

# The Capacity to Combat Corruption (CCC) Index

Assessing Latin America's ability to detect,  
punish and prevent corruption

# 2022



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## WHO WE ARE

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**Americas Society and the Council of the Americas** is the premier forum dedicated to education, debate, and dialogue in the Americas. Its mission is to foster an understanding of the contemporary political, social, and economic issues confronting Latin America, the Caribbean, and Canada. Views expressed in this report do not necessarily reflect those of AS/COA or its members.

### Control Risks

**Control Risks** is a global specialist risk consulting firm that helps clients create organizations that are secure, compliant, and resilient in an age of ever-changing risk and connectivity. Our experts across 36 offices help clients investigate wrongdoing and resolve crises, and provide the insight and intelligence companies need to realize opportunities and grow.

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**June 2022**



# The 2022 Capacity to Combat Corruption (CCC) Index

Assessing Latin America's ability to detect, punish and prevent corruption

**T**he fight against corruption presented a mixed picture throughout Latin America over the past year. Some countries showed resilience, while others, including the region's two largest countries Mexico and Brazil, saw new setbacks for key institutions and the anti-corruption environment as a whole. For many citizens throughout Latin America, the continued struggle with COVID-19 and economic issues like inflation, now compounded by Russia's conflict with Ukraine, have taken precedence over corruption. Many governments in the region have relegated anti-corruption reforms to a lower priority. Accordingly, many of the judicial branches and anti-corruption agencies across the region have struggled in comparison to the mid-2010s, when the anti-corruption movement enjoyed greater popular support and government attention.

Nevertheless, the overall scenario in 2022 was one of relative stability following the clear setbacks of recent years. Several governments made fighting corruption and strengthening institutions a priority. Notably, the anti-corruption environment was stable even in countries with recent elections, such as Chile, Costa Rica, Ecuador and Peru, indicating the strength of certain key institutions.

Other countries saw a nuanced picture: Regressions in legal capacity sometimes occurred alongside advancements in the quality of the press or the strength of civil society. It was clear that anti-corruption efforts, while under some duress, remain a priority for many citizens throughout the region.

## **A DATA-DRIVEN TOOL**

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Against this backdrop, Americas Society/Council of the Americas (AS/COA) and Control Risks are publishing the fourth edition of the Capacity to Combat Corruption (CCC) Index. First launched in 2019, the Index assesses Latin American countries' ability to detect, punish and prevent corruption.

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

The CCC Index looks at 14 key variables, including the independence of judicial institutions, the strength of investigative journalism, and the level of resources available for combating white collar crime. The Index relies on extensive data and on a proprietary survey conducted among leading anti-corruption experts from Control Risks, academia, civil society, media and the private sector. For the third consecutive year, the index covers 15 countries, which together represent 92% of Latin America's GDP.

The country with the highest score in the 2022 CCC Index is Uruguay (7.42 out of 10). Uruguay was followed by Costa Rica (7.11), Chile (6.88), Peru (5.66), the Dominican Republic (5.19), Argentina (5.04), Panama (4.96), Colombia (4.87), Ecuador (4.82), Brazil (4.76), Paraguay (4.45), Mexico (4.05), Guatemala (3.38), Bolivia (2.57) and Venezuela (1.63).

#### **AMONG KEY FINDINGS:**

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- Despite registering a decline in its score for the first time since the Index was launched, Uruguay was the top performer in the Index for the third consecutive year. Costa Rica and Chile remained in the top three, as they have since 2020. The bottom three ranked countries also remained the same as in 2021.
- Four of the 15 countries measured saw significant declines in their scores. Seven countries had minor to moderate score variations. Four countries saw significant improvements.
- Guatemala experienced the sharpest decline in the Index, and Uruguay, Argentina, Brazil and Mexico also registered drops. With the exception of Uruguay, these countries' scores have decreased each year since the Index was released.
- Countries ranked closer to the bottom of the Index showed some signs of improvement. Paraguay advanced in aspects of its legal capacity, while Bolivia and Venezuela had minor growth in select areas related to civil society and the media.
- The Dominican Republic saw the greatest improvement in its score, continuing a two-year upward trajectory.

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

# Overall Score

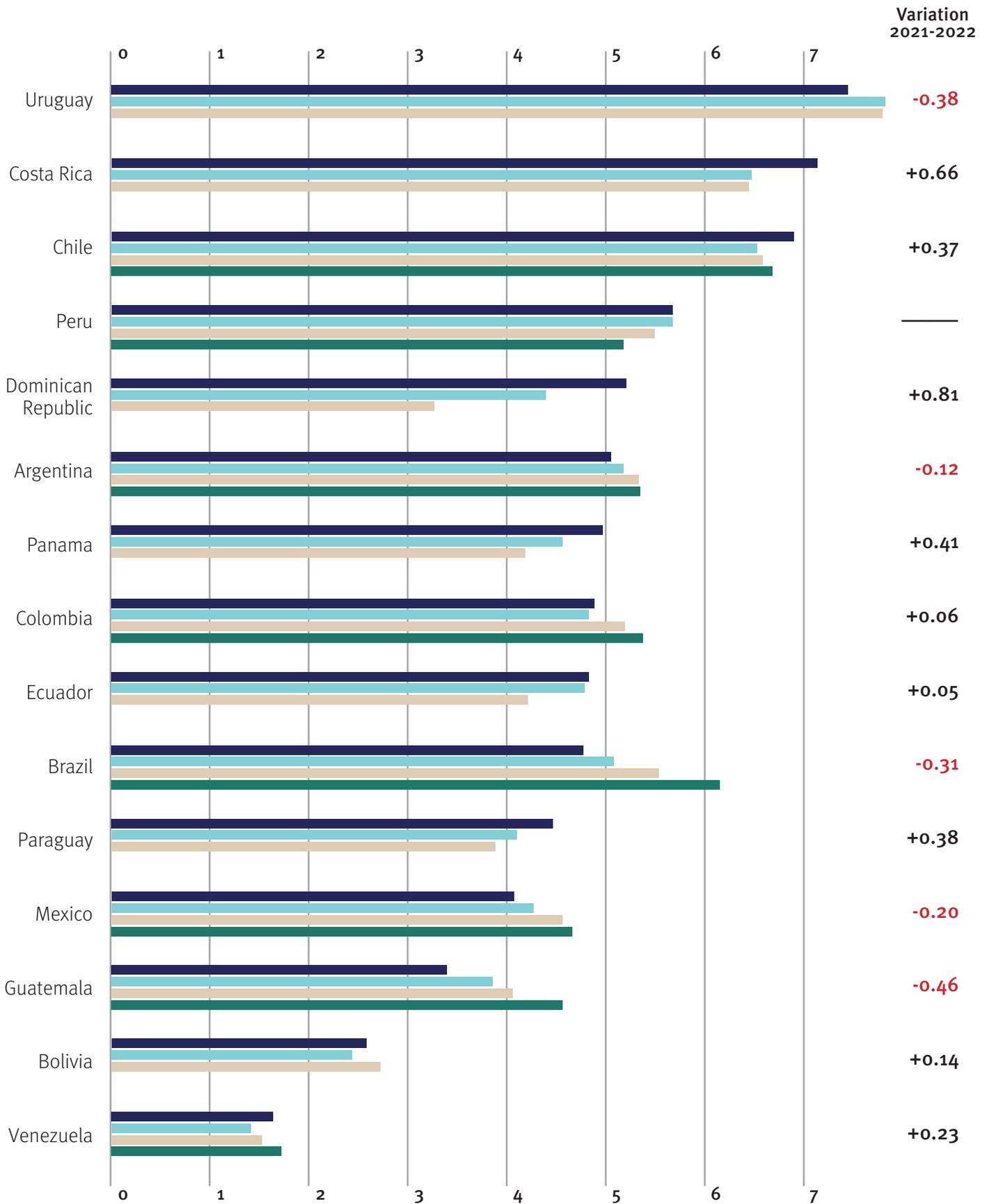


## Overall Ranking

1	Uruguay	7.42
2	Costa Rica	7.11
3	Chile	6.88
4	Peru	5.66
5	Dominican Republic	5.19
6	Argentina	5.04
7	Panama	4.96
8	Colombia	4.87
9	Ecuador	4.82
10	Brazil	4.76
11	Paraguay	4.45
12	Mexico	4.05
13	Guatemala	3.38
14	Bolivia	2.57
15	Venezuela	1.63

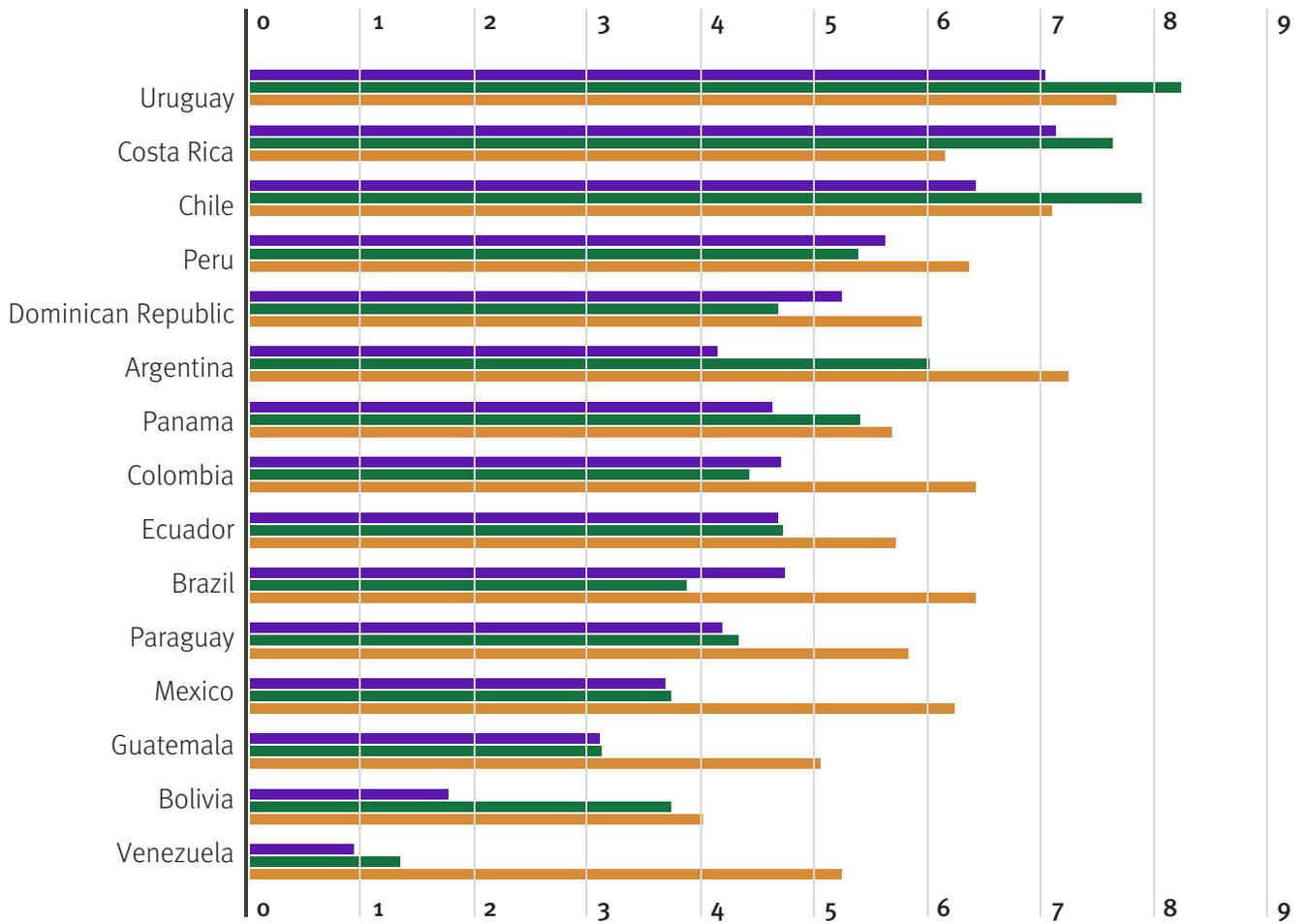
# Overall Scores

● 2022 ● 2021 ● 2020 ● 2019



# Results by Category

■ Legal Capacity    
 ■ Democracy and Political Institutions    
 ■ Civil Society and Media



**Legal Capacity**



**Democracy and Political Institutions**



**Civil Society and Media**





# URUGUAY

**1**  
RANKING

**7.42**

2022 Overall Score

**7.80**

2021 Overall Score

**7.78**

2020 Overall Score

**n/a**

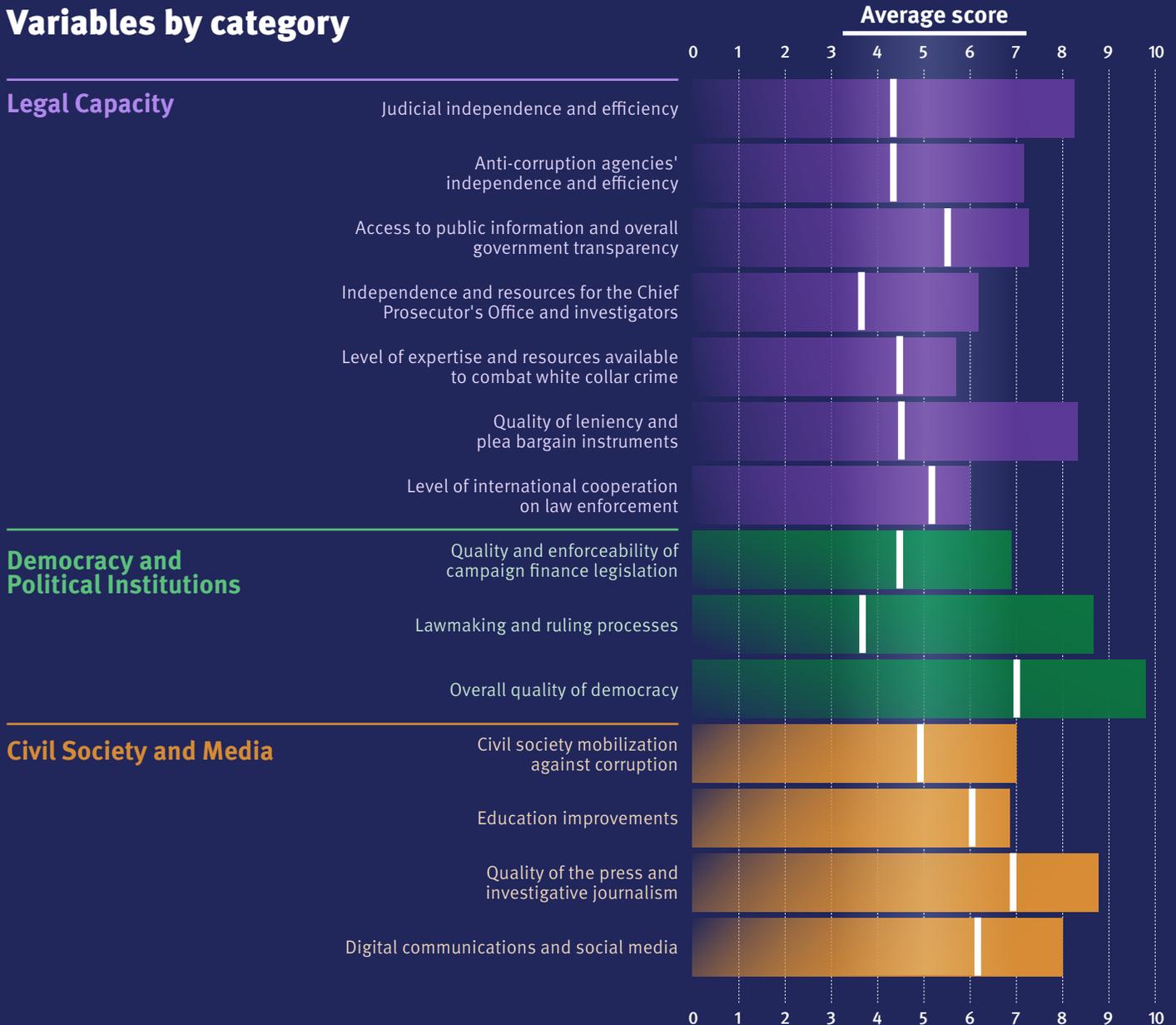
2019 Overall Score

**7.03** Legal Capacity

**8.23** Democracy and Political Institutions

**7.66** Civil Society and Media

## Variables by category





1

RANKING

# URUGUAY

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Despite an almost 5% dip in its overall score, Uruguay maintained its first-place Index ranking, which it has held since 2020. While Uruguay's scores in the democracy and political institutions and civil society and media categories remained stable, the country had a 7% score drop in the legal capacity category. Decreases in variables assessing the level of international cooperation, the efficiency of anti-corruption agencies and Uruguay's capacity to combat white collar crime contributed to this setback. Still, Uruguay outperforms the regional average across all variables covered in the Index due to its independent institutions, active civil society and strong democratic credentials.

In 2022, the main development affecting Uruguay's capacity to combat corruption was the Urgent Consideration Law (LUC), which was ratified in a March referendum. The LUC was a government-sponsored legislative package that introduced a series of changes to the country's legal framework, mostly in order to attract private and foreign investment. Among its provisions, the LUC included the easing of some restrictions for cash transactions as well as changes to reporting procedures for certain (non-financial) actors. Some observers say these changes have the potential to hamper, to some extent, Uruguay's capacity to tackle money laundering.

## **CRITICAL ISSUES TO MONITOR**

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The selection of a new permanent chief prosecutor is possible. It will require legislative approval, and will likely become a touchstone for political debate in the legislature, which is divided closely between the governing coalition and the opposition.

The persistent underfunding of the country's main anti-corruption agency, the Transparency and Public Ethics Board (JUTEP), which has raised concerns among experts about the institution's capacity to conduct sophisticated operations.

Uruguay's closer ties to the Organization for Economic Co-operation and Development (OECD) and to the European Union (EU) may further improve its governance standards. The country recently adhered to the OECD Declaration on International Investment and Multinational Enterprises, and in October 2021 the EU ratified Uruguay's status as a cooperative jurisdiction.



# COSTA RICA

**2**  
RANKING

**7.11**

2022 Overall Score

**6.45**

2021 Overall Score

**6.43**

2020 Overall Score

**n/a**

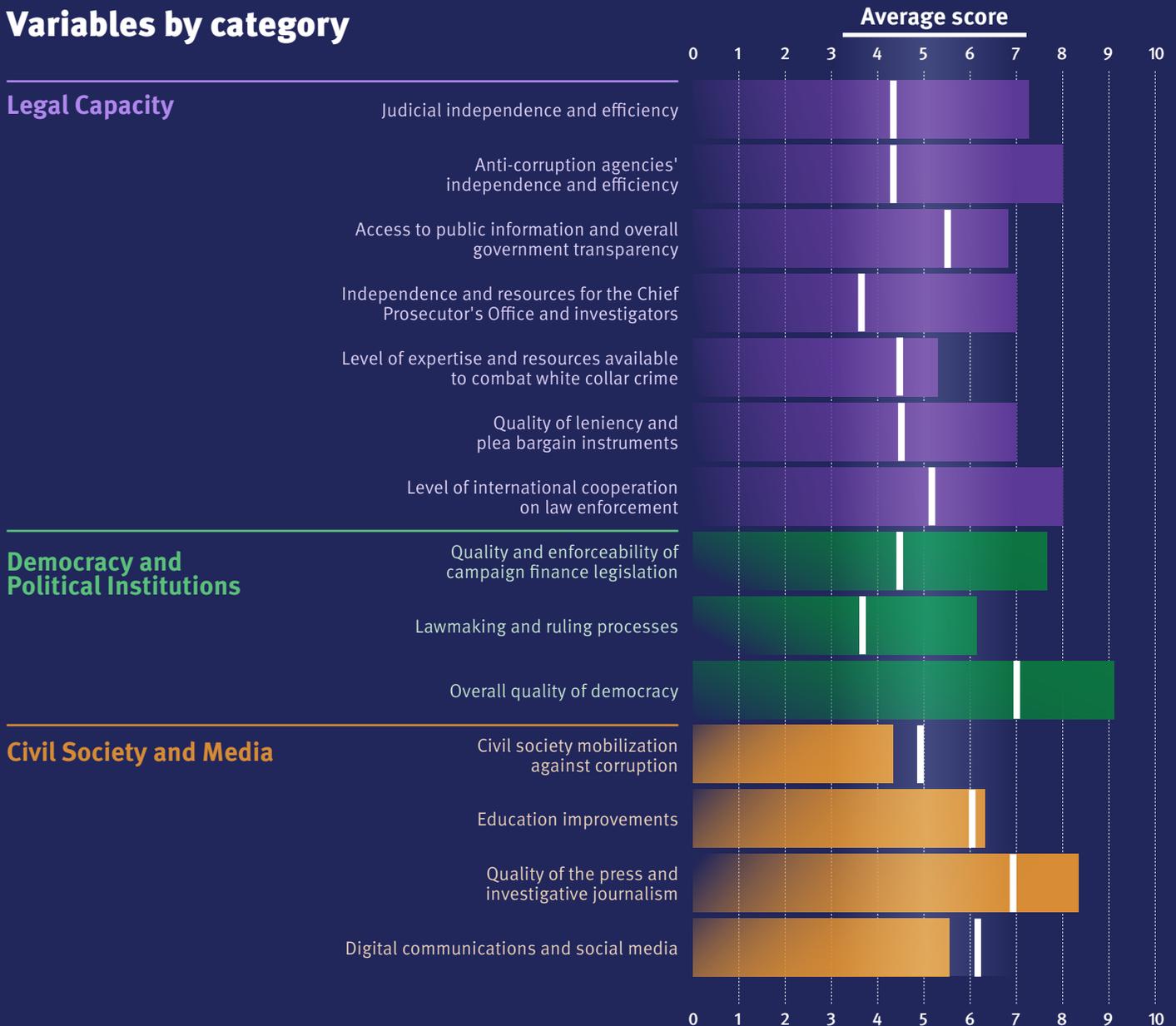
2019 Overall Score

**7.12** Legal Capacity

**7.63** Democracy and Political Institutions

**6.14** Civil Society and Media

## Variables by category





2

RANKING

# COSTA RICA

Costa Rica saw 10% year-on-year growth in its overall score, surpassing Chile for the first time to rank second behind Uruguay. The country registered moderate improvement in both the legal capacity and democracy and political institutions categories, where it ranks among the top three regionwide. Popular disillusionment with the political class likely contributed to an almost 7% setback in the civil society and media category, driven down by decreases in the variables assessing civil society mobilization against corruption, as well as digital communications and social media.

Over the past year, Costa Rica has undertaken important steps to both investigate and prevent corruption. In August, Costa Rica launched the National Integrity and Corruption Prevention Strategy (2021-2030) to prioritize corruption prevention and coordination among 17 groups from the private and public sectors as well as civil society.

Costa Rican authorities announced recent investigations into alleged corruption schemes between construction companies and public officials. According to authorities, the *Cochinilla* corruption case caused a \$127 million deficit in the national road works budget from 2018 to 2020. Several mayors were arrested in November in connection with another case of alleged corruption in the public works sector. In August 2021, the Attorney General's Office indicted a former legislator and a businessman in connection with alleged bribery in the high-profile *cementazo* case, a scheme involving state officials, a public bank and imports of cement from China that emerged in 2017.

## CRITICAL ISSUES TO MONITOR

President Rodrigo Chaves, who ran on an anti-establishment and anti-corruption platform, took office in May. The Chaves administration will likely prioritize anti-corruption reforms, but his party lacks a legislative majority, which could delay meaningful improvements.

Observers have expressed concern over Chaves' criticism of the media and the judicial branch, as well as promises he made on the campaign trail to enact reforms by referendum or decree to bypass the legislative assembly.

Progress in the *Cochinilla* case, one of the biggest cases of construction-sector graft Costa Rica has seen, will be closely followed.



# CHILE

**3**  
RANKING

**6.88**

2022 Overall Score

**6.51**

2021 Overall Score

**6.57**

2020 Overall Score

**6.66**

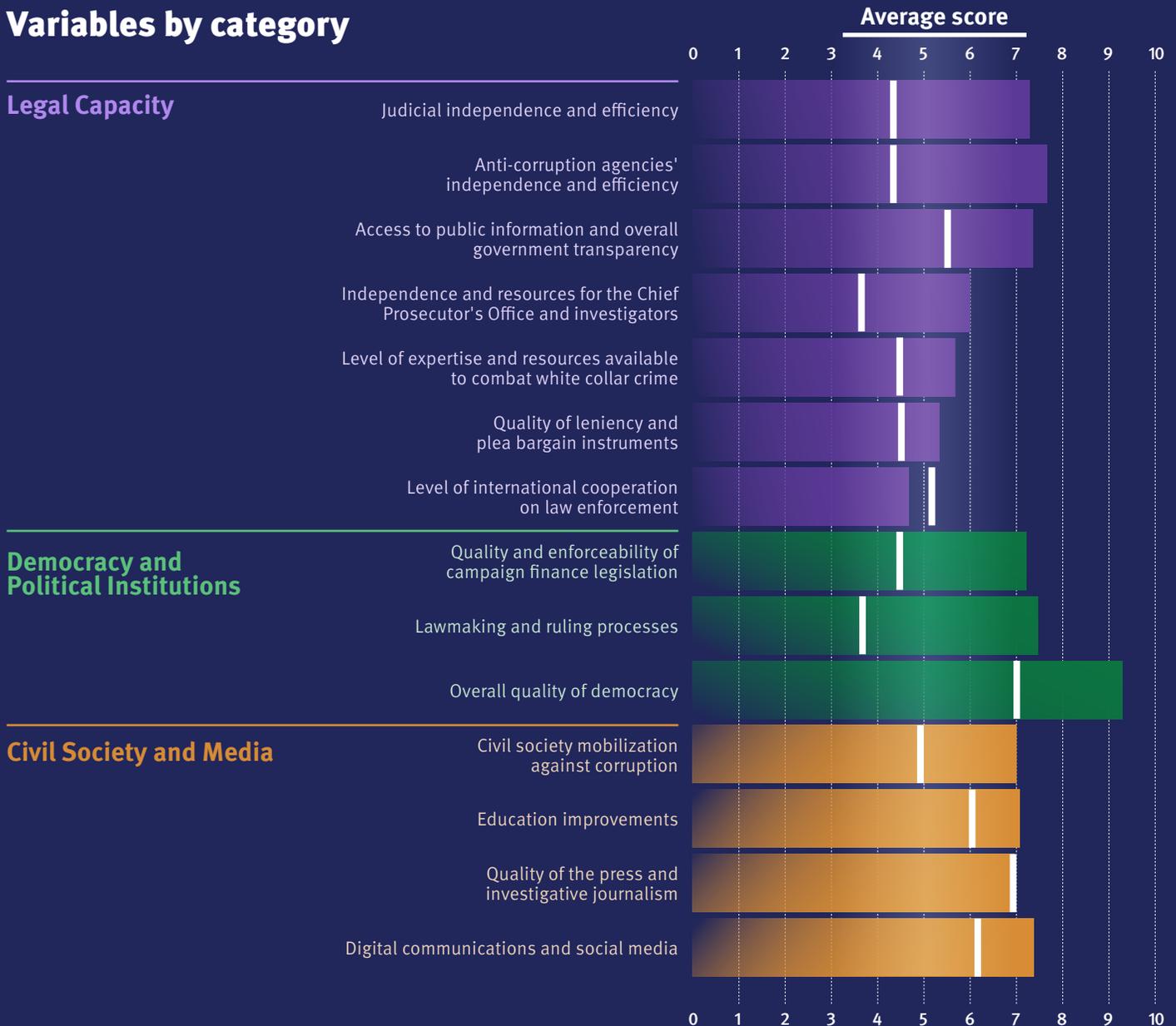
2019 Overall Score

**6.42** Legal Capacity

**7.88** Democracy and Political Institutions

**7.10** Civil Society and Media

## Variables by category





3

RANKING

# CHILE

Chile's overall score increased by 5%, but its upward trajectory did not keep pace with Costa Rica's, leading to Chile's drop from 2nd place in 2021 to 3rd place in 2022. The country maintained its 3rd place ranking in the legal capacity category, which saw an 8% score increase year-on-year, bolstered by improvements in key variables assessing international cooperation and anti-corruption agencies' independence and efficiency. As in 2021, Chile outperformed the regional average in almost all of the variables analyzed.

Chile had an uptick in the variable assessing civil society mobilization against corruption, and prominent cases of alleged corruption have received extensive media coverage in recent months. Former President Sebastián Piñera was named in the Pandora Papers leak in October 2021—he has denied any wrongdoing. The lower house of Congress initiated an impeachment motion against Piñera, which the Senate rejected in November. Investigations related to corruption in the military led to the March resignation of the commander in chief of the army. His three predecessors have also been investigated for alleged fraud.

The country is in the process of drafting a new Constitution that will include measures covering corruption and governance issues. In April, the Constitutional Convention approved ten articles related to probity, transparency and accountability. President Gabriel Boric, in office since March, has announced an ambitious set of reforms, including an anti-corruption and probity agenda.

## CRITICAL ISSUES TO MONITOR

The Constitutional Convention is expected to produce a draft constitution by July. The lack of consensus on key issues may delay the process, and the diminishing public support for Convention has raised the possibility that the constitution will not be approved in a referendum scheduled for September.

Boric will likely focus on transparency and anti-corruption reforms to address the concerns of his constituency and try to shore up popular approval, which has waned since the start of his term. However, pressing security challenges may push anti-corruption reforms to the back burner.



# PERU

**4**  
RANKING

**5.66**  
2022 Overall Score

**5.66**  
2021 Overall Score

**5.47**  
2020 Overall Score

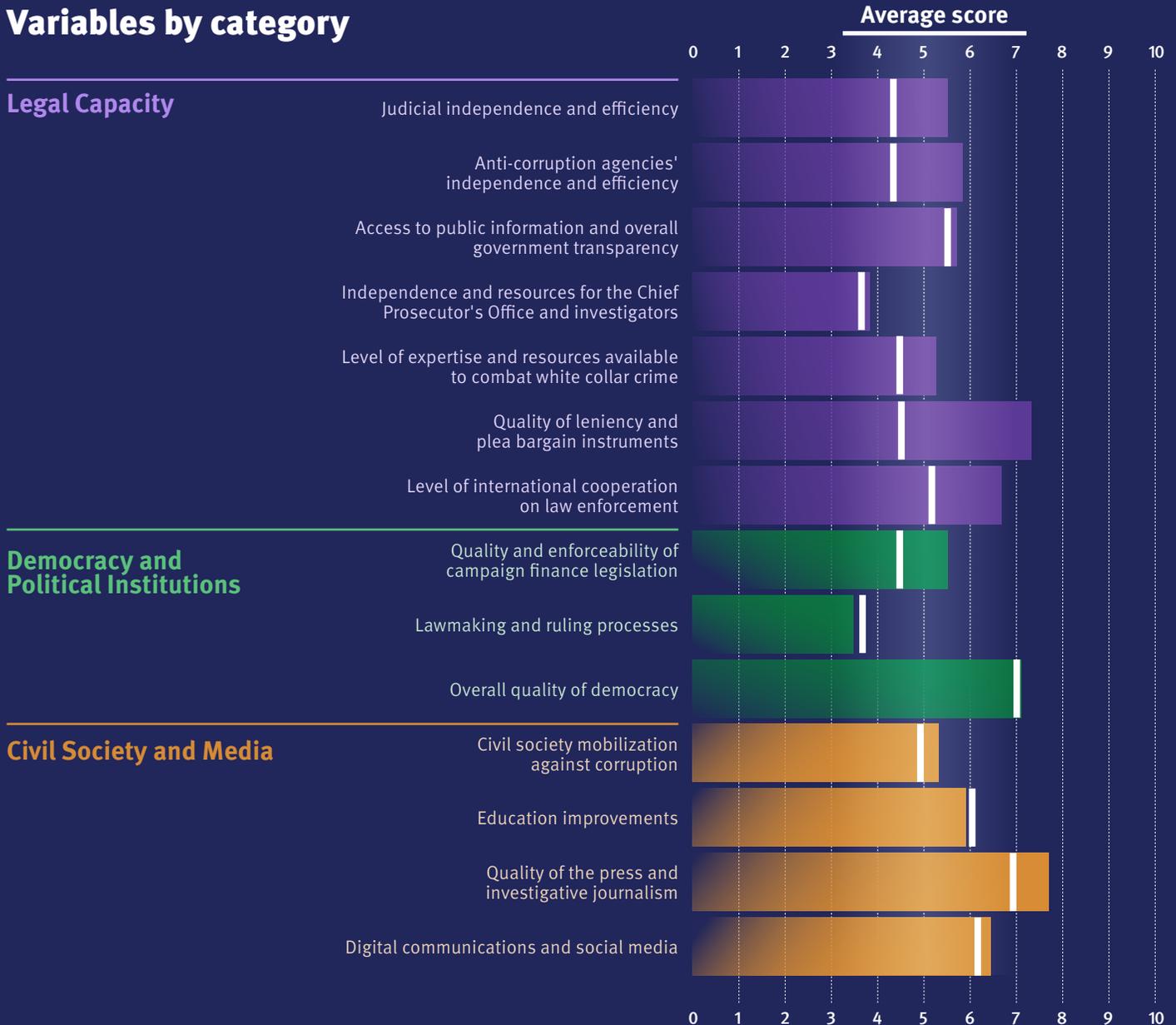
**5.17**  
2019 Overall Score

**5.61** Legal Capacity

**5.38** Democracy and Political Institutions

**6.35** Civil Society and Media

## Variables by category





# PERU

4

RANKING

As in 2021, Peru placed fourth in the Index, and its overall score and category scores remained stable. The country saw a 9% setback in the variable measuring lawmaking and ruling processes, reflecting persistent tensions between the executive and legislative branches. Since entering office in July 2021, President Pedro Castillo has faced a series of impeachment motions, and his administration has struggled to create a consensus around its reform agenda.

Peruvian judicial institutions have maintained incremental progress in corruption proceedings. The National Justice Board (JNJ) has continued to address corruption in the judiciary and removed public officials as part of the probe into the *Cuellos Blancos del Puerto* case. The trial of former President Ollanta Humala, who allegedly received illegal campaign financing from the Brazilian firm Odebrecht, began in February.

The Attorney General's office has initiated investigations into alleged corruption by Castillo and his inner circle, and the president has denied wrongdoing. Presidential immunity limits significant progress in the investigations until Castillo's term ends in 2026. Public sector corruption is widespread and generates significant losses for the government. Castillo has pushed for the creation of a digital platform to promote due diligence in the public sector.

The variable evaluating civil society mobilization against corruption fell by 6% since 2021, likely reflecting increasing public concern over rising food and fuel prices rather than corruption issues.

## **CRITICAL ISSUES TO MONITOR**

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Additional impeachment motions against Castillo and continued political instability.

A trial of opposition leader Keiko Fujimori for money laundering may take place this year.

Peru's process to join the OECD started this year, and will drive efforts to strengthen integrity practices.



# DOMINICAN REPUBLIC

**5**  
RANKING

**5.19**

2022 Overall Score

**4.38**

2021 Overall Score

**3.26**

2020 Overall Score

**n/a**

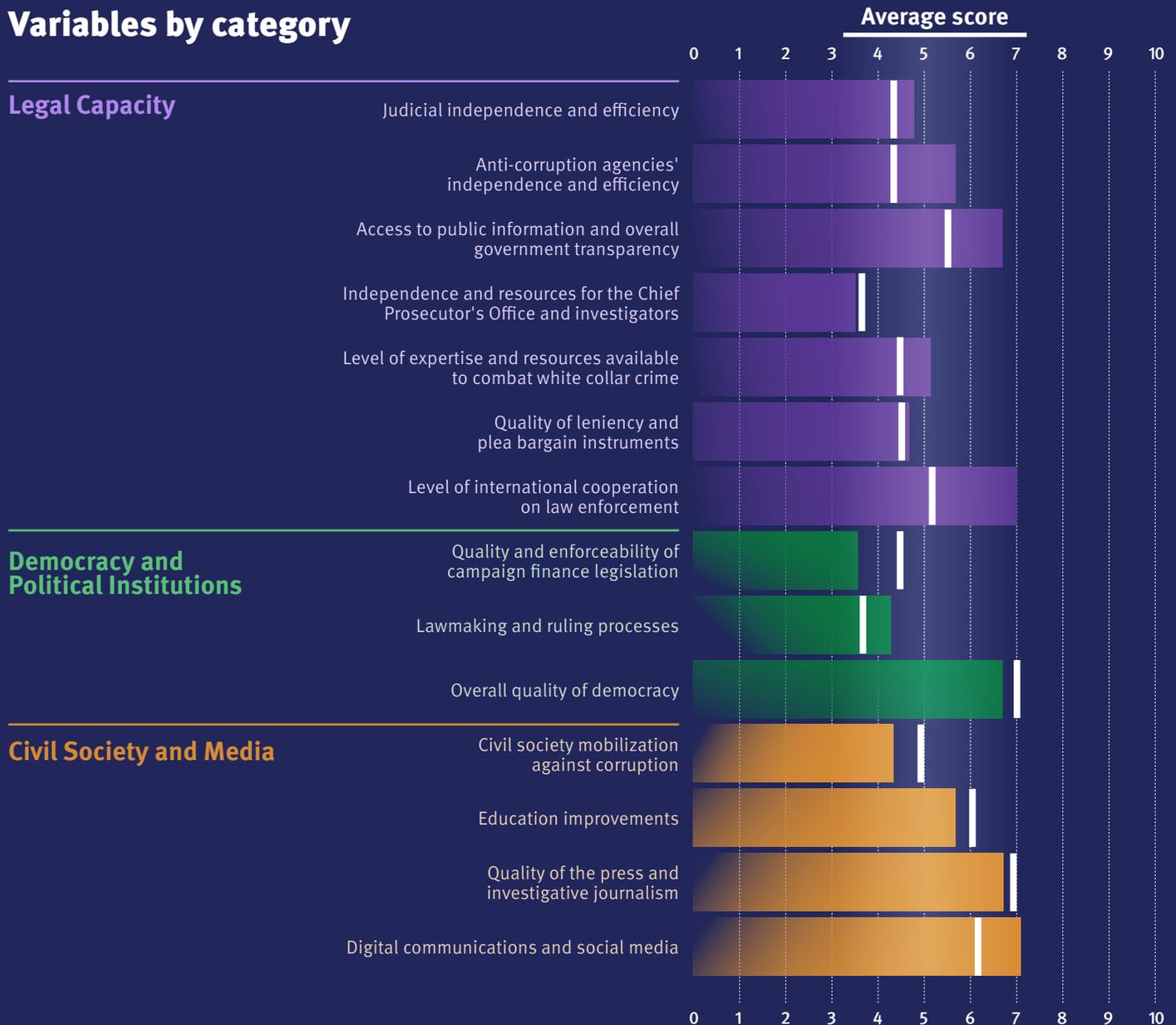
2019 Overall Score

**5.23** Legal Capacity

**4.66** Democracy and Political Institutions

**5.95** Civil Society and Media

## Variables by category





5

RANKING

# DOMINICAN REPUBLIC

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The Dominican Republic continued its rise in the CCC Index, climbing from 10th place in 2021 to 5th place in 2022. The country's overall score improved by 18% since 2021, boosted by 24% growth in the legal capacity category and significant advancement in the variables assessing international cooperation and anti-corruption agencies. These gains reflect President Luis Abinader's anti-corruption push since he entered office in 2020. His administration has proposed a law to promote transparency in public contracts, instituted compliance programs in public institutions, and enacted a law to simplify bureaucracy.

Despite these reforms, more resources are needed to fight corruption, and the Attorney General has requested that Congress dedicate more funds to the Public Ministry. Over the last year, high-profile anti-corruption investigations like *Operación Coral* and *Operación Antipulpo* have continued. These operations have mainly focused on individuals with ties to the previous administration, leading to accusations that these investigations are politically motivated. The Abinader government has also investigated alleged acts of corruption from within its own administration. Abinader was named in the October 2021 Pandora Papers leak of documents detailing leaders' use of offshore companies, and stated that he has always fulfilled his tax obligations.

The Dominican Republic registered a significant increase in the variable assessing civil society mobilization against corruption, indicating that citizens continue to demand government accountability and actively scrutinize the current administration's anti-corruption efforts.

## CRITICAL ISSUES TO MONITOR

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A potential constitutional reform could make the office of the attorney general more independent from the executive branch. Irrespective of the possible reform, the current attorney general is widely considered to be independent.

Abinader has backed an asset recovery bill to return assets stolen from the state and assets with illicit origins. Congress is debating the bill, which may be approved before the end of 2022.

The Financial Analysis Unit is conducting a national money laundering risk assessment ahead of the country's next evaluation from the Financial Action Task Force.



# ARGENTINA

**6**  
RANKING

**5.04**

2022 Overall Score

**5.16**

2021 Overall Score

**5.32**

2020 Overall Score

**5.33**

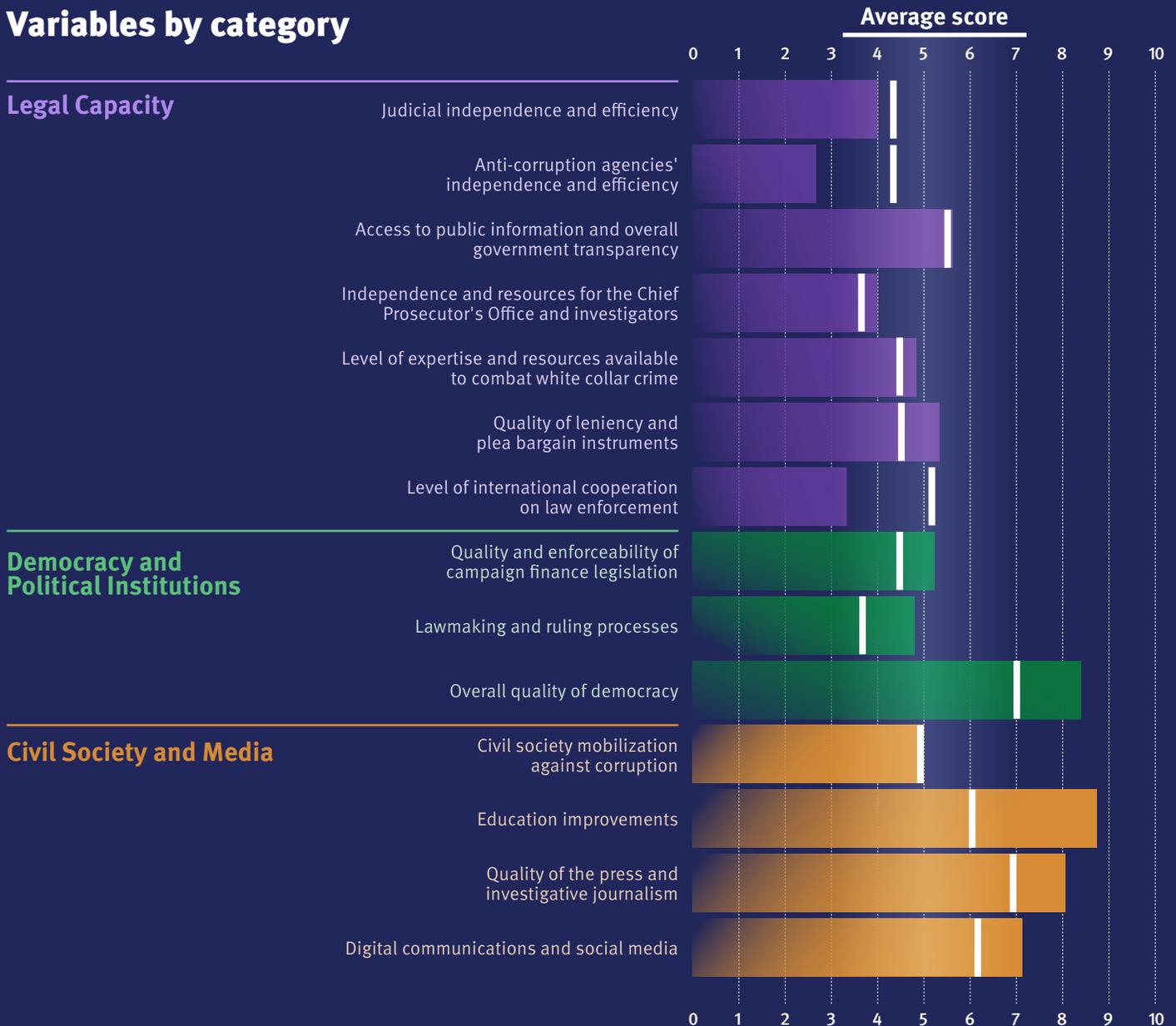
2019 Overall Score

**4.13** Legal Capacity

**6.01** Democracy and Political Institutions

**7.23** Civil Society and Media

## Variables by category





6

RANKING

# ARGENTINA

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Argentina's overall score decreased by 2%, continuing the country's three-year downward trajectory in the Index and leading to a fall from 5th to 6th in the 2022 ranking. Argentina registered slight improvements in all categories except for legal capacity, which had an 8% setback. Its score in the independence and efficiency of anti-corruption agencies fell for the third year running, placing Argentina 12th regionwide in that variable.

Progress on anti-corruption efforts remains halting. A judicial reform package championed by the Alberto Fernández government is stalled in Congress.

In 2019, the Anti-Corruption Office started work on a transparency registry (RITE) to bring together public and private sector groups, consolidate transparency measures and disclose compliance programs. The project was launched this year.

Argentina registered improvement in the civil society and media category, where it ranks second in the region behind only Uruguay. Recent anti-corruption demonstrations representing both pro-*kirchnerista* groups and the opposition have been well-attended, suggesting that anti-corruption could be a central issue in the 2023 general election.

## CRITICAL ISSUES TO MONITOR

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Participatory meetings to debate the government's Public Ethics Bill, which began in October 2021 and are open to Argentine citizens. The law intends to reform the ethical and public accountability standards for all branches of government.

The impacts of the government's agreement with the International Monetary Fund announced in January. In addition to changes in fiscal policy, the deal requires the government to align Argentina's anti-money laundering regulations to international standards.

Former President and current Vice President Cristina Fernández de Kirchner is a defendant in multiple corruption investigations, with a verdict in the so-called *Vialidad* case possible in 2022. She has denied wrongdoing in all cases.



# PANAMA

**7**  
RANKING

**4.96**

2022 Overall Score

**4.55**

2021 Overall Score

**4.17**

2020 Overall Score

**n/a**

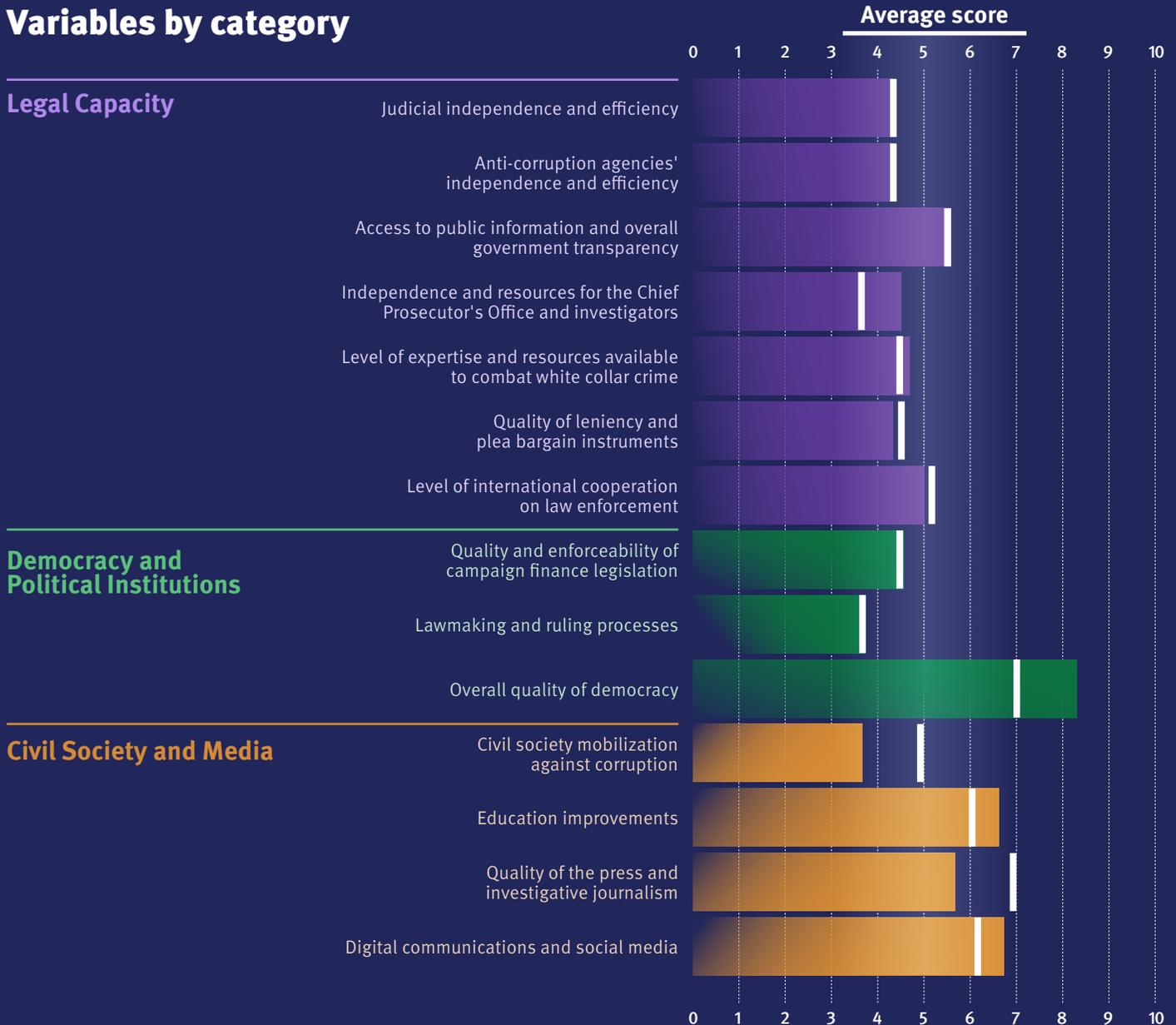
2019 Overall Score

**4.62** Legal Capacity

**5.39** Democracy and Political Institutions

**5.67** Civil Society and Media

## Variables by category





# PANAMA

Panama registered modest improvements and had 9% growth in its overall score, rising from 9th place in 2021 to 7th place in 2022. The country saw slight advancements across all three categories, improving most in the variables assessing lawmaking and ruling processes, digital communications and social media, and judicial independence and efficiency.

Panamanian authorities conducted high-profile anti-corruption investigations over the past year, and there is a petition underway to recall the mayor of Panama City. In April, the electoral court admitted a request for the recall against the mayor, who is accused of administrative irregularities, budget mismanagement and lack of transparency, which he has denied. In August 2021, the government took a step backward in transparency when the Laurentino Cortizo administration issued Resolution 71, which restricts access to records of the discussions or activities of cabinet members, the president and the vice president for a period of 10 years.

In March, former President Ricardo Martinelli (2009-2014) was granted a legal protection from prosecution in cases related to his alleged involvement in corruption scandals, enabling him to run for the presidency in the 2024 elections. Martinelli has rejected the accusations against him. In May, a U.S. court sentenced two of Martinelli’s sons to 36 months in prison for laundering \$28 million in bribe proceeds from Odebrecht for the benefit of one of their close relatives, a high-ranking public official in Panama.

AML enforcement is a persistent challenge for Panama. In June the Paris-based Financial Action Task Force (FATF), the global inter-governmental money laundering and terrorist financing watchdog, decided to keep Panama on its grey list. In February, the European Union kept Panama on its list of non-cooperative countries for tax purposes.

## CRITICAL ISSUES TO MONITOR

A decision from the Supreme Court on the appeal filed to declare unconstitutional Resolution 71, which limits access to the executive branch’s records.

The FATF has stated that if Panama does not complete its action plan by October 2022, it will consider calling on jurisdictions to apply enhanced due diligence to business relations and transactions with Panama.



# COLOMBIA

**8**  
RANKING

**4.87**  
2022 Overall Score

**4.81**  
2021 Overall Score

**5.18**  
2020 Overall Score

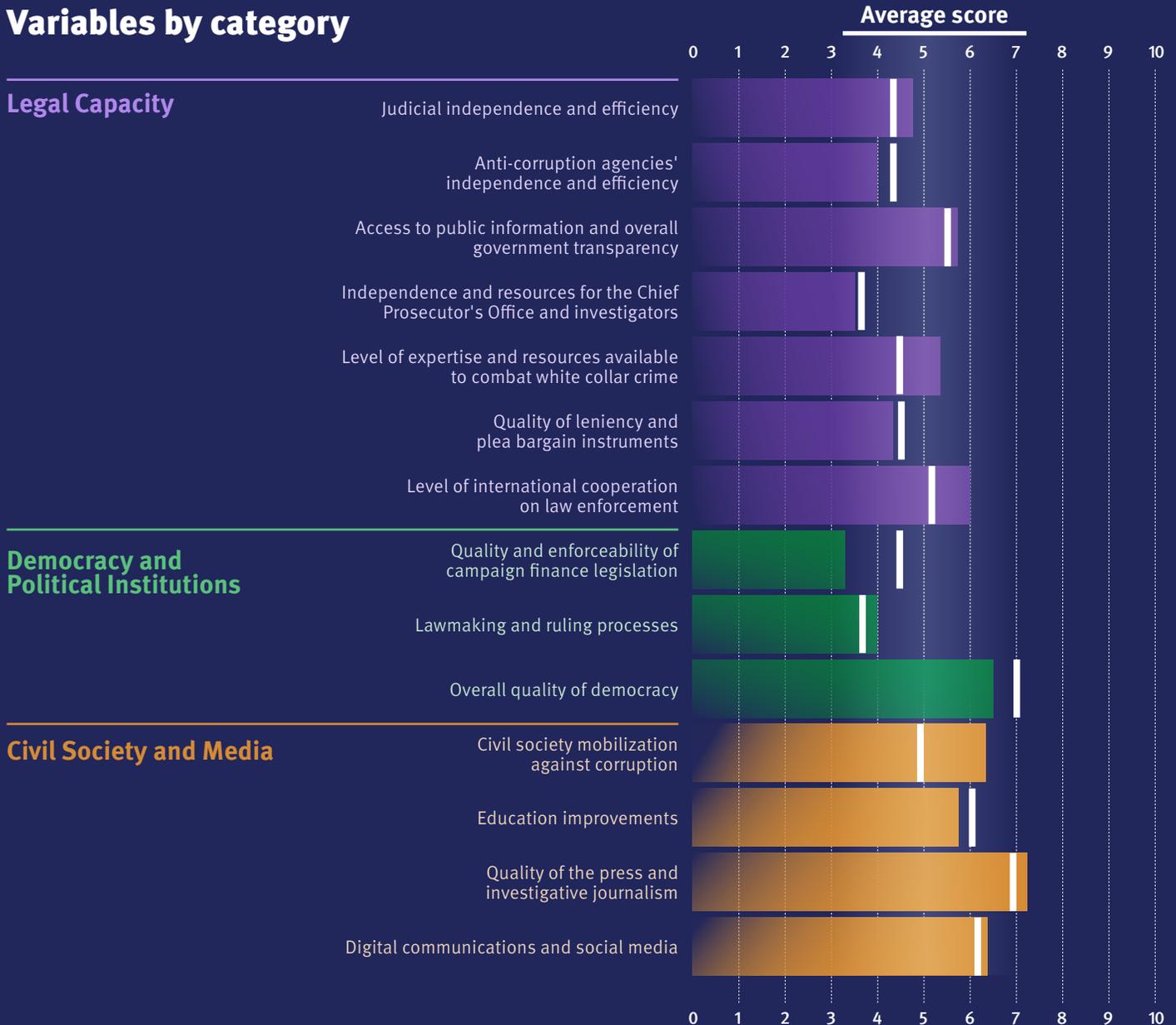
**5.36**  
2019 Overall Score

**4.69** Legal Capacity

**4.41** Democracy and Political Institutions

**6.42** Civil Society and Media

## Variables by category





8

RANKING

# COLOMBIA

Despite a small improvement in its overall score, Colombia fell from 7th to 8th place in the Index overall. Colombia advanced slightly in the civil society and media and legal capacity categories, but declined by 6% in the democracy and political institutions category, continuing a downward trend in that category since 2019 and falling behind the regional average.

Within the legal capacity category, Colombia had a 20% setback in the variable assessing the independence of anti-corruption agencies. During President Iván Duque's term, the independence of the offices of the Comptroller General and the Attorney General have been widely questioned. In January, Duque signed into law a wide-ranging anti-corruption bill that addresses the role of private companies in facilitating and combating corruption. The new rules increase the likelihood that companies will be targeted in corruption investigations, but some observers say the law does not adequately address the influence of special interests in government or weaknesses in the judicial system.

Colombia registered a 21% drop in the variable assessing the quality of campaign finance regulations during a key election year. Colombians elected a fragmented Congress in March, and distrust in the electoral process has grown amid fraud accusations and calls for a recount. Anti-corruption rhetoric has been common across the political spectrum this election season, reflecting citizens' demand for reforms. Colombia showed significant improvement in civil society mobilization against corruption, continuing an upward trajectory in that variable since 2019.

## CRITICAL ISSUES TO MONITOR

President-elect Gustavo Petro has proposed anti-corruption reforms such as whistleblower protection legislation, participatory budgeting and better oversight for all public contracting. Petro also announced plans to create an anti-corruption prosecutor's office and an international anti-corruption commission to investigate past corruption cases.

There will be close scrutiny over Congress' appointment of a new Comptroller General in August. The new official's term will coincide with that of President-elect Petro's.

A bill progressing through Congress would change how the Attorney General is chosen in order to increase that office's independence and autonomy. Currently, the Supreme Court chooses the Attorney General from a list presented by the president. With this constitutional reform, the president would select a candidate from a list prepared by the Supreme Court.



# ECUADOR

**9**  
RANKING

**4.82**  
2022 Overall Score

**4.77**  
2021 Overall Score

**4.19**  
2020 Overall Score

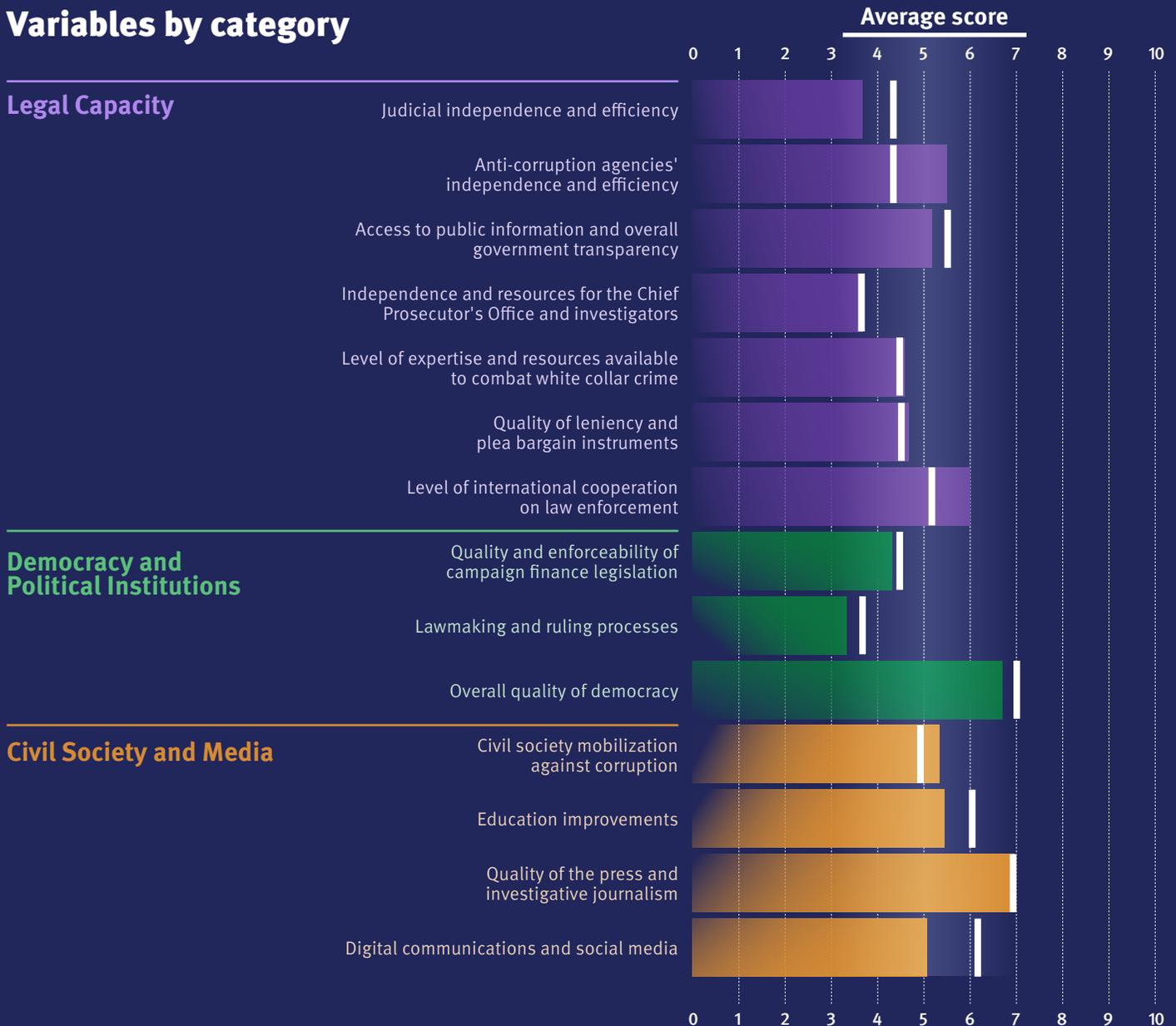
**n/a**  
2019 Overall Score

**4.66** Legal Capacity

**4.72** Democracy and Political Institutions

**5.70** Civil Society and Media

## Variables by category





9

RANKING

# ECUADOR

Ecuador's overall score is practically unchanged since 2021, indicating a stable anti-corruption environment since Guillermo Lasso became president in May 2021. The country registered moderate growth in the democracy and political institutions category, reflecting some of Lasso's efforts to combat corruption. These include a decree that regulates and restricts nepotism, improper use of public resources and conflicts of interest, as well as a new judicial unit specialized in combating corruption and organized crime.

In May, Lasso issued a decree creating an Anti-Corruption Secretariat that will be part of his cabinet and will be tasked with developing a national anti-corruption strategy focused mainly on prevention. Some critics have warned that such a group could grant too much power to the executive branch. Lasso was named in the Pandora Papers leak and stated that he got rid of legitimate investments abroad prior to the election.

Ecuador climbed from 11th to 5th place regionwide in the variable assessing the level of international cooperation. The U.S. has strengthened its collaboration with Ecuador in corruption investigations in the past year amid a surge in violence related to increased drug trafficking in Ecuador.

In July 2021, a former comptroller general resigned due to allegations of ties to organized crime and corruption related to state oil company Petroecuador. Another former comptroller general was indicted in the U.S. in March on money laundering charges related to alleged bribes solicited from Odebrecht.

## CRITICAL ISSUES TO MONITOR

The Citizen Participation and Social Control Council's appointment of a new comptroller general, which has been significantly delayed.

It is likely that Lasso's anti-corruption efforts, including his call for a judicial system reform, will continue to face opposition in the National Assembly.

Ecuador's National Justice Court has requested to extradite former President Rafael Correa from Belgium. In 2020, Correa was sentenced in absentia to 8 years in prison for alleged bribery, and his allies maintain that legal actions against him are politically motivated.

The December release of the Financial Action Task Force of Latin America's final report on the efficiency of Ecuador's anti-money laundering and anti-terrorism financing systems.



# BRAZIL

**10**  
RANKING

**4.76**

2022 Overall Score

**5.07**

2021 Overall Score

**5.52**

2020 Overall Score

**6.14**

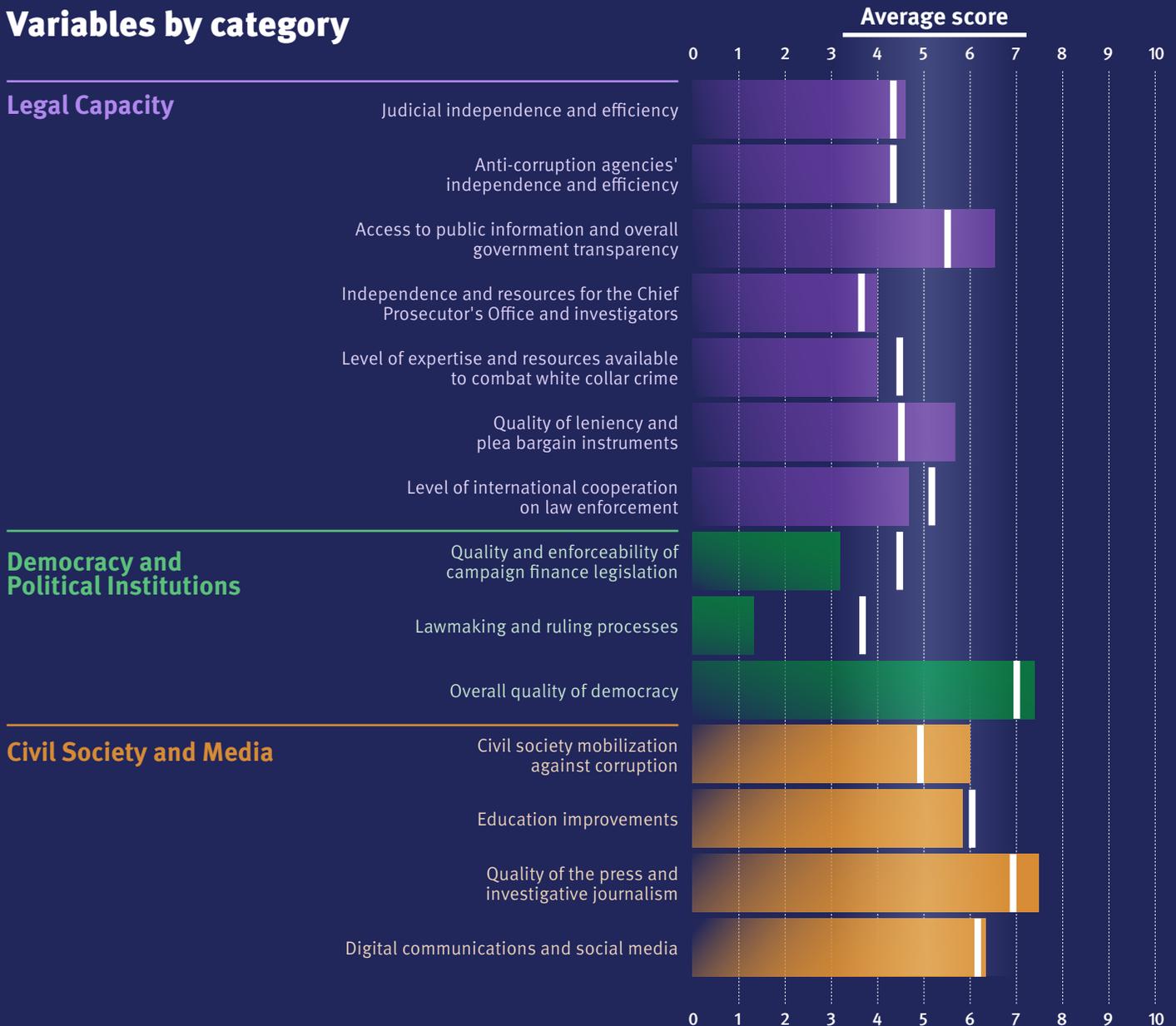
2019 Overall Score

**4.73** Legal Capacity

**3.86** Democracy and Political Institutions

**6.42** Civil Society and Media

## Variables by category





10

RANKING

# BRAZIL

Brazil declined in the Index for the third consecutive year, falling from 6th place in 2021 to 10th in 2022. Its overall score is down 6% since last year and has fallen by 22% since 2019. Brazil's legal capacity score declined by 8%, but the country stayed above the regional average in that category, indicating that setbacks over the past three years have not fully reversed decades of institutional strengthening.

The Supreme Court and the Superior Electoral Court remain independent from the government despite the escalation in President Jair Bolsonaro's public criticism of them. However, the variable assessing anti-corruption agencies' independence and efficiency fell by almost 19% as Bolsonaro has sought to consolidate control over bodies investigating alleged corruption involving his allies. Authorities within the Federal Police have reassigned officials conducting such investigations, and Bolsonaro has appointed allies to the Federal Public Ministry and other bodies. Independent anti-corruption agencies like the Council for Financial Activities Control have seen budget cuts, limiting their investigative and oversight abilities. Despite its limited resources, the office of the Comptroller General (CGU) appears to be taking a more prominent role in promoting enforcement and negotiating agreements and resolutions of corruption-related matters. *Processos administrativos de responsabilização* (PAR) are increasingly being used by multiple government entities and authorities as an alternative mechanism to seek resolution into harmful acts covered by Brazil's anti-corruption law.

Brazil saw its steepest decline in the variable assessing lawmaking and ruling processes, amid media reports about federal budget allocations to Bolsonaro's allies in Congress that were not fully transparent. Even with political polarization on the rise, Brazil's score in the civil society and media category remained stable and outperformed the regional average. NGOs and the press have remained mostly independent and have uncovered corruption scandals at the federal, state and local levels.

## CRITICAL ISSUES TO MONITOR

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Anti-corruption reforms are unlikely ahead of the October general election.

Voters are more focused on inflation, unemployment and living standards than anti-corruption issues. Candidates will invoke anti-corruption rhetoric to criticize their adversaries, but this messaging may not gain as much traction among the electorate as it did in 2018.

The election outcome will have decisive impacts on Brazil's anti-corruption capacity in coming years.



# PARAGUAY

**11**  
RANKING

**4.45**  
2022 Overall Score

**4.08**  
2021 Overall Score

**3.88**  
2020 Overall Score

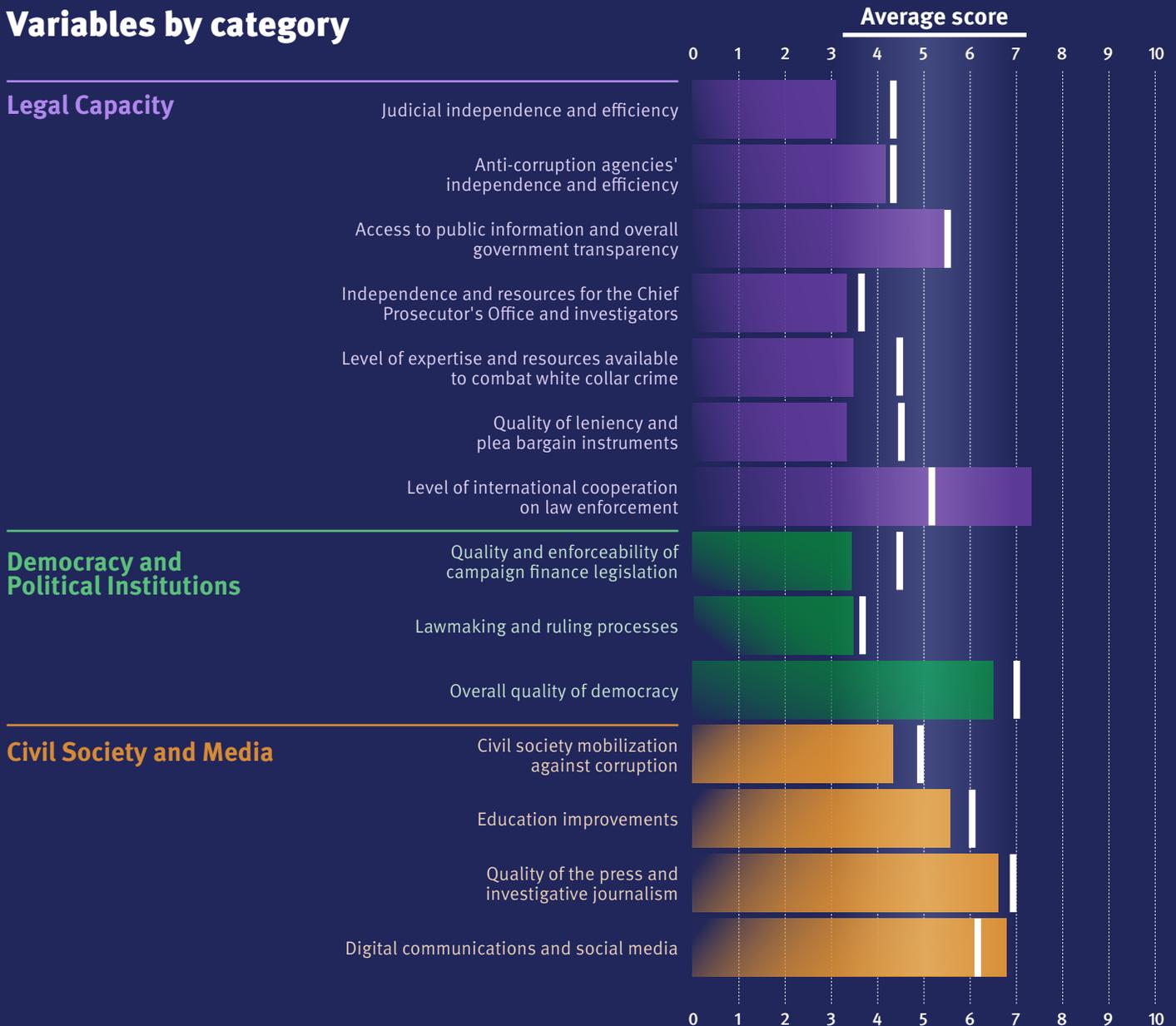
**n/a**  
2019 Overall Score

**4.17** Legal Capacity

**4.32** Democracy and Political Institutions

**5.82** Civil Society and Media

## Variables by category





11

RANKING

# PARAGUAY

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Paraguay rose from 12th to 11th place in the Index in 2022. Its overall score maintained an upward trajectory for the second consecutive year and increased by 9% in 2022. Paraguay registered a 13% improvement in the legal capacity category, rising from 13th to 10th place regionwide. Within that category, the country had a sharp increase in the variable assessing the level of international cooperation on law enforcement.

Paraguay is a central distribution point for cocaine in South America, and recently it has launched international anti-money laundering and anti-drug trafficking operations that have led to key arrests and the seizure of cocaine and other products. These include the TURF operation, in conjunction with Brazil and Europol, and A Ultranza PY, in coordination with Uruguay, Europol, and the U.S. Drug Enforcement Agency.

Despite these gains, Paraguay remains among the lowest performing countries in the Index, and the politicization of judicial institutions is perceived as a persistent challenge. Political bargains in October 2021 over the nomination of new justices to the Supreme Court and the Supreme Electoral Court underscore this trend. In February, the Attorney General's Office announced an investigation into former President Horacio Cartes (2013-2018) related to alleged money laundering and movement of contraband cigarettes.

## CRITICAL ISSUES TO MONITOR

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The results of the Financial Action Task Force of Latin America (GAFILAT) review of Paraguay, which is key for the country's international anti-money laundering credentials, are expected this July.

Developments in the A Ultranza PY operation, which could expose key figures in the country.

Corruption and money laundering will likely be key campaign issues during the 2022 primaries and the general election in April 2023, when Paraguayans will cast votes for president, Congress, and regional authorities.



# MEXICO

**12**  
RANKING

**4.05**  
2022 Overall Score

**4.25**  
2021 Overall Score

**4.55**  
2020 Overall Score

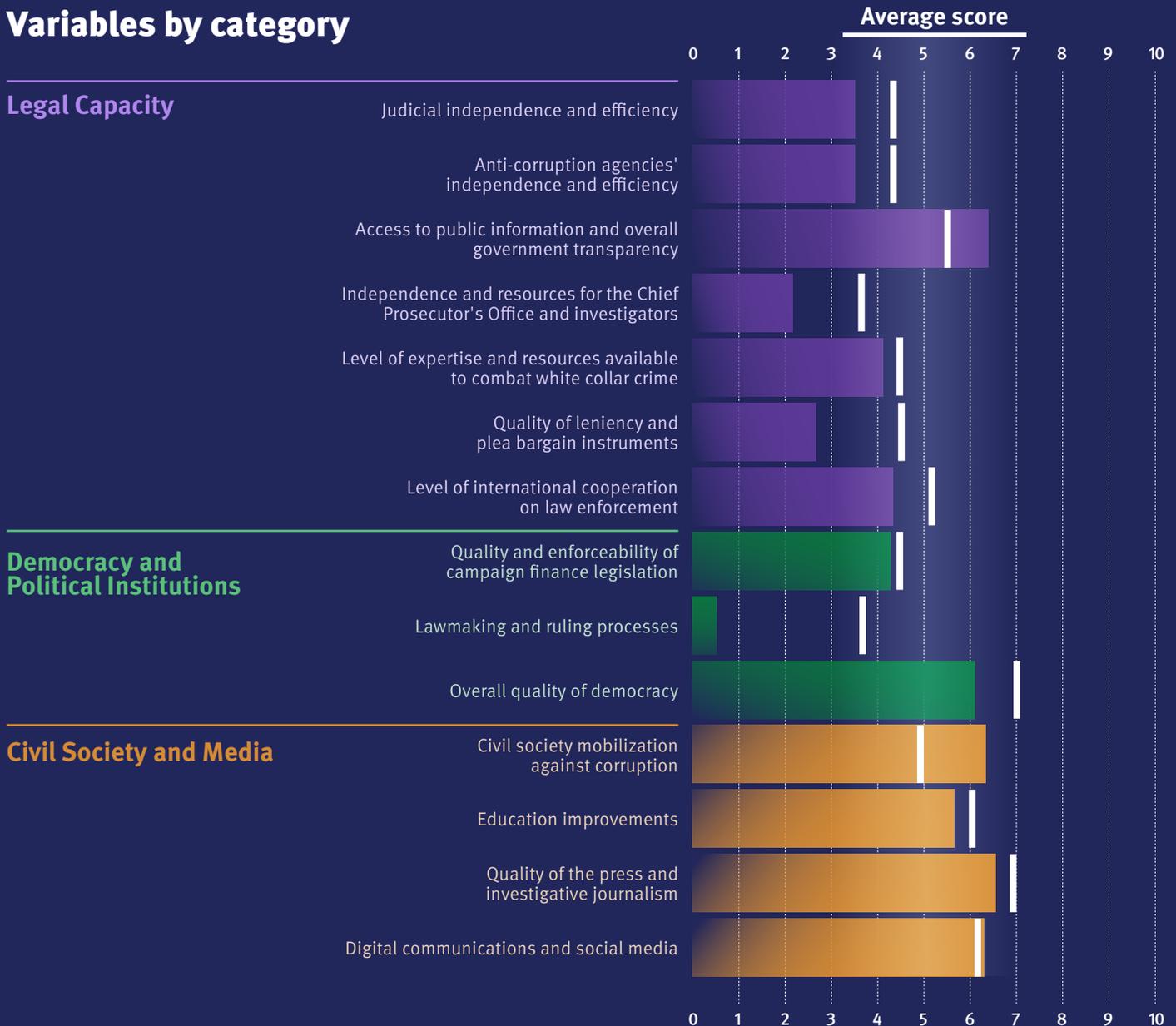
**4.65**  
2019 Overall Score

**3.68** Legal Capacity

**3.72** Democracy and Political Institutions

**6.22** Civil Society and Media

## Variables by category





12

RANKING

# MEXICO

Mexico fell from 11th to 12th place in the Index, and its overall score continued on a downward trend, dropping by almost 5% in 2022, and by 13% since 2019. The country experienced setbacks in all categories, but the steepest decline was within democracy and political institutions. In that category, Mexico had a sharp drop in the variable assessing lawmaking and ruling processes, reflecting the executive branch's perceived efforts to interfere in judicial and legislative matters.

President Andrés Manuel López Obrador (known as AMLO) has increasingly criticized the judicial branch and independent public institutions including the National Electoral Institute (INE), the Antitrust Commission (COFECE), and the National Institute for Transparency, Access to Information and Protection of Personal Data (INAI). In April he proposed a constitutional reform that would reduce the size of Congress and eliminate the INE, replacing it with a new electoral authority whose members would be elected by popular vote.

Mexico lags behind the regional average in the variable assessing the efficiency and independence of anti-corruption agencies, which some observers say have been used for personal gain or have politically motivated appointments. The number of state contracts awarded directly is on the rise, and the armed forces—which are not subject to the same scrutiny and transparency standards as civil agencies—are increasingly participating in key infrastructure projects.

Over the past year, AMLO escalated his criticism of civil society organizations and the press amid revelations of alleged conflicts of interest and corruption involving his relatives and allies, which they deny. Mexico registered a setback in its score measuring civil society mobilization against corruption, but remained above the regional average in that variable.

## CRITICAL ISSUES TO MONITOR

The president stated that he plans to eliminate the Executive Secretariat of the National Anti-Corruption System, which would affect institutional efforts to fight corruption.

Congress will vote on a presidential proposal to put the Ministry of Public Administration (SFP), a key anti-corruption institution, in charge of both government procurement and supervising public spending. This could undermine transparency and accountability, as the SFP would audit itself instead of autonomous bodies supervising public spending.



# GUATEMALA

**13**  
RANKING

**3.38**  
2022 Overall Score

**3.84**  
2021 Overall Score

**4.04**  
2020 Overall Score

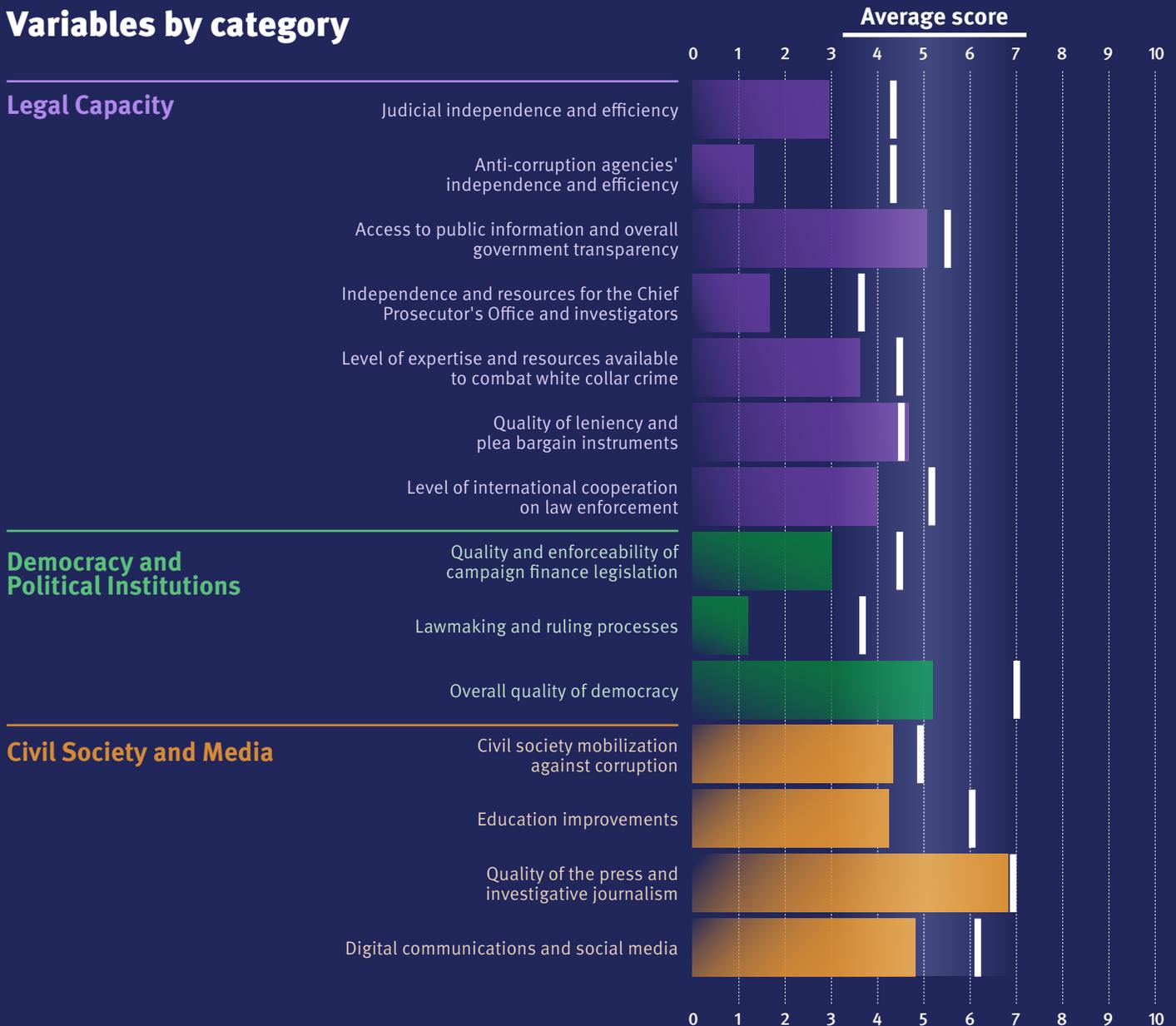
**4.55**  
2019 Overall Score

**3.09** Legal Capacity

**3.11** Democracy and Political Institutions

**5.05** Civil Society and Media

## Variables by category





13  
RANKING

# GUATEMALA

Guatemala's overall score dropped by almost 12% year-on-year, and it remained in 13th place, scoring ahead of only Bolivia and Venezuela. The country experienced setbacks in all three categories, but the most significant was a 17% decrease in legal capacity, which has been on a downward trajectory since 2019.

Guatemala experienced particularly steep declines in the variables evaluating anti-corruption agencies and the independence of the chief public prosecutor's office, reflecting recent acts from the administration of President Alejandro Giammattei. Led by Attorney General Consuelo Porras, the Public Ministry (MP) obstructed and fired officials conducting corruption investigations. In 2021 the U.S. added Porras to the Engel List of corrupt actors and sanctioned high-level Guatemalan officials for alleged acts of corruption. Following institutional pressure and threats to their safety, several prominent anti-corruption figures fled Guatemala over the past year. In July 2021, Juan Francisco Sandoval, head of the Anti-Corruption Unit (FECI), an agency within the MP, was fired and is now exiled in the U.S. He was investigating corruption cases involving high-ranking politicians, including Giammattei, who is alleged to have accepted bribes as well as illicit funding for his 2019 presidential campaign. The president has denied both accusations.

The country also saw diminished levels of civil society mobilization against corruption. Although anti-government demonstrations have taken place periodically, they have not led to meaningful improvements in the anti-corruption environment.

## CRITICAL ISSUES TO MONITOR

The political will to address systematic high-level corruption may remain limited even as the international community, particularly the U.S. and the EU, continues to pressure the government. This will likely result in additional corruption-related sanctions against high-ranking officials.

More prominent anti-corruption prosecutors and judges may flee Guatemala due to institutional pressure and security threats.

Illicit campaign financing schemes are likely to occur ahead of the June 2023 general elections. Meaningful anti-corruption reforms during the campaign season are unlikely.



# BOLIVIA

**14**  
RANKING

**2.57**  
2022 Overall Score

**2.43**  
2021 Overall Score

**2.71**  
2020 Overall Score

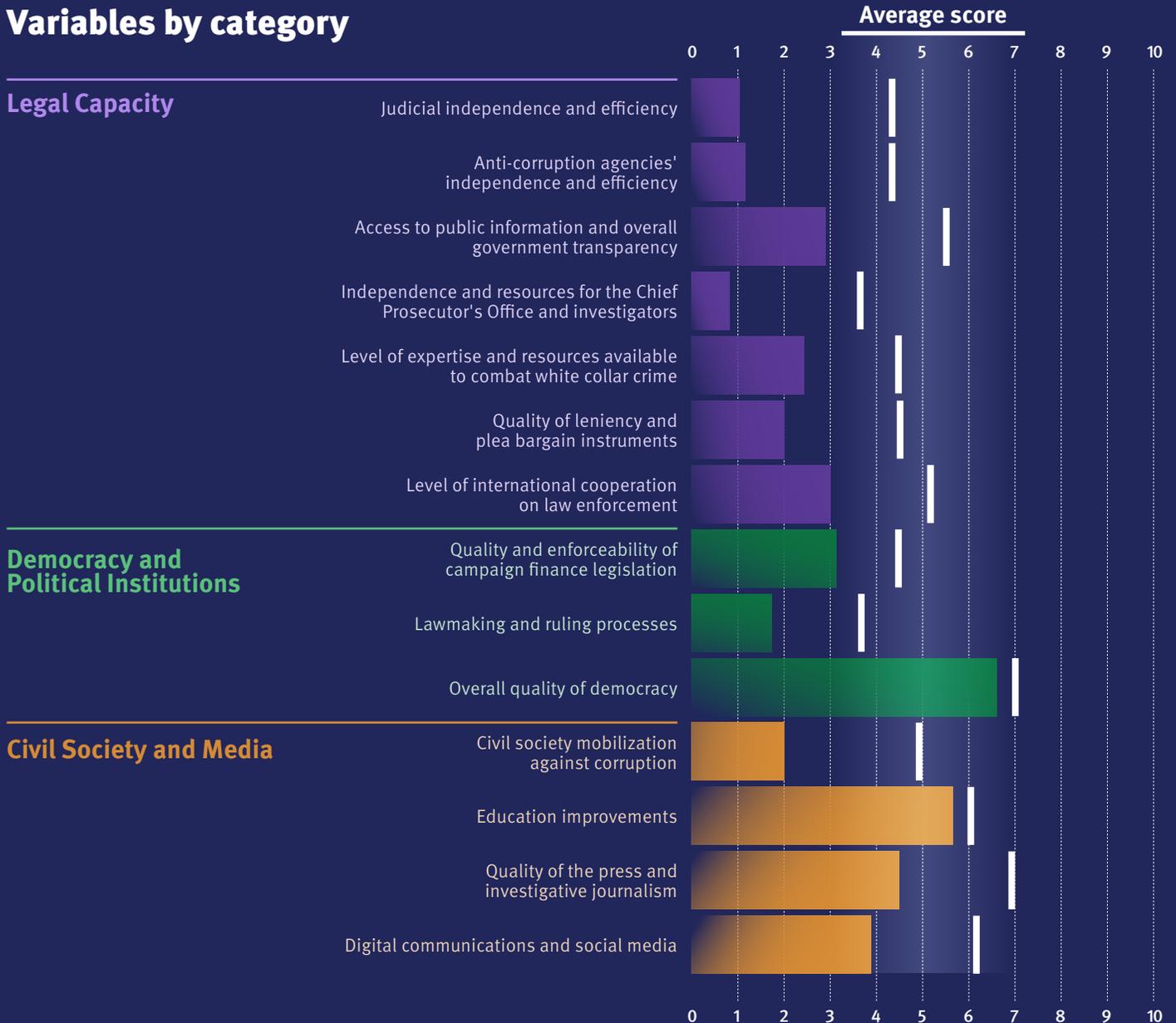
**n/a**  
2019 Overall Score

**1.75** Legal Capacity

**3.72** Democracy and Political Institutions

**4.01** Civil Society and Media

## Variables by category





14

RANKING

# BOLIVIA

As it has done since 2020, Bolivia scored above only Venezuela in the CCC Index. Modest gains were made in the legal capacity and civil society and media categories, although Bolivia still ranks 14th and 15th respectively in those categories. Bolivia had an almost 7% decline in the democracy and political institutions category, reflecting tensions between the opposition and members of the ruling Movimiento al Socialismo (MAS) party. Critics have observed that the politically motivated use of the justice system has continued during President Luis Arce's term.

Bolivia retained its 14th-place ranking in the variable assessing judicial independence. In August 2021, an expert group convened by the Inter-American Commission on Human Rights (IACHR) to investigate the violence of late 2019 reported "serious state deficiencies" in guaranteeing judicial independence. The Bolivian government signed an agreement with the IACHR in March to implement its recommendations, including judicial reforms.

Bolivia registered significant growth in the variable assessing civil society mobilization against corruption. In November 2021 there were mass protests against a law aimed at addressing money laundering. Critics said the law would have granted excessive power to the executive branch, and it was repealed later that month. During the first quarter of 2022, major urban centers saw protests over impunity in the judicial system related to femicide and rape cases, after allegedly corrupt justice officials released perpetrators of these crimes.

## CRITICAL ISSUES TO MONITOR

Delays in the implementation of the IACHR's recommended judicial reforms. Arce announced a National Justice Summit to begin discussions around this reform, but the Summit has been postponed twice so far this year.

In June, a Bolivian court found former interim President Jeanine Áñez guilty of making "decisions that were contrary to the Constitution" and sentenced her to 10 years in prison. Áñez, who succeeded former President Evo Morales after he resigned in 2019, denied the charges of sedition and terrorism against her. Following her arrest, the European Union and the U.S. highlighted the politicization of Bolivia's justice system, and Human Rights Watch expressed concern about how the case was pursued. Áñez's defense has said it will appeal to international organizations to seek justice.



**15**  
RANKING

# VENEZUELA

**1.63**

2022 Overall Score

**1.40**

2021 Overall Score

**1.52**

2020 Overall Score

**1.71**

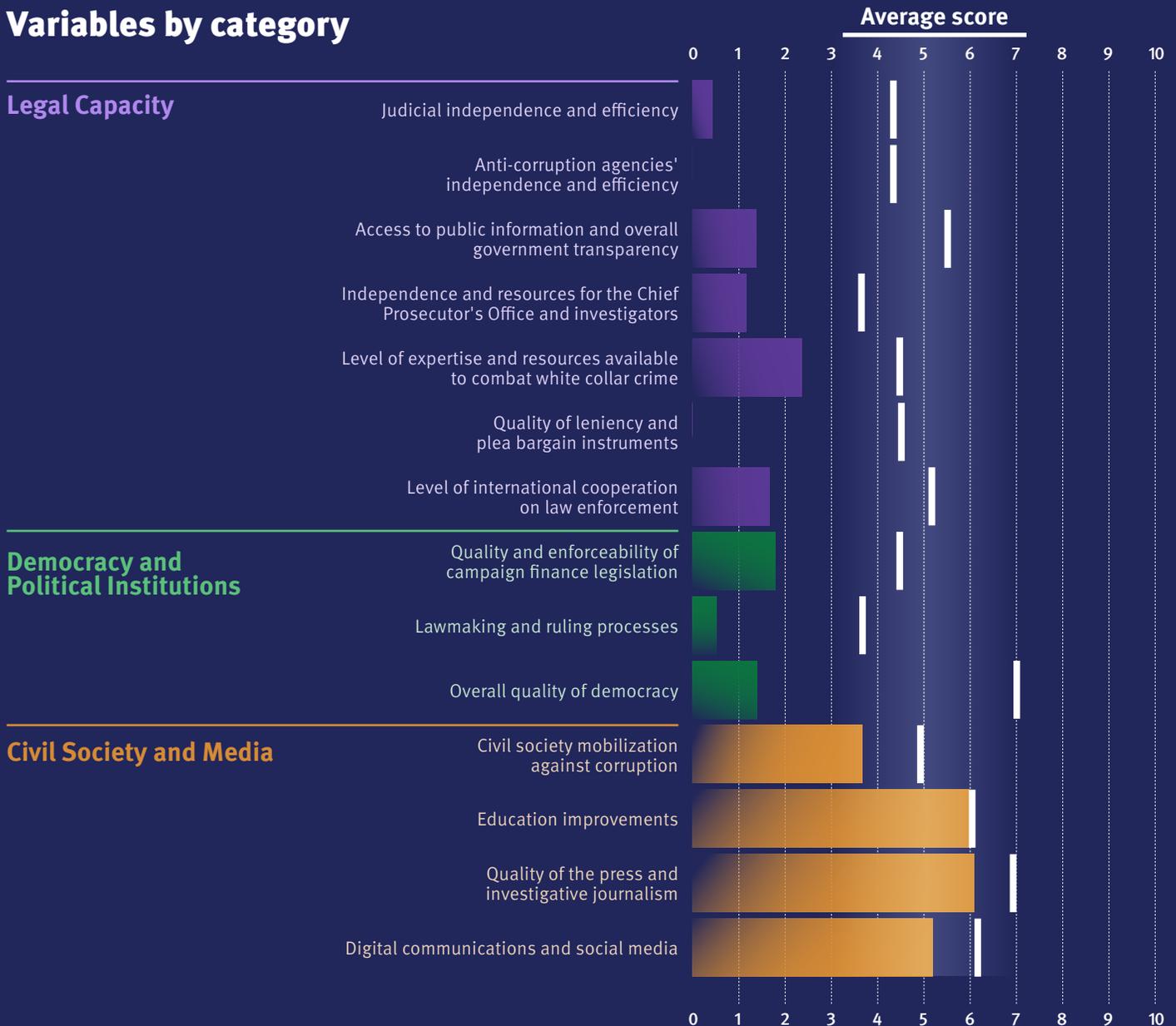
2019 Overall Score

**0.92** Legal Capacity

**1.32** Democracy and Political Institutions

**5.23** Civil Society and Media

## Variables by category





15  
RANKING

# VENEZUELA

Venezuela remained in last place in 2022 and continues to lag far behind other countries covered in the Index. Its overall score increased moderately since 2021, albeit from a very low base of comparison. The CCC Index evaluates the *de facto* Nicolás Maduro regime, not the *de jure* interim government recognized by some in the international community. A 37% increase in the variable that assesses digital communications and social media contributed to this modest overall improvement, reflecting the growing diversity and sophistication of online media outlets that continue to denounce state corruption.

Growth in the democracy and political institutions category (from a very low baseline), in part reflects the appointment of two independent members to the National Electoral Council in May 2021, ahead of the November 2021 regional elections. However, the limitations of this step became apparent when the Supreme Court, controlled by Maduro allies, invalidated an apparent opposition victory in the state of Barinas. The court ordered a repeat election in January 2022 that the opposition candidate won.

Despite a marginal increase from 2021, Venezuela's legal capacity score remains 24% below its 2019 level. Judicial independence was dealt a blow with the appointment of new Supreme Court justices in April. Taking advantage of a January reform of the Organic Law of the Supreme Court of Justice, Maduro appointed a close ally as chief justice.

## CRITICAL ISSUES TO MONITOR

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Maduro's administration has come under increasing international scrutiny. In 2021, the U.N. International Independent Fact-Finding Mission on Venezuela released a report on the deterioration of democracy and the rule of law. Last November, the International Criminal Court (ICC) announced the opening of an investigation into human rights violations and possible crimes against humanity committed by top officials. This March the ICC Prosecutor announced that the Court would open an office in Caracas to continue the investigation.

Talks between the Maduro government and opposition may resume following negotiations in Mexico City last August, although an agreement on political reforms that would significantly improve anti-corruption mechanisms is seen as unlikely.

# METHODOLOGY

## STRUCTURE OF THE RESEARCH

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The CCC Index encompasses different aspects of countries' anti-corruption environment—from the independence of the judiciary and law enforcement agencies, to the quality of laws governing lobbying and campaign financing. The overall CCC Index score is composed of three categories:

- Legal Capacity (I)
- Democracy and Political Institutions (II); and
- Civil Society and Media (III).

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

### LEGAL CAPACITY

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Judicial independence and efficiency

Anti-corruption agencies' independence and efficiency

Access to public information and overall government transparency

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

Level of expertise and resources available to combat white collar crime

Quality of leniency and plea bargain instruments

Level of international cooperation on law enforcement

### DEMOCRACY AND POLITICAL INSTITUTIONS

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Quality and enforceability of campaign finance legislation

Lawmaking and ruling processes

Overall quality of democracy

### CIVIL SOCIETY AND MEDIA

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Civil society mobilization against corruption

Education improvements

Quality of the press and investigative journalism

Digital communications and social media

Collectively, these 14 variables provide a comprehensive and detailed view of countries' anti-corruption environment – in other words, their ability to uncover, punish and deter corruption. We understand that the 14 variables influence countries' capacity to combat corruption differently, so the variables receive different weightings in the scoring to reflect this reality. For example, we considered judicial independence and efficiency to be more critical than the free flow of information on social media. Consequently, the former variable has a higher weighting in the score of the CCC Index.

## **DATA COLLECTION**

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

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

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

The index relies on the latest available data from these institutions. Certain data points from UNESCO and the World Economic Forum were not updated over the past year. In those cases, we used the same data points as in the 2021 CCC Index. Because of this, the survey results had a greater relative weight in determining changes in countries' scores in 2022. In some cases, specific data within the dataset was carved out—for instance, the index only uses the Open Government factor in the World Justice Project database and only the campaign financing variable in the Harvard Electoral Integrity Project repository.

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

necessary flexibility and accuracy to perform the analysis.

As was the case in the 2021 edition, we consulted three experts per country – one Control Risks analyst plus two independent analysts – compared to two experts in 2019. The advantage of having an additional expert is that we were able to track outliers: when one expert diverged significantly from the other two (by more than two points), we invited the expert to clarify the reasoning behind the response provided.

With more survey data, we were also capable of performing better regional comparisons to spot anomalies. For example, we analyzed the correlation between the “hard” data and the survey data and escalated cases of major divergence to a detailed analysis.

The survey was conducted between mid-March and mid-April and included the following experts: Mauricio Alarcón Salvador (Fundación Ciudadanía y Desarrollo), Daphne Álvarez Villa (Fedesarrollo), Fabiano Angélico (Università della Svizzera italiana), David Arellano-Gault (Centro de Investigación y Docencia Económicas- CIDE), Erika Brockmann (independent consultant), Miguel Carter (DEMOS- Centro para la Democracia, la Creatividad y la Inclusión Social), Marielos Chang (Universidad del Valle de Guatemala), María Lorena Cummings (MLC & Co. Legal and Compliance), Mercedes De Freitas (Transparencia Venezuela), Camilo A. Enciso Vanegas (Anticorruption Institute), María Laura Escuder (independent consultant), Hazel Feigenblatt (Institute for War & Peace Reporting), María Paula Garat (Universidad Católica del Uruguay), María Jaraquemada (lawyer), Mariana Labastie (Instituto de Comunicación y Desarrollo), Eduardo Mello (Fundação Getúlio Vargas), Gustavo L. Morales Oliver (Marval, O’Farrell Mairal), Carolina Muñoz (According2Law), Alfredo Ortega Franco (Universidad Rafael Landívar), Bonnie J. Palifka (Tecnológico de Monterrey), Carlos Aníbal Peris Castiglioni (Universidad Nacional de Asunción), Cristián Pliscoff (Pontificia Universidad Católica de Chile), Denisse Rodríguez-Olivari, (Humboldt University Berlin), Paola Romero Arnó (Certezza Group), Lindsay Sykes (PPO Abogados), Simeon Tegel (journalist and analyst), Camila Ulloa Torres (Grupo FARO), Ana Carolina Ureña Adames (LOVILL), and Geovanny Vicente-Romero (Inter-American Institute on Justice and Sustainability). One external expert requested not to be identified – a senior anti-corruption analyst working in Venezuela. The Control Risks analysts who participated include Silvana Amaya, Mário Braga, Gabriel Brasil, Theodore Kahn, Leandro Lima, Claudia Navas, Ani de la Quintana, Alejandra Soto, Valeria Vásquez, and Alan Zamayoa.

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

## **METHODOLOGICAL LIMITATIONS**

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All indices measuring human behavior are imperfect, as they can never capture all elements of a given phenomenon. The CCC Index is necessarily a partial representation based on the model discussed above, with 14 variables, based on limited public and proprietary data. The index's model has some limitations, including subjectivity, overlapping and endogeneity (a causal relationship between some of the variables). Questionnaires to country experts were as factual as possible, but some degree of subjectivity inevitably remained. To reduce subjectivity, we applied rigorous analysis to test consistency of responses and requested that experts interpret and compare the data against regional averages. Overlapping relates to the fact that some variables include the same elements: for instance, the Freedom House score also includes measures of judicial independence. Regarding endogeneity, although we recognize that it may be present in the methodology, it does not undermine the consistency of the results. The same variables, using the same data sources, were analyzed for all countries, so any endogeneity would affect all countries in largely the same way. Last but not least, it is impossible to analyze all elements affecting a country's ability to fight corruption. We selected 14 variables that cover a wide array of topics and which we believe are the key elements shaping the anti-corruption environment. But some aspects may have been left out. In cases where we believed this posed a limitation, we highlighted this factor in the country profile.

## **ACKNOWLEDGMENTS**

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The 2022 CCC Index is the work of over fifty people and we are profoundly grateful to all of them.

At AS/COA, Policy Manager Emilie Sweigart helped manage the project's execution and assisted with editing the report. Research Assistants Ezequiel González Camaño and Martina Graña contributed to the report editing process. Creative Director Donald Partyka designed the report and the digital data visualizations. Senior Media Relations Manager Pía Fuentealba helped amplify the Index's media repercussion.

At Control Risks, Gavin Strong, Principal, provided valuable insights and coordinated responses from the firm's country analysts. Stefany Shigaeff, Consultant, led on the data analytics work, populating the growing CCC Index database and querying the data to inform the report. Kate Rallis, Laure le Masson, and Juliana Borges, respectively Partner, Manager and Coordinator of Marketing, collaborated closely with AS/COA's media team to coordinate media coverage and planning of post-launch events. Rodolfo Padilla dedicated a significant time of his internship at the firm analyzing the data, providing useful insights and assisting with quality control.

# Categories

	Argentina	Bolivia	Brazil	Chile	Colombia	Costa Rica	Dominican Republic	Ecuador	Guatemala	Mexico	Panama	Paraguay	Peru	Uruguay	Venezuela
<b>Legal Capacity</b>	4.13	1.75	4.73	6.42	4.69	7.12	5.23	4.66	3.09	3.68	4.62	4.17	5.61	7.03	0.92
<b>Democracy and Political Institutions</b>	6.01	3.72	3.86	7.88	4.41	7.63	4.66	4.72	3.11	3.72	5.39	4.32	5.38	8.23	1.32
<b>Civil Society and Media</b>	7.23	4.01	6.42	7.10	6.42	6.14	5.95	5.70	5.05	6.22	5.67	5.82	6.35	7.66	5.23

# Variables

<b>Legal Capacity</b>	Argentina	Bolivia	Brazil	Chile	Colombia	Costa Rica	Dominican Republic	Ecuador	Guatemala	Mexico	Panama	Paraguay	Peru	Uruguay	Venezuela
Judicial independence and efficiency	3.99	1.03	4.60	7.29	4.76	7.27	4.78	3.66	2.95	3.51	4.33	3.09	5.51	8.25	0.43
Anti-corruption agencies' independence and efficiency	2.67	1.17	4.33	7.67	4.00	8.00	5.67	5.50	1.33	3.50	4.33	4.17	5.83	7.17	0.00
Access to public information and overall government transparency	5.64	2.91	6.50	7.42	5.80	6.83	6.75	5.09	5.04	6.39	5.48	5.46	5.71	7.33	1.37
Independence and resources for the Chief Prosecutor's Office and investigators	4.00	0.83	4.00	6.00	3.50	7.00	3.50	3.67	1.67	2.17	4.50	3.33	3.83	6.17	1.17
Level of expertise and resources available to combat white collar crime	4.83	2.44	4.00	5.68	5.35	5.30	5.14	4.59	3.61	4.12	4.68	3.48	5.26	5.69	2.36
Quality of leniency and plea bargain instruments	5.33	2.00	5.67	5.33	4.33	7.00	4.67	4.67	4.67	2.67	4.33	3.33	7.33	8.33	0.00
International cooperation	3.33	3.00	4.67	4.67	6.00	8.00	7.00	6.00	4.00	4.33	5.00	7.33	6.67	6.00	1.67

<b>Democracy and Political Institutions</b>	Argentina	Bolivia	Brazil	Chile	Colombia	Costa Rica	Dominican Republic	Ecuador	Guatemala	Mexico	Panama	Paraguay	Peru	Uruguay	Venezuela
Quality and enforceability of campaign financing legislation	5.22	3.14	3.19	7.22	3.29	7.65	3.57	4.32	3.00	4.27	4.55	3.44	5.52	6.89	1.79
Lawmaking and ruling processes	4.80	1.73	1.33	7.47	4.00	6.13	4.27	3.33	1.20	0.53	3.73	3.47	3.47	8.67	0.53
Overall quality of democracy	8.40	6.60	7.40	9.30	6.50	9.10	6.70	6.70	5.20	6.10	8.30	6.50	7.10	9.80	1.40

<b>Civil Society and Media</b>	Argentina	Bolivia	Brazil	Chile	Colombia	Costa Rica	Dominican Republic	Ecuador	Guatemala	Mexico	Panama	Paraguay	Peru	Uruguay	Venezuela
Civil society mobilization against corruption	5.00	2.00	6.00	7.00	6.33	4.33	4.33	5.33	4.33	6.33	3.67	4.33	5.33	7.00	3.67
Education improvements	8.74	5.66	5.84	7.08	5.74	6.32	5.67	5.45	4.25	5.66	6.61	5.57	5.91	6.86	5.98
Quality of the press and investigative journalism	8.06	4.50	7.49	6.96	7.23	8.34	6.72	6.96	6.82	6.56	5.67	6.60	7.69	8.78	6.08
Digital communications and social media	7.13	3.88	6.34	7.37	6.37	5.55	7.09	5.07	4.81	6.31	6.73	6.79	6.45	8.00	5.19