



# The Sentry 2021 Annual Impact Report

The past year has been a very difficult one globally, with the continuing rise of authoritarianism, conflict, and unchecked corruption against the backdrop of the ongoing pandemic. The Sentry has successfully focused its investigative and policy efforts on preventing a return to full-scale war in the Democratic Republic of Congo (DRC), South Sudan, Sudan, and the Central African Republic (CAR), as well as on creating accountability for human rights crimes and corruption in these countries and in Zimbabwe.

In this report, we are pleased to share the impact of our work this year.

In 2021, The Sentry focused on the cross-border networks and international enablers that facilitate the corruption that lies at the root of so much suffering around the world.

Our persistent investigations and advocacy targeting corrupt business tycoons like Dan Gertler, Benjamin Bol Mel, and Al-Cardinal resulted in new and updated network sanctions against all three men and their companies by the US Department of the Treasury—showing that even when they try to buy political influence or deploy dirty tricks to evade sanctions, they can't outrun The Sentry's dogged investigators.

Our investigations highlighted the responsibility of corporate actors—from the French-owned Castel Group, a global sugar and beverage giant, to Russia's Wagner Group, a private mercenary army—for atrocities committed in the CAR. Evidence surfaced by The Sentry triggered an internal investigation by Castel Group, contributed to EU sanctions against Wagner and Valery Zakharov in particular, and served as the basis for a criminal indictment against Hassan Bouba, a government minister and former militia leader with links to both.

Our strategic media and nonprofit partnerships have significantly exposed corrupt actors. As a member of the Congo Hold-up consortium, The Sentry helped investigate Africa's biggest data leak, revealing how family and friends of former President Joseph Kabila stole millions of dollars of public funds and then stashed those millions in overseas real estate. These stunning revelations have led to the firing of Albert Yuma, a central figure in Kabila's looting machine, from his position as head of the state mining company Gécamines, as well as new investigations.

Yet in spite of these significant advances, the coup that shook Sudan in October also offers a stark warning that the progress on human rights and anti-corruption reforms we have achieved over the past few years risks being undermined if underlying systems of kleptocracy remain in place, which is why we are focused on that structural issue. As we look ahead to the next year and beyond, The Sentry will continue to direct its efforts toward fully dismantling these corrupt systems and the warped financial incentives they create.



# KEY IMPACTS

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## Advancing Global Anti-Corruption Policy

### Contributed to Expansion of Global Magnitsky-style Human Rights and Anti-Corruption Sanctions

In April, the United Kingdom launched its [Global Anti-Corruption Sanctions regime](#), a new sanctions program that targets individuals and entities involved in serious corruption. The Sentry worked extensively behind the scenes with the UK Foreign Office to help design this program, sharing technical expertise, country analysis, and evidence on possible targets. This sanctions program enhances global efforts to stop those involved in serious corruption from laundering their ill-gotten gains, including through the UK, long a [destination of choice for international kleptocrats](#). Among the first to be sanctioned was the Sudanese businessman Al-Cardinal, the subject of a [2019 investigative report](#) by The Sentry for his role as a key enabler of the corrupt government of South Sudan.

“The Sentry’s research into a high-profile individual was hugely helpful in enabling us to build a case to designate them earlier this year. In doing this we are not only challenging corruption at the highest levels in South Sudan and the region, but we are also showing the world that the UK is not a safe haven for dirty money.”

- Senior UK Diplomat

Separately, The Sentry advocated with other NGOs for the creation of a Global Magnitsky-style sanctions regime in the European Union, which came into effect in December 2020 (although it only covers serious human rights abuses and does not currently cover corruption). We also submitted evidence to Australia’s parliamentary committee on foreign affairs that helped inform legislation expanding Australia’s sanctions regime to allow for Magnitsky-style human rights and anti-corruption sanctions. But much remains to be done, and The Sentry will continue its work to globalize these types of sanctions while advocating for increased coordination and overlap on sanctions targets between the US, UK, EU, Canada, Australia and any new governments adopting Global Magnitsky-style legislation.

### Informed Major New Anti-Corruption Initiatives and Review of Sanctions Policy

In December, the Biden administration announced a new strategy to counter corruption and illicit finance, as well as steps from the US Department of the Treasury to tackle how illegal actors abuse the US real estate market to hide their wealth. The new policy followed on the heels of the much-anticipated [sanctions review, published by](#) the Treasury Department in October. The Sentry was asked to provide inputs at several stages, the only NGO to be included both in [initial consultations](#) and in a [roundtable](#) with human rights and anti-corruption NGOs. The Sentry has long advocated—including in a [research paper](#) in 2019 and, more recently, in [Congressional testimony](#) and in a [briefing](#) to the administration—that sanctions should be one tool in a larger pressure strategy designed to reach a clearly stated goal, as opposed to a standalone policy, and that they should be deployed multilaterally in concert with allies. We will continue to work closely with the US government as it starts to modernize sanctions and implement its new anti-corruption strategy.

## Creating Financial Consequences for Corrupt Networks

### Blocked Attempts by Key Enablers of Corruption in the DRC and South Sudan to Sidestep Sanctions

The Sentry has worked for years to create serious consequences for Dan Gertler and his network. He is responsible for looting significant amounts of the DRC's natural wealth, and the combined efforts of The Sentry and other organizations resulted in sanctions imposed in 2017 under the US Global Magnitsky program. When the outgoing Trump administration decided to issue a license effectively nullifying those sanctions, The Sentry—together with a broad coalition of partners—launched a major [media](#) and [advocacy](#) campaign against this unprecedented action. The new administration revoked the license, allowing the DRC's anti-corruption efforts to get back on track. In December, the US announced [new sanctions on Alain Mukonda and 12 associated entities with close ties to Dan Gertler](#), further extending the consequences for his network.

In South Sudan, a new Sentry investigation uncovered over \$4 billion in government contracts awarded to companies ostensibly controlled by two members of President Salva Kiir's inner circle. Both men were already subject to US sanctions, and our investigation uncovered a commonly used tactic to evade sanctions: registering new companies with relatives or close associates as shareholders thereby avoiding compliance controls by financial institutions. Subsequently, as part of International Anti-Corruption Day, the US Department of the Treasury imposed Global Magnitsky sanctions on two of the companies highlighted in our investigation.

### Revealed Major Corruption in the DRC Using Africa's Biggest-Ever Data Leak

The Sentry was at the vanguard of [Congo Hold-up](#), a collaborative project bringing together media and investigative organizations from over a dozen countries spanning four continents. The project made sense of millions of confidential records—the largest ever such leak related to Africa—from a bank controlled by the family of former President Joseph Kabila. The Sentry conducted two landmark investigations exposing the precise machinery of grand corruption. The first was a [deep dive into theft from government coffers](#), looking at how corrupt elites can exploit gaps in the global financial system to stash stolen funds in foreign real estate. The [second investigation](#) dealt with a slick middleman who paid off Congolese elites to move along a massive deal between Chinese state-owned firms and the Congolese government to swap the DRC's mineral wealth for desperately needed infrastructure, dubbed the “Deal of the Century.” Finally, The Sentry used its technical know-how to help our partners find critical public interest stories hidden deeply in the leak. The stunning revelations by the Congo Hold-up consortium led to the sacking of Albert Yuma, a central figure in Kabila's looting machine, from his position as the head of the state-owned mining company, Gécamines. Yuma has long been the subject of [advocacy](#) by The Sentry and Congolese civil society.



## Exposed the Role of Russian Mercenaries in Atrocities in the Central African Republic

The Sentry worked closely with CNN on a [confidential investigation](#) implicating the Wagner Group, a Kremlin-linked mercenary army, in mass atrocities against civilians in CAR. The investigation reveals how the Wagner Group, allied with forces loyal to Central African President Faustin-Archange Touadéra, uses mass killings, extrajudicial executions, torture, and rape to control and exploit areas rich in gold and diamonds. Building on the evidence we've discovered, The Sentry is engaging with governments, financial institutions, and law enforcement, including the International Criminal Court and the Special Criminal Court, to hold these foreign enablers to account for their complicity in war crimes and crimes against humanity. Citing the joint CNN / Sentry investigation, the European Parliament has called for concrete steps to hold the Wagner Group and other private military companies to account. In December the EU imposed sanctions on Wagner and on Valery Zakharov, security counselor to President Touadéra. The Sentry wrote about Zakharov in its 2020 report, "[State of Prey](#)."



## Revealed How a French-owned Company in CAR Struck Deals with a Brutal Militia

For more than six years, starting in 2014, Castel Group, a multibillion-dollar French sugar and beverage empire, conducted business with *Unité pour la paix en Centrafrique* (UPC), a notoriously brutal militia group. [The Sentry's investigation](#) revealed how a Castel subsidiary in CAR made arrangements with the UPC and other armed groups to protect its monopoly in the sugar sector. In exchange, the company provided cash, fuel, and vehicle maintenance. This arrangement persisted despite knowledge from company officials that the UPC had committed numerous atrocities, including a [deadly attack in 2018 on a camp sheltering 18,000 displaced civilians](#). One day after The Sentry's report was published, Castel Group announced an internal investigation into its subsidiary's activities. The Sentry's investigation also for the first time revealed the role of Hassan Bouba, a former UPC leader and confidant of the Central African president, in atrocities committed by the UPC. The Special Criminal Court has indicted Bouba as a key perpetrator, based in part on evidence provided by The Sentry to judicial authorities. In December, the US government sanctioned militia leader Ali Darassa, a long-time Sentry target, for his role in serious human rights abuses committed by the UPC.

## New Zimbabwe Program Exposed a Global Network Involved in Hiding Corrupt Proceeds

The Sentry launched a new program aimed at tackling systemic corruption in Zimbabwe, a notoriously repressive state. Our first investigative report, “[Shadows and Shell Games](#),” looked at Zimbabwean tycoon Kudakwashe Tagwirei and the elaborate foreign network he has built to hide his ill-gotten wealth. We shared our findings with the public through a media partnership with the [Daily Maverick](#), and our team has briefed banks, governments, and regulatory agencies as part of our strategy to convert the evidence into action. In July, the UK announced sanctions against Tagwirei under its Global Anti-Corruption Sanctions program.

## Developed a Strategy to Address Sudan’s Political Crisis

The coup that shook Sudan in October shone a spotlight on a problem that The Sentry has been emphasizing for a long time: the warped financial interests of Sudan’s military and security services. Addressing this head-on is essential to addressing the country’s political crisis and revitalizing the transition to civilian rule. In the days following the coup, The Sentry laid out [a strategy](#) for the international community to confront these perverse incentives by targeting the military’s wealth and impunity. Financial pressure is essential for building the leverage needed to get the transition back on track, and The Sentry is intensifying its work with governments and global banks to shut those responsible for Sudan’s crisis out of the international financial system.

## 2021 By The Numbers

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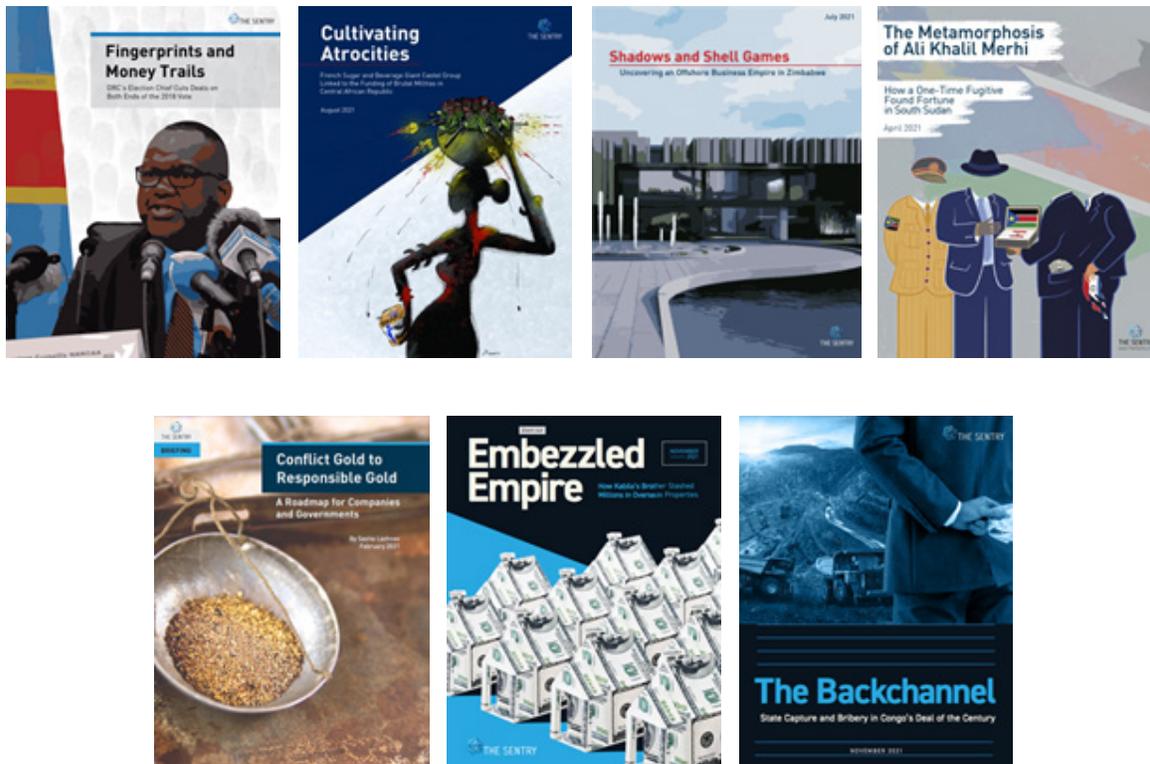
Delivered **30 investigative cases and dossiers** of evidentiary material to more than **30 government and law enforcement agencies** around the world, providing them with the means to take targeted action against perpetrators and enablers of atrocities and financial crimes.

The Sentry deepened its engagement with **26 major banks and financial service providers**, hosting roundtables and sharing evidence to strengthen their role on the front line of sanctions and anti-money laundering policy enforcement.

Investigations and policy analysis by The Sentry appeared in at least **2,182 news articles, interviews, and special features** across top national and international media outlets in more than **20 languages**.

# Major Investigations

The Sentry’s team of investigators follows the dirty money connected to violent conflict and repression, sharing the evidence we uncover with governments, banks, and law enforcement so that they may act against the international enablers of corrupt regimes. This year, we published major investigations on the financial interests of foreign actors in the conflict in the Central African Republic, the Congolese bank at the heart of a major money laundering scandal, the offshore empire of one of Zimbabwe’s richest tycoons, and the hidden identity of a Lebanese businessman in South Sudan, among others. A number of ongoing investigations into corrupt deals worth billions of dollars are nearing completion and will be published in the coming months.



For all reports and briefings by The Sentry, please visit our website:

<https://thesentry.org/reports/>

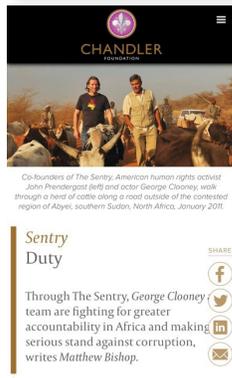
# Media Partnerships

Partnerships with the media are central to The Sentry's strategy. This year, we worked with local and international media partners, from the [BBC](#) and [CNN](#) to South Africa's [Daily Maverick](#) and Sudan's [Radio Dabanga](#). By telling compelling stories in print, video, and podcasts, we help governments, banks, and the interested public understand the root causes and systemic issues that require our collective response.



## Sanctions Are Reimposed on Israeli Billionaire Granted Relief Under Trump

The Biden administration moved to reverse an action that had benefited Dan Gertler, who has been accused of corruption over mining deals in the Democratic Republic of Congo.



# Thank You

The Sentry's work is made possible thanks to the generous support of our close partners and donors. We are grateful for their continued investment in our mission.



## About The Sentry

The Sentry is an independent investigative and policy organization that seeks to disable multinational predatory networks that benefit from violent conflict, repression, and kleptocracy.

Pull back the curtain on the wars, mass atrocities, and other human rights abuses that plague our world, and you'll find grand corruption and unchecked greed. These tragedies persist because the perpetrators rarely face meaningful consequences. The Sentry aims to alter the warped incentive structures that continually undermine peace and good governance. Our investigations follow the money as it is laundered from war zones to financial centers around the world. We provide evidence and strategies for governments, banks, and law enforcement to hold the perpetrators and enablers of violence and corruption to account. In doing so, our work builds new leverage for human rights and peace efforts.

Co-founded by George Clooney and John Prendergast, The Sentry is a strategic partner of the Clooney Foundation for Justice.