used, some of the resources that have informed the thinking behind the research include:

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- StAR Initiative. (n.d.). *Managing Seized and Confiscated Assets - A Guide for Practitioners*.
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- UNODC. (2003). *United Nations Guide on Anti-Corruption Policies*.
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- UNODC. (2013). *An Anti-Corruption Ethics and Compliance Programme for Business: A Practical Guide*
- UNODC. (2013). *Overview of Anti-Corruption Compliance Standards and Guidelines*.
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- World Bank Group. (2010). *Integrity Compliance Guidelines*.

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- Anti-corruptions systems for a meritocratic democracy (version 1, unedited version, **Diana Radoane**): [https://www.strategie-anticoruptie.ro/\\_files/ugd/6614a5\\_50810b3e7b1f4ef084de8ee4ee7e6cca.pdf](https://www.strategie-anticoruptie.ro/_files/ugd/6614a5_50810b3e7b1f4ef084de8ee4ee7e6cca.pdf)
- According to a 2020 report from the Open Contracting Partnership and Spend Network, almost 97% of all public procurement spending around the world per year (\$12.6 trillion) is opaque (meaning there is no transparency about what the spending is).  
Source: <https://www.open-contracting.org/news/12-6-trillion-of-public-procurement-spend-each-year-is-opaque/>
- How the Big Four are embedded in European Union policy-making on tax avoidance: <https://corporateeurope.org/sites/default/files/tax-avoidance-industry-lobby-low-res.pdf>
- The European Commission's Response: The European Commission's use of consultants in preparing legislation:  
Source: [https://www.europarl.europa.eu/RegData/etudes/STUD/2022/739498/IPOL\\_STU\(2022\)739498\\_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/STUD/2022/739498/IPOL_STU(2022)739498_EN.pdf)

However, it does not address that the multinational consultancies (big four) received over \$4 billions in contracts in only 3 years.

The 450 million European Union citizens don't endorse the European Union institution's decisions to spend E.U.R. 4 billion on the Big Four consulting and audit cartel, which already causes damages of 200 billion yearly to population, extracted through tax dodging. The 450 million citizens don't want the Big Four's consulting and accounting companies partners to be enriched yearly, each with E.U.R. millions from European Union contracts, while the captured European Union institutions, with people hired and controlled by the Big Four consulting companies, discriminate more qualified and ethical professionals who haven't received their fair share from public funds because someone else is stealing it through crony capitalism.

On top of that, the national resilience plan and funds now go to political cronies. Corrupt companies in partnerships with these Big Four consulting companies are robbing most of the resources at the national level, in addition to the \$4 billion contracts at the level of European Union institutions. This corruption, anti-competitive behavior, and regulatory capture is a human rights violation of honest entrepreneurs (victims of corruption and organized criminal groups that captured the public institutions) and professionals.

The U.N. Convention against Corruption and the Organized Crime Convention state that four criteria define an "organized criminal group":

- A structured group of three or more persons
- The group exists for some time
- It acts in concert with the aim of committing at least one serious crime
- To obtain, directly or indirectly, a financial or other material benefit.