

Fueling Atrocities

Oil and War in South Sudan

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South Sudan's leaders use the country's oil wealth to get rich and terrorize civilians, according to documents reviewed by The Sentry. The records reviewed by The Sentry describe who is financially benefiting from the conflict itself. Little has been known about the financial machinery that makes South Sudan's continuing war possible, but these documents appear to shed new light on how the country's main revenue source—oil—is used to fuel militias and ongoing atrocities, and how a small clique continues to get richer while the majority of South Sudanese suffer or flee their homeland.

Documents reviewed by The Sentry purport to describe how funds from South Sudan's state oil company, Nile Petroleum Corporation (Nilepet), helped fund militias responsible for horrific acts of violence. They also indicate that millions of dollars were paid to several companies partially owned by family members of top officials responsible for funding government-aligned militia or military commanders.¹

One key document, part of a collection of material provided to The Sentry by an anonymous source, appears to be an internal log kept by South Sudan's Ministry of Petroleum and Mining detailing security-related payments made by Nilepet. The document titled, "Security Expenses Summary from Nilepet as from March 2014 to Date" ("the Summary") lists a total of 84 transactions spanning a 15-month period beginning in March 2014 and ending in June 2015. In total, the document lists over \$80 million in payments to politicians, military officials, government agencies, and private companies, many of which include captions that describe activities directly linked to the government's war effort. Other documents reviewed by The Sentry include copies of correspondence that describe the petroleum ministry's provision of fuel and other supplies to Padang Dinka militia groups.

South Sudan became the world's newest country in 2011, but a civil war that broke out in December 2013 has resulted in tens of thousands of deaths and has left more than 4 million people displaced, internally and externally. The proximate trigger of the civil war was a dispute between President Salva Kiir and then-Vice President Riek Machar. However, the key catalyst of South Sudan's civil war has been competition for control over state assets and the country's abundant natural resources. A peace deal to halt fighting between warring factions has stalled, and the United Nations has warned that nearly two-thirds of the country will need food aid to keep from starving. And while the conflict has had dire economic consequences for most of South Sudan's population, many of the top officials responsible for the war in the first place have accrued enormous wealth and have families living luxurious lifestyles outside the country.

South Sudan's oil revenue management practices—and in particular those of Nilepet—have long been criticized by a wide range of civil society groups and international organizations, such as the South Sudanese Law Society, the International Monetary Fund, and the U.N. Panel of Experts. The new documents reviewed by The Sentry shine a spotlight into those



murky practices and appear to explain how top officials used Nilepet funds to support a group of Padang Dinka militias implicated in widespread attacks and other atrocities.

Key Information Contained in the Documents

- More than \$80 million was recorded as paid to South Sudanese politicians, military officials, government agencies, and companies owned by politicians and members of their families who were, according to the Summary, paid for services such as military transport and logistics to forces implicated in atrocities.
- South Sudan's petroleum ministry assisted in the provision of food, fuel, satellite phone airtime and money to a group of militias in Upper Nile state, according to the Summary. The militias are reportedly responsible for destroying villages and attacks against civilians, including a February 2016 attack against civilians at a U.N. site in Malakal that left dozens dead.
- Interstate Airways, partially owned by South Sudan First Lady Mary Ayen Mayardit, reportedly received six payments beginning in April 2014 for army logistics and transportation of military hardware.
- Crown Auto Trade, owned by Obac William Olawo, a prominent South Sudanese businessman, is listed in the Summary as having received \$8 million in payments from Nilepet in 2014 alone for activities ranging from supplying vehicles to importing armored personnel carriers and transporting tanks and supplies.
- Nile Basin for Aviation, a little-known airline owned by family members of top military and government officials—including the wife of former military chief of staff Paul Malong and a nephew of then-petroleum minister and current Minister of Finance and Planning Stephen Dhieu Dau—is identified in the Summary as receiving payments from Nilepet in early 2015 for military logistics operations.

Fueling Militias

The documents appear to describe how top officials used Nilepet funds to support a group of Padang Dinka militias active in northeastern Upper Nile state and implicated in widespread attacks against civilians and other atrocities. Composed of members of the Padang Dinka sub-ethnic group from greater Upper Nile, these militia groups were initially established to protect oil fields at Paloch but evolved to become central actors in South Sudan's evolving civil war when they began receiving support directly from South Sudan's National Security Service.²

Small Arms Survey, a Geneva-based non-governmental organization, reported that this group of militias targeted the Shilluk ethnic group, burned down villages and engaged in widespread attacks against civilians, including a February 2016 attack on a U.N. Protection of Civilians



(PoC) site in Malakal that resulted in dozens of deaths.³ This group of Padang Dinka militias are commonly referred to collectively as the “Oil Protection Force” or the “Community Police Force,” though they have also been described in numerous reports as the “Dinka White Army” or the “Padang White Army.”⁴ The documents reviewed by The Sentry appear to show that the petroleum ministry was providing support to these militias from mid-2014 to mid-2015.

The documents appear to describe how the petroleum ministry provided support to these militias in the form of fuel, equipment, funds, food and supplies, and airtime for satellite phones. The Summary, for example, lists payments for \$1.1 million worth of food for the “White Army” in numerous locations in Upper Nile state where the Padang Dinka militias were operating, as well as payments to one of the militias commanders, Tor Ajuot Deng.⁵ Email correspondence reviewed by The Sentry between Gieth Abraham Dauson, a senior aide to Dhieu Dau, and individuals stationed at the Paloch oilfields, indicate that the Ministry of

Petroleum played a role in supplying the Padang Dinka militias over a 10-month period between September 2014 and July 2015.⁶ These emails appear to corroborate assertions made by the U.N. Panel of Experts that the Ministry of Petroleum was using Nilepet revenue to provide weapons to the Padang Dinka militia.⁷

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Reports of violence against civilians by Padang Dinka militias continued through 2017. “Numerous witnesses said that members of a Dinka militia, which some called the ‘White Army,’ rampaged freely through the region during the government offensive,” according to a June 2017 report by Amnesty International documenting abuses that occurred in Upper Nile state. “Its members were armed with automatic weapons and wore military uniforms, and at least some of them wore white bandanas. While engaging in massive looting, they harassed, threatened and killed civilians.”⁸

Given that these forces operate outside a formal state military structure, the militias are, by definition, paramilitary forces. Organizing and supporting them appears to contradict a provision of the South Sudan constitution, which states: “No person or persons shall raise any armed or paramilitary force in South Sudan except in accordance with this Constitution and the law.”⁹ Dhieu Dau, the official that the U.N. Panel of Experts said was responsible for using Nilepet funds to supply these militia, was appointed South Sudan’s Minister of Finance and Economic Planning in July 2016.¹⁰

Profiting from War

The Summary further describes transactions indicating that numerous private companies have provided support to security forces in South Sudan in the form of supplying and transporting weapons, troops, and other goods. The Summary identifies a total of 84 transactions spanning a 15-month period beginning in March 2014 and ending in June 2015. In total, the document lists over \$80 million in payments to politicians, military officials,



government agencies, and private companies, many of which are directly linked to the South Sudanese government's war effort.¹¹

The Sentry has independently obtained and reviewed documents that identify the owners of many of the companies listed in the Summary. In several cases, key shareholders in these companies were in a position to know about the operations of the forces for whom they were providing services. This is particularly true in the case of four aviation firms that, according to the Summary, provided services for South Sudan's military and security services from mid-2014 to mid-2015:

- Interstate Airways, an airline whose 33-percent shareholder is identified in the documents reviewed by The Sentry as First Lady Mayardit, is listed in the Summary in connection with six payments over a 14-month period beginning in April 2014, including payments for “army logistics” and “transportation of military hardwares.”¹²
- Nile Basin for Aviation appears in connection with five payments recorded in the Summary, all occurring in 2015, including several payments for charter flights to cities in Upper Nile state in early 2015 as fighting was intensifying.¹³ Corporate records reviewed by The Sentry indicate that this company was owned, in part, by a wife of then-military chief of staff Paul Malong, as well as a nephew of Dhieu Dau, and another senior government official.
- According to the Summary, Crown Auto Trade, a Toyota dealership with a majority owner—Obac William Olawo—who is a prominent South Sudanese businessman, received over \$8 million in payments from Nilepet in 2014 alone for activities ranging from supplying vehicles to importing armored personnel carriers and transporting tanks and supplies.¹⁴ A report by Control Arms, a research and advocacy group, stated that the type of armored personnel carriers described in the Summary were “observed in different locations within South Sudan between May and December 2014, including in areas of Unity State where the conflict has been intense.”¹⁵ In an interview with The Sentry, Olawo denied that any of his companies have ever been involved in transporting troops, weapons, or equipment for the military. He said that the documents and reports suggesting as much may be confusing his company with “Sierra” an operation connected to Erik Prince, who he said is one of his business partners.
- There are indeed two payments recorded in the Summary that mention Prince's company, Frontier Services Group, in connection with “Project Sierra.” Two \$16.4 million payments were recorded as paid in July and October 2014, labeled “Air Logistics & Support Services...(Project Sierra, Frontier Services Group).” Olawo described Sierra as an air cargo operation for the Sudan People's Liberation Army (SPLA) and the National Security Service. In April 2016, The Intercept reported that FSG had attempted to provide attack aircraft to the Government of South Sudan in addition to other defense-related services.¹⁶ Representative from FSG have



previously denied doing business with South Sudan’s military, but did not respond to questions about the payments described in the Nilepet security expenses summary.¹⁷

- The Summary also lists Golden Wings Aviation—another company owned by Olawo—alongside several other companies in connection with a \$4,250,802 payment dated June 1, 2015, labeled “payment for army logistics operation.”¹⁸ The company is also mentioned by the U.N. Panel of Experts on South Sudan as having transported weapons to Unity state on several occasions during a period of particularly horrific violence in 2014 and 2015.

Each of the companies listed above is identified in the Summary in connection with transactions involving flights or military logistics operations in 2014 and 2015, during a period of intense fighting in Unity and Upper Nile. Several payments specifically reference flights or operations in Upper Nile, and two of the companies—Crown Auto and Golden Wings Aviation—are linked to military operations in Unity state.¹⁹ In short, the Summary indicates that these companies received payments from Nilepet for military- or security-related activities, and, as a result, may have supported, wittingly or unknowingly, forces responsible for perpetrating atrocities.

Murky Management of South Sudan’s Oil

The Sentry conducted extensive supplemental research to corroborate assertions made in the documents and to identify additional relevant facts and contextual information. This included interviews with subject matter experts and individuals with first-hand knowledge of the events described in the documents. One source with direct knowledge of the operations, revenue management, and spending habits at South Sudan’s Ministry of Petroleum and Mining confirmed key facts, processes, events, and relationships described in the documents. This person lamented that South Sudan’s oil revenue management and anti-corruption laws failed to live up to expectations. “In principle, if the bills were implemented it would have been the most transparent sector management in the whole of the region especially in the absence of the war,” he said. In fact, however, efforts to promote transparency were stifled. An international accounting firm had assisted with the development of a website for the purposes of publishing oil revenue data, but the same person said those efforts were abandoned with the start of the war. In 2017, the International Monetary Fund reported that, “Nilepet does not provide transparent accounting of its financial activities and no dividends are paid to the central government.”²⁰

The documents reviewed by The Sentry raise serious questions about whether these payments are part of an off-budget finance mechanism.

The U.N. Panel of Experts on South Sudan reported that “as Minister of Petroleum and Mining, Dhieu Dau directed the national oil company, Nilepet, to cover military-related expenses, circumventing national budget and financial management processes.”²¹ After a review of South Sudan’s published budgets and publicly available information about military procurement, The Sentry has not found any indication that the transactions listed in the Summary were included in the country’s budget or otherwise subjected to public scrutiny.



Against the backdrop of reports about the diversion of revenue to fund militias and pay for weapons, the documents reviewed by The Sentry raise serious questions about whether these payments are part of an off-budget finance mechanism and, therefore, represent a diversion of state assets.

Expand Financial Pressure to Hold Companies and Individuals to Account

The petroleum sector is meant to be the source of South Sudan's future. Instead, the documents reviewed by The Sentry suggest oil is intimately linked to violence. Fortunately, the financial realities of the international oil business and the potential for enhanced governance measures mean that action can be taken, and the promise of the sector realized.

As is standard in the petroleum sector, the vast majority of the transactions listed in the Summary were denominated in U.S. dollars. Indeed, according to the documents, the government used these funds to purchase weapons; paid companies to transport weapons, troops, and supplies around the country; and made payments to the offices of several of the top officials responsible for planning and executing the war—all with U.S. dollars.

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Dollar-denominated transactions provide a source of leverage that the international community must use to bring South Sudanese officials to the negotiating table and to promote peace, respect for human rights, and good governance in South Sudan. This leverage stems from the fact that, through a system known as correspondent banking, nearly all U.S. dollar-denominated transactions will pass, even if for only a split second, through banks in New York. When that happens, the U.S. government has

jurisdiction over the transactions. This means that asset freezes and anti-money laundering measures directed at those doing business in dollars can have great impact, even when those individuals or entities are not in the United States, because banks in New York and around the globe can face the consequences of directing illicit transactions through the U.S. financial system. The Sentry makes the following recommendations:

Target the Networks Behind Violence. The international community should expand financial pressure on those responsible for atrocities in South Sudan, building on the positive actions taken by the United States, European Union, Canada, and Australia since September 2017, which include sanctions applied to individuals and companies tied to South Sudan's leadership. The United States, European Union, and others in the international community should investigate the top officials who have played a role in military operations that have resulted in atrocities and, where appropriate, impose network-focused sanctions on them, their business associates and facilitators, and the companies they own or control. Sanctions against individuals alone are often less effective because individuals often can still move money through business associates, family members and companies. By targeting multiple actors and entities together as a network, sanctions have a greater impact because they provide banks with the information they need to more effectively detect evasion. Such



measures have already been imposed by the United States against Malek Reuben Riak and Benjamin Bol Mel.²²

Impose Sectoral Sanctions. The use of sanctions related to the oil sector should also expand beyond designations of key officials and their companies. Using the sectoral sanctions models developed for Russia/Ukraine and Venezuela, the United States should impose appropriate sanctions that would limit the nature, type, and length of financing available for projects in the South Sudanese oil sector, in order to prompt greater due diligence and risk mitigation.²³ Given the ubiquitous use of the U.S. dollar in the oil sector, such a measure could have a strong impact. Further, the United States should introduce responsible investment reporting guidelines in order to promote broader due diligence by commodities traders and others engaged in the sector in line with the United Nations' "Guiding Principles on Business and Human Rights."²⁴ The European Union should evaluate prospects for similar guidelines within the auspices of its non-financial reporting mechanism.

Banks and Financial Regulators Have a Key Role. Banks and financial regulators should step up efforts to halt the flow of illicit funds out of South Sudan. In September 2017, the U.S. Department of the Treasury's Financial Crimes Enforcement Network (FinCEN) issued an Advisory focusing on the risks of money laundering connected to the government of South Sudan.²⁵ Other financial intelligence units (FIUs) in the European Union, United Kingdom, Canada, and Australia should follow suit with alerts and other appropriate warnings. Kenya's Financial Reporting Centre (FRC) and Uganda's Financial Intelligence Authority (FIA) should participate and lead in their national efforts, including through engagement and cooperation with their major financial institutions and global banks providing U.S. dollar correspondent services. These actions should then lead to measures that are focused on specific types of transactions—for example, targeting the purchases by senior South Sudanese politically exposed persons (PEPs) of real estate in Nairobi or Kampala or of the luxury sports utility vehicles parked near that property. Banks found to be connected to be money laundering may incur heavy penalties and be subject to other law enforcement measures. The Sentry will continue to investigate these issues and raise appropriate findings to relevant authorities.

South Sudan's Neighbors Must Escalate Financial Pressure, or Risk Damage to Their Own Financial Systems. In order to have impact, regional enforcement of multilateral financial measures is key. Ethiopia, Kenya, and Uganda have been reluctant to enforce and escalate international political and financial pressures. These countries, where such purchases are made and assets are held, should also follow up on information collected from any advisories they issue, which focus the attention and resources of banks and other private sector actors on corruption and money laundering in South Sudan.

There are numerous opportunities for the international community—including U.S. and European governments and financial institutions—to encourage South Sudan's neighbors to increase pressure on those responsible for South Sudan's civil war. For example, the U.S. and European governments can directly underscore the financial risks the Kenyan and Ugandan governments continue to take and the heavy financial penalties they could face in



allowing illicit activity or enabling abusive practices within their banking systems, placing at risk sectors where these governments have invested heavily, particularly in Kenya.²⁶

A report released in January 2018 by the regional anti-money laundering body, the East and Southern Africa Anti-Money Laundering Group (ESAAMLG) demonstrated that the Kenyan banking system in particular faces major concerns from “de-risking” by global banks that are concerned about the risks flowing through Kenya and the inability, or unwillingness, of Kenyan banks to address them.²⁷ Taking action against illicit flows from South Sudan is a direct way that Kenyan banks and regulators can demonstrate sounder practices to the international community, particularly at a time when the country is taking on increasing levels of debt from Europe and facing stronger scrutiny from the International Monetary Fund.²⁸

Continuing to enable, or at least failing to prevent, the proceeds of South Sudanese corruption to transit through the Kenyan banking system will continue to grow as a risk factor and could easily imperil the financial system. As demonstrated by this investigation, these transactions can be identified, and they must be stopped.

This investigation is one of a series focusing on South Sudan and being released by The Sentry, an investigative initiative co-founded by George Clooney and John Prendergast, that follows the money in order to create consequences for those funding and profiting from genocide or other mass atrocities in Africa, and to build leverage for peace.



Endnotes

- ¹ The Sentry conducted an analysis of the authenticity of each of these documents to attempt to identify inconsistencies or any indication that they may have been falsified. One source with direct knowledge of the operations, revenue management, and spending habits at South Sudan's Ministry of Petroleum confirmed key facts, processes, events, and relationships described in the documents. Additionally, other information contained within the documents has been independently corroborated by information in the public domain, and numerous transactions recorded in the documents are consistent with events and patterns described in public reporting as well as in other internal South Sudanese government records obtained over the course of The Sentry's ongoing investigation of the continued conflict in South Sudan. Finally, The Sentry endeavored to contact every individual and entity discussed in this investigative brief and afford them an opportunity to address the information gathered during the course of the investigation. In most cases, these persons and entities did not respond to The Sentry's email or telephone requests that they speak with us and respond to our questions. However, responses that were received have been included.
- ² Joshua Craze, "The Conflict in Upper Nile State," (Geneva: Small Arms Survey, March 2016), available at <http://www.smallarmssurveysudan.org/facts-figures/south-sudan/conflict-of-2013-14/the-conflict-in-upper-nile.html>.
- ³ Ibid.
- ⁴ This Padang Dinka White Army should not be confused with the predominantly Nuer White Army that is aligned with South Sudan's armed opposition.
- ⁵ Office of the Minister of Petroleum, "SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE."
- ⁶ In total, The Sentry has reviewed what purport to be 11 separate email messages from Gieth Abraham Dauson requesting a total of 251 barrels of diesel fuel to be delivered to military forces. Several of these emails show Dauson requesting the provision of diesel fuel to specific paramilitary units. See also, Office of the Minister of Petroleum, "SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE."
- ⁷ In January 2016, the U.N. Panel of Experts reported that: "The Panel has determined, on the basis of multiple, independent sources with first-hand knowledge, that the arming of those communities largely circumvented the SPLA weapon supply and accounting mechanisms, with the Dinka Padang militias in particular receiving small arms and ammunition directly through the Internal Security Bureau, headed by Akol Koor, with financial authorization for the purchase and transfer provided through the Nile Petroleum Corporation by a Dinka Padang and Minister of Petroleum and Mining, Stephen Dieu Dau (sic)." U.N. Security Council, "Final report of the Panel of Experts on South Sudan established pursuant to Security Council resolution 2206 (2015)," S/2016/70, January 22, 2016, available at: http://www.un.org/ga/search/view_doc.asp?symbol=S/2016/70.
- ⁸ Amnesty International, "'It Was as If My Village Was Swept by A Flood'—The Mass Displacement of the Shilluk Population from the West Bank of the White Nile, South Sudan," (June 2017), available at: <https://www.amnesty.nl/content/uploads/2017/06/South-Sudan-briefing.pdf?x2587>.
- ⁹ Government of South Sudan (GOSS), "The Transitional Constitution of the Republic of South Sudan, 2011," available at http://www.sudantribune.com/IMG/pdf/The_Draft_Transitional_Constitution_of_the_ROSS2-2.pdf.
- ¹⁰ Radio Tamazuj, "Stephen Dhieu named as new Minister of Finance," July 28, 2016, available at: <https://radiotamazuj.org/en/news/article/stephen-dhieu-named-as-new-minister-of-finance>.
- ¹¹ Office of the Minister of Petroleum, "SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE."
- ¹² In a letter obtained by the Indian Ocean Newsletter, Stephen Dhieu Dau directed Nilepet to make a payment to Interstate in January 2016 for "4 trips of IL-76 plane to Wau, Malakal, and Paloch for SPLA and [the Internal Security Bureau]." "Nilepet: State secret fund has run out of money," Indian Ocean Newsletter, July 1, 2016. Additionally, a version of Interstate Airways' website published in 2015 lists the Sudanese People's Liberation Movement (South Sudan's ruling party) as one of its clients; a version of the company's website published in 2017 lists Nilepet as a client. A version of Interstate Airways website published in 2015 is available at: <http://www.interstate.systelligence.com/our-client.aspx>



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- ¹³ Office of the Minister of Petroleum, “SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE.”
- ¹⁴ Office of the Minister of Petroleum, “SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE.”
- ¹⁵ Arms Trade Treaty Monitor, “Arms transfers to South Sudan: Case Study 1,” (August 2015), available at http://armstreatymonitor.org/en/wp-content/uploads/2015/08/ATT_ENGLISH_South-Sudan-Case-Study.pdf.
- ¹⁶ Jeremy Scahill and Matthew Cole, “Echo Papa Exposed: Inside Erik Prince’s Treacherous Drive to Build a Private Air Force,” *The Intercept*, April 11, 2016 <https://theintercept.com/2016/04/11/blackwater-founder-erik-prince-drive-to-build-private-air-force/>.
- ¹⁷ Ilya Grindeff, “South Sudan hires Ex-Blackwater Chief to Restore War-Hit Oil,” *Bloomberg*, December 17, 2014 (updated December 18, 2014), available at <https://www.bloomberg.com/news/articles/2014-12-18/south-sudan-hires-ex-blackwater-chief-to-restore-war-hit-oil>.
- ¹⁸ Office of the Minister of Petroleum, “SECURITY EXPENSES SUMMARY FROM NILEPET AS FROM MARCH 2014 TO DATE.”
- ¹⁹ See, U.N. Security Council, “Final report of the Panel of Experts on South Sudan established pursuant to Security Council resolution 2206 (2015),” S/2016/70, January 22, 2016; and Geoffrey York, “Canadian Company sold armoured vehicles to South Sudan: report,” *The Globe and Mail*, July 28, 2016, (updated March 24, 2017), available at <https://www.theglobeandmail.com/news/world/canadian-company-sold-armoured-vehicles-to-south-sudan-report/article31191713/>.
- ²⁰ International Monetary Fund, “South Sudan: 2016 Article IV Consultation—Press Release; Staff Report; and Statement by the Executive Director for South Sudan,” (March 2017), IMF Country Report No. 17/73, p. 15, available at: <https://www.imf.org/en/Publications/CR/Issues/2017/03/23/South-Sudan-2016-Article-IV-Consultation-Press-Release-Staff-Report-and-Statement-by-the-44757>.
- ²¹ U.N. Security Council, “Final report of the Panel of Experts on South Sudan established pursuant to Security Council resolution 2206 (2015),” S/2016/70, January 22, 2016.
- ²² For Benjamin Bol Mel, see, U.S. President (Donald J. Trump), Executive Order 13818, “Blocking the Property of Persons Involved in Serious Human Rights Abuse or Corruption,” December 20, 2017, available at https://www.treasury.gov/resource-center/sanctions/Programs/Documents/glomag_eo.pdf. For Malek Reuben Riak, see, U.S. Department of the Treasury, “Treasury Targets South Sudanese Government Officials and Related Companies for Continued Destabilization,” Press release, September 6, 2017, available at <https://www.treasury.gov/press-center/press-releases/Pages/sm0152.aspx>.
- ²³ For sanctions regarding Russia see, U.S. Department of Treasury, Office of Foreign Assets Control (OFAC), “Directive 1 (As Amended) Under Executive Order 13662,” September 12, 2014, available at https://www.treasury.gov/resource-center/sanctions/Programs/Documents/eo13662_directive1.pdf. For sanctions regarding Venezuela, see, U.S. President (Donald J. Trump) Executive Order 13808, “Imposing Additional Sanctions With Respect to the Situation in Venezuela,” August 24, 2017, available at <https://www.treasury.gov/resource-center/sanctions/Programs/Documents/13808.pdf>.
- ²⁴ United Nations, “Guiding Principles on Business and Human Rights: Implementing the United Nations ‘Protect, Respect and Remedy’ Framework,” (New York and Geneva: 2011), available at http://www.ohchr.org/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf.
- ²⁵ U.S. Department of the Treasury Financial Crimes Enforcement Network (FinCEN), “Advisory on Political Corruption Risks in South Sudan,” FIN-2017-A004, September 6, 2017, available at https://www.fincen.gov/sites/default/files/advisory/2017-09-06/South%20Sudan%20Advisory_09-06-2017_0.pdf.
- ²⁶ Samuel Kimeu, “KIMEU: Sanctions against South Sudan should worry Kenyan banks,” *The East African*, September 28, 2017, available at <http://www.theeastafrican.co.ke/oped/comment/Sanctions-against-South-Sudan-should-worry-Kenyan-banks/434750-4116278-gtctebz/index.html>.
- ²⁷ Eastern and Southern Africa Anti-Money Laundering Group, “Report of the Survey to Assess the Existence, Causes and Impact of De-Risking Within the Eastern and Southern Africa Anti-Money Laundering Group (ESAAMLG) Region,” September 2017, available at [http://www.esaamlg.org/userfiles/ESAAMLG%20Report%20on%20De-risking%20-%20September%202017%20\(1\).pdf](http://www.esaamlg.org/userfiles/ESAAMLG%20Report%20on%20De-risking%20-%20September%202017%20(1).pdf).



²⁸ See, Judith Akolo, "Kenya raises two billion dollars from Eurobond," Kenya Broadcasting Corporation (KBC1), February 22, 2018, available at <http://www.kbc.co.ke/kenya-raises-two-billion-dollars-from-eurobond/>. For Kenya's debt, see, Duncan Miriri, "IMF stops Kenya's \$1.5 billion standby credit after deficit clash," Reuters, February 20, 2018, available at <https://www.reuters.com/article/us-kenya-imf/imf-stops-kenyas-1-5-billion-standby-credit-after-deficit-clash-idUSKCN1G411Q>.

