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***GEORGETOWN UNIVERSITY***

**Electoral Corruption Assessment Framework:  
A Conceptual Approach and Case Study**

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## Executive Summary

Corruption in electoral processes is diminishing electoral integrity, creating incentives to attack electoral institutions and undermine the basis of democratic governance. Electoral corruption creates an uneven playing field, further entrenches incumbents, and can provide opposition legitimate reasons to destabilize the electoral process through violence or other means.

Corruption also advantages political and economic elites and criminal elements, in turn giving them undue influence in elections and, consequently, public policymaking. Over the long term, corruption erodes the public's confidence in elections as instruments to determine governance and undercuts the trust necessary to sustain or build democratic institutions.

This report first establishes definitions on the basic terminology, tactics, and categories of corruption which are relevant to the scope of the framework. It offers a new and more focused definition of *electoral corruption* to be operationalized. This report produces a novel understanding of electoral corruption, defined as *those acts committed by state, non-state, and international entities or individuals which seek to influence the electoral legal framework, election administration, political campaigning, or electoral observation to meet their objectives of gaining or retaining political power, suppressing the opposition, or enhancing personal financial gain.*

This report then offers a theory of change, and a framework to assessing electoral corruption risks and program priorities and options. The objective of the Electoral Corruption Assessment Framework (henceforth referred to as the 'Framework') is to inform implementers in creating a comprehensive profile of electoral corruption in a given country context so that programming strategies and activities can be developed to prevent, manage, or mitigate the impact of this corruption on electoral integrity and outcomes.

There are four steps to the Framework: (1) Using internationally developed indices for democracy, corruption, and elections along with research on corruption risk factors to establish a baseline understanding of electoral corruption in a given case; (2) Identifying those political, security, social and economic factors which create vulnerabilities for electoral corruption to occur and assessing electoral corruption stakeholders from two perspectives, first – state, non-state, and international, and second – enforcement, organization, perpetration, and targeting; (3) Prioritizing program priorities in addressing electoral corruption; and (4) Creating programming strategies and activities to counter the threats of electoral corruption based upon the profile developed in the first three steps and an inventory of current electoral, anti-corruption, rule of law, and economic growth programming.

To illustrate its utility, this framework is applied for in-depth analysis of El Salvador, a Latin American country experiencing democratic backsliding and rampant corruption. El Salvador faces a host of challenges in addressing electoral corruption. Recent trends in various corruption,

democratic quality, and transparency ratings for El Salvador demonstrate the deterioration of necessary levels of institutional integrity and state capacity.

This paper highlights political, security, social, and economic risk factors that lead to increased risk. Among the myriad of risk factors identified, the paper highlights issues surrounding judicial independence, gangs, distrust of the police, and large vulnerable populations as key openings for electoral corruption. In conducting the electoral threat profile, the next stage involves identifying the relevant stakeholders who are engaged in electoral corruption. In El Salvador, the case study identifies the Supreme Electoral Tribunal (TSE) and Executive branch as the most relevant state stakeholders, gangs as the most relevant non-state stakeholders, and the Organization of American States and the United States as the most relevant international stakeholders.

There are two high-profile cases of electoral corruption in El Salvador. The first is a clear example of grand corruption; in 2004, President Francisco Flores was accused of corrupt acts, including illegal embezzlement, money laundering, illicit enrichment, and diverting funds to his hand-picked successor's election campaign. Second, in a 2021 state department report on "Corrupt and Undemocratic Actors," Luis Guillermo Wellman Carpio, a current magistrate of the Supreme Electoral Tribunal, was accused of undermining democratic processes and institutions by causing serious and unnecessary delays in election preparations, as well as tabulating elections results for his personal benefit. Both instances are clear-cut examples of electoral corruption during the pre-election phase.

International organizations, NGOs, and government entities have all provided critical funding and implementation strategies for enhancing the country's democratic institutions. With these developments in mind, it is important to take inventory of elements of pre-existing assistance programming, with special attention to historical funders and implementers of electoral, anti-corruption, rule of law, and economic growth programming. Specifically, the paper identifies the National Endowment for Democracy and the European Union as two organizations that have substantial existing programming in El Salvador.

One of the key issues preventing progress on mitigating electoral corruption is the lack of transparency, specifically regulation, reporting, and oversight measures as it relates to campaign and political finance. It is therefore essential to highlight the inadequacy of transparency mechanisms to expose pervasive corruption.

The paper proposes focusing on three key areas: reforming the TSE and anti-corruption commissions to tackle the issue of electoral corruption, strengthening campaign finance laws, and bolstering the status of independent media organizations. The report concludes with final thoughts and implications for future USAID programming. An electoral corruption programming guide has been attached based on the research in these previous sections.

## Section One: Background and Definitions

### Part One: Terminology, Tactics and Typologies

Corruption is a broad encompassing term. At its most basic, Transparency International defines corruption as the “abuse of entrusted power for private gain.” It involves the illicit use of benefits for personal gain and/or power enrichment. This in turn can manifest in five non-mutually exclusive ways, as outlined by the U.S. Strategy on Countering Corruption<sup>1</sup>:

- ***Political / grand corruption*** - When political elites steal large sums of public funds or otherwise abuse power for personal or political advantage.
- ***Bureaucratic / administrative corruption*** -The abuse of entrusted power for private gain by low to mid-level government officials in interactions with citizens and the private sector.
- ***State capture*** - When private entities corruptly influence a country’s decision-making process for their own benefit.
- ***Kleptocracy*** - A government controlled by political officials who abuse their political power to extract public resources.
- ***Strategic corruption*** - Government weaponization of corruption in foreign policy to achieve certain goals.

These manifestations in turn incorporate a variety of tactics, such as abuse of state resources, bribery, embezzlement, facilitation payments (or “greasing the wheels”), collusion, extortion, patronage, clientelism, fraud, and nepotism. Definitions of these terms<sup>2</sup> can be found later in the implementation framework.

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<sup>1</sup> “United States Strategy on Countering Corruption.” The White House, December 2021.  
<https://www.whitehouse.gov/wp-content/uploads/2021/12/United-States-Strategy-on-Countering-Corruption.pdf>.

<sup>2</sup> Except for the “abuse of state resources,” we draw from the following document to define various manifestations of corruption: “Why Corruption Matters: Understanding Causes, Effects and How to Address Them.” UK Department for International Development, January 2015.  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/406346/corruption-evidence-paper-why-corruption-matters.pdf).

<b>Abuse of State Resources</b>	When “government resources – whether material, human, coercive, regulatory, budgetary, media-related, or legislative – are misused for electoral advantage.” <sup>3</sup>
<b>Bribery</b>	“The act of dishonestly persuading someone to act in one’s favor by payment or other inducement.”
<b>Embezzlement</b>	“To steal, misdirect or misappropriate funds or assets placed in one’s trust or under one’s control. From a legal point of view, embezzlement need not necessarily be or involve corruption.
<b>Facilitation Payments</b>	“A small payment, also called a ‘speed’ or ‘grease’ payment, made to secure or expedite the performance of a routine or necessary action to which the payer has legal or other entitlement.”
<b>Fraud</b>	“The act of intentionally and dishonestly deceiving someone in order to gain an unfair or illegal advantage” financially, politically, or otherwise.
<b>Collusion</b>	“An arrangement between two or more parties designed to achieve an improper purpose, including influencing improperly the actions of another party.”
<b>Extortion</b>	“The act of impairing or harming, or threatening to impair or harm, directly or indirectly, any party or the property of the party to improperly influence the actions of a party.”
<b>Patronage, Clientelism, Nepotism</b>	“Patronage at its core means the support given by a patron. In government, it refers to the practice of appointing people directly.”

For now, this report notes that *electoral corruption* can also entail these acts and indeed operate as an abuse of trust, but is conceptualized here as focused on influencing the electoral process. This paper thus defines it as *those acts committed by state, non-state, and international entities or individuals which seek to influence the electoral legal framework, election administration, political campaigning, or electoral observation to meet their objectives of gaining or retaining political power, suppressing the opposition, or enhancing personal financial gain*. Acts of electoral corruption are here distinguished from acts of electoral malpractice, electoral fraud, and systemic manipulation in that electoral corruption is the catalyst and resource enabling these other acts to occur.

<sup>3</sup> Grace, Laura. “How Citizen Organizations Can Monitor Abuse of States Resources in Elections: An NDI Guidance Document.” National Democratic Institute, 2021.  
[https://www.ndi.org/sites/default/files/NDI\\_States-Resources-Elections\\_EN.pdf](https://www.ndi.org/sites/default/files/NDI_States-Resources-Elections_EN.pdf).

**Electoral fraud** is defined as “deliberate wrong-doing by election officials or other electoral stakeholders, which distorts the individual or collective will of the voters.”<sup>4</sup> Deliberate actions or omissions by election officials, other public officials, voters, political parties, candidates, and media constitutes interference with individual and overall vote counts.

**Electoral malpractice** is defined as “the breach by an election professional of his or her relevant duty of care, resulting from carelessness or neglect.”<sup>5</sup> Electoral malpractice by election management officials, although may not have clear intention or is difficult to prove, can still result in criminal prosecution and penalties.<sup>6</sup>

**Systemic manipulation** denotes “the use of domestic legal provisions and/or electoral rules and procedures that run counter to international public law principles and obligations, and that purposefully distort the will of voters.”<sup>7</sup> An example of systemic manipulation in elections could include a political actor changing the electoral rules, such as requiring an egregious number of signatures a candidate must receive to be placed on the election ballot. This would significantly alter the playing field against the opposition parties or candidates challenging the incumbent.

The difference between electoral fraud and electoral malpractice is that fraud is deliberate whereas malpractice is not necessarily intentional. Though both acts are illegal, “A poll worker who places a stack of pre-filled ballots in the ballot box on Election Day has committed fraud; that same polling worker who forgets to attach security seals to a ballot box may have breached his duty of care and committed malpractice. When developing fraud deterrence and mitigation strategies, this is an important distinction, and one which will shape approaches to ensure the integrity of elections.”<sup>8</sup>

Electoral fraud might be committed in the name of overall electoral corruption. The conceptual distinction between the two is incredibly obscure but electoral corruption generally speaks to the manipulation of overall systems involved in electoral processes, and can include fraud in an effort to alter electoral systems and political outcomes for personal, political or economic gain. Given their intrinsically interconnected relationship, distinguishing between the two must be done on a case-by-case basis.

One example of electoral fraud that falls under electoral corruption is vote-buying, as this is a conscious attempt of a political actor to manipulate the electoral system to gain or preserve power. An example of election fraud that may not be considered electoral corruption is voter

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<sup>4</sup> Vickery, Chad, and Erica Shein. “Assessing Electoral Fraud in New Democracies: Refining the Vocabulary.” International Foundation for Electoral Systems, May 2012.  
[https://www.ifes.org/sites/default/files/assessing\\_electoral\\_fraud\\_series\\_vickery\\_shein.pdf](https://www.ifes.org/sites/default/files/assessing_electoral_fraud_series_vickery_shein.pdf).

<sup>5</sup> Ibid, pg 10.

<sup>6</sup> Ibid, pg 10.

<sup>7</sup> Ibid, pg 13.

<sup>8</sup> Ibid, pg 11.

impersonation because it is a deliberate act but the voter is not directly abusing their power to benefit themselves. Systemic manipulation practices such as the example above could be considered electoral corruption because the political actor is using their office or power to directly influence electoral outcomes to stay in power.

There are several relevant components of electoral processes that relate to our conception of corruption. This report considers *electoral processes* to be the public processes by which administrative, legislative, and judicial offices are chosen. This can include the acts of voter registration, campaigning, voting, vote tabulation, the adjudication of disputes, and vote certification. The framework examines vulnerabilities for corruption within each of these activities during phases of the electoral cycle. There are three main phases of the electoral cycle: pre-electoral, electoral, and post-electoral, each offering separate opportunities for corruption.

In examining electoral processes, this report also examines the *political party system*, or the system by which political parties and candidates are established, operate, and are funded. The personalistic features, legal framework, and organizational structure all affect vulnerabilities for electoral corruption, given that parties are a focal point of political representation and interest articulation.

The *electoral / campaign finance system* is another component, defined here as the mechanisms surrounding electoral finance, campaign spending and fundraising disclosure, and other financial considerations.

Two other important state institutions associated with electoral processes are electoral management bodies (EMBs) and the electoral justice system. Going off of definitions established by the International Foundation for Electoral Systems, this report considers *EMBs* to be the entities responsible for electoral management, regardless of the wider institutional framework in place. The *electoral justice system* is meanwhile considered to be the means and mechanisms for ensuring each action, procedure, and decision related to the electoral process is in line with the law, resolving election disputes, and for protecting or restoring the enjoyment of electoral rights.

There are other relevant state institutions in analyzing electoral corruption, but prime among them are anti-corruption commissions and agencies, the judicial system, and the security sector.

*Anti-corruption commissions and agencies* are those government bodies charged with the investigation of corruption. While anti-corruption commissions and agencies have general responsibility to investigate all forms of corruption, the framework will examine the efficacy in investigation of acts of electoral corruption in particular.

The *Judiciary* is the conventional jurisprudential system of courts of first instance and appeals. The framework will assess the efficacy of the prosecution of crimes of electoral corruption in conventional courts.

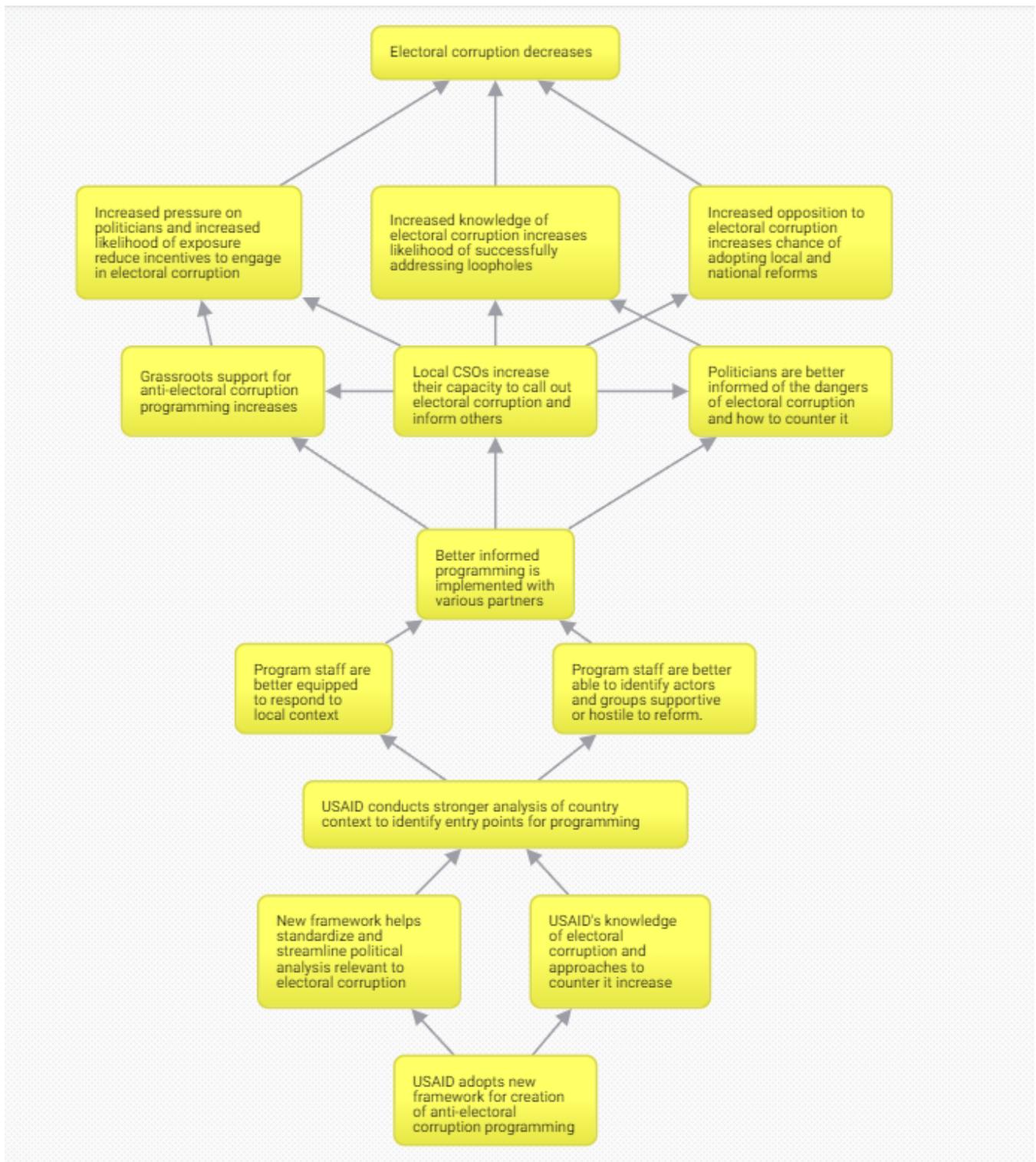
The *Security Sector*<sup>9</sup> entails formal and informal actors who are involved in the provision of security services at the national and local levels, including uniformed services such as the police, armed forces, or paramilitary. They can be involved in electoral security and be either perpetrators or targets of election-related corruption.

Equally important are *election and anti-corruption observation organizations*, which can be domestic, regional, or international. Domestic organizations can include non-partisan independent election observers like civil society organizations and other NGOs, as well as government-organized non-governmental organizations (GONGOs), zombie election monitors, and fake NGOs run by government allies. International organizations can entail bilateral diplomatic election observation missions, international non-governmental organizations, and inter-governmental organizations such as the Organization for Security and Cooperation in Europe (OSCE) and the Economic Community of West African States (ECOWAS), and others.

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<sup>9</sup> “Democracy, Human Rights, and Governance: Security Sector Governance.” USAID, December 2021. <https://www.usaid.gov/sites/default/files/documents/SecuritySectorReformTwoPager12.2020.pdf>.

## Part Two: Theory of Change



**IF** USAID adopts the framework approach, particularly in its comprehensive analysis of the country context, and **IF** a regional context is amenable to accepting democracy assistance programs, **THEN** USAID will streamline and standardize political economy analysis and increase its knowledge of electoral corruption approaches, which will **THEN** allow it to conduct stronger analysis and identify entry points for programming. **IF** this framework successfully builds USAID's information capacity on electoral corruption, they will **THEN** be better equipped to use this information to more efficiently deploy assistance related to electoral integrity and corruption. **IF** this knowledge is applied, it will **THEN** lead to better equipped program staff, who are able to identify relevant actors supportive or hostile to reform and better respond to local context, which will **THEN** lead to more effective democracy assistance programs **BECAUSE** programs will be better situated to respond to and build the local demand necessary to counter and prevent electoral corruption. **IF** better informed and localized programming is implemented as a result, it will **THEN** build grassroots capacity and pressure to force systematic reforms and change incentives for electoral corruption. The improved programming will **THEN** create a positive feedback loop that increases civil society capacity, information, and pressure that can lead to bottom-up and top-down change that gradually reduces incentives and opportunities for electoral corruption. This feedback loop will be effective **BECAUSE** corruption generally requires broad coalitions and mass support to support lasting change and challenge stubborn political systems.

This theory of change operates under the assumption that USAID will use the new framework as guidance that informs relevant anti-electoral corruption programs. It also assumes, given USAID's commissioning of this study, that USAID will have ample funding and political will to support relevant democracy assistance programming to address electoral corruption. It also assumes a country and/or its municipalities have a political space that is not entirely closed. Additionally, this theory of change anticipates an ability to have a long-term commitment to assistance programming, as technical support alone cannot effectively build or reform the institutions necessary to mitigate electoral corruption.

## **Section Two: Electoral Corruption Assessment Framework**

This section provides a methodology for conducting an electoral corruption assessment. The objective of the Electoral Corruption Assessment Framework (henceforth referred to as the ‘Framework’) is to inform implementers in creating a comprehensive profile of electoral corruption in a given country context so that programming strategies and activities can be developed to prevent, manage, or mitigate the impact of this corruption on electoral integrity and outcomes.

There are four steps to the Framework: (1) Using internationally developed indices for democracy, corruption, and elections along with research on corruption risk factors to establish a baseline understanding of electoral corruption in a given case; (2) Identifying those political, security, social and economic factors which create vulnerabilities for electoral corruption to occur and assessing electoral corruption stakeholders from two perspectives, first – state, non-state, and international, and second – enforcement, organization, perpetration, and targeting; (3) Prioritizing program priorities in addressing electoral corruption; and (4) Creating programming strategies and activities to counter the threats of electoral corruption based upon the profile developed in the first three steps and an inventory of current electoral, anti-corruption, rule of law, and economic growth programming.

### **Step 1: Assess the Country Case Context**

The first step in the Implementation Framework is the assessment of the country case context. Evaluating the country case context requires the analysis of baseline indices for levels of corruption and electoral integrity and the analysis of four distinct types of risk factors, (political, security, social, and economic), that create vulnerabilities for electoral corruption to occur.

#### **Electoral Corruption Baseline Indices**

Electoral Corruption Baseline Indices can be consulted to provide a broad understanding of the corruptive environment. These ratings can come from a number of indices, such as Varieties of Democracy (V-Dem)’s Democracy Rating, Transparency International’s Corruption Perception Index, or Electoral Integrity Project’s Perceptions of Electoral Integrity Index. These ratings provide a broad overview of the status of democratic governance, the levels of corruption, and the quality and integrity of electoral processes.

#### **Electoral Corruption Risk Factors**

The index ratings previously identified can be used to inform the identification of the electoral corruption risk factors. These factors manifest in four primary categories:

### *Political Risk Factors*

The political system of a country is pivotal to the likelihood and manifestation of electoral corruption, with a variety of factors to consider. Key among these risk factors is regime type, specifically in how the government is structured and how leaders exercise power. Regime type particularly can influence the type of electoral corruption likely to be most pervasive, as well as its magnitude. Examples of regime types can include, (but are not limited to), Closed Autocracies, Electoral Autocracies, Electoral Democracies, and Liberal Democracies. Political risk factors can also include political will, or the demonstrated likelihood of actors to follow-through on anti-corruption measures or resist engaging in corruption.

The electoral system can also be evaluated in conjunction with the regime type to understand how leaders are elected as well as how they exercise power in order to properly evaluate vulnerabilities to electoral fraud and malpractice. When evaluating the electoral system, the duration and characteristics of each phase of the electoral cycle should be considered, as each phase can provide unique opportunities for electoral corruption.

The legal sphere can additionally be analyzed, taking into account pre-existing election and anti-corruption legal frameworks related to overall electoral administration. Additional guidance from pre-existing systemic frameworks includes topics ranging from: electoral systems (both national and subnational), political party systems, political finance systems, electoral justice systems, civil and criminal justice systems, anti-corruption systems, and enforcement/policing systems. The priority focus of this analysis should be on how effective the legal frameworks currently in place are in limiting corruption, or if there are significant loopholes that corruption is able to utilize (for example, how independent the judiciary is from the other branches). Altogether, these frameworks can inform future implementation programming based on a country case context approach. Political factors can also include bilateral or multilateral sanctions against regime for corruption, electoral system, political party system, political finance, anti-corruption enforcement, and independence of the EMB.

### *Security Risk Factors*

Security risk factors can include factors such as a post-conflict environment, where the conflict may still influence those in power. Cleavages and tension stemming from the conflict may persist into the political climate more broadly, increasing the risk of electoral corruption. The security sector, such as the military and police force, can be analyzed as well, especially if it is particularly partisan or polarized following a conflict. The crime rate in the country may also be indicative of certain risks if it is particularly high or prevalent in certain areas. How crime organizes itself may also be a risk, as highly organized crime may provide avenues for corruption.

### *Social Risk Factors*

Social risk factors can include public attitudes and tolerance for corruption, role of social media, and other factors. A high social tolerance for corruption or a strong deference to authority can exacerbate the presence of electoral corruption by limiting the degree of consequences faced by perpetrators. Social media can play a role as well, as it can be a strong tool for either political transparency or the spreading of disinformation. Societal involvement in the political system as a whole can factor into electoral corruption as well, as a disconnected populace may not have a strong awareness of corruption in the electoral system.

### *Economic Risk Factors*

Economic factors can severely alter the magnitude and tolerance of electoral corruption. High unemployment, poverty, or economic inequality (as measured, for example, by the Gini coefficient) can determine who is involved in electoral corruption, altering the scale and locations of actors. The percentage of Gross Domestic Product (GDP) that is derived from natural resources may produce decreased reliance on the population for state revenue, potentially shifting the priorities of elected officials away from non-corrupt behavior.

## **Step 2: Electoral Corruption Threat Profile**

The second step in the implementation Framework is the electoral corruption threat profile. This requires a comprehensive review of both the history of electoral corruption in recent elections as well as any recent procurements of election technologies and equipment. This review is accomplished by first identifying the relevant stakeholders and then moving to a review of the typologies of the relevant corruption types, motives, corruptive tactics and phases of the electoral cycle in a given case.

### **Electoral Corruption Stakeholders**

In conducting the electoral threat profile, the next stage involves identifying the relevant stakeholders who are engaged in electoral corruption at any capacity. When identifying these stakeholders, their level will also be identified, i.e., national or subnational in nature. Electoral corruption stakeholders will be identified through three perspectives.

First, state stakeholders include regulatory, security and judicial bodies. Regulatory stakeholders include EMBs and anti-corruption commissions. Security stakeholders include police and military. Judicial stakeholders include electoral and traditional justice authorities. The assessment will moreover identify any explicit coordination mechanism that has been established among these regulatory, security, and judicial stakeholders for the purposes of electoral corruption enforcement.

Second, non-state stakeholders include but are not limited to: political parties, election monitoring groups, anti-corruption monitoring groups, media, traditional leaders, election

equipment and supply vendors, financial institutions, extractive industries, other relevant private sector actors, and criminal organizations.

Third, International Stakeholders such as inter-governmental organizations (IGOs) and non-governmental organizations (NGOs) with anti-corruption, electoral assistance, rule of law programming, or economic growth in these areas as well as governments, private enterprise, and criminal organizations. Among these three sets of stakeholders, they are further identified as enforcers, organizers, perpetrators, and targets.

In assessing relevant stakeholders, implementers should identify which stakeholders play the largest role in both maintaining and mitigating corruption, the nature and size of resources available at their disposal, and how the identified stakeholders interact with one another.

### **History of Electoral Corruption Profile**

With the universe of stakeholders identified, the next step of the threat profile is to examine the relevant types of corruption, motives, tactics, and timing where corruption has occurred. This evaluation will include identifying the connection of the corruptive tactics to the electoral malpractice, fraud, and systematic manipulation tactics which have been employed historically to impact electoral integrity and outcomes.

#### *Types of Corruption*

There are five different types of electoral corruption, Political/Grand Corruption, Bureaucratic/Administrative Corruption, Kleptocratic Corruption, State Capture, and Strategic Corruption. This assessment should include a comprehensive review of both contemporary types and historical instances of electoral corruption in a given state. Further explanation of these typologies can be found in *Section One: Background and Definitions*.

#### *Motives*

The next category for assessment is the motive for electoral corruption. While influencing the outcome of an election is the overall objective of acts of electoral corruption, in this context motive is defined as resulting in financial gains for the organizers and the perpetrators. The underlying motive for this financial gain should additionally be discerned, as it may be used for personal gain, to maintain political power, or both.

#### *Corruptive Tactics*

There are a number of corruptive tactics that organizers may utilize; extensive definitions can be found in *Section One: Background and Definitions*. Tactics can include Abuse of State Resources, Bribery, Embezzlement, Facilitation Payments, Collusion, Extortion, Patronage, Clientelism, Nepotism, Fraud, and Systemic Manipulation. The latter two tactics represent the means by which the election outcomes are influenced. With Fraud and Systemic Manipulation,

the voter may or may not be complicit. For example, in the cases of multiple voting and vote buying, the voter is complicit. However, other examples of Fraud may involve bribing election officials and illicit political financing.

### *Timing of Electoral Corruption*

The timing of electoral corruption cases can be analyzed to identify risk periods of electoral corruption. There are two key perspectives to consider on the timing. The first is in the context of the electoral cycle and how corruption may manifest differently throughout each phase. The second is in the context of other timeline considerations. Events such as state or cultural holidays or other notable events (natural disasters i.e., COVID-19, economic crises, etc.) may offer unique opportunities for electoral corruption to occur with reshifted priorities and attention.

### *Role of Social Media*

Please note: In working through the electoral corruption threat assessment, it is vital that the role of social media is considered and the myriad ways it may manifest. Depending on the context, social media can be an avenue for corruption, a target for manipulation, a tactic, and even a relevant actor. Therefore, it must be considered at every stage of the assessment process.

## **Step 3: Define Program Priorities**

### **Inventory of Assistance Programming, Funders, and Implementers**

Existing facets of local election administration, including election observation, anti-corruption work, political party programming, and rule of law compliance can be used to improve the threat assessment and potential risk management strategies within the framework. The purpose of this inventory is to avoid redundancies in programming and identify gaps in programming that can be filled, overall saving time and money. Moreover, existing programming in the country should be identified and thoroughly evaluated, particularly in how it may work towards or interfere with the program goals. An analysis of economic growth should also be included to determine the capability of the proposed programming funders and implementation apparatus.

### **Focus on Key Points from Previous Steps**

It is vital that implementers assess the takeaways from the previous steps of the Framework to determine the priority for addressing potential threats. Once the key points are identified, they can be sequenced in order of priority, depending on the case context. For instance, key points from previous steps may include an assessment of regime type, pre-existing election and legal frameworks, or an inventory of the available funders and implementers. A reexamination of key points in this step can shape the priorities that then define the programming proposals.

### **Prioritize Key Areas, Threats, and Entry Points**

Through an identification of the key points from previous steps, and with the inventory of existing anti-corruption implementers and programs, each potential threat must be prioritized to

fit the case country's context. Programming cannot be successful if implementers attempt to tackle every issue at once; threats must be prioritized by their relevance to the program plan and the most immediate danger they pose to a country's electoral system. This prioritization of key areas and threats should inform the overall program priorities and ensure that they are feasible to address within the case context. Further, determining the highest priority areas by feasibility for implementation allows implementers to identify key entry points for potential programming.

#### **Step 4: Conceptualize Program Options**

Finally, the implementation Framework culminates with the conceptualization of program options. Taking into account the key areas and threats identified in step three, the objectives of the programming can be clearly defined, focusing on the most important and feasible targets.

#### **Localization Strategy**

Once the programming objectives have been defined, localization strategy should be kept in mind in the conceptualization phase. In accordance with USAID guidelines (most recently the 2019 New Partnership Initiative), priority should be placed on incorporating local voices when defining priorities and programming, as well as increasing the percentage of funding directed towards local actors.

#### **Conceptualize Programming**

With localization strategy in mind, conceptualizing the programming can begin. Programming options should target the program priorities through key entry points while taking the case context into account. More examples of programming options can be found in the programming guide accompanying this Framework; however, some examples include improving the legal framework, enhancing enforcement of anti-corruption laws, and promoting monitoring and accountability. A number of questions should be answered while designing the programming, particularly surrounding the level of effort intended, the desired period of implementation, the role of the electoral calendar, and cost considerations. Lessons learned from previous programs pertaining to what does and does not work can be considered as well, with more information on ideal programming options found in the included programming guide. Programming should additionally work around or in tandem with any pre-existing programming that already targets the program priorities.

#### **Identify International and Domestic Implementing Organizations for Partnership**

With the programming conceptualized, the ideal international and/or domestic partners for implementation can be identified. Who these partners are will depend on their individual capacities, however local actors should be kept in mind and prioritized as per localization strategy.

## Section Three: Case Study - Electoral Corruption in El Salvador

### Step 1: El Salvador Case Context

#### *Introduction to El Salvador*

El Salvador faces a host of challenges in mitigating electoral corruption, highlighting the need for a multi-faceted approach encompassing political, economic, institutional, security, and other factors. Recent trends in various corruption, democratic quality, and transparency ratings for El Salvador demonstrate the deterioration of necessary levels of institutional integrity and state capacity. The rise in perceptions of corruption, decline of electoral integrity, and consistently being rated at the bottom 30-40% of countries evaluated for democratic quality highlight the broader, structural shifts in the country's political system. These concerning assessments underscore not only the experiences of El Salvadorans facing anti-democratic movements, but also the country's stance on the global stage, affecting political relationships and economic activity.

#### **El Salvador Regime Type and Electoral Corruption Indices**

According to the *V-Dem Institute*, El Salvador's regime type is categorized as an electoral autocracy, having regressed from an electoral democracy as of 2021.<sup>10</sup> *Freedom House* scores the country as "Partly Free," with El Salvador scoring 30 out of 40 for political rights and 33 out of 60 for civil liberties.<sup>11</sup> On V-Dem's Liberal Democracy Index (LDI), which measures to what extent the ideal of "liberal democracy" is achieved in a given country, El Salvador scored 0.21 out of 1.00, ranking 119th in the world, leaving it in the bottom third of countries evaluated.<sup>12</sup> El Salvador's ranking on this index has steadily declined over the last 10 years, leading to its new categorization as an electoral autocracy.

*Transparency International* publishes a Corruption Perceptions Index (CPI) each year for 180 countries, which measures the perception of public sector corruption reported by experts and businesspeople from surveys and assessments. The score represents the perceived level of corruption on a scale of 0-100, where 100 is clean and untainted and 0 is highly corrupt.<sup>13</sup> In 2021, El Salvador ranked 115th out of the 180 countries and had a score of just 34 out of 100.<sup>14</sup> The score indicates El Salvador has major corruption issues.

<sup>10</sup> "Democracy Report 2022: Autocratization Changing Nature?" V-Dem Institute, 2022. [https://v-dem.net/media/publications/dr\\_2022.pdf](https://v-dem.net/media/publications/dr_2022.pdf).

<sup>11</sup> "Freedom in the World 2020: El Salvador." Freedom House, 2020. <https://freedomhouse.org/country/el-salvador/freedom-world/2020>.

<sup>12</sup> "Democracy Report 2022: Autocratization Changing Nature?" V-Dem Institute, 2022. [https://v-dem.net/media/publications/dr\\_2022.pdf](https://v-dem.net/media/publications/dr_2022.pdf).

<sup>13</sup> "The ABCs of the CPI: How the Corruption Perceptions Index Is Calculated." Transparency International, 2021. <https://www.transparency.org/en/news/how-cpi-scores-are-calculated>.

<sup>14</sup> "2021 Corruption Perceptions Index." Transparency International, 2022. <https://www.transparency.org/en/cpi/2021/index/slv>.

The Perceptions of Electoral Integrity Index, conducted by the *Electoral Integrity Project*, evaluates countries based on experts' assessment from each country on election quality in a cumulative study from 2012-2018.<sup>15</sup> The evaluations take into account the pre-election, campaign season, the election day(s), and the post-election to gauge a comprehensive score. On this index, El Salvador scored 54 out of 100, indicating a lower level of election integrity.

## **Electoral Corruption Risk Factors in El Salvador**

### *Political Risk Factors*

#### Electoral System

El Salvador has a unicameral structure of parliament, the Legislative Assembly, which has 84 directly elected representatives that represent 14 multi-member constituencies (3-24 seats).<sup>16</sup> The country's voting system is proportional, meaning that the electoral selects their representatives by voting for:

- a party or coalition (with possibility of indicating preference for candidates);
- individual candidate registered with a party or belonging to a coalition;
- Individual candidates registered with different parties in their constituency.<sup>17</sup>

The electoral system and constitutional guarantees are mechanisms designed to safeguard the electoral process, however enforcement and institutional capacity, in addition to other components, create opportunity for electoral corruption.

#### Political Party System

Prior to 2019, El Salvador effectively had a two-party system: the conservative right-wing Nationalist Republican Alliance (ARENA), and the Farabundo Martí National Liberation Front (FMLN).<sup>18</sup> Due to the public's growing resentments and dissatisfaction of the political atmosphere, 2019 saw new political movements reshaping the preexisting party dynamics.<sup>19</sup> Current president Bukele overcame both dominant parties—ARENA and FMLN—by a wide margin. However, he was unsuccessful in receiving the same support in parliamentary elections, thus limiting his ability to pass legislation.<sup>20</sup> This presents a risk for Electoral Corruption because the unilateral victory of one party and the inability for other parties to provide important checks and balances may have consequences on other important institutions, the legislative and the judicial, for example, which themselves affect electoral corruption.

<sup>15</sup> Grömping, Max, and Pippa Norris. "Electoral Integrity Worldwide." Electoral Integrity Project, 2019. <https://static1.squarespace.com/static/58533f31bebafe99c85dc9b/t/604785d34098312195a143ee/1615300055051/Electoral+Integrity+Worldwide.pdf>, pg. 4.

<sup>16</sup> "EL SALVADOR: Asamblea Legislativa (Legislative Assembly)." Inter-Parliamentary Union, 2016. [http://archive.ipu.org/parline-e/reports/2099\\_b.htm](http://archive.ipu.org/parline-e/reports/2099_b.htm).

<sup>17</sup> Ibid.

<sup>18</sup> Herbrink, Sabine, and Juan Meléndez. "NIMD Country Programme: El Salvador." Netherlands Institute for Multiparty Democracy, n.d. <https://nimd.org/programmes/el-salvador/>.

<sup>19</sup> Ibid.

<sup>20</sup> Ibid.

### Political Finance System

Political finance regulations in the country are largely insufficient, both in quantity and scope. There are minimal reporting or oversight measures to ensure transparency of political financing:

- political parties do not have to report regularly on their election campaign finances;
- Individual candidates do not have to report regularly on their election campaign finances;
- third parties do not have to report regularly on their election campaign finances;
- information in reports from political parties and/or candidates is no required to be made public;
- political parties and/or candidates do not have to reveal the identity of donors in reports.<sup>21</sup>

In 2013, there were failed attempts to reform political financing, called the 2013 Political Parties Act; however, these efforts were undermined by El Salvador’s Constitutional Court, which ruled that the changes were unconstitutional.<sup>22</sup>

The use of “Bitcoin” as an official federal legal tender in El Salvador has also raised questions surrounding electoral finance regulations, and international agencies like the IMF have urged the country to reverse this decision for various reasons.<sup>23</sup> Because of the untraceable nature of cryptocurrencies like Bitcoin, violations of electoral finance laws could take place at the highest and lowest levels of government with little recourse available for anti-corruption agencies.<sup>24</sup> Since there are very minimal regulations on reporting and contribution limits, candidates and parties are able to exploit such deficiencies and risk factors undermining electoral integrity.

### Electoral Justice and Anti-Corruption System

Human Rights Watch reports that Bukele’s administration has been proactively undermining electoral justice and anti-corruption mechanisms, specifically by undermining judicial independence and limiting accountability.<sup>25</sup> In June 2021, El Salvador withdrew from the International Commission Against Impunity in El Salvador (CICIES), an anti-corruption accord under the Organization of American States (OAS), in response to the organization’s decision to support investigations into high-ranking administration officials accused of corruption.<sup>26</sup> Bukele’s supporters in the Legislative Assembly passed a law granting impunity for government

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<sup>21</sup> Herbrink, Sabine, and Juan Meléndez. “NIMD Country Programme: El Salvador.” Netherlands Institute for Multiparty Democracy, n.d. <https://nimd.org/programmes/el-salvador/>.

<sup>22</sup> Ibid.

<sup>23</sup> BBC News. “IMF Urges El Salvador to Remove Bitcoin as Legal Tender,” January 26, 2022. <https://www.bbc.com/news/world-latin-america-60135552>.

<sup>24</sup> Burcher, Catalina Uribe. “Cryptocurrencies and Political Finance.” International Institute for Democracy and Electoral Assistance, February 2019. <https://www.idea.int/sites/default/files/publications/cryptocurrencies-and-political-finance.pdf>.

<sup>25</sup> “El Salvador: Legislature Deepens Democratic Backsliding.” Human Rights Watch, 2021. <https://www.hrw.org/news/2021/11/01/el-salvador-legislature-deepens-democratic-backsliding#>.

<sup>26</sup> Ibid.

officials and contractors responsible for emergency purchases during the COVID-19 pandemic, and stopped the attorney general's office from conducting investigations of the finance and health ministers.<sup>27</sup> The continued efforts to undermine electoral justice mechanisms and withdrawal from anti-corruption across by the Bukele government poses important risks to electoral integrity,

### Traditional Court System

Judges must be elected by the legislative branch upon the recommendation of “the National Council of the Judicature, an independent body elected by the Legislative Assembly, and the Bar Association.”<sup>28</sup> Further, judges are elected for 9-year terms, with renewal of one-third of membership every 3 years, and consecutive reelection is allowed.<sup>29</sup>

*Freedom House* notes that judicial independence is persistently disrespected by the government and is affected by corruption.<sup>30</sup> Government officials oftentimes disregard Supreme Court decisions, and influential individuals are able to avoid justice.<sup>31</sup> Due to these efforts by the current government, diminished judicial independence opens up possibilities for further electoral manipulation and decreased legitimacy in judicial mechanisms.

### *Security Risk Factors*

Gangs and crime organizations pose the most significant security threat to El Salvadorans by threatening peaceful, free and fair elections. Relevant tactics include controlling homicides to bolster or hinder an incumbent on security issues, extortion payments from political actors to campaign, and either seizing voter identity documents or directly threatening voters, sometimes at the behest of candidates or parties.<sup>32</sup> These gangs and corrupt police undermine voter safety, damage institutional trust, and preserve corrupt electoral practices. Further, it notes that public perception of insecurity is high as ongoing gang violence, widespread extortion, and a lack of economic opportunities continue to drive irregular migration from El Salvador to the United States.<sup>33</sup> The high prevalence of gangs and persistent violence creates severe risk factors for peaceful, orderly, and transparent elections as citizens face instability and insecurity in day-to-day lives. For example, in order to fulfill its duties, the Supreme Electoral Tribunal is forced to

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<sup>27</sup> “El Salvador: Legislature Deepens Democratic Backsliding.” Human Rights Watch, 2021. <https://www.hrw.org/news/2021/11/01/el-salvador-legislature-deepens-democratic-backsliding#>.

<sup>28</sup> Ibid.

<sup>29</sup> Ibid.

<sup>30</sup> “Freedom in the World 2021: El Salvador.” Freedom House, 2021. <https://freedomhouse.org/country/el-salvador/freedom-world/2021>.

<sup>31</sup> Ibid.

<sup>32</sup> Fischer, Jeff. How Gang Electoral Violence Threatens Voters in El Salvador, 2018. <https://www.creativeassociatesinternational.com/stories/how-gang-electoral-violence-threatens-voters-in-el-salvador/>.

<sup>33</sup> Ibid.

work in gang-controlled territories, leading to increased opportunities for gangs to exert influence over electoral processes.<sup>34</sup>

### *Social Risk Factors*

There is a direct link between gang violence and public tolerance for corruption. As a result of the poor economy and lack of political will to combat this violence, gangs penetrate lower-income communities and offer alternative solutions for their economic and security hardships. With higher rates of poverty and unemployment, people find themselves vulnerable to these groups, especially young men who become dependent on their earnings.

The gang recruitment and susceptibility of the public only reinforces the problem because the economy does not grow with gangs in power and the public infrastructure (schools, hospitals, etc.) are not being built or are not kept well. There are also high levels of mass incarceration and detention, and an emphasis on militarizing the police force to combat these gangs. With a crackdown on gangs from police there has been reports of mass police brutality and executions, causing an environment of insecurity for many El Salvadorans. Cessation of large-scale violence would have to happen in order to have support from the public on anti-corruption measures.<sup>35</sup> The public tolerance for corruption is a risk factor for electoral corruption because the perpetrators have endorsement from the public, which means weaker pressure and fewer incentives to address electoral corruption.

### *Economic Risk Factors*

El Salvador's crime/violence and lack of economic opportunities are exacerbating irregular migration and little economic prosperity. Areas with higher crime rates are seeing higher rates of migration which is causing barriers to economic opportunities and social development.<sup>36</sup> El Salvador is considered a lower middle-income country.<sup>37</sup> In the region, El Salvador has one of the largest proportions of vulnerable population with almost 0.48. With vulnerable people and lack of economic opportunity it leads them to a higher risk of falling into poverty.<sup>38</sup> The lack of economic opportunities presents threats to elections free of corruption because people in low-income areas are relying on these gangs who are using violence and threats during elections for

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<sup>34</sup> "El Salvador Electoral Observation Mission." European Commission, 2018. [https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections\\_4-March-2018\\_EU-EOM-report.pdf](https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections_4-March-2018_EU-EOM-report.pdf), pg. 10 - 11.

<sup>35</sup> "El Salvador's Politics of Perpetual Violence." International Crisis Group, December 2017. <https://www.crisisgroup.org/latin-america-caribbean/central-america/el-salvador/64-el-salvadors-politics-perpetual-violence>.

<sup>36</sup> The World Bank. "The World Bank in El Salvador," 2021. <https://www.worldbank.org/en/country/elsalvador/overview#1>, and USAID. "El Salvador - Overview," 2022. <https://www.usaid.gov/el-salvador/overview>.

<sup>37</sup> U.S. Agency for International Development. "International Data & Economic Analysis: El Salvador, Labor and Employment," <https://idea.usaid.gov/cd/el%20salvador/economy#tab-labor-and-employment>.

<sup>38</sup> The World Bank. "The World Bank in El Salvador," 2021. <https://www.worldbank.org/en/country/elsalvador/overview#1>.

favorable outcomes. The challenge of low economic development is a risk factor because criminal organizations provide economic security in impoverished places, leaving people increasingly tolerant of electoral corruption in exchange for aid. The immediate benefits of economic security outweigh the more abstract costs of electoral corruption.

## **Step 2: Electoral Corruption Threat Profile in El Salvador Electoral Corruption Stakeholders**

### *State*

#### Executive Branch

At the federal level, reduced executive oversight is cause for significant concern regarding electoral integrity.<sup>39</sup> The current president's administration has repeatedly clashed with the Supreme Court's constitutional chamber, which has led to sharp clashes over the checks and balances on executive power.<sup>40</sup>

Bukele's legal advisor, Conan Tonathiu Castro Ramirez was listed on the State Department's Corrupt and Undemocratic Actors report for assisting in the removal of the Constitutional Chamber judges.<sup>41</sup> During Bukele's term, there have been several people close to the president who have been named as corrupt by the U.S. State Department's report, also known as the Engel List. Names in the Engel List include his Chief of Staff, the Minister of Labor, the former Minister of Security, and the former Minister of Agriculture.<sup>42</sup> The executive branch should be a perpetrator as it seeks to undermine other state institutions, such as legislative and judicial branches, in order to diminish laws on anti-corruption.

#### Legislative Branch

Since Bukele's supporters gained a two thirds majority in the legislative branch, they have "nearly eliminated checks on his power," by packing the Supreme Court, replacing the attorney general, and passing laws discharging hundreds of judges and prosecutors.<sup>43</sup> The legislative branch is considered an organizer allowing the president to have limited checks and balances and passing laws that allow the executive branch to over exercise power.

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<sup>39</sup> "In Leaving Anti-Corruption Accord, Bukele Moves Close to Unchecked Power in El Salvador." Washington Office on Latin America, June 2021. <https://www.wola.org/2021/06/el-salvador-cicies-oas/>.

<sup>40</sup> "After El Salvador's Legislative Elections, Government Must Respect Rule of Law and Separation of Powers." Washington Office on Latin America, March 1, 2021. <https://www.wola.org/2021/03/el-salvadors-legislative-elections-rule-of-law/>.

<sup>41</sup> "Section 353 Corrupt and Undemocratic Actors Report," 2021. <https://www.state.gov/reports/section-353-corrupt-and-undemocratic-actors-report/>.

<sup>42</sup> AFP. "EEUU Publica Lista de Funcionarios 'Corruptos' de El Salvador, Guatemala y Honduras." *France 24*, 2021. <https://www.france24.com/es/minuto-a-minuto/20210701-eeuu-publica-lista-de-funcionarios-corruptos-de-el-salvador-guatemala-y-honduras>.

<sup>43</sup> *Ibid.*

### Judicial Branch

The removal in 2021 of all five magistrates of the country's Constitutional Court and the Attorney General of the country, moves President Bukele described as “house cleaning,” shows a determination to reduce the independence of the judiciary.<sup>44</sup> These actions to depose high-ranking members of the judiciary were taken by the National Assembly, led by the President's party, and show that there is an all-out assault on checks and balances within the country.<sup>45</sup> This removal of checks and balances allows for executive abuses of power, including acts that would violate the integrity of electoral processes and allow for corrupt acts on behalf of elected officials. Although the judicial branch should be an enforcer of rule of law it is a target of corruption from the executive and legislative branch.

### Supreme Electoral Tribunal

El Salvador's election management body is the Supreme Electoral Tribunal (TSE). The TSE manages, organizes, and announces the electoral processes.<sup>46</sup> The members of the TSE are 10 magistrates who are elected every 5 years by the legislature, coinciding with presidential elections.<sup>47</sup> Because of its judicial and administrative powers, the TSE makes important decisions about El Salvador's elections. They also have the power to punish those who have engaged in wrongful actions. The TSE also engages in activities with the voters of El Salvador to help with knowledge of elections and with this they employ different tactics to help them in that goal.<sup>48</sup> The Supreme Electoral Tribunal is considered an enforcer although its role in enforcing anti-corruption is weak.

### State Media

El Salvadoran's main news sources are from television and radio. A small number of private media groups dominate the media stage with clear political and economic interests while the state-run media openly supports the government with no critiques. This restricts independent and impartial news sources for El Salvadorans. The *Televisión de El Salvador* (TVES) is the state-run television media while the *Radio Nacional de El Salvador* (RNES) is the state radio program. State media, in particular, has been the “the traditional mouthpiece of the government and an instrument for promotion of governmental projects.”<sup>49</sup> The state media promulgates biased information and often propaganda from the government, making the media landscape less free and perceived as untrustworthy. State media is considered an organizer and perpetrator of electoral corruption as it spreads disinformation and propaganda.

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<sup>44</sup> “El Salvador's Moves against Attorney General, Constitutional Court: ‘Direct Attack on Democratic Institutions.’” Washington Office on Latin America, May 2021. <https://www.wola.org/2021/05/el-salvador-attorney-general-constitutional-court/>.

<sup>45</sup> Ibid.

<sup>46</sup> Ibid, pg. 1.

<sup>47</sup> Ibid, pg. 1.

<sup>48</sup> Ibid. pg. 15-16.

<sup>49</sup> “European Union Election Observation Mission: El Salvador 2019.” European Union, 2019, pg. 18. [https://www.eods.eu/library/eu\\_eom\\_el\\_salvador\\_2019\\_final\\_report\\_eng.pdf](https://www.eods.eu/library/eu_eom_el_salvador_2019_final_report_eng.pdf).

### Military and Police Apparatus

The police in El Salvador have been accused of and criticized for extrajudicial murders with there being cases of officers threatening or outright killing individuals. An example of this is when officers of the National Civilian Police were sentenced to prison after it was proven that they stopped and killed people in their car.<sup>50</sup>

Police forces were used to guard the chambers of the Constitutional Court and the office of the Attorney General, showing the politicized manner in which the police are wielded by President Bukele. The military, heavily-armed, ordered by Bukele, surrounded the Congress and interfered with a democratic process.<sup>51</sup> The use and abuse of police forces at both federal and local levels is a major potential source of corruption. Institutional weaknesses in the police force have wreaked havoc on the governing capacity of democratic institutions and elected officials.<sup>52</sup> These weaknesses have allowed organized crime to infiltrate political and economic processes, where they manipulate and degrade the ability of elected officials to act as representatives of their constituents.<sup>53</sup>

The Disciplinary Investigation Unit reported the National Civil Police (PNC) had 1,578 investigations into police officers from 2014-2017. Types of crimes investigated included injuries, theft, threats, fraud, homicide, sex crimes, unlawful imprisonment, smuggling, and bribery. Unlawful imprisonment rose significantly in this report period. The U.S. Department of State describes El Salvador's policing and enforcement resources as insufficient "to mitigate youth joining criminal activities and improve police-community relations."<sup>54</sup> As for citizen trust in PNC, 64.6% of citizens in a public opinion survey have "little" to "no" confidence in PNC. The police are perpetrating corruption and violence despite it being an enforcement institution.

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<sup>50</sup> "El Salvador 2021 Human Rights Report." U.S. Embassy in El Salvador, 2021. [https://sv.usembassy.gov/our-relationship/official-reports/hrr\\_2021/](https://sv.usembassy.gov/our-relationship/official-reports/hrr_2021/).

<sup>51</sup> Seelke, Claire Ribando. "El Salvador: Authoritarian Actions and U.S. Response." Congressional Research Service, 2021. <https://crsreports.congress.gov/product/pdf/IN/IN11658> AND Winter, Brian. "Q&A: Why El Salvador's Crisis Is Different – and Worrying." *Americas Quarterly*, February 13, 2020. <https://www.americasquarterly.org/article/qa-why-el-salvadors-crisis-is-different-and-worrying/>.

<sup>52</sup> Ávalos, Hector Silva. "Corruption in El Salvador: Politicians, Police and Transportistas." In *Sight Crime*, n.d. <https://www.justice.gov/eoir/file/876411/download>.

<sup>53</sup> Ibid.

<sup>54</sup> U.S. Department of State. "Bureau of International Narcotics and Law Enforcement Affairs: El Salvador Summary" <https://www.state.gov/bureau-of-international-narcotics-and-law-enforcement-affairs-work-by-country/el-salvador-summary/>.

## *Non-State*

### Gangs

Organized crime organizations threaten peaceful free and fair elections in the country, where violence and other gang-related tactics create insecurity.<sup>55</sup> Specifically, methods used by criminal organization involves the following:

- controlling the homicide rate to credit the incumbent with a control on security;
- driving up homicide rates in an opposing member's community to create feelings of insecurity;
- extorting payments or "rentas" in order for candidates and parties to campaign safely in the territories largely controlled by gangs;
- seizing voter identity documents to prevent voters from being able to vote; intimidating people to stay in their homes and threaten them if they have voting ink prints (indicating they cast a ballot).<sup>56</sup>

The United States has worked with El Salvador to try to curb its gang activities. With help from the US Treasury Department, and from US law enforcement, the El Salvadoran government has worked to bring multiple gang members to justice with an effort to maintain the integrity of the police through assistance from the State Department, for example.<sup>57</sup> USAID has also been assisting in relation to the crime in El Salvador, with an approach that looks at multiple different areas such as helping keep families secure, assistance to those who might be in jeopardy of getting involved in violence, as well as helping those who have already partook in these actions get back into the community.<sup>58</sup> The gangs are perpetrators of corruption through the means of violence and demanding payments.

### Domestic Election Observers

Polling stations, as stipulated by law, must have a minimum of three poll workers with the stated goal and maximum of having five workers. In the 2018 elections, only 55% of the polling stations had five members and, more concerningly, some trained poll workers who were appointed through the TSE's lottery system were replaced with political party nominees.<sup>59</sup> In most polling stations there was either one or multiple-party agents observing which creates lack of confidence in impartiality of the voting environment. In the 2018 election, there were reports of vote tabulation poll workers having poor training and knowledge which created inefficiencies. In the 2019 elections, almost all polling stations had at least three members well trained and

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<sup>55</sup> Fischer, Jeff. How Gang Electoral Violence Threatens Voters in El Salvador, 2018. <https://www.creativeassociatesinternational.com/stories/how-gang-electoral-violence-threatens-voters-in-el-salvador/>.

<sup>56</sup> Ibid.

<sup>57</sup> Seelke, Claire Ribando. "El Salvador: Background and U.S. Relations." Congressional Research Service, 2020. <https://sgp.fas.org/crs/row/R43616.pdf>.

<sup>58</sup> Ibid, pg. 27.

<sup>59</sup> Ibid, pg. 26.

there was a significant increase in poll workers in each station (about 70% had at least four workers).<sup>60</sup> The presence of party agents in both elections ensures transparency but in both elections the electoral silence period was not respected by parties, thus creating a biased environment.<sup>61</sup> In the 2021 election, it was reported there was great improvement with electoral staff training with more training and tailored training for different duties, serving to improve voters' overall experience.<sup>62</sup>

A report by the European Union on the 2019 presidential election found that “some JEDs (Departmental Electoral Management Boards) and JEMs (Municipal Electoral Management Boards) were poorly resourced and staffed and that communication with TSE central structures could have benefited from better coordination.”<sup>63</sup> Further, for the 2019 elections, the EU report stated that the Legislative Assembly approved only \$27.5 million, \$10 million less than the TSE had asked for.<sup>64</sup> The TSE provided training for a sufficient number of poll workers, although the quality of training lacked clarity due to lack of institutional capacities and inadequate funding.<sup>65</sup> The domestic election observers are enforcers of anti-corruption by observing the voting process to limit coercion and corruption tactics by perpetrators.

### Political Parties

The NDI helped create the Observador Electoral 2019 consortium to monitor elections in El Salvador in 2019 with the University of El Salvador, the Association of Private Universities of El Salvador, and Social Initiative for Democracy, using technology to assist in reporting problems such as violence or fraud and after monitoring, the consortium concluded there were no significant issues and that the election was adequately operated.<sup>66</sup>

Current President Nayib Bukele's party, Nuevas Ideas, missed the legal deadline set out by the Election Law to participate in the presidential elections. The Human Rights Ombudsperson stated that the TSE “deliberately delayed the party's registration,” thus causing deficiencies and delay in the registration process, which requires a minimum of 50,000 signatures.<sup>67</sup>

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<sup>60</sup> “European Union Election Observation Mission: El Salvador 2019.” European Union, 2019, pg. 28. [https://www.eods.eu/library/eu\\_eom\\_el\\_salvador\\_2019\\_final\\_report\\_eng.pdf](https://www.eods.eu/library/eu_eom_el_salvador_2019_final_report_eng.pdf).

<sup>61</sup> Ibid. and “El Salvador Electoral Observation Mission.” European Commission, 2018. [https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections\\_4-March-2018\\_EU-EOM-report.pdf](https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections_4-March-2018_EU-EOM-report.pdf).

<sup>62</sup> For more, see [EU Election Missions \(europa.eu\)](https://www.europa.eu/eu-election-missions).

<sup>63</sup> “European Union Election Observation Mission: El Salvador 2019.” European Union, 2019. [https://www.eods.eu/library/eu\\_eom\\_el\\_salvador\\_2019\\_final\\_report\\_eng.pdf](https://www.eods.eu/library/eu_eom_el_salvador_2019_final_report_eng.pdf).

<sup>64</sup> Ibid.

<sup>65</sup> Ibid.

<sup>66</sup> “NDI Supports New Salvadoran Consortium to Observe February 2019 Presidential Elections.” National Democratic Institute, 2019. <https://www.ndi.org/our-stories/ndi-supports-new-salvadoran-consortium-observe-february-2019-presidential-elections>.

<sup>67</sup> Ibid.

The European Union’s Election Observation Mission Report found that the presidential race winner Bukele’s campaign primarily operated through social media networks (e.g., Facebook, Twitter), radio and TV. Importantly, the Bukele’s campaign ran on a platform seeking to confront corruption and the poor economic and security conditions faced by citizens. In doing so, he and his party used social media to challenge the integrity of elections and raised suspicions of electoral fraud well before the official election started.<sup>68</sup> In spite of these findings, the Committee in Solidarity with the People of El Salvador states that the Bukele campaign repeatedly and consistently violated various campaign laws, “from withholding public campaign funds from participating parties to using tax dollars to illegally campaign for Nuevas Ideas.”<sup>69</sup> On January 31, 2021, a group of gunmen shot supporters of the FMLN party, killing two people that were returning from a day of campaigning for the upcoming mayoral and legislative elections. Then-candidate Bukele expressed unsubstantiated claims accusing FMLN of orchestrating this act to “gain public sympathy.”<sup>70</sup> Political parties are targets of electoral corruption by the current government as it seeks to undermine their ability to win future elections by eliminating vital electoral integrity measures.

### Civil Society

On November 17, 2021, Transparency International issued a statement expressing concern about the approval of the “foreign agents bill” introduced by the Bukele government to “severely handicap the work of civil society organizations and independent media.”<sup>71</sup> The new law would do the following: “require entities and people who receive international funding or support to register as a ‘foreign agent’ with the Interior Ministry; ‘Foreign agents’ will be barred from carrying out “political activities” that aim to alter “public order” or that “endanger or threaten national security or the social and political stability of the country”.<sup>72</sup> Civil society is considered a target of the executive branch, state media, and gangs.

### Independent Media Organizations

The independent media, although generally allowed to report freely, faces threats and violence.<sup>73</sup> In 2021, it was observed that there was a continued decline in working conditions of journalists.

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<sup>68</sup> Ibid.

<sup>69</sup> Committee in Solidarity with the People of El Salvador. “Big Election Wins for Bukele’s ‘Nuevas Ideas’ Amidst Illegal Campaign Tactics,” March 2021. <https://cispes.org/article/big-election-wins-bukeles-nuevas-ideas-amidst-illegal-campaign-tactics>.

<sup>70</sup> Committee in Solidarity with the People of El Salvador. “Two Members of Opposition FMLN Party Murdered in El Salvador Weeks before Election amidst President Bukele’s ‘Hate Campaign,’” 2021. <https://cispes.org/article/two-members-opposition-fmln-party-murdered-el-salvador-weeks-election-amidst-president>.

<sup>71</sup> Transparency International. “El Salvador: Proposed Law Undermines Civil Democratic Space,” November 17, 2021. <https://www.transparency.org/en/press/el-salvador-proposed-law-undermines-civil-democratic-space>.

<sup>72</sup> Ibid.

<sup>73</sup> Ibid.

There were smear campaigns against outlets and journalists criticizing the state, harassment and threats toward journalists, and restricted access to information. Often, those who criticize the government are not allowed access to cover official events.<sup>74</sup> There are little protections for journalists in El Salvador, especially those who investigate corruption. In the *World Press Freedom Index*, El Salvador ranks 82 out of 180 countries in press freedom and with a global score of 30.49 in 2021.<sup>75</sup>

Bukele has led several verbal attacks on the media throughout his presidential term, creating mistrust of journalists and independent media. Bukele has also restricted critiques by journalists on social media creating a hostile environment.<sup>76</sup> The media in El Salvador have found themselves between two hostile situations. On one hand, there is real violence that naturally comes from the reporting on the actions of gangs. On the other hand, the Bukele government has been engaging in actions that have hindered the status of the press, such as rhetoric that has attempted to hurt the view of the media in the eyes of the public as well as increasing the difficulty of being able to find out important information on El Salvador's elected officials.<sup>77</sup> With this there have also been attempts to force the media into compliance through civil suits that are intended to force them to pool their resources into the legal sections of their business to slow their ability to report.<sup>78</sup> There have also been accusations that note not only the legal actions, but also not allowing important access, investigations into finances, and even criminal monitoring of journalists based on their reporting.<sup>79</sup> Independent media organizations are targets of electoral corruption as various state institutions threaten their existence via legal, financial, and legislative means.

### Business Leaders/Extractive Industries

According to Global Edge, El Salvador's risk rating is high due to the following weaknesses: high crime and insecurity linked to drug trafficking; lack of natural resources; climate and seismic vulnerability; inadequate infrastructure and investment; dependence on the United States (number-one destination for exports and main source of expatriate remittances); structural fragility of public and external accounts, and; significant inequality and poverty.<sup>80</sup> According to

<sup>74</sup> "European Union Election Follow-Up Mission El Salvador 2021 Final Report." European Union, 2021. [https://www.eeas.europa.eu/sites/default/files/eu\\_efm\\_slv\\_2021\\_fr\\_en.pdf](https://www.eeas.europa.eu/sites/default/files/eu_efm_slv_2021_fr_en.pdf).

<sup>75</sup> "World Press Freedom Index 2021: El Salvador." Reporters without Borders <https://rsf.org/en/el-salvador>.

<sup>76</sup> Reporters without Borders. "Salvadorean President's Alarming Hostility towards Independent Media," October 7, 2020. <https://rsf.org/en/news/salvadorean-presidents-alarming-hostility-towards-independent-media>.

<sup>77</sup> Nauta, Myrthe. "El Salvador: 'The State Is Trying to Exhaust the Media Financially and Legally.'" *Free Press Unlimited*, November 2021. <https://www.freepressunlimited.org/en/current/el-salvador-state-trying-exhaust-media-financially-and-legally>.

<sup>78</sup> Ibid.

<sup>79</sup> "El Salvador 2021 Human Rights Report." U.S. Embassy in El Salvador, 2021. [https://sv.usembassy.gov/our-relationship/official-reports/hrr\\_2021/](https://sv.usembassy.gov/our-relationship/official-reports/hrr_2021/).

<sup>80</sup> "El Salvador: Risk Assessment." globalEDGE, 2022. <http://globaledege.msu.edu/countries/el-salvador/risk>.

the U.S. Department of Commerce’s International Trade Administration, President Nayib Bukele’s sweeping election in 2019 and his party’s gaining of a supermajority in the legislature “created a less stable environment in which to do business.”<sup>81</sup>

Corruption remains a key issue regarding economic and trade activity, especially impeding U.S.- El Salvador market relations, as American companies are prohibited from soliciting, offering, or accepting bribes, per the United States Foreign Corrupt Practices Act (FCPA).<sup>82</sup> These factors are important to keep in mind as El Salvador’s economic progress heavily depends on the United States, who provides a variety of “whole-of-government lines of effort to help increase trade and bolster Salvadoran economic development.”<sup>83</sup> Due to the declining business environment caused by increased undemocratic and corruptive actions by the Bukele government, businesses have become targets of electoral corruption.

### *International*

#### Organization of American States (OAS)

With Bukele’s predecessors facing serious corruption charges, his anti-establishment charismatic persona made him more appealing. Bukele announced cooperation in 2019 with the OAS for the International Commission against Impunity in El Salvador (CICIES). CICIES’s purpose was to “strengthen and actively collaborate with the institutions of the Republic of El Salvador charged with preventing, investigating and punishing acts of corruption and other related crimes, including crimes related to public finances, illicit enrichment, money laundering, and national and transnational organized crime, in non-limiting terms.”<sup>84</sup>

CICIES was constructed to be a neutral entity that would be a transparency commission fighting corruption, but was terminated after Bukele found his own administration being investigated for corruption.<sup>85</sup> With this commission terminated, there is no longer an independent commission designed to investigate corruption in the government which was one of the only enforcers of anti-corruption.

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<sup>81</sup> “El Salvador - Country Commercial Guide: Market Overview.” International Trade Administration, n.d. <https://www.trade.gov/country-commercial-guides/el-salvador-market-overview>.

<sup>82</sup> “El Salvador - Country Commercial Guide: Market Challenges.” International Trade Administration, n.d. <https://www.trade.gov/country-commercial-guides/el-salvador-market-challenges>.

<sup>83</sup> “El Salvador - Country Commercial Guide: Market Opportunities.” International Trade Administration, n.d. <https://www.trade.gov/country-commercial-guides/el-salvador-market-opportunities>.

<sup>84</sup> Organization of American States. “Government of El Salvador and the Organization of American States (OAS) Install CICIES,” September 2019. [https://www.oas.org/en/media\\_center/press\\_release.asp?sCodigo=E-063/19](https://www.oas.org/en/media_center/press_release.asp?sCodigo=E-063/19).

<sup>85</sup> “In Leaving Anti-Corruption Accord, Bukele Moves Close to Unchecked Power in El Salvador.” Washington Office on Latin America, June 2021. <https://www.wola.org/2021/06/el-salvador-cicies-oas/>.

### European Union (EU)

For the 2018-2019 election cycle, the European Union was granted permission to observe El Salvador elections, with an Election Follow-Up Mission (EFM) deployed to evaluate implementation of recommendations. This mission found that 8 out of 32 recommendations were only partially or fully implemented for the following election.<sup>86</sup> In a stakeholder organized by the EFM, concerns were expressed with regards to the upcoming 2024 election, specifically regarding the “need to undertake electoral reforms within the timeframe provided by the law for an effective implementation.”<sup>87</sup> Further, the EFM has been leading efforts to encourage the Legislative Assembly and the TSE to assess the possibility of electoral reforms in consultation with interested stakeholders through open and respectful dialogue.<sup>88</sup>

The European Union is considered an enforcer of anti-corruption, providing reports and recommendations for the government.

### United States

As previously mentioned, not only has the State Department issued the report on corrupt and undemocratic actors, the United States also provides aid to El Salvador, providing around 65 million dollars in 2021. USAID focused this aid towards civil society and human rights, "away from the National Police and the Institute for Access to Public Information" after worries about how transparent and accountable the agencies were.<sup>89</sup>

The United States' Millennium Challenge Corporation and El Salvador have agreed to invest in the country through different areas including, for example, in human capital, as well as infrastructure.<sup>90</sup> In order to understand the electoral corruption context, the role of the state through the executive, legislative, and judicial levels, as well as the non-state and international actors, need to be analyzed not only for how their roles affect electoral corruption, but for how these roles and topics affect each other. It is rather difficult to assess the role of the media, for example, without also looking into the role of social media and state intimidation. Similarly, the role of political parties, for example, seem to be deeply entwined with the role of the legislative and the judicial branches of government, and it is with this that we get a much more holistic view of the government of El Salvador in relation to its electoral reality and its ability to maintain the democratic proclivities within its government. The United States role in anti-corruption is as an enforcer by releasing reports on specific actors and designating aid to help civil society enforce corruption.

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<sup>86</sup> In Leaving Anti-Corruption Accord, Bukele Moves Close to Unchecked Power in El Salvador." Washington Office on Latin America, June 2021. <https://www.wola.org/2021/06/el-salvador-cicies-oas/>.

<sup>87</sup> "European Union Election Follow-Up Mission El Salvador 2021 Final Report." European Union, 2021. [https://www.eeas.europa.eu/sites/default/files/eu\\_efm\\_slv\\_2021\\_fr\\_en.pdf](https://www.eeas.europa.eu/sites/default/files/eu_efm_slv_2021_fr_en.pdf).

<sup>88</sup> Ibid.

<sup>89</sup> Roth, Kenneth. "World Report 2022: El Salvador." Human Rights Watch, 2022. <https://www.hrw.org/world-report/2022/country-chapters/el-salvador>.

<sup>90</sup> Seelke, Claire Ribando. "El Salvador: Background and U.S. Relations." Congressional Research Service, 2020, pg. 21. <https://sgp.fas.org/crs/row/R43616.pdf>.

## NGOs

IRI, through their CSO Electoral Space, conducts electoral monitoring to promote free and fair elections.<sup>91</sup> Electoral Space seeks to enhance democratic integrity and address concerns regarding elections, such as low civic participation and civil society disempowerment.<sup>92</sup> The “Let’s All Vote” campaign provides citizens across the country (particularly youth and women) with information regarding the electoral process and candidates.<sup>93</sup> NGOs are considered enforcers as they work with local partners and stakeholders in pushing anti-corruption efforts.

## International Election Observers

International observers accredited by the Supreme Electoral Court include the NDI, IRI, American and European embassies of El Salvador, the European Union, and the Organization of American states with the number of observers ultimately at 1,103.<sup>94</sup> These observation missions are regulated by the TSE. In the 2018 elections, according to the El Salvador Election Observation Mission (ELS EOM) established by the European Union, there were more than 1700 accredited national observers and over 900 accredited international observers. 1146 observers were deployed by the Human Rights Ombudsperson’s Office, and these international election observers included the European Union, Inter-American Union of Electoral Bodies, Embassy of the United States of America, Organization of the American States, and the International Republican Institute.<sup>95</sup> International Election Observers are enforcers as they provide anti-corruption assistance for free, fair, transparent elections.

## **History of Electoral Corruption Profile**

### *Types of Electoral Corruption in El Salvador*

There are two high-profile cases of Electoral Corruption in El Salvador. The first is a clear example of grand corruption; in 2004, President Francisco Flores was accused of corrupt acts, including illegal embezzlement, money laundering, illicit enrichment, and diverting funds to his hand-picked successor’s election campaign. However, he died before he could be tried in court.<sup>96</sup> Second, in a 2021 state department report on “Corrupt and Undemocratic Actors,” Luis Guillermo Wellman Carpio, a current magistrate of the Supreme Electoral Tribunal, was accused

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<sup>91</sup> Arce, Jorge, and Christopher Marinez. “Electoral Space: Strengthening El Salvador’s Democracy Ahead of Elections.” *International Republican Institute*, February 24, 2021. <https://www.iri.org/news/electoral-space-strengthening-el-salvadors-democracy-ahead-of-elections/>.

<sup>92</sup> Ibid.

<sup>93</sup> Ibid.

<sup>94</sup> “European Union Election Observation Mission: El Salvador 2019.” European Union, 2019. [https://www.eods.eu/library/eu\\_eom\\_el\\_salvador\\_2019\\_final\\_report\\_eng.pdf](https://www.eods.eu/library/eu_eom_el_salvador_2019_final_report_eng.pdf).

<sup>95</sup> “El Salvador Electoral Observation Mission.” European Commission, 2018, pg. 16. [https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections\\_4-March-2018\\_EU-EOM-report.pdf](https://www.europarl.europa.eu/cmsdata/212543/El-Salvador-parliamentary-municipal-elections_4-March-2018_EU-EOM-report.pdf).

<sup>96</sup> Lohmuller, Michael. “Fmr El Salvador President Ordered to Trial on Corruption Charges.” *Insight Crime*, December 4, 2015. <https://insightcrime.org/news/brief/fmr-el-salvador-president-ordered-to-trial-on-corruption-charges/>.

of undermining democratic processes and institutions by causing serious and unnecessary delays in election preparations, as well as tabulating elections results for his personal benefit.<sup>97</sup>

### *Electoral Corruption Motives*

The motives of these political leaders were generally for personal financial gain or for their close allies. However, Flores is a clear example of electoral corruption during the pre-election phase.

### *Corruptive Tactics*

Prior to President Bukele's 2019 electoral win, each of his predecessors were investigated for corruption including the prior four presidents. President Francisco Flores (in office from 1999-2004) was accused of corrupt acts, including illegal embezzlement, money laundering, and illicit enrichment, but died before he could be tried in court.<sup>98</sup> The embezzlement scheme includes Flores diverting donation funds intended for natural disaster victims to the Nationalist Republican Alliance (ARENA) party and to Antonio Saca's election campaign. Although Flores escaped charges after his death in 2015, Saca (2004-2009) was the next to receive corruption charges. He was indicted on illicit enrichment, like his predecessor. He and his wife were ordered to pay back \$4.4 million they diverted to their personal and business accounts from the state. It is worth noting that Saca is the first Salvadoran president to be convicted of corruption. His successor was also involved in corruption schemes.<sup>99</sup> Mauricio Funes, president from 2009-2014, was accused of embezzlement and money laundering. Funes, leader of the Farabundo Martí National Liberation Front (FMLN), was accused of taking trash bags full of money from a state bank and using it for himself, his family, and his inner circle for personal gain. While many people in his administration were charged and arrested, Funes fled to Nicaragua where he sought political asylum from the Ortega government.<sup>100</sup> Funes successor, Salvador Sánchez Cerén (2014-2019) was also accused of money laundering, illegal enrichment, and embezzlement. Sánchez Cerén also received political asylum in Nicaragua where he escaped from corruption charges.<sup>101</sup>

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<sup>97</sup> "Section 353 Corrupt and Undemocratic Actors Report," 2021. <https://www.state.gov/reports/section-353-corrupt-and-undemocratic-actors-report/>.

<sup>98</sup> Lohmuller, Michael. "Fmr El Salvador President Ordered to Trial on Corruption Charges." *Insight Crime*, December 4, 2015. <https://insightcrime.org/news/brief/fmr-el-salvador-president-ordered-to-trial-on-corruption-charges/>.

<sup>99</sup> Sleinan, Julett Pineda. "Salvadoran Court: Ex-President and Wife Guilty of Illicit Enrichment." *Organized Crime and Corruption Reporting Project*, 2021. <https://www.occrp.org/en/daily/13586-salvadoran-court-ex-president-and-wife-guilty-of-illicit-enrichment>.

<sup>100</sup> Ávalos, Hector Silva. "El Salvador Ex-President Funes' Trash Bags Full of Money." *Insight Crime*, 2018. <https://insightcrime.org/news/analysis/el-salvador-ex-president-funes-trash-bags-money/>, and Daugherty, Arron. "3 Former El Salvador Presidents Investigated for Corruption." *InSight Crime*, 2016. <https://insightcrime.org/news/brief/three-el-salvador-presidents-investigated-corruption/>.

<sup>101</sup> Tian, Emily. "Nicaragua Grants Citizenship to Former Salvadoran President Wanted for Corruption." *Organized Crime and Corruption Reporting Project*, August 2021. <https://www.occrp.org/en/daily/14965-nicaragua-grants-citizenship-to-former-salvadoran-president-wanted-for-corruption>.

### *Timing of Electoral Corruption*

In the case of El Salvador, electoral corruption has most frequently impacted the pre-election phase of the election cycle. Most notably, gangs and criminal non-state actors extort payment or “rentas” from political parties and their candidates during the election campaign. This element of electoral corruption has increased since a 2012 truce between two of the country’s prominent gangs (Mara Salvatrucha and Barrio 18) and the government. According to election observers and officials on the ground, the truce amounted to a pact that has since enabled gangs to use violence as political leverage.<sup>102</sup> Leading up to an election, gangs require “rentas” from candidates and parties in order to safely campaign in certain territories without the threat of violence or harassment.<sup>103</sup> Additionally, gangs reduce or increase violence in certain territories to help or hurt their preferred candidates ahead of an election. On Election Day, gangs threaten violence to intimidate voters from participating in select areas, and even work with parties and candidates to target voters at polling stations.<sup>104</sup>

The Bukele government renewed talks with gangs including MS-13 in the run-up to the 2021 elections, underscoring their continued power in the country’s electoral cycle. The government reportedly proposed a repeal of certain anti-crime laws in exchange for electoral assistance for Nuevas Ideas during the pre-election phase.<sup>105</sup> Along with the “rentas” and reciprocal relations with gangs, an abuse of state resources defines the pre-election phase of El Salvador’s election cycles. As a result, electoral corruption often dominates the period leading up to Election Day in El Salvador.

### *Role of Social Media in Electoral Corruption*

President Bukele has used social media to his advantage throughout his presidential candidacy and his presidency. He used the platform as a mouthpiece for his political statements and political views to weaponize his political and governmental ambitions.<sup>106</sup>

Bukele's use of social media has been significant in that he has also rapidly taken over the medium through his party after their electoral victory, changing different governmental accounts' pictures and removing official documents that were previously available.<sup>107</sup>

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<sup>102</sup> Fischer, Jeff, “How Gang Electoral Violence Threatens Voters in El Salvador.” *Creative Associates International*, 2018. <https://www.creativeassociatesinternational.com/stories/how-gang-electoral-violence-threatens-voters-in-el-salvador/>

<sup>103</sup> Ibid.

<sup>104</sup> Ibid.

<sup>105</sup> Martinez, Carlos, Oscar Martinez, Sergio Arauz, and Efen Lemus, “Bukele Has Been Negotiating with MS-13 for a Reduction in Homicides and Electoral Support.” *El Faro*, 2020. [https://elfaro.net/en/202009/el\\_salvador/24785/Bukele-Spent-A-Year-Negotiating-with-MS-13-for-a-Reduction-in-Homicides-and-Electoral-Support.htm](https://elfaro.net/en/202009/el_salvador/24785/Bukele-Spent-A-Year-Negotiating-with-MS-13-for-a-Reduction-in-Homicides-and-Electoral-Support.htm)

<sup>106</sup> “BTI 2022 Country Report: El Salvador.” Bertelsmann Stiftung, 2022. [https://bti-project.org/fileadmin/api/content/en/downloads/reports/country\\_report\\_2022\\_SLV.pdf](https://bti-project.org/fileadmin/api/content/en/downloads/reports/country_report_2022_SLV.pdf).

<sup>107</sup> Gonzalez Ormerod, Alex. “El Salvador’s President Is Remaking the Government’s Social Media in His Image.” *Rest of the World*, May 11, 2021. <https://restofworld.org/2021/el-salvador-digital-coup/>.

President Bukele has engaged in undemocratic actions relating to social media as he seems to have reacted negatively to criticism, and blocked the accounts of multiple people within the political landscape. With this Bukele has been working to hinder the role of civil society through multiple means, such as inquiring and investigating NGOs in an attempt to disturb their work.<sup>108</sup>

The TSE also uses social media in order to engage with the people of El Salvador. The TSE uses the platforms to inform, engage, and guard the people of El Salvador against misinformation. The TSE has gradually been able to increase its reach to multiple different users of different social media platforms, most likely helping their efforts.<sup>109</sup>

### **Step 3: Defining Program Priorities to combat Electoral Corruption in El Salvador Inventory of Assistance Programming, Funders, and Implementers**

International organizations, NGOs, and government entities have all provided critical funding and implementation strategies for enhancing the country's democratic institutions. However, the Bukele government's proposed "foreign agents" legislation poses a threat to programming funders and implementers, as Human Rights Watch labels the government's proposal as "inconsistent" with international human rights law.<sup>110</sup> With these developments in mind, it is important to take inventory of elements of pre-existing assistance programming, with special attention to historical funders and implementers of electoral, anti-corruption, rule of law, and economic growth programming.

The National Endowment for Democracy (NED) has funded multiple programs that have looked at many of the issues noted. This includes, "Municipal Governance, Local Opportunities II" which assists with citizen organization and participation through local officials and civil society organizations, "Legislative Oversight via Independent, Investigative Media" which assists with strengthening independent media in order to be effective watchdogs of government and party actions, "Investigating the Impacts of the Pandemic and State Response on Women's Rights" which focuses on the issues of gender and how the government's way of dealing with the Covid pandemic has affected women in El Salvador, "Financing the Transparency of Political Parties in El Salvador" which, corresponding with the media and civil society organizations, assists with bringing about greater understanding of the way that parties are financed and their level of transparency, "Strengthening the Rule of Law, Transparency, and Citizen Participation" which, other than its focus being in its name, "will establish a center for democratic strengthening,

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<sup>108</sup> "El Salvador: Critics Blocked on Social Media." Human Rights Watch, December 16, 2021. <https://www.hrw.org/news/2021/12/16/el-salvador-critics-blocked-social-media#>.

<sup>109</sup> "Elections in El Salvador - 2019 Presidential Election Frequently Asked Questions," pg. 7. International Foundation for Electoral Systems, January 2019. [https://www.ifes.org/sites/default/files/2019\\_ifes\\_el\\_salvador\\_presidential\\_election\\_faqs\\_final.pdf](https://www.ifes.org/sites/default/files/2019_ifes_el_salvador_presidential_election_faqs_final.pdf).

<sup>110</sup> "El Salvador: Shelve 'Foreign Agents' Bill." Human Rights Watch, November 12, 2021. <https://www.hrw.org/news/2021/11/12/el-salvador-shelve-foreign-agents-bill>

which will conduct research and offer academic instruction on the rule of law, governance, and transparency."<sup>111</sup>

With this there is also "Supporting Rights for Victims of the Justice and Security Systems Apparatus" which focuses on an issues previously raised about the abuses of the security system, bringing to light important information and assisting victims and their pursuit of justice and "Collaboration to Defend Civic Space and Counter Anti-Democratic Advances" which assists with bolstering "civic space and freedom of information assembly." as well as informing people and bringing about "training for youth about the importance of transparency, accountability, and democratic principles."<sup>112</sup> Ultimately the cost of these programs total \$856,000.<sup>113</sup>

There has been analysis into the ways that the EU might best be able to support El Salvador in its ability to protect civil society organizations by Solidar, a civil society network with around 50 organizations, working also with different partners.<sup>114</sup>

The network has written a report that discusses the ways that both the EU and El Salvador can create a better place for civil society organizations. They note multiple local members who work in El Salvador for different issues including bringing about better governance such as Humanitarian Aid, Consultancy for Development Programs and Projects or ASPRODE which assists with capacity building that helps people be able to preserve their rights.<sup>115</sup>

With this it is clear that the level of existing democracy promotion programming is extensive in that it encompasses many of the aforementioned problems that El Salvador has been recently experiencing. It is with this that while elections and their time frames are important, so too are the adjacent issues that affect the strength of El Salvador's institutions.

### **Focus on Key Points from Previous Steps**

One of the key issues preventing progress on mitigating electoral corruption is the lack of transparency, specifically regulation, reporting, and oversight measures as it relates to campaign and political finance. As discussed in detail, El Salvador's legal framework and policy toward disclosing the sources, amounts, and usage of funds in election campaigns are incapable of detecting the various overt and covert ways political parties and individual candidates engage in

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<sup>111</sup> National Endowment for Democracy. "El Salvador 2021 - International Republican Institute," February 12, 2022. <https://www.ned.org/region/latin-america-and-caribbean/el-salvador-2021/>.

<sup>112</sup> Ibid.

<sup>113</sup> Ibid.

<sup>114</sup> SOLIDAR. "About Us," <https://www.solidar.org/en/about-us/solidar>.

<sup>115</sup> SOLIDAR. "Economic & Social Rights Report El Salvador: Zoom on Shrinking Space for Civil Society," December 2020. <https://www.solidar.org/system/downloads/attachments/000/001/242/original/Solidar-El-Salvador-v06.pdf?161295346>.

corrupt practices. It is therefore essential to highlight the inadequacy of transparency mechanisms to expose pervasive corruption.

With the electoral victories of President Nayib Bukele and his party's supermajority in Congress, drastically diminishing judicial independence is a fundamental threat to democratic principles. Strong democracies require separation of power to ensure each branch of the government is able to check one another in order to prevent usurpation of power. President Bukele's successful removal of five supreme court justices is a crucial area of concern, highlighting both the short- and long-term impacts on free and fair elections. Further, the disregard for supreme court decisions and withdrawal from anti-corruption agencies discredits President Bukele as a democratic leader.

Gang-related violence and the use of law enforcement, particularly the military, further creates a more strenuous landscape for mitigating corruption. Organized criminal organizations are rampant in El Salvador, and they continue to exert power and influence in the political arena. These illegal groups infiltrate parties and individuals, compromising politicians and impeding progress on anti-corruption reform. The government's deployment of law enforcement agencies to enforce unconstitutional COVID-19 measures and intimidate legislators further creates a highly volatile and unstable security environment.

Finally, institutional capacity presents obstacles for spurring positive change. Emphasis needs to be placed on building mechanisms to mitigate corruption in elections, however state institutions are not capable of bringing on substantial changes as they are manipulated and disregarded, both formally and informally. Civil society has an important role to play in this case, however the sitting president's "foreign agents bill" would place many CSOs at grave risk of being legally eliminated.

### **Prioritize Key Areas, Threats, and Entry Points**

Gangs and crime organizations pose the most significant security threat to El Salvadorans. But these gangs have intricate, inconspicuous criminal networks that may be difficult to infiltrate and stabilize the environment. Because these groups are entrenched in the social, political, and economic sphere, it would be difficult for practitioners to tackle without a peace negotiation and the will of the people and politicians to hold these groups accountable.

In El Salvador, practicable programming operations could focus on reforming the TSE and anti-corruption commissions to tackle the issue of electoral corruption. Helping CSOs and politicians concerned with corruption draft policy and raise awareness about the partisan and often manipulated TSE could produce reforms to build a stronger legal electoral commission independent of politics. The anti-corruption commission CICIES, although abused by Bukele, could be reinstated and reformed to contain an independent board of members. Practitioners

could encourage CSOs, parties (especially those targeted by partisan investigations), the private sector (who are unfairly disadvantaged in procurement strategies) and voters who feel unrepresented by the political parties to lobby for an independent anti-corruption commission. These areas of programming will be more successful at the local level especially with communities experiencing different levels of crime and economic opportunities.

Another area that could be addressed is the campaign finance laws. These laws are weak on reporting political finance reinforcing corruption. CSOs and voters could drive this effort especially because they are directly impacted from corruption such as embezzlement and money laundering. The anti-corruption commissions and judiciary branch, if strengthened, could aid in this effort to hold parties accountable. The people may favor more transparency because their past four presidents and current one have been involved in corruption and misusing funds (many of which are for natural disasters and pandemic relief) to enrich themselves. With the livelihoods of people directly harmed by corruptive tactics, people from all parties may support stricter campaign finance laws.

Lastly, the protection and expansion of the media could be a program objective of practitioners because they are currently threatened by the government and cannot report freely. Unfortunately, Bukele has done significant damage to the image of independent journalists, so people may be less inclined to support this reform objective but CSOs and international media organizations could play a role in mitigating the violence and expanding free reporting.

#### **Step Four: Program Options for El Salvador**

##### **Localization Strategy**

Due to the electoral landscape in El Salvador, local partnerships and strategies are foundational in preventing opportunities for corruptive forces to persist. Six key principles, per USAID's New Partnership Initiative, will guide localization approaches:

- promoting local leadership;
- Improving equity and inclusivity within partner relationships;
- demonstrating accountability to constituents;
- seeking innovative approaches;
- lowering barriers to partnerships; and,
- identifying new and nontraditional sources of funding<sup>116</sup>

Organized crime networks with over 60,000 gang members pose significant risks for violence and threaten peaceful and orderly elections.<sup>117</sup> Localization strategies ought to be diversified and responsive to possible sensitivities where candidates, election workers and other election stakeholders are vulnerable to such risk factors. Local and nontraditional partners (e.g., faith-

<sup>116</sup> USAID. "New Partnerships Initiative," 2022. <https://www.usaid.gov/npj>.

<sup>117</sup> Roth, Kenneth. "World Report 2022: El Salvador." Human Rights Watch, 2022. <https://www.hrw.org/world-report/2022/country-chapters/el-salvador>.

based organizations, CSOs, cooperatives, etc.) are vital in providing support for electoral developmental work.<sup>118</sup> Local media outlets and journalists conducting investigative reporting on corruption should be supported with more funding and resources to increase capacity. Such targeted partnerships and initiatives with local actors are critical, as evidenced by El Salvador's proposed law that would tax journalists and civil society organizations out of existence by imposing a 40% tax on financial transactions.<sup>119</sup>

### **Conceptualize Programming**

In El Salvador practicable programming operations could focus on reforming the TSE and anti-corruption commissions to tackle the issue of electoral corruption. Helping CSOs and politicians concerned with corruption draft policy and raise awareness about the partisan and often manipulated TSE could produce reforms to build a stronger legal electoral commission independent of politics. The anti-corruption commission CICIES, although abused by Bukele, could be reinstated and reformed to contain an independent board of members. Practitioners could encourage CSOs, parties (especially those targeted by partisan investigations), the private sector (who are unfairly disadvantaged in procurement strategies) and voters who feel unrepresented by the political parties to lobby for an independent anti-corruption commission. These areas of programming will be more successful at the local level especially with communities experiencing different levels of crime and economic opportunities. This is because municipalities are not only smaller, meaning aid has a larger impact, but because local actors may be more democratically-minded than national leadership. Furthermore, local actors would witness more concrete changes that affect their day-to-day lives, increasing the chance of buy-in.

Another area that could be addressed is the campaign finance laws. These laws are weak on reporting political finance reinforcing corruption. CSOs and voters could drive this effort especially because they are directly impacted from corruption such as embezzlement and money laundering. The anti-corruption commissions and judiciary branch, if strengthened, could aid in this effort to hold parties accountable. The people may favor more transparency because their past four presidents and current one have been involved in corruption and misusing funds (many of which are for natural disasters and pandemic relief) to enrich themselves. With the livelihoods of people directly harmed by corruptive tactics, people from all parties may support stricter campaign finance laws. Programming that builds local CSO skills to advocate for change and build grassroots support could lead to more effective pressure on politicians responsible for drafting the necessary legal changes. Helping bring these CSOs into a national network could further amplify their reach and capacity.

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<sup>118</sup> USAID. "New Partnerships Initiative," 2022. <https://www.usaid.gov/npi>.

<sup>119</sup> Villatoro, Jenny. "Journalists Are on the Front Line of Central America's Fight for Democracy." George W. Bush Presidential Center, March 22, 2022. <https://www.bushcenter.org/publications/articles/2022/03/democracy-talks-villatoro-journalists-are-on-the-front-line-fight-for-democracy.html>.

Lastly, the protection and expansion of the media could be a program objective of practitioners because they are currently threatened by the government and cannot report freely. Unfortunately, Bukele has done significant damage to the image of independent journalists, so people may be less inclined to support this reform objective but CSOs and international media organizations could play a role in mitigating the violence and expanding free reporting. Furthermore, it is plausible that journalists with greater financial support can better do their job, which may increase the public's trust in them as watchdogs. This is especially true on the local level, where residents and journalists are likely to know each other.

With a stronger independent judiciary and anti-corruption agencies/commissions, transparency and accountability are enhanced which not only weakens more authoritarian behavior of politicians but also weakens criminal organizations who rely on this corruption for profit and a power hold. Focusing on the local level would be most feasible in tackling this problem.

The effort that Buekele and his party are putting into consolidating their power requires an equal response to strengthen El Salvador's institutions. When we look to present options, we not only have the multiple democracy promotion agencies that have been working on a multitude of issues within El Salvador, but through them we also have more ground-level examples of the ways that institutions might be bolstered.

### **International and Domestic Implementing Organizations for Partnership**

Ultimately when attempting to find adequate implementing organizations to partner with, it may be useful to keep in mind the important areas that must be worked on and addressed. The implementing organizations would be most useful within the context of assisting the multitude of problems that exacerbate the electoral corruption threat. Implementing organizations that focus on not only the transparency of the government but also of the political parties and the security service would be helpful in the effort to maintain the integrity of elections in El Salvador. Those outside of the government who play an important role in maintaining their transparency such as civil society organizations and the media are also important areas to consider when looking to seek out adequate implementing organizations.

We have noted the work of multiple organizations on El Salvador including IFES, IRI, NDI, NED, and others who have worked on the challenges of El Salvador. However, it is important to also include the work of those who are closer to the ground such as the "Fundación Nacional para el Desarrollo" the national chapter of Transparency International in El Salvador.<sup>120</sup>

Examples of programs noted previously, funded by the NED which looked at multiple facets of El Salvador including issues of gender, bolstering the media, citizen engagement, transparency

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<sup>120</sup> "FUNDE," <http://www.funde.org/transparencia>.

of political parties, as well as security service accountability, may assist with also finding implementing partners as these programs are taken by grantees.<sup>121</sup>

As such, we can look to the grantees as potential partners including "Asociacion Juvenil Gato Encerrado Media" for their work on the media, "Asociacion Accion Ciudadana" for their work on political party transparency, "Asociacion Azul Originario" for their work on security service accountability, as well as "Asociacion Transparencia, Contraloria Social y Datos Abiertos" for their work in strengthening the rights of citizens and civil society.<sup>122</sup>

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<sup>121</sup> National Endowment for Democracy. "El Salvador 2021 - International Republican Institute," February 12, 2022. <https://www.ned.org/region/latin-america-and-caribbean/el-salvador-2021/>.

<sup>122</sup> Ibid.

## Section Four: Conclusions

By assessing existing election and corruption information and interviewing experts on corruption and electoral integrity, this report has attempted to build a framework and programming guide that informs implementers and guides their efforts to combat electoral corruption. The Framework seeks to highlight the multifaceted reality of electoral corruption, the programming guide serves to understand existing programs, and the case study shows their suitability in different regime type contexts. Electoral corruption affects a myriad of areas, and to adequately correct these factors, both the root causes and symptoms must be adequately understood and addressed where possible.

The framework has detailed these root causes and symptoms of electoral corruption, addressing important areas such as context, threat, program priorities, and program options. Attempting to combine the issues of corruption and electoral security, the electoral corruption assessment framework was designed not only to work for the included case study, but consolidated democracies and autocracies as well. The definition and framework of electoral corruption presented in this paper provides USAID officers a novel and systematic way to approach and address an increasingly salient issue to the democracy promotion community and its practitioners. By referencing this compact framework and guide, practitioners can implement a more targeted, dynamic, and streamlined strategic approach to the intersection of corruption and electoral integrity. Having a common definition of electoral corruption and its components will also help in creating mutual understandings among partners about what the electoral corruption phenomenon can entail.

The case of El Salvador, a backsliding democracy, was used to show how the framework and programming guide can be applied to a specific country. Within the case of El Salvador, the role of these state, non-state, and international actors and other relevant stakeholders underscores the ways that weakening both governmental and non-governmental institutions can be a strategy for electoral corruption by various actors, and how this multifaceted framework to combating electoral corruption can therefore be useful in preventing corrupt practices. It also highlighted entry points for programming and priority areas for improvement, which could allow USAID to better tailor its funding and program opportunities.

Admittedly, some settings will not be particularly conducive to electoral corruption programming due to country restrictions or safety risks. Nonetheless, the programming guide alludes to some options relevant to most contexts. The framework can also assist USAID officers - especially ones newer to electoral corruption programs - better determine the options available within restricted political spaces, helping save time, resources, and lives in the long term.

## Annexes

### Annex One: Programming Guide

Understanding the full scope of existing electoral assistance and anti-corruption programming is vital to both programming planning as well as implementation.

Among the core funders of electoral integrity and anti-corruption programming from the U.S. are the U.S. Agency for International Development and the U.S. State Department, particularly through the Bureau of Democracy, Human Rights, and Labor (DRL) and the Bureau of International Narcotics and Law Enforcement Affairs, which seeks to fight transnational corruption and strengthen countries' criminal justice systems.

U.S. based agencies such as the National Endowment for Democracy and its core grantees the International Republican Institute (IRI), National Democratic Institute (NDI), Center for International Private Enterprise (CIPE), and the Solidarity Center are among the main implementers of anti-corruption programming. IFES, NDI, and IRI are key members of the Consortium for Political Process Strengthening (CEPPS), which USAID uses to deliver and fund many democracy programs.

This programming guide would also be remiss to not mention Transparency International (TI) and Global Witness as important anti-corruption organizations and the International Institute for Democracy and Electoral Assistance (IDEA). Intergovernmental organizations and national anti-corruption organizations outside the U.S. also aim to support or implement anti-corruption programming.

The variety of programs supported and implemented by these organizations and their partners is wide. However, central to most of them are increasing the demand for anti-corruption initiatives and the supply of means to implement them. Many agencies also underscore the importance of locally-tailored programming and considering the increasingly international nature of corruption. This guide will illustrate currently relevant program approaches to improving electoral integrity and countering corruption from some of the aforementioned institutions.

#### ***International Foundation for Electoral Systems (IFES)***

IFES, along with its Center for Anti-Corruption and Democratic Trust, is perhaps the institution most focused on countering corruption in electoral systems. Their programs have been focused primarily on seven domains: implementing anti-corruption frameworks, professionalizing the regulation and oversight of political and campaign finance, preventing the abuse of state resources, strengthening the means to investigate and prosecute electoral corruption, civic education, citizen-government engagement, and securing the autonomy and accountability of independent institutions.

Many of these approaches have focused on the creation of partnerships and provision of resources to agents interested and invested in reforming electoral systems.<sup>123</sup>

- **Implementing Anti-Corruption Frameworks:** IFES has partnered with domestic stakeholders and influencers to identify, prioritize, and create action plans while encouraging governments to actually act on their anti-corruption commitments.
- **Professionalizing Regulation and Oversight:** By focusing on change agents, IFES seeks to amplify those groups' pushes for stricter compliance and reform. This has involved providing oversight bodies the means to enforce regulations, thus bolstering capacity, and supporting the monitoring of political funding and spending.
- **Protecting Against State Abuse of Resources:** IFES has provided training to oversight bodies, journalists, civil servants, and local civil society organizations to better engage in monitoring and advocacy. IFES also promotes legal and regulatory reform and creating and maintaining partnerships with responsible government agencies.
- **Strengthening Investigative and Prosecutorial Capacity:** IFES has trained judges, magistrates, and developed the Election Investigations Guidebook and other resources to increase technical capacity of judicial actors.
- **Civic Education:** Taking a holistic approach, IFES has supported the Strengthening Engagement through Education Democracy (SEED) civic education program to increase citizen involvement in their country's electoral and political processes. The program partners with universities to introduce people to fundamental democratic concepts and ways to apply this increased knowledge to empower people. Fundamentally, SEED seeks to empower citizens to decrease opportunities for corruption and electoral fraud.
- **Citizen-Government Engagement on Transparency, Integrity and Accountability:** IFES supports civil society actors and creates partnerships to create positive feedback loops and constituent engagement. An example of this was IFES co-creating and helping implement Guatemala's Open Government National Action Plan for 2016-2018, particularly through its provision of technical and financial assistance to the Participacion Civica project. This informed hundreds of CSOs and politicians about open governance practices.

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<sup>123</sup> International Foundation for Electoral Systems. "Anti-Corruption," <https://www.ifes.org/issues/anti-corruption>.

*National Democratic Institute (NDI)*

NDI's anti-corruption programming incorporates consideration of political incentives for both domestic elites and international actors, while relying primarily with local civil society organizations and government reformers. Their anti-corruption programs primarily focus on three themes: kleptocratic transitions, anti-corruption communications strategies, and transnational advocacy. This primarily features training and financial support for local reformers in communicating about, assessing, and targeting the mechanisms that strengthen kleptocracy. Communications strategies are drawn from evidence and citizen input.

NDI launched the Open Election Data Initiative in 2015 to provide civil society actors, election administrators, and other individuals with tools to better analyze election data and advocate for change. It was most recently updated in late 2021 to highlight strategies for election data collection, analysis, and advocacy, as well as practice exercises and learning modules.

*International Republican Institute (IRI)*<sup>124</sup>

As of late 2021, IRI has implemented at least 75 anti-corruption and pro-transparency programs in more than 150 countries, although the exact number directly tackling electoral corruption is not immediately clear. These approaches, specifically focused on looking at entry points for working with government, have involved the state and civil society organizations (CSOs) and sought to create accountability mechanisms. Relevant ones include collective action and cross-sector coalition building and financial transparency and budget literacy. IRI's Anti-Corruption Toolkit for Civic Activists is also worth reviewing.<sup>125</sup>

*Center for International Private Enterprise*<sup>126</sup>

The Center for International Private Enterprise focuses largely on business actors. Through CEPPS, CIPE was one of the founding partners of the U.S. – Albania Transparency Academy, particularly focusing on the supply side of corruption and private sector engagement. They also investigate and illuminate the sharp power and corrosive capital influence of authoritarian Russia and China. CIPE also has some collective action-based programming, including a program in Thailand that seeks to bind business leaders to anti-corruption and ethics standards. The Africa Business Integrity Network meanwhile offers anti-corruption compliance training and advocates for greater business ethics and integrity. This program aims to raise awareness, provide access to compliance resources, and create a network of like-minded anti-corruption businesses and professionals.

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<sup>124</sup> "Best Practices for Working with Governments on Anti-Corruption." International Republican Institute, 2021. [https://www.iri.org/wp-content/uploads/2021/12/iris\\_best\\_practices\\_on\\_working\\_with\\_governments\\_on\\_anticorruption-1.pdf](https://www.iri.org/wp-content/uploads/2021/12/iris_best_practices_on_working_with_governments_on_anticorruption-1.pdf).

<sup>125</sup> "Anti-Corruption Toolkit for Civic Activists." International Republican Institute, December 2020. <https://www.iri.org/resources/new-toolkit-empowers-civic-activists-across-the-globe-to-combat-corruption/>.

<sup>126</sup> Center for International Private Enterprise. "Anti-Corruption & Ethics," <https://www.cipe.org/what-we-do/anti-corruption-ethics/>.

### *Transparency International (TI)*

Transparency International is perhaps best known for its publishing of the Corruption Perceptions Index and Global Corruption Barometer, which seek to gauge levels of corruption and public perceptions of it in over 100 countries. TI is involved in research and a variety of advocacy efforts and projects seeking to expose corruption, strengthen anti-corruption agencies, and advocate for change. Among its partners are intergovernmental organizations, civil society, and investigative journalists. Its programs target a variety of actors such as anti-corruption agencies, businesspeople, citizens, civil society, and governments, demonstrating the need to target various stakeholders in anti-corruption programming strategies. Some ongoing programs worth highlighting<sup>127</sup> include:

- **The Anti-Corruption Agency Strengthening Initiative:** This initiative has identified anti-corruption agencies, (ACA), as partners. TI creates evaluations of ACAs to highlight areas for improvement and facilitates networks to share and build best practices.
- **Business Integrity Programme:** This program refers to a series of interrelated multi-stakeholder projects seeking to improve integrity within public and private sector businesses.
- **Global Anti-Corruption Consortium:** This partnership leverages TI's resources and investigative journalism from organizations like the Organized Crime and Corruption Reporting Project (OCCRP) to spotlight investigations into transnational corruption, fuel demand for change, and inform TI's advocacy efforts.
- **Strengthening Accountability Networks Among Civil Society:** This program created a network of civil society organizations from 21 countries around the world, which share challenges in areas of public resource abuse, vested interests, and citizens having little say in the decision-making process. They pool resources, knowledge, and skills across borders, allowing them to better monitor public finance, oversight bodies, and policy decisions.

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<sup>127</sup> Transparency International. "Project Index," <https://www.transparency.org/en/projects>.

## **Annex Two: Stakeholder Question Guide/Electoral Corruption Assessments**

When conducting an electoral corruption assessment, the following are illustrative questions which can be posed to stakeholders during interviews.

### *Regulatory Institutions*

#### Legislatures

- Which legislative committees are responsible for drafting electoral laws?
- Are electoral reform measures in process? If so, describe the reforms.
- Are there aspects of existing legislation that create risks for electoral corruption?
- Are there obstacles to passing anti-corruption legislation?

#### EMBs

- Does the EMB have structural independence from the government in legislation and finance?
- How is the EMB appointed and what do its members represent, i.e., political parties, judiciary, or civil society?
- Have recent opinion polls been conducted to measure the public's perceptions about the performance and credibility of the EMB?
- Does the EMB receive electoral assistance from the international community? If so, please describe.
- How have recent election observation reports evaluated the technical efficiency and democratic quality of electoral administration?
- What role does the EMB play in electoral security administration?
- What has been the nature of complaints filed against the EMB in past elections?
- Are there any mechanisms to investigate malpractice, fraud, and manipulation?
- Have any election officials been targeted for intimidation or violence during past elections? If so, who were the perpetrators, what did they do, when and where did they do it? How did the perpetrators obtain their conflict resources?

#### Media and Anti-Corruption Commissions

- Does the Commission have structural independence from the government in legislation and finance?
- Media – has the commission played an effective role in ensuring accuracy in broadcast and print content and equitable access to media time and space for qualified political entities?
- What role does State-run Media play in the political landscape?
- Are journalists able to freely and safely report on issues of corruption?
- Anti-Corruption – what is the record of the commission in uncovering corruption in political
- What penalties have been issued against parties for infractions?

## *Security Institutions*

### Military

- Are security sector reforms planned or underway?
- How is electoral security enforcement coordinated with other agencies?
- What is the role of the military in enforcing anti-corruption measures?
- Has anyone in the military or the military itself been accused of corruption?
- Has the military ever performed a coup d'état? If so, when did it occur and what is its impact on the current election?

### National Police

- Is there a national police or constabulary force?
- If so, how will the police be deployed – mobile, fixed or reserve?
- What is the role of police in anti-corruption investigations?
- How is electoral security enforcement coordinated with other agencies?
- Has anyone in the police or the police itself been accused of corruption?
- Have the national police been trained in electoral security by the international community?

### Local Police

- If there are local police, how will they be deployed – mobile, fixed, or reserve?
- Are the local police armed?
- What are their rules of engagement?
- How is electoral security enforcement coordinated with other agencies?
- Are local police assisted by other official or quasi-official grassroots security entities such as village watches or patrols?
- How is electoral security enforcement coordinated with other agencies?
- Have the national police been trained in electoral security by the international community?

### High, Supreme and Constitutional Courts

- Are high courts considered independent from the government?
- In past elections, have high courts been employed to determine the outcomes of an election or the eligibility of major candidates?
- If so, what parties brought the complaints to the high court for redress?

### Electoral Tribunals and Special Electoral Courts

- Is there a special tribunal or court that hears electoral cases?
- If so, is that tribunal or court separate from the EMB?
- Do citizens consider these courts credible? Are these legal channels used by citizens?
- How is this court appointed and who are its members?
- Does the tribunal or court have a history of hearing electoral corruption cases in recent elections?

- If yes, what were their decisions?

#### Ordinary Courts

- Are ordinary courts considered as independent from the government?
- Have ordinary courts been employed to hear electoral complaints of a criminal nature? If so, what has been the experience in providing justice?
- Do ordinary courts have any authority to overturn election results or call for a new election?

#### Transitional Justice

- Were there widespread human rights abuses in recent elections?
- If so, was there an investigation or any transitional justice undertaken?
- Were perpetrators of the abuses identified and penalized?
- Was there any compensation or redress for the victims of the abuses?

#### International Stakeholders

- Are there existing programs that deal with Electoral Corruption in other nations?
- What is the role in enforcing anti-corruption policies and programs?
- How does this organization support existing programming and incorporate localization strategy?

### Annex Three: Acronym List

ACA	Anti-Corruption Agency
AG	Attorney General
ARENA	Nationalist Republican Alliance
ASDER	Asociación Salvadoreña de Radiodifusores
ASPRODE	Humanitarian Aid, Consultancy for Development Programs and Projects
AUPRIDES	University of El Salvador and the Association of Private Universities of El Salvador
CEPPS	Consortium for Electoral and Political Processes Strengthening
CICIES	International Commission Against Impunity in El Salvador
CIPE	Center for International Private Enterprise
CPI	Corruption Perceptions Index
CSO	Civil Society Organization
DOS	Denial of Service
DRL	Bureau of Democracy, Human Rights, and Labor
DUI	National Identity Card
EDI	Electoral Democracy Index
EE	Electoral Space (Espacio Electoral)
EFM	Election Follow-Up Mission
ELS EOM	El Salvador Election Observation Mission
EMB	Electoral Management Body
EU	European Union
FCPA	U.S. Foreign Corrupt Practices Act
FMLN	Farabundo Martí National Liberation Front
FUSADES	Salvadoran Foundation for Economic and Social Development
GANNA	Great Alliance for National Unity
GDP	Gross Domestic Product
GEPT	Global Elections and Political Transitions
GONGO	Government-Organized Non-Governmental Organizations
GW	Global Witness
HRW	Human Rights Watch

IDEA	International Institute for Democracy and Electoral Assistance
IFES	International Foundation for Electoral Systems
IGO	Inter-Governmental Organizations
IMF	International Monetary Fund
IRI	International Republican Institute
JED	Department Electoral Board
JEM	Municipal Election Board
MSMEs	Micro, Small and Medium Enterprises
NDI	National Democratic Institute
NED	National Endowment for Democracy
NGO	Non-Governmental Organization
NI	New Ideas (Nuevas Ideas)
NT	Our Time (Nuestro Tiempo)
OAS	Organization of American States
OCCRP	Organized Crime and Corruption Reporting Project
OE2019	Observador Electoral 2019
OGP	Open Government Partnership
OPEN	Open Society Foundations
PCN	National Coalition Party
PDC	Christian Democratic Party
PNC	National Civil Police
RNES	<i>Radio Nacional de El Salvador</i>
RNPN	National Civil Registry
SEAIDF	Seattle International Foundation
SEED	Strengthening Engagement through Education Democracy
TI	Transparency International
TOC	Theory of Change
TRACODA	Social Comptrollership and Open Data
TSE	Supreme Electoral Tribunal
TVES	<i>Televisión de El Salvador</i>
U.S.	United States of America
UKAid	United Kingdom Agency for International Development

USAID

United States Agency for International Development

V-DEM

Varieties of Democracy Institute

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