

إقليم كوردستان – العراق
هيئة النزاهة



هەريەمى كوردستان – عێراق
دهستەى دەسپاکى

Kurdistan Region- Iraq
Commission of Integrity (KRCI)



Report of Commission of Integrity of Kurdistan Region for 2021

Website of commission of Integrity
www.despaky.krd

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Introduction

We will present all duties and activities of commission for (2021) to Kurdistan parliament:

(2021) was different than last year, it was full of different activities of Anti-Corruption in the field of (Prevention, Awareness, Observation on the duties of institutions, Following up the implementation of reform law, Receiving information on corruption cases and investigation them, Managing a wide program for training abilities with the cooperation of (UNDP) United Nations development program, Pedestaling and developing a good relation with observational institutions in and outside of Iraq by participating many local and foreign conference).

We again ensure on all those activities were took place by little incorporeal and materialistic ability there's no important changes about commission's situation that's why in addition to improving activities it's still not on an expected level.

More duties needs more ability we present commission's duties and obstacles for your clarification we hope that parliament of Kurdistan take its role in providing needs and activating more observational institution, the most important need which Kurdistan parliament can provide is amending commission's law which we were presented before after more than a year it was returned back to commission we aim to present it again if there's a permission for accepting the law.

Important Activities

Development Program of Justice for Anti-Corruption:

In 24/5/2021 development program of justice for Anti-Corruption stated that the amount of (15) million Euros were provided by European Union and will be implement by United Nations Development Program (UNDP) which the ambassador of European Union and the representative of (UNDP) in Iraq a statement of council of representatives of Iraq and Kurdistan region, Iraq government, Kurdistan region, commission of Integrity of Iraq and commission of Integrity of Kurdistan were presented.

In the frame of this program many activities, debates and training will be provided for observational institutions in Iraq and Kurdistan region for (4) years.

Institutions of Kurdistan region generally and observational institutions are a part of this program which will be a reason for developing abilities in their work field.

These two programs are a part of the cooperation of European Union and United Nations for Anti-Corruption in Iraq and Kurdistan region; many programs are on the way for different field of Anti-Corruption.

Investigation program in Financial Crimes:

In 6/7/2021 in the building of the council of Justice in Baghdad the program of investigation in financial crimes by (UNDP) and ministry of foreign affairs of America were presented whom chairman of commission were present, in this ceremony miss.(Zina Ali) representative of (UNDP) in Iraq, judge (Fayaq Zidan) chairman of the council of higher justice of Iraq, judge (Ala Jawad) chairman of commission of integrity of Iraq, a number of related officials and judges were present.

This program was funded by America for two years for developing the abilities of judges, commission of Integrity and public prosecutors in different investigations.

Which will be worked on preparing investigation guideline in financial crimes and includes many workshops.

The statement of the ambassador of America in Iraq, chairman of justice council of Iraq, officials of (UNDP) in Iraq, chairman of commission of integrity of Iraq and chairman of commission of integrity of Kurdistan region were presented, during the ceremony a meeting between the ambassador of America and chairman of commission of integrity of Kurdistan region took place and chairman of commission of integrity of Kurdistan region asked the American ambassador to include Kurdistan region in their all programs that they have for federal institutions especially commission of integrity and American ambassador promised to cooperate in this field.

Dr. Ahmed Anwar chairman of commission of integrity of Kurdistan region presented a statement during the ceremony.

The conference of returning the money of Iraq:

On 15-16/ 9/2021 with the supervision of prime minister of Iraq, the participation of general deputy of Arabic countries and many officials of Arabic countries and experts in Baghdad, a conference of returning the money of Iraq took place and Dr. Ahmed Anwar chairman of commission of integrity of Kurdistan region participated this conference.

This conference was arranged by commission of Integrity of Iraq and ministry of justice of Iraq.

The conference was started by a statement from prime minister of Iraq, later on statements from many Arabic countries and many countries on the level of ministry of justice and some with another representative were participated the ceremony and in Kurdistan region chairman of commission and deputy of ministry of justice were participated.

During these two days many important investigations were presented about the mechanism of returning Iraq's money from abroad by (legal-administration- political- diplomatic) side.

During the conference many meetings were implemented between chairman of commission of Iraq, minister of justice of Iraq, chairman of commission of region with the staff of (Egypt, Jordan, Qatar and Palestine).

Conference of membership countries in United Nation's agreement for Anti-Corruption :

Participation in ninth conference of membership countries in United Nation's agreement for Anti-Corruption in Sharm El-Sheikh/Egypt,

For the first time chairman of commission of Integrity of Kurdistan region in Baghdad in the frame of Iraqi staff with the presidency of judge (Ala Alsady) chairman of commission of Integrity of Iraq participated in the ninth conference of membership countries in United Nation's agreement for Anti-Corruption in 13-17/12/2021 in Egypt, those meetings will be implemented once in two years and (190) countries participate this conference which are members of this agreement with hundreds of activists and experts from this field.

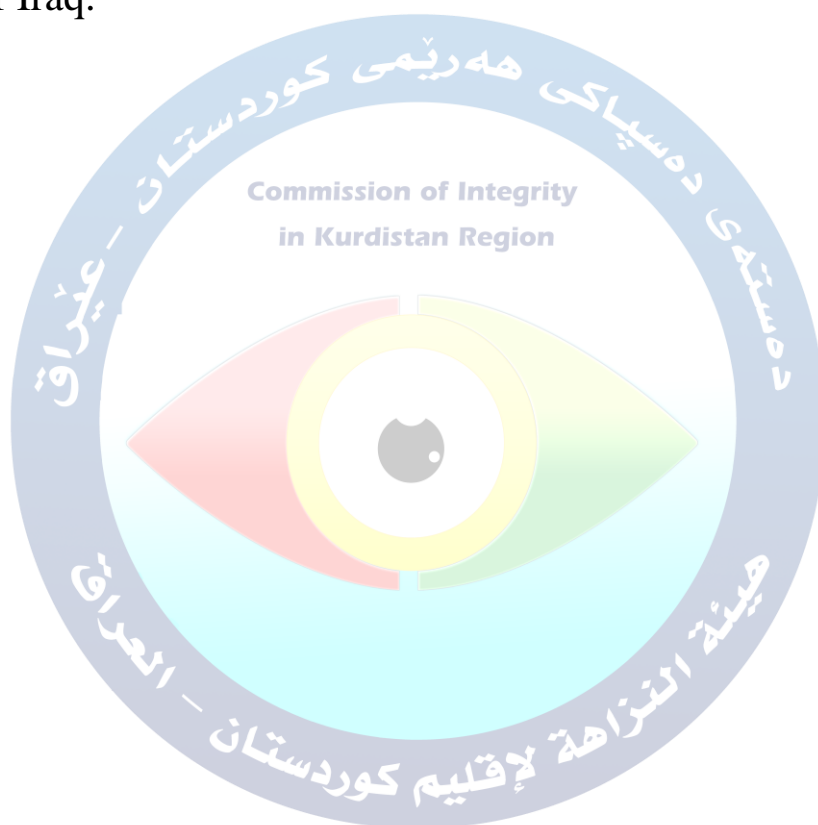
The conference lasted for five days and statements of all membership countries were presented in the main conference hall and started its duties with the statement from prime minister of Egypt and many debates and different activities took place.

Kurdistan region with Iraqi staff also alone implemented many meetings for the purpose of knowing each other, exchanging ideas and information which commission later on specifically works on it and it doesn't need the details of the meetings because the news were published before, with the cooperation of commission of integrity of Iraq and ministry of foreign relations we are trying to achieve official acceptance for commission of integrity of Kurdistan region to be officially invited to this conference and many other activities that is related to this conference every time which will took place, by guiding a written document by ministry of foreign relations of Iraq for the secretariat of the United Nations agreement for Anti-Corruption to state that in Iraq in addition to commission of Integrity of Iraq there's also

commission of Integrity in Kurdistan region which is dependent to this agreement and issues this subject.

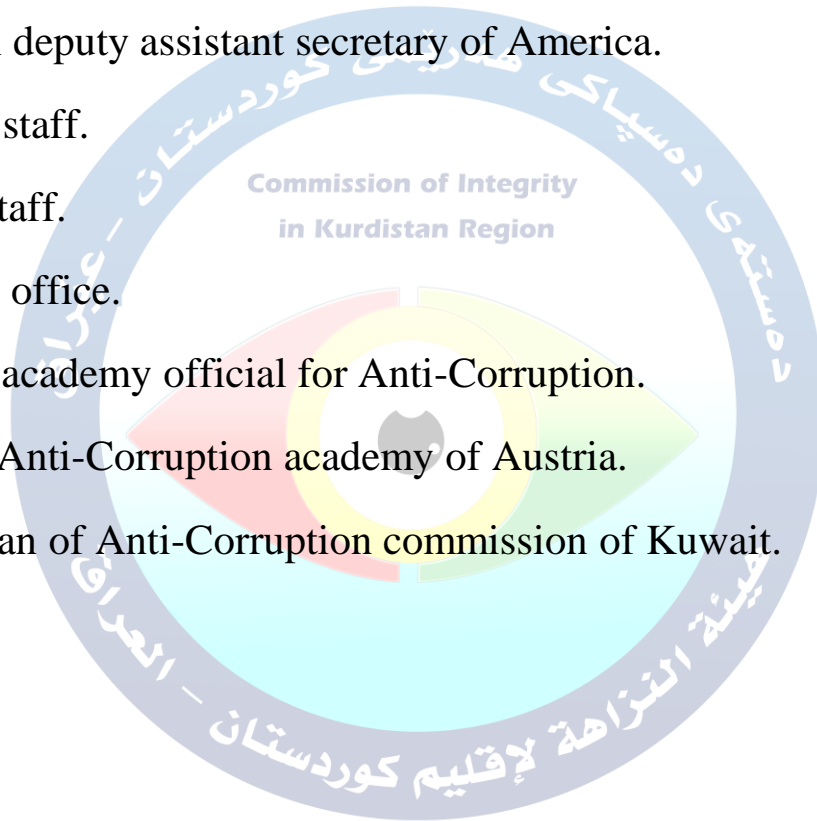
Having this acknowledgment is very important so as to Kurdistan region participate annually in writing the report of Iraq on the basis of implementing this agreement and the steps of Anti-Corruption.

It's worth stating that this participation was with the cooperation of minister of foreign relations of Iraq and chairman of commission of Integrity of Iraq.



During the conference (Dr. Ahmed Anwar) chairman of commission of Integrity of Kurdistan region implemented many meetings with the membership countries in the conference which included the following countries:

- 1-Endonesian staff.
- 2-French staff.
- 3-Chairman of Anti-Corruption commission in Palestine.
- 4-Principal deputy assistant secretary of America.
- 5-Turkish staff.
- 6-Iranian staff.
- 7-UNODC office.
- 8-Egyptian academy official for Anti-Corruption.
- 9-Head of Anti-Corruption academy of Austria.
- 10-Chairman of Anti-Corruption commission of Kuwait.



National strategy of Anti-Corruption in Kurdistan region- Iraq 2021-2025

Commission in 2020 prepared the draft of national strategy of Anti-Corruption in Kurdistan region-Iraq (2021-2025) and send to council of ministries of Kurdistan region with the purpose of accepting (look for page 9-10 of commission report for 2020). Council of ministries of Kurdistan region in 29/9/2021 accepted the draft in its meeting with taking the consideration of other ministries observations. The committee of reviewing the draft of the strategy with the presidency of chairman of commission implemented a meeting so as to discuss all comments and preparing latest draft of the strategy. And now after finishing committee's duties in preparing the latest draft of the strategy, the draft were send to council of ministries of Kurdistan region for the purpose of publishing within new year, in Waqqai Kurdistan the official newspaper and starting its implementation.



Obstacles that commission of Integrity faces during expanding its duties

Incorporeal side:

1-Commission has a few numbers of (Investigators) which doesn't suit the big level of public sector in Kurdistan region.

Investigating corruption cases needs a lot of investigators which till now commission has only (23) investigators in (Erbil-Sulaymanyah-Duhok) for observing public sector which includes (800) thousand employees.

Also from each (Garman, Halabja, Koya, Soran) there's no investigators from commission, only has one justice investigator in Halabja whom in addition to his works, he takes care of corruption cases too, meanwhile there are many big cases which needs to be worked on.

2-Back in 2014 in the first amendment of commission law we asked to have an authority to establish investigators as the same way as commission of Integrity of Iraq but due to the political disagreement between political parties our request got rejected.

3-Special court for corruption cases:

Last year in 18/2/2021 council of justice with order number (1/1/117) on commission's request decided to form a special court for corruption cases which was an important step but due to obstacles and problems this decision still isn't get to be implemented and we continuously in

contacting term with them so that they can make the decision in to reality.

4-For other fields commission needs more (legal-Prudent-Administration) employees but due to financial crises we couldn't abled to employ employees or transfer the needed employees, only a few and that's because suspension of transferring employees.



Materialistic side:

1-Old, unsuitable and main location of the building of commission and both directorate of investigation of Sulaymaniah and Duhok which doesn't suit to their works and duties.

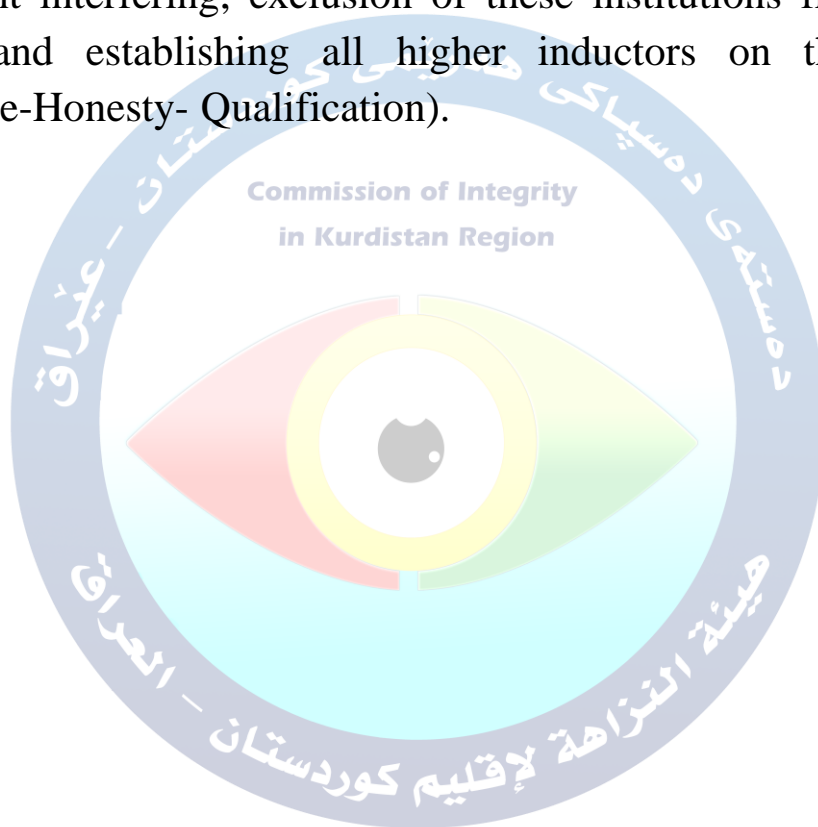
2-Having little budget became an obstacle toward developing duties, opening the offices of commission in an independent managements and some districts which those offices needs a building, assets and cars.....etc.

In addition to our needs incorporeally which we stated before, we hope that it will be provided in the project of budget law 2022 of Kurdistan region and we need your support in parliament of Kurdistan for this purpose.



-Another important point of commission of Integrity and observational institutions:

Protecting independence and neutrality of observational institutions are the most important point of developing and activating this institution which parliament of Kurdistan can support and cooperate this process and prevent interfering, exclusion of these institutions from political conflicts and establishing all higher inductors on the basis of (Experience-Honesty- Qualification).





Activities of Investigation Department

The main duty of revealing corruption cases and collecting information about them with the support of artistic institutions, receiving news, information, complaints and investigating corruption crimes which was stated in commission law (first article/7) according to the legal articles of Iraqi penal law number (111) in (1969) commission law with the support of the basis of penal justice law and instructions of arranging investigation duties of commission number (3 in 2016), cooperation in the field of observing fiscal charges of region and the ways of managing them, returning those culprits whom they ran away abroad, returning those assets which were taken abroad. Exchanging information and common international investigation.

The duty of investigation department about investigating corruption crimes will be in three stages (receiving information and following up, news telling stage which commission's investigator investigates the case without investigation judge (initial investigation), the stage of legal lawsuit which commission's investigator investigates under observation of the judge of investigation court of integrity and both stages will be considered as a case).

According to commission law number (3) in (2011) amended to law number (7) in (2014) with the support of the instructions of arranging investigation duties number (3) in (2016) our commission directorates and investigations of all three governorates; Erbil, Duhok and Sulaymaniah which is related to investigation department works on receiving information with all ways of receiving will takes three stages (information), (news telling lawsuit) and (penal lawsuit) that's why the details of total information's in 2021 in basis records of directorates

were saved and necessary steps were taken, following up and investigations were implemented for them, we will elaborate for you

Notice: due to the different ways of receiving information, news telling lawsuit and penal lawsuit total statistics will not be matched.

Generally in investigation department first step of total received information recorded for 2021 contains (129) information and the second step news telling lawsuit contains (156) the third stage penal lawsuit contains (475) those penal lawsuits which were send to special court by judge of investigation court contains (151) the penal lawsuit which was send according to its special, types and place contains total (39) the decisions of closing penal lawsuit are (102) those penal lawsuits that are under investigation contains (572) penal lawsuits and those penal lawsuits that are under investigation contains (244).

Special details of statistics of investigation directorate of Erbil contains as the following:

In first stage total received information that saved for 2021 contains (38) information the second stage news telling lawsuit contains (51) the third stage penal lawsuit contains (75) those penal lawsuits which were send to special court by judge of investigation court contains (41) penal lawsuits those penal lawsuits that were send according to its specialty, type and place are (20) total of closing decisions of penal lawsuits are (22) the penal lawsuits that are under investigation are (130).

Special details of statistics of investigation directorate of Sulaymaniah contains as the following:

In first stage total received information that saved for 2021 contains (72) information the second stage news telling lawsuit contains (64) the third stage penal lawsuit contains (195) those penal lawsuits which were send to special court by judge of investigation court contains (48) penal lawsuits those penal lawsuits that were send according to its specialty, type and place are (11) the penal lawsuits that are under investigation are (297) total of closing decisions of penal lawsuits are (49).

Special details of statistics of investigation directorate of Duhok contains as the following:

In first stage total received information that saved for 2021 contains (19) information the second stage news telling lawsuit contains (41) the third stage penal lawsuit contains (205) those penal lawsuits which were send to special court by judge of investigation court contains (62) penal lawsuits those penal lawsuits that were send according to its specialty, type and place are (8) total of closing decisions of penal lawsuits are (31) the penal lawsuits that are under investigation are (176).



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General statistics of Investigation department from 1/1/2021 till 25/12/2021

Special information of commission which were send according to place specialty		Information that were send and has elements of penal but it's not in commission's specialty		Information which is under the law of commission				Total recorded information in basic information records of 2021		
				Became news telling lawsuit	It's in following up stage	Incorporated	saved			
3		4		82	25	2	13	129		
Total news telling lawsuits which is under investigation (244) lawsuit		News telling lawsuits that became penal lawsuits		Arranged news telling lawsuits	News telling lawsuits that were send according to place specialty	Saved news telling lawsuits		Total recorded news telling lawsuits in news telling records		
Previous returned lawsuits	2021					Lawsuits from previous years	Decisions of 2021			
139	105	23	6	7	84	15	156			
Total penal lawsuits which is under investigation (572) lawsuit		Total decisions of closing penal lawsuits (102)		Total decisions of sending penal lawsuits to special court (151)		Penal lawsuits that were send according to place specialty		Send according to the article 54	Arran-penal lawsuit	Total recorded penal lawsuits in penal records
Previous returned lawsuits	2021	Previous returned lawsuits	2021	Previous returned lawsuits	2021	Previous returned lawsuits	2021			
222	350	63	39	109	42	16	23	-	27	475

Statistics of related sides of penal lawsuits of Investigation department from 1/1/2021 till 25/12/2021

Number of penal lawsuit	Related side	N.
158	Ministry of Internal affairs	1
7	Individual (a person)	2
10	Ministry of Labor and Social affairs	3
38	Ministry of Education	4
38	Ministry of Municipality and Tourism	5
5	Ministry of Industry and Commerce	6
29	Ministry of Finance and Economy	7
9	Ministry of Youth and Culture	8
4	Ministry of Higher education and Scientific research	9
7	Representative of ministry of Education of Iraqi union	10
7	Ministry of migration and Displaced	11
1	Presidency of Public prosecutor	12
1	Ministry of Peshmarga	13
10	Ministry of Justice	14
6	Ministry of Electricity	15
27	Ministry of Health	16
1	Ministry of Commerce of Iraq	17
1	Compensation and extrapolate committee 222	18
3	Ministry of Natural resources	19
3	Ministry of Agriculture	20
16	Company, Society and Organization	21

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4	Commission of Investment	22
2	Ministry of Planning	23
3	Council of Chancery	24
2	Erbil Governorate	25
1	Ministry of Communication and Transport	26
1	Parliament	27
5	Directorate of Sulaimanyah security	28
2	Directorate of Companies of Sulaimanyah	29
4	Directorate of Investment+ Planning and Construction+ National card of Garmyan	30
2	Frontier Guard	31
1	Chavi tourism project	32
408	Total	



Statistics of the decisions of judge of arresting and preparation in department of Investigation from 1/1/2021 till 25/12/2021



Unimplemented Decisions	Implemented Decisions	Total	Judicial Decision	N.
102	290	392	Decision of Presence	1
54	47	101	Decision of arrest	2
156	337	493	Total Judicial decisions	3

Statistics of Culprits according to legal article in department of Investigation from 1/1/2021 till 25/12/2021

number	Legal Article	N.
17	307 P.L	1
2	310 P.L	2
2	312 P.L	3
11	316 P.L	4
5	293 P.L	5
10	330 P.L	6
20	331 P.L	7
16	332 P.L	8
18	340 P.L	9
150	341 P.L	10
4	318 P.L	11
1	335 P.L	12
17	298-289 P.L	13
25	340 with proof article 49.48.47 P.L	14
18	315 P.L	15
8	333 P.L	16
1	269 P.L	17
3	329 P.L	18
1	119 The law of the basis of penal judiciary	19
1	444 P.L	20
1	339 P.L	21
2	457 P.L	22
1	400 P.L	23
7	307 with proof 310 P.L	24
1	240 P.L	25

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1	Article 14 in commission of Integrity of Kurdistan region's law	26
1	Article 15 in commission of Integrity of Kurdistan region's law	27
2	194 customs	28
1	238 P.L	29
1	322 P.L	30
13	307-289	31
1	229 P.L	32
1	239 P.L	33
363	Total	



Statistics of Culprits according to official post (Status) in department of Investigation from 1/1/2021 till 25/12/2021

number	Official post (Status)	N.
2	General Director	1
2	Previous general director	2
1	Notary public	3
1	Assistant of general director	4
5	Chairman of municipality	5
26	Manager	6
249	Employee	7
53	Officers with rank and file	8
3	Doctor	9
1	Teacher	10
2	Legal	11
1	Lawyer	12
1	Chairman of Organization	13
5	Owner of Company	14
37	Workman	15
14	Citizen	16
1	Businessman	17
404	Total	

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Statistics of Culprits according to their fates during sending their dossiers to special court in department of Investigation from 1/1/2021 till 25/12/2021

150	Total lawsuit that were send to special court	N.
11	Escaped culprit	1
5	Person under arrest	2
230	Bailed culprits	3
1	Adjourned fate	4
1	Disagreement of Bailment	5
248	Total	



The amount of returned money in department of Investigation from 1/1/2021 till 25/12/2021

Preventing the waste of public asset	The value of return charges	The amount of money that were taken over	The value of extrapolated corruption		Governorate	N.
			Dollar	Dinar		
—	—	—		twelve million, eight hundred - thirty two thousand and six hundred dinar 12,832,600	Erbil	1
—	25,623,595,900 Twenty five milliard, six hundred- twenty three million, five hundred- ninety five thousand and nine hundred dinar	—	3,849,010 Three million , eight hundred- forty nine thousand and ten dinar	25,649,020,900 Twenty five milliard , six hundred- forty nine million, twenty thousand and nine hundred dinar	Sulaymania	2
—	286,033,500 Two hundred- eighty six million, thirty three thousand and five hundred dinar	—		739,021,372 Seven hundred- thirty nine million, twenty one thousand, three hundred and seventy two dinar	Duhok	3
—	25,909,629,400 Twenty five milliard, nine hundred- nine million, six hundred- twenty nine thousand and four hundred dinar			26,400,874,872 Twenty six milliard, four hundred million, eight hundred- seventy four thousand, eight hundred and seventy two dinar	Total	



Activities of Legal Department

Activities of Legal Department

This department's issues:

According to the law of our commission No (3)2011 that have been amended to law No (7) 2014 that have been consider decision No (10) 2015 issued by the presidency of Kurdistan region, our departments issues have been decided as below:

1-Presenting opinions and discussion about legal issues which is presented to commission and representing commission against those lawsuits which will be taken against them with the proxy of the chairman of commission.

2-Ennoblement in front of special courts which is special for corruption crimes or reviewing grounds for appealing about them.

3-Representing commission in those investigation committees which was formed upon commission request.

4-Preparing investigation and legal research which special for the laws of Anti-Corruption and international agreements from this field.

5-Presentation and requesting international legal cooperation.

6-Observing the integrity of decisions and duties of public sector.

7-Putting instructions of prevention on strife of interest in Region.

8-Taking observation on integrity level of discussions, duties of public sector and publishing occasional reports in to consideration.

9-Preparing suggestions and legal projects in the field of prohibiting and Anti-Corruption.

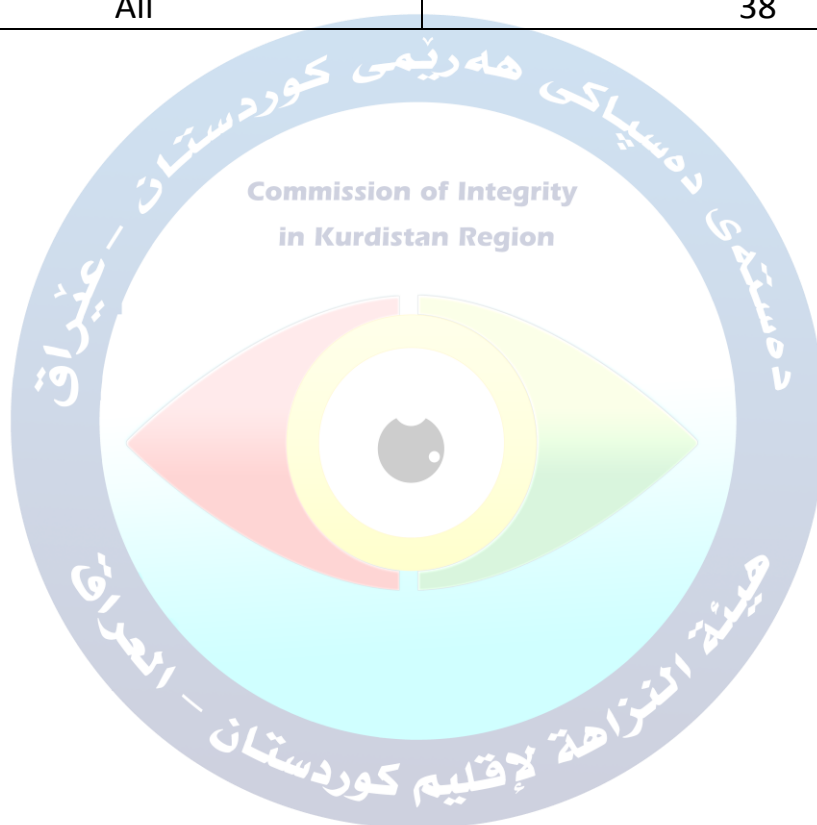
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- Legal department is consisting of (6) divisions:
- Our department is consisting of divisions mentioned below and their employees also:

No	Divisions	Employees number	Gender		Notes
			Male	Female	
1	Claims division	11	5	6	In this division (2) employees are in the directorate of investigating in Sullaimania , and (4) employees in the directorate of investigating in Duhok.
2	Division of draft advice and suggestion	2	1	1	-
3	Division of monitoring and administrative reform	6	1	5	-
4	Division of legal affairs	4	2	2	-
5	Division of finance monitoring on the region	4	3	1	-
6	Administrating division	9+2(contract)	9	2	-
	Total	36=2(contract)=38 employees	21	17	-

Employees number according to their specialist:

Employees	Number
Legal employees	22
Administration employees	11
Serving employees	5
All	38



structural of legal department

director general

1. Lawsuit division

- Subdivision of lawsuit
- Subdivision of implementing
- Subdivision of following up corruption cases

2. Draft advice and suggestion department

- Subdivision of suggestion
- Subdivision of draft advice
- Subdivision of researched and studies
- Subdivision of international law exchange cooperation

3. Division of Observation and Administration Reform

- Subdivision of integrity and administrative reform
- Subdivision of committee
- Subdivision of observing region's wealth

4. Division of legal affairs

- Subdivision of contract and ratification
- Subdivision of property

5. Division of administration

- Subdivision of printing
- Subdivision of outgoing and incoming

Lawsuit division

Lawsuit division follows up in special courts (Magistrate/ Assize) through the section of following up of corruption cases in Region, and participates on trials as work defense in general rights the ones that related to corruption.

Following up those lawsuits that commission takes against someone or be taken against commission for the purpose of pleading and grounds for appealing.

The statistics of Kurdistan region provinces that have been investigated at 2020 (1/1/2020 – 31/12/2020) The total corruption cases I court are the characteristics of (assize and magistrate court) over the Kurdistan region in (1/1/2020 – 31/12/2020) with previous years.

Lawsuit division follows up in special courts (Magistrate/ Assize) over the Kurdistan region in 2021.

Lawsuits that has been sent to competent courts		Kurdistan region provinces			Total
		Erbil	Sullaymania	Duhok	
In court	Assize court	31	37	23	91
	Magistrate court	17	17	11	45
Total		48	54	34	136
Settled	Assize court	12	7	47	66
	Magistrate court	7	7	22	36
Total		19	14	69	102
Returned	Assize court	5	1	3	9
	Magistrate court	0	0	0	0
Total		5	1	3	9

Settled lawsuit in the special courts (Magistrate/ Assize) over the Kurdistan region in 2021:

Lawsuits that has been sent to competent courts		Kurdistan region provinces			Total
		Erbil	Sullaymania	Duhok	
In court	Assize court	13	19	23	55
	Magistrate court	14	8	11	33
Total		27	27	34	88
Settled	Assize court	3	6	11	20
	Magistrate court	4	2	11	17
Total		7	8	22	37
Returned	Assize court	1	1	3	5
	Magistrate court	0	0	0	0
Total		1	1	3	5

Previous years' lawsuits:

Lawsuits that has been sent to competent courts		Kurdistan region provinces			Total
		Erbil	Sullaymania	Duhok	
In court	Assize court	18	18	1	37
	Magistrate court	3	9	0	12
Total		21	27	1	49
	Assize court	9	1	35	45
	Magistrate court	3	5	11	19
Total		12	6	46	64
Returned	Assize court	4	0	0	4
	Magistrate court	0	0	0	0
Total		4	0	0	4

Settled lawsuit in the special courts (Magistrate/ Assize) over the Kurdistan region in 2021:

Government	Guilt		Freeing		Total
	Assize	Magistrate	Assize	Magistrate	
Erbil	2	3	10	4	14
Sullaymania	3	6	4	1	69
Duhok	23	6	24	16	
total	28	15	38	21	102

the appealed cases are in the post- judgment stage in 2021:

No	Name of the accused	Position	Legal article	Court's decision
1	F.F.M	Mukhtar	331 e.s	(12/1/2021)magistrates court decided to be imprisoned for one year but the execution was stopped.
2	CH.Q.R	Director	331 e.s	(19/10/2021)magistrates Court(erbil) decided to be imprisoned for (6 months) but the execution was stopped.
3	S.S.A R.F.A T.SH.A G.M.F F.SH.B N.A.S N.A.F	Merchant University teacher University teacher University teacher Director of auditing Director of accountant University teacher	240 e.s	(22/12/2021)magistrates Court/ koye decided to be imprisoned for (3 months) but the execution was stopped.
4	D.A.A	employee	340 e.s	After the decision of the court has been executed and returned to the court and court of cassation decided to stop the execution for one year

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				(18/8/2021)
5	D.H.A	employee	340 e.s	(1/9/2021)the court decided to be imprisoned for one year but the execution was stopped.

The punished in 2021

The punished in erbil government:

Government	Number of the accused	Assize	Magistrates	Notes
Erbil	5	5	0	-
Sullaimania	3	3	0	-
Duhok	0	0	0	-
Total	8	8	0	-

The punished in sulaymaniyah province:

No	Name of the accused	Job position	Legal article	Specialist court	Court's decision
1	H.F.K	Police	312	Magistrates court	Was decided to be imprisoned for (2 years)
2	J.N.A	Retired employee	335	Assize court	was decided to be imprisoned for (6 months) but the execution was stopped (28/10/2021)
3	A.M.H	Citizen	453	Magistrates court	Was decided to be imprisoned for 6 months
4	M.H.N	Employee	279	Magistrates court	Was decided to be fined by the amount (225000) Dinar

The punished in Duhok province:

No	Name of the accused	Job position	Legal article	Court's decision
1	N.H.R	Bursar	315 E.S	Was decided to be imprisoned them for 3 years with returning the amount of money which is (139513500) DinarS
2	A.S.J	Merchant	310/307	Was decided to be imprisoned for 6 months
3	A.A.SH	Contractor	310 E.S	was decided to be imprisoned for 6 months for 3 crimes which become (1) year and (6) months in imprisoned
4	A.H.D	Bank employee's	307/310 E.S	Was decided to be imprisoned for (1) year
5	S.S.F	Contractor	310 E.S	Was decided to be imprisoned for 6 months
6	M.J.A	Merchant	318 E.S	Was decided to be imprisoned for 2 months
7	A.H.A	Merchant	307/310 E.S	Was decided to be imprisoned for 4 months
8	K.H.R	Merchant	307/310 E.S	Was decided to be imprisoned for 4 months
9	M.H.M	Zeravani	341 E.S	was decided to be imprisoned for (6 months) but the execution was stopped
10	B.A.T	Merchant	307 E.S	Was decided to be imprisoned for (6) months absently
11	M.K.M	Contract employee's	307 E.S	was decided to be imprisoned for 6 months for 2 crimes which become 12 months in imprisoned
12	B.R.T	Contract employee's	307 E.S	was decided to be imprisoned for 6 months for 2 crimes which become 12 months in imprisoned
13	L.S.J	Port of justice	330 E.S	court was decided to be fined by the amount (250000) dinar
14	M.S.H	Company director	330 E.S	court was decided to be fined by the amount (250000) dinar
15	A.S.KH	Employee	330 E.S	court was decided to be fined by the amount (250000) dinar
16	A.S.KH	Employee	330 E.S	was decided to be imprisoned for (6 months) but the execution was stopped
17	A.SH.KH	Contract employee's	330 E.S	court was decided to be fined by the amount (225000) dinar
18	SH.J.A	Employee	335 E.S	Was decided to be imprisoned for 4 months
19	B.KH.M	Traffic commissioner	331 E.S	court was decided to be fined by the amount (225000) dinar
20	F.S.J	Accountant	318 E.S	Was decided to be imprisoned for (2 years)
21	A.H.H	Bank employee's	316 E.S	was decided to be imprisoned for (6 months)
22	SH.J.A	Employees	335 E.S	court was decided to be fined by the amount (225000) dinar
23	M.M.T	President of Chamank	316 E.S	Was decided to be imprisoned for (1) year

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		municipality		
24	H.A.A	Employee	276 E.S	was decided to be imprisoned for (6 months)
25	K.M.N	Servant at doctors without borders organization	307 E.S	Was decided to be imprisoned for (5 years) and (1 month
26	R.A.T	Employee	307/310 E.S	was decided to be imprisoned for (6 months)
27	M.A.T	Employee	307/310 E.S	Was decided to be imprisoned for (1) year and (6) months
28	M.A.M	Employee	307/310 E.S	Was decided to be imprisoned for (1) year and (6) months
29	T.T.H	Employee	307/310 E.S	Was decided to be imprisoned for (1) year and (6) months
30	A.M.KH	Employee	307/310 E.S	Was decided to be imprisoned for (1) year and (6) months
31	TH.N.M	Employee	340 E.S	was decided to be imprisoned for (6 months)

Commission of Integrity
in Kurdistan Region

Statistic of punished according to their positions in 2021:

Job position	Punished
Director	3
Company director	1
Accountant	1
President of Chamanky municipality	1
Port of justice	1
Employee	17
Retired employee	1
Contract employees	3
University teachers	4
Mukhtar	1
Contractor	2
Police	2
Zeravani	1
Merchant	6
Citizens	1
Servants	1
Total	46

The statistics of punishments at Kurdistan region`s courts:

City	Number of the accused
Erbil	11
Sullaimania	4
Duhok	31
Total	46



Draft advice and suggestion department

This department will be involved in giving legal advice and preparing investigation paper and studies to prevent corruption, drafting a legal project and guidelines that are related to self-defense in corruption, as well as drafting guidelines and internal lyrics, reviewing and evaluating legal tools.

Starting to express question about various types of legal issues and preparing research and evaluating legal action and administrative solutions related to the required periodic report to prevent corruption, resistance and investigation.

Activity of draft and advice and suggestions department:

- 1- In 4/1/2022 this division gave its own suggestion and notes about complaints review board of implementing public contracts No (2) 2016, this board has been selected by administrative order No (15) 22/11/2020.
- 2- In 1/3/2021 following the request of department of investigating/ Sullaymania this division gave a suggestion in Arabic and Kurdish language after researching specifically about money laundering to be applied in money laundry cases.
- 3- In 27/06/2021 we sent clarification about arranging employees contract form in the commission to subdivision of following up corruption cases in Sullaymania.
- 4- In 28/06/2021 we gave clarification about forming investigating community in kurdistan region's offices.
- 5- In 19/9/2021 this division has presented how to solve administrative and financial corruption and how to avoid it in

Iraq, as writing a law to avoid facing corruption in private sectors and developing the E-government that will help the government to be transparent in its issues. also activating law No (11) 2013 which is the law of accessing information. And also the independent of the courts so it can be shared with Televisions and radio channels.

- 6- In 1/11/2021 following up the memorandum of sub division of following up corruption cases in Sullaymania this division gave clarification about the way of renting markets and the beneficiaries in school.
- 7- In 22/9/2021 this division gave clarification about issuing financial instruction No (13) 6/9/2021 according to reform law No (2) 2020.
- 8- This division beyond its duty has visited directorate of social reform and police directorate/division of sentenced cities of Kurdistan issuing a high community due to the administrative order No (150) 8/11/2020 in cooperation with subcommittees in Sullaymania in Duhok city and following up arrested and sentenced situations in the point of social equality, and providing legal solution I case having any problem or being delayed in investigating process.

Division of Observation and Administration Reform:

The primar responsibilities of this department are as follow:

1. Monitoring public sector decisions and regulations to make sure are all aligned with the principles of integrity.
2. Monitoring Kurdistan Regions expenditure and financial administrative in coordination with the finance auditing department.
3. Issuing periodical report on the expenditures.
4. Following up the tasks of the committees within the integrity commission or any other committees whose tasks are related to this department.
5. Updating information on all public and private entities in Kurdistan region along with their incomes, employees, head of departments.

6-The tasks and activities of the committee of monitoring and administrative reform for the year (2021):

To follow up the implementation of law No.2 of the year 2020, (Reform in payments, grants, privileges, and retirement in Kurdistan region – Iraq), regulation No.94 was passed on 28 july 2020 according to which a committee was formed led by the general director of the

legal department (Moshir Rashid Ibrahim) to follow up the implementation of the mentioned law.

This step was followed by passing regulation No.116 on 27 September 2020, according to which seven teams were formed to follow up the implementation of the law. Each team was assigned a specific task.

Team No.1: Monitoring retirement Benefits.

Team No. 2: Monitoring the termination of re- benefiting from the national budget.

Team No. 3: Monitoring re-counting the years of service and job ranking.

Team No. 4: Monitoring the rights and benefits of the families of martyrs and Anfal victims as well as political prisoners.

Team No.5: Monitoring the retirement status of Peshmarga forces and guards.

Team No. 6: Monitoring the opening of an account for employer's payments and returning commercial loans.

Team No. 7: Monitoring

Team no. 1: Monitoring retirements:

This team has visited the directorate of retirements several times, following our first report in our special retirements axis which is consist of:

First axis: arranging pensions of Kurdistan region's high positions according to article (7).

Works has been done on high position as below:

Amending pensions of high position:

According to the first paragraph (amending pensions of high positions) in the previous report we mentioned The reimbursement schedule for the pensions of judges and prosecutors that (70%) of the work has been done, but currently pensions of judges and prosecutors that (100%) of the work has been done. Currently we working on general directorates and mayors, members of government council as clarified below:

Amended judges list:

Directorate of retirement	Retirement No	Old salary	New salary	The differs of salary
D.R. Erbil	53	264,325,000	218,241,000	46,084,000
D.R. Sullayman	43	198,530,000	167,977,000	25,533,000
D.R. Duhok	14	72,800,000	58,584,000	14,216,000
D.R. Soran	1	5,400,000	4,725,000	675,000
D.R. Garmian	2	7,800,000	6,825,000	975,000
Total	113	548,855,000	456,372,000	87,483,000

The reformed list of (General Directorate – Member of Provincial Council – Mayor)

Directorate of Retirement	No. of retirements	Old salary	New salary	Salary differences
D.R. Erbil /1	7	17,811,000	16,296,000	1,515,000
D.R. Erbil /2	70	187,026,000	136,365,000	50,661,000
D.R. Duhok	53	128,798,850	85,405,000	43,393,850
D.R. Raparin	1	3,064,000	2,390,000	647,000
D.R. Zaxo	3	7,200,000	4,938,000	000,2,262
D.R. Soran	1	2,998,000	1,555,000	1,443,000
D.R. Koya	1	3,263,000	2,545,000	718,000
Total	136	350,160,850	249,494,000	100,639,850

The reformed list of (Experts)

Directorate of Retirement	No. of retirements	Old salary	New salary	Salary differences
D.R. Erbil/1	57	93,157,000	58,424,000	34,733,000
D.R. Erbil /2	269	496,888,000	237,350,000	259,538,000
D.R. Sulaymanyah	72	111,558,000	61,730,000	49,558,000
D.R. Duhok	80	129,187,200	73,936,000	55,251,200
D.R. Raparin	2	2,337,000	1,900,000	437,000
D.R. Chamchamal	1	1,217,000	618,000	599,000
D.R. Zaxo	7	11,448,000	5,451,000	5,977,000
D.R. Soran	4	4,541,000	2,501,000	2,040,000
D.R. Akre	3	4,656,000	3,042,000	1,614,000
D.R. Koya	1	1,614,000	1,014,000	600,000
Total	494	856,603,200	443,465,000	410,367,200

Annulment of illegal salaries:-

According to article (7) second section specified for annulment of illegal salaries, specific to the list of illegal retirements, General Directorate of Retirements has sent two lists to the Council of Ministers to abolish high-ranking positions, one with NO. (461) high positions, the second one with No. (1169) high positions, in both Article (9) and Article (10) in the reform law, they will be canceled, but because some of these retirees have Peshmerga service, they will follow up on their cases and then it will be decided to cancel them.

Article (8)

Dissolving all accounting units in all administrations that spend pensions especially unit (70) and unit (80) and those retirements of Ministry of Peshmerga/ General Directorate of Peshmerga Retirements and front line disabled, now that both of units (70) and (80) working on clearing their lists, General Directorate of Retirements are waiting for their files and lists to arrive and work on as necessary as auditing the files and separation legal from illegal.

➤ On the suggestions of General Directorate of Retirement which we mentioned in our first report about Retirement Fund consist of first article third section of activation and financial support of Retirement Fund, General Directorate of Retirement has done the work about the Fund on all levels but it is not in their authority to activate and they don't have the authority for accepting the structure of Retirement Fund.

Barriers:-

- 1- Not having the authority to activate Retirement Fund by General Directorate of Retirement.
- 2- Lack of specialist and expert employees on that filed.
- 3- Not having the authority to hire imperative and expert employees.

Results:-

As in special list of amending salaries of high positions (Judges, General Managers, Members of Provincial Councils, Experts and Mayor) the difference between their old and new salaries has been highlighted to do the work of this committee without highlighting the amount of money because the General Directorate of Retirement has mentioned that the statistics will be published incorrectly in the media.

Second team/ Investigation team for the end of the re - benefit of the general budget

- Ministry of Labor and Social Affairs have formed high and subcommittee to work on the beneficiaries of disabled and special needs, and mentioned below is part of their works so far:-
- The Ministry of Labor and Social Affairs has published instructions no. (2) (2020) on the amount of disabled funds in The Waqaei Newspaper of Kurdistan no (261) on (28/2/2021) so it is in the field of implementation.
- The presidency of the council of ministers in letter no. (5425) on (29/9/2020) agreed to open the center of identifying disabled and

providing buildings and staff and approving the structure of that center.

- Ministry of Labor and Social Affairs has prepared special instruction for identifying disability.
- Subcommittees are continuing in auditing and reviewing the beneficiaries of special needs list which the total is (88867) disable.
- The ministry has prepared the list of disabled employees name and job titles for auditing in cooperation with Information Technology Office of the presidency of the Council of Ministers because part of Full names and biometric number has been repeated more than once as below:-

No.	Details	Number	Salary differences
1.	Number of disabled employees	13249	1,324,900,000
2.	Number of biometry code twice again	648	3,240,0000
3.	Number of biometry code three times again	17	3,400,000
4.	Number of biometry code forth times again	1	300,000

Third team / Special investigation of service recounting and job positions:

After investigating the ministries and offices of the Kurdistan Regional Government, it became clear that the ministries and decrees were not connected to the ministry according to the capabilities and work of the employees worked on reform in this way:

No	Name of Ministries And Commissions	Number of employees files	No. Of files that have been audited	Number of extra rank	Extra allowance
1	Presidency of Kurdistan Region	598	103	185	258
2	Parliament of Kurdistan	664	8	-	-
3	Council of Ministers	They didn't send data		-	-
4	Ministry of Peshmerga	We have not received any Data		-	-
5	Ministry of Interior				
A	Internal security forces file	38312	38312	122	103
B	Civil employees file	5405	5226	117	25
6	Judicial Council	170	170	16	115
7	Ministry of Justice	4158	3565	63	53
8	Ministry of Higher Education and scientific	30786	21759	138	41

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	researches				
9	Ministry of Finance and Economy	14437	14103	872	1372
10	Ministry of Health	49408	23339	94	15
11	Ministry of Education	162613	162613	79	805
12	Ministry of Culture and Youth	7062	5773	690	504
13	Ministry of Trading and Industrial	3250	3249	40	139
14	Ministry of Agriculture and Water Resource	10232	6456	37	248
15	Ministry of Electricity	14107	14107	179	28
16	Ministry of Natural Resource	1887	1575	62	38
17	Ministry of planning	1034	1034	20	52
18	Ministry of Endowment and Religious Affairs	12510	12510	113	225
19	Commission of Human Rights	294	241	30	3
20	General Board for Kurdistan Areas Outside the Region	151	130	Incapable	Incapable
21	Mine Action Agency	238	238	30	173

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22	Board of Supreme Audit/Erbil	389	389	Incapable	Incapable
23	Board of Supreme Audit/Sulaymanyah	185	185	9	-
24	Board of Investment	497	497	79	39
25	Ministry of Labor and Social Affairs	5790	5775	86	332
26	Ministry of Transport and Communication	5121	3919	207	449
27	Ministry of construction and housing	5175	5175	200	159
28	Ministry of Martyrs and Anfal Affairs	1359	1319	196	65
29	Ministry of Municipality	24562	22719	389	480
30	Board of Environmental protection and Improvement	376	344	84	7
31	The Independent High Election and Referendum commission	534	534	5	1
32	Commission of Integrity	203	182	9	7
Remark		They don't have extra rank and extra allowance			

Barriers:-

- 1- Corona disease affected the work of the committees.
- 2- The alternate style of employees' work.
- 3- Not responding to the ministry of finance and economy for the writings that the ministries have asked for clarification to implement.
- 4- The employees of the organizations that have become permanent property on the institutions of the regional government do not have the necessary priority in their files and their addresses are not compatible with their certificates and services.
- 5- Ambiguity of financial instructions no. (12) For implementing the reform law because in each ministry it is interpreted in a way that instructions are made at the time of its implementation.
- 6- The request of most offices was that the Ministry of Finance should have held a large meeting to further clarify the guidelines.
- 7- In places where there were mass demonstrations such as Halabja province, Head of the offices took employees' files home to protect them from burning, which would have been a problem for the committee's work.
- 8- In some places, due to the fear of social problems, some of the members of committees could not work as necessary, for example, it was mentioned in the Health office of Halabja martyr.
- 9- The commander of Zeravani Peshmerga and the commander of defense and emergency Peshmerga only their salaries are on the interior ministry, their allowance, promotion and retirement are on Ministry of Peshmerga, and so this matter must be resolved.
- 10- The fifth point of the first section of financial Instruction number (12) of (2020) is contrary to the content of the directive because all ranks and titles have been given to employees by administrative decision.

11- Ministry of Interior asks for that law no. (22) Of (2008) be the basis for financial instructions number (12).

12- Therefor the situation of Kurdistan and the rebellion of (1991) and civil war from (1991 to 1997), many of the cases were burned and this is an obstacle to implementing the law and instruction reform special for the Ministry of Interior.

13- In the attached schedule of financial instructions no.(12) of (2020), injustice appears to be ineffectual.

14- Those who were given less than their rights needed to have that right returned because the law says reviewing the rank, rank, and salary of employees.

15- The rate of extra salaries that have been received the basic salary and the allocation is different from one degree to another, and it is not mentioned because we only have received the difference of basic salary, not the total of salary and allocation.

16- In Halabja governorate, after the follow-up of our committees, it was revealed that they had a misconception about the law in their work in a way that the number we mentioned only audited at the case of those employees who were employed until (2005).

17- A- Some members of the subcommittees are longstanding employees are included in the reform.

B- Therefore the review of the position and the implementation of the law has been done by the subcommittee it has been done by committee's effort, so it is necessary to review these cases by financial supervision so that the employee is not harmed.

C- IN Some offices may not enforce the law and instructions as necessary, either because of the inexperience of a part of the administrative staff or the negligence in the implementation of the law, this matter should be worked on more seriously.

The fourth team / Investigation team specialize in the rights and privileges of the heirs of the families of martyrs, Anfal victims, prisoners, and political prisoners:-

After our visit to Ministry of Martyr about the implementation of reformed law in salary, allocation, grants, privileges and retirement in Kurdistan Region – Iraq and they have set the High Committee and subcommittee special for that subject, and below is their work :-

1. Expel and publishing instructions number (1) of (2021) the instructions of facilitating the implementation of the law of privileges of political prisoners of Kurdistan number (11) of (2011) amended.
2. Expel and publishing instructions number (2) of (2021), the instructions of facilitating the implementation of the law of privileges of families of martyrs and anfal in Kurdistan Region – Iraq no. (9) of (2007) amended.
3. Visiting the field of the ministry committee to visit the subcommittee of reform in the general directorates of (Erbil, Sulaymaniyah, Duhok).
4. Auditing and reviewing the files of (Frontline Martyr, Genocide Martyr, Citizen Martyr and Political Prisoners) has done as below:-

No.	Place	Type of File	Number of file	Number of auditing files
1.	Directorate of Martyrs and Anfal Affairs/Erbil	Frontline martyr	13465	720
		Genocide martyr	3026	370
		Citizen martyr	8458	251
2.	Directorate of Martyrs and	Frontline martyr	17695	853

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	Anfal Affairs/Slemany	Genocide martyr	7826	0
		Citizen martyr	8762	1482
3.	Directorate of Martyrs and Anfal Affairs/Duhok	Frontline martyr	6415	557
		Genocide martyr	778	500
		Citizen martyr	3908	474
4.	The committee of auditing and reviewing political prisoners case	Political prisoners	23769	475
5.	The committee of dissatisfaction of the families of Anfal and Martyr	Complaints	967	822
6.	The committee of auditing and reviewing genocide survivor case	Genocide survivor	361	361
7.	The committee of auditing and reviewing Chemical weapon victims case	Chemical weapon victims	9202	0

Fifth Team/ The investigation team for retired Peshmerga accountants and guards:-

1- On 10/2/2021, the committee visited the ministry as follows:

The work of the subcommittee for reviewing the personal files and serving all the officers and ranks of the Peshmerga forces as below:

- The subcommittees have not done their job in auditing the personal file because of the lack of priorities in the files.
- Therefore the auditing in the files of Peshmerga service in has not been done, Peshmerga service has not reviewed.
- Special instructions were issued in cooperation with the Ministry of Finance and Economy No. (31) On (22/12/2021).
- The letter No. (1184) on (31/1/2021) sent to the (70) and (80) forces to reorganize the case of Peshmerga forces.

- The work of the subcommittee reviewing the lists of disabled and martyrs and retirement as below:-

- By ministerial order No. (9807) on (28/10/2020) a committee was formed to reinstate the High Medical Committee and generalize number (1049) on (2/11/2020).

2- Units of (80) Peshmerga forces responded by letter no. (4880) on (10/12/2020) that the number of disabled people is as below:-

- (1989) officers and seniors have not received the necessary rate of disability and are asked to be returned to the medical committee.
- Another letter was written no. (4824) on (8/12/2020) for (440) disabled people for the same purpose above.

- The commander of the(80) forces with the letter no. (3699) on (31/10/2020) showed their readiness to help the Ministry of Peshmerga to review the file and the monthly salary list of officers and retired officers of all kinds, martyrs, immigrants, and disabled people.
- The commander of the (80) forces in writing no. (4881) on (10/12/2020) has sent the list of the names of (221) officers and rank servants who have so far obtained the duties and ranks of the disabled to the Ministry of Peshmerga.
- The letter no. (A/2/930) was sent to the Minister of Peshmerga by the Secretary-General at a meeting on (25/1/2021) with the retired director of the Peshmerga forces and both commanders of the (70) and (80) forces made some decisions to implement the units and articles of the reform law.

2- Peshmerga Forces Property Committee:-

No progress has been seen in the works of the subcommittees regarding the reorganization of the equipment and property of the Peshmerga forces of Kurdistan, they are waiting for the decisive response of the presidency of the region according to the chairman of the committee.

3- organizing and unifying the salary of Peshmerga forces and scrutiny and spending salary list in this way:-

- on (10/1/2021) the committee meeting was held by the presence of representative of (70) and (80) units and bellows points were accepted:-
- Organizing the budget of (70) and (80) forces with the budget of the ministry of Peshmerga.
- Two account numbers will be renewed to fund after their accounts are settled by the end of the year.
- Monthly financing, amount, and analysis will be through the Ministry of Peshmerga.

- Their monthly salary list should be sent to the ministry's council to unify them.
- By ministerial order no. (A/T 10113) on (2/11/2020) a committee of (6) people was formed to propose and implement the points mentioned above.
- According to the letter no. (389) on (12/1/2021), the mechanism of unifying the accounting units of Peshmerga forces was sent to the presidency of the council of ministers.

4- The committee of preparing the list of responsible guards:-

The guards of the officials will be transferred from the property of the Peshmerga forces to the property of the Interior ministry forces, but so far they have not made any progress and there are no more guards according to the property according to the committee's chairman.

❖ Obstacles and problems:-

1. The lack of priority in the case of Peshmerga forces is the main problem in doing their work.
2. The (70) forces did not have an answer for the case of retirees, disabled people, and martyrs.
3. The lack of structure for the 70th and 80th forces according to the brigades in the ministry's council is the reason for the lack of unifying property in the council of the Ministry of Peshmerga.

The sixth team / follow - up team to open a special account for salary payments and business debt repayments:-

Our team visited each of the Ministry of Finance, Economy and The Big Banks and after completing a three-month extension to return the debts will be worked on.

On (17) February (2021), our state of defeat in team has visited the Directorate of Justice Enforcement/Erbil, but we couldn't receive any information due to moving their building on the same date.

- **Commercial banks from (1/10/2020) until (1/2/2021) the amount of money returned is as below:-**

No.	Bank	Total Returns
1.	Erbil	185206015
2.	Sulaymanyah	59750200
3.	Total	244956215

- However, a special committee of commercial banks has been formed to take back the loans and they have made many suggestions for this subject and our report have been attached.
- Professional banks from (1/10/2020) to (1/2/2021).
The amount of returned money is as below:-

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No.	Bank	Total Returns
1.	Professional Banks	22192918900
2.	Total	22192918900

- **Small debt on (1/10/2020) until (1/2/2021) the amount of returned money is as below:-**

No.	Bank	Total of the Returned
1.	Erbil Office	94319400
2.	Sulaymanyah Office	48838650
3.	Duhok Office	156128942
4.	Garmyan Office	4216000
5.	Total	303502992

According to the letter of General Manager of Commercial banks no. (688) on (18/2/2021) which is special for returning small debts, and we agree to work on points below:-

1. Properties that have been mortgaged should record under the name of Ministry of Finance and Economic.
2. Those projects which have received the money from facility debt should mark as a mortgaged on finished and unfinished projects.

3. The name of all government debtor companies should be blacklisted and no treatment should be done by government.
4. Should be prevented from traveling abroad on the company's authorized managers and shareholders and to prevent loans received in the name of other persons.
5. A letter to the High Committee of Biometrics to stop their salaries for all individuals (shareholders and authorized managers of companies).
6. A letter to the general directorates of (taxes, prince's housing, customs, real estate records, traffic) to stop working for individuals and (shareholders and authorized company managers).

Team seven/Special team of follow-up sermons:-

The special team has done their job, the names are specified, and only procedures remains with them, which we mentioned in the previous report.

- **Statistics of the Fact - Revealing Committee for the year (2021) is as below:-**

Closed	Sent to investigation				A letter has sent to relevant side and it is on auditing	Sent to relevant side	Total
	Erbil	sulaymanyah	Duhok	Total			
26	12	3	1	16	25	2	69

Division of Legal Affairs

This division will be done by organizing and connecting the commission's contracts that are related to houses, trucks, property, and the property of the commission and approving the agent's promised letters of decisions and provisions that are specific to the legal office and monitoring the corruption case.

Works and activities of the Division of Legal Affairs for the year (2021):-

- By order no. (155) on (8/9/2021) the general agent of both employees (Aram Abdullah Faqe Rashid, Mohammad Abd-Aljabar) has been cancelled.
- By order no. (167) on (29/9/2021) the general agent of employee (Fadhil Aged Binyamin) has been cancelled.
- By order no. (213) on (8/12/2021) the general agent have given to (Qadir Saleh Abdul).

Confederation

Erbil	Sulaymanyah	Duhok	Total
2	0	0	2

Renewing Contracts

Erbil	Sulaymanyah	Duhok	Total
14	13	9	36

Hiring by Contract

Erbil	Sulaymanyah	Duhok	Total
1	0	0	1

Car Renting Contract

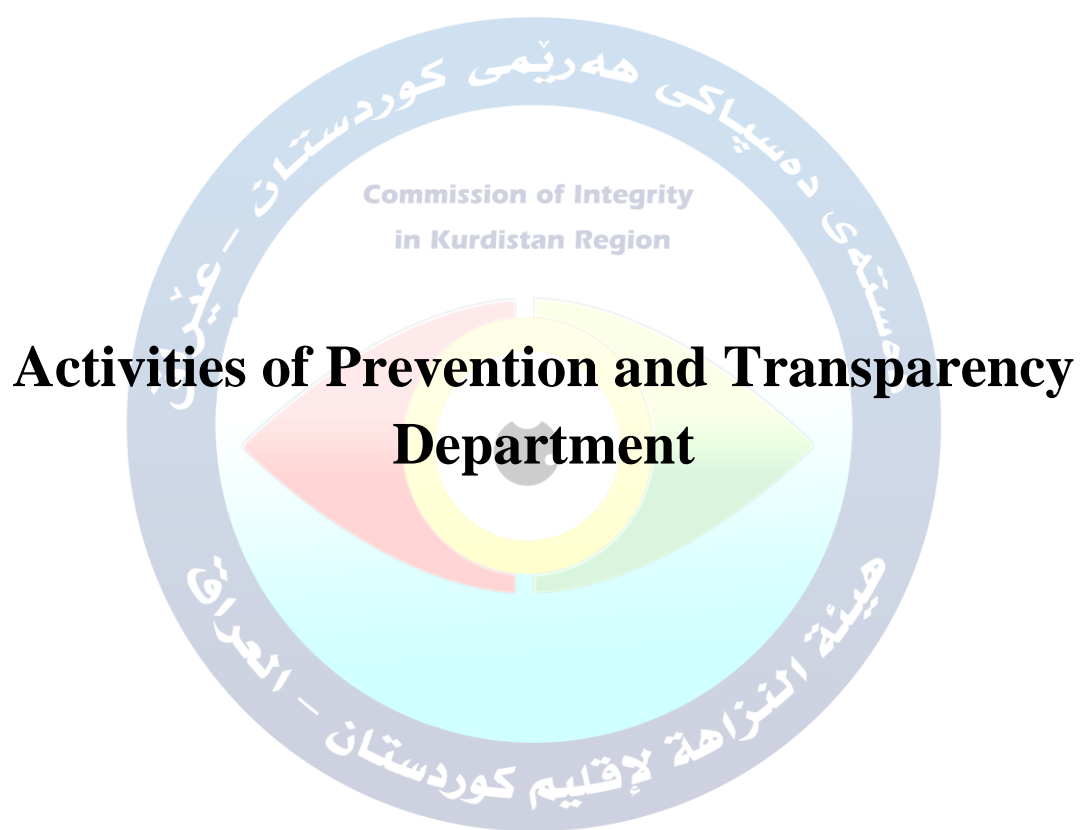
Erbil	Sulaymanyah	Duhok	Total
0	1	0	1

Car Renewing Contract

Erbil	Sulaymanyah	Duhok	Total
1	0	0	1

General Agent

Erbil	Sulaymanyah	Duhok	Total
0	1	0	1



Assignment and Activities of general directorate/ Prevention and Transparency

The structure of of general directorate/ Prevention and Transparency is as follow:

1. Despaky Academy (It consists of multiple department).
2. Disclosure of financial interests department.
3. Transparent and behavior of employees department.
4. Administration department.

Apart from the activities carried out by each department, the general directorate of transparency and prevention was involved in following tasks as well:

1. General director at the department of transparency and prevention as a member of the committee of drafting the “ national strategy of confronting corruption in Kurdistan region 2021-2025” took part in a meeting on November 2021 with the rest of the members of the committee to review the final draft of the strategy before publishing it in (Waqae Kurdistan) - Official journal. It is worth mentioning that council of minister approved the draft in a meeting on September 29, 2021 after the remarks of all ministries took into consideration.
2. Distributing a book written by a COI staff Abdulqadir Salih Abdul titled “Work Ethic-- fifth edition” on all governmental departments.

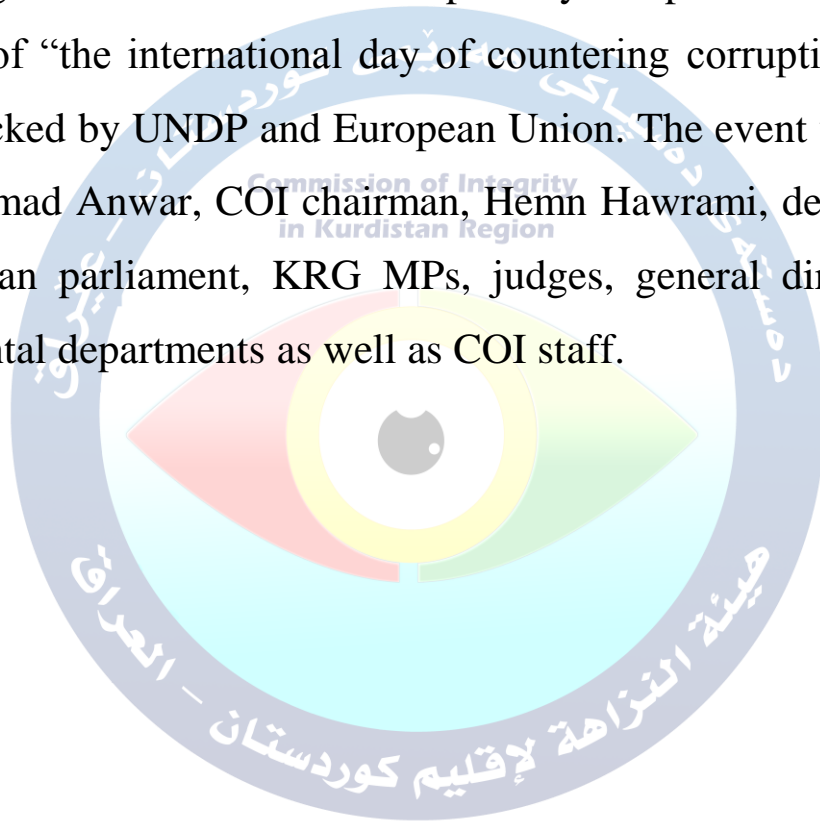
3. General Director at department of transparency and prevention as the COI representative was a member of a committee formed in 2021 to design an investigation guide on financial crimes funded by United States of America. This committee consists of UNDP experts, Iraq judiciary council, Kurdistan region judiciary council, Iraqi COI, Kurdistan region COI, Iraqi interior ministry, Kurdistan region interior ministry, Iraqi finance auditing diwan, Kurdistan region finance auditing diwan, Iraqi Justice ministry, Kurdistan region Justice ministry, KR security department, Iraq central bank office of anti-money laundering.

4. Forming a committee, backed by UNDP and headed by general director of the general directorate of transparency and prevention to coordinate with the ministry of higher education and scientific research. The task of the committee is to implement the project of research integrity in scientific researches.

5. General directorate/ Prevention and Transparency in cooperation with the Ministry of Higher Education and Scientific Research, and UNDP held the Academic Research Integrity forum on November 2, 2021 at Salahaddin Social and Cultural center. Dr. Ahmad Anwar, chairman of COI, Dr. Aram, minister of Higher Education and Scientific Research, Dr. Fatah, deputy minister of Higher Education and Scientific Research attended the event. In addition, around 150 other high-ranking officials were also attended the event, among them

were Dr. Alan Hama Saaed. Minister of education, Dr. Jutyar Adel, the chairman of the department of Media and information, Omer Xoshnaw, Erbil mayor, presidents and vice presidents of universities, COI general directors, UN representatives, as well as many other officials from KRI governmental departments.

6. The general directorate of transparency and prevention supervised the event of “the international day of countering corruption” in Hotel Rotana backed by UNDP and European Union. The event was attended by Dr. Ahmad Anwar, COI chairman, Hemn Hawrami, deputy speaker of Kurdistan parliament, KRG MPs, judges, general directors KRG governmental departments as well as COI staff.



Activities of the Ingredients of the prevention and transparency department (2021)

First: Despaky Academy Activities (2021)

Based on COI declaration published in Waqae Kurdistan on October 13, 2019, Despaky Academy is a directorate within general directorate prevention and transparency consist of different departments.

As previous years, departments within Despaky academy carried out various activities such as following:

1. The Despaky Academy in cooperation with the Ministry of Higher Education and Scientific Research, and UNDP held a workshop on 20 June 2021 titled “managing threat of corruption in higher education”. The following attended the event: Dr. Ahmad Anwar, COI chairman, Dr. Abdulfattah Abdulrazaq deputy minister at ministry of higher education and scientific research, Dr. Amanj Abdullah Saeed, advisor at ministry of higher education and scientific research, Dr. Adnan Abdullah, general director at the department of transparency and prevention, Moshir Rashid Ibrahim, general director at COI legal department, Dr. Khattab Ahmad Mustafa, general director at the ministry of higher education and scientific research, Dr. Najdat Sabri Ismaeel general director at the ministry of higher education and scientific research, Dr. Jwan Jalal Sharif general director at the ministry

of higher education and scientific research, Dr. Mohammad Hussein, general director at the ministry of higher education and scientific research, Dr. Dawoud Suleiman Salim, general director at the ministry of higher education and scientific research, Dr. Nuri Yassin Harzani, general director at the ministry of higher education and scientific research, Dr. Govand Hussien Sherwani general director at the ministry of higher education and scientific research, Mrs. Sawsan Mohammad Amin, Despaky Academy manager, as well as UNDP experts and COI staff.

2. On 25 September 2021, Despaky Academy in cooperation with SonoShad and APHRA association held a workshop titled “Work Ethic & Business Etiquette Skills” at COI meeting hall. Nidhal Shalabi delivered the workshop from Jordan. COI employees from Erbil, Dohuk and Sullaimania participated at the workshop. At the end of the workshop, the participants received certificate of participation.

3. Under the supervision of the The Despaky Academy, UNDP and European Union held three workshops titled “Arbitration and anti-corruption projects” were held from 21 to 25 November 2021 in Johaina hotel. These workshops were supervised by COI and backed by UNDP and European Union. COI staff in Erbil, Sullaimania and Dohuk as well as COI staff from Iraqi government participated in the workshop. The workshops consisted of various subjects including “ the rank of Iraq based on corruption international standard”, “ assessing the threat of corruption” and “ assessing the anti-corruption legislations”.

4. On 5 September 2021, Despaky Academy supervised a four day training course titled “capacity building of COI investigators” for new investigators. Judge Rizgar Mohammad Amin, retired judge Rahim al-Agili, Judge Nader Abdulaziz Harki, as well as a member of general jurisdiction, Dr. Mohammad Rekani, delivered the course.

5. On 10 August 2021, Despaky academy held an online meeting with UNDP experts to discuss the project of empowering NGOs.

6. On 19 October 2021, Dr. Ahmad Anwar Mohammed, the head of Commission of Integrity in Kurdistan region held a meeting with a delegation from UNDP headed by Heki Windorv and Mohammed Musili experts in financial corruption cases. Director General at Prevention and Transparency department, the head of Despaky Academy, COI attorney general, the head of Erbil Investigation office, 2 investigators as well as 2 auditors attended the meeting as well. They focused on the urgent need of setting a more effective mechanism of investigating corruption cases in Kurdistan region in general and COI in particular. Align with this strategy; UNDP is to launch 30 workshops in Baghdad over the course of 3 years to raise the capacity building of investigators and auditors. Preparing a guideline on the investigation process on financial corruption is in on the agenda as well.

7. On 20 October 2021, Despaky Academy held a meeting between Dr. Ahmad the head of Commission of Integrity with a delegation from UNDP. Director General at Prevention and Transparency department also attended the meeting in which they discussed the mechanism of

implementing the national strategies of countering corruption in Kurdistan region.

8. On 24 October 2021, Despaky Academy held a meeting between Dr. Ahmad Anwar Mohammed, the head of Commission of Integrity in Kurdistan region with UNDP experts Yama Torabi and Sam Makan. They discussed launching a survey on code of conduct and design based on the result of the survey.

9. On 25 October 2021, Despaky Academy held a meeting between Dr. Ahmad Anwar Mohammed, the head of Commission of Integrity in Kurdistan region with a delegation of European Union to Iraq, Mrs Barbara Egger head of cooperation, Ebba Abdu, EU representative in countering corruption, and Ghada Hameed, UNDP project manager. Director General at Prevention and Transparency department attended the meeting as well. In the meeting, they stressed on the EU continuous support of COI in launching long-term projects that facilitates the implementation of COI projects.

10. The department of relations with NGOs in Despaky Academy is launching a project named “countering corruption to build trust in Iraq” in cooperation with UNDP. The purpose of the project is to identify the challenges of countering corruption and finding effective solutions. This project aims at capacity building of NGOs as an effective ... of countering corruption. UNDP

11. The department of relations with NGOs in Despaky Academy arranged a meeting between COI coordinator with NGOs and council

of minister department of NGOs. The purpose of the meeting was to boost cooperation and coordination in carrying out join projects between the two sides.

12. Supervising the process of getting COI, staff participated in training courses launched by China and announced by KRG ministry of Planning. After conducting a need assessment, Despaky Academy selects the qualified candidates and registers their names through ministry of planning.

The following are some of the online training courses attended by COI staff:

- Cloud Computing and Big Data. Date: Oct 12—25, 2021.
- Public Administration training course for civil service staff. Date: Nov 1—12, 2021.
- Public Administration course for civil service staff Date: Nov 1—12, 2021.

13. Quality control department within Despaky Academy design evaluation form for all seminars, workshops and training courses conducted inside and outside of COI by. It later evaluates all the forms and filling them.

14. Supervising the task of getting COI, staff participated in KIPA training courses.

Second: disclosure of financial interest's activities (2021):

This department issues is to reveal the financial interest, to fill the forms of revealing financial interest, those who are nominated to fill the form of financial interests disclosure according to article No (fifth, eighth, three) from the Law of CIKR – Iraq no (3) (2011) modified, and also article (2) (2016), this department checks the reliability of the forms according to article No(13)from the instruction of revealing financial interest No(2)(2016), and also determine the cases in which there is an increase in their funds according to article No(14) in the law of commission of integrity in Kurdistan region-Iraq No(3) modified (2011).

All these processes will be done through the process of revealing financial interest.

This department activity for the year (2021) were as below:

1- Ordering a new list for those who are required to fill the form:

Ordering the list from KRG offices especially those offices that has faced changes in number of their nominated ones. After their response, this department had compared the new lists with the old ones for confirmation of the forms that will be sent.

(Over the past year, ordering list litter has been sent to all the organizations)

2- Sending the forms of revealing financial interests:

After the response of KRG offices, disclosure of financial interest has sent all three type of forms (First, Periodical and Final) disclosure of financial interest compared to the list that been sent, then the process of retrieve forms has been investigated for the process of returning forms at the specified time, in the case of their delay, many warning letters has been sent to the responsible ones, and that is according to article (11/2) from the instruction of financial interests disclosure no 2 (2016).

The table below shows the latest data of sending and receiving back forms.

NO	Type of form financial interests disclosure	No. of sent forms	No. of received forms
1	First form of financial interests disclosure	3949	1776
2	Periodical form of financial interests disclosure	153	134
3	Final form of financial interests disclosure	104	95

Note (1): The reason of differences in numbers of sent and returned forms in the first form of financial interests disclosure is due to the Ministry of Interior and Peshmarga (a group of Majors promoted to Lieutenant – Colonel in the last three months), and therefore the distance of their administrations, they will be given more time to fill out and return the forms.

Note (2): About periodical forms, the difference goes back to the forms have not been returned at the end of the year.

(Periodical forms fill out every three years).

Note (3): About the final form, the differences goes to the interruption of responsible one in his/her workplace. The form barely reaches the responsible one and therefore he/she should fill out the form while retiring.

3 - According to article (K) in article no (five, eight, three) on commission of Integrity of Kurdistan regions law:

It was considered necessary that some of the employees in KRG's organizations to obliged to fill the financial interest disclosure forms, for that purpose Commission of Integrity's order no. (87) On (27/6/2021) has been published. For this order (the directors and officials of accounting, border crossing managers and tax estimators) adhered to fill out the forms.

Therefore (171) first forms has been sent to the organizations according to their response and the list of their names. (only those Organizations that have returned their names), therefore the delay of the parties in sending names of responsible one's, so far only one form has been returned.

4- Initial audit for financial interest disclosure form:

After receiving back the forms, according to article (10) from the instruction of financial disclosure no (2) of the year (2016), this department did the initial auditing for the returned forms in case of having any unfilled or mistakes in the forms, the department notified the responsible ones to fix the problem.

5- Documenting and Protecting Form of Revealing Financial Interests:

After receiving back the forms and fixing all its problems, this department have been documenting all the forms and scanning them to save and protect them from being corrupted.

During this year, (2005) form has been documented.

6- Internal auditing for the forms of revealing financial interests:

After filling the first - periodical - last forms by the responsible ones. This department audited the changes that happened between the periods of filling both forms in order to know the change that happened between the periods of filling both forms, if there was a significant

increase in the responsible ones income, all documents will be given to the Investigation office to investigate and raise the penalty request .

7- External auditing for the forms of revealing financial interests:

According to article (15) from the instruction of revealing financial disclosure No (2) (2016) department of revealing financial interests, in auditing the forms in cooperation with:

- Ministry Of Justice / General Director of recording Real Estate.
- Ministry of Finance / the Branch of Central Bank in Kurdistan Region / Erbil – Sulaymaniyah.
- Ministry of Trade and Industry / General Director of Recording Companies.
- Ministry of Finance / General Director of Income Tax.

During this process, written for each of these institutions has been made to ensure the correctness of this information recorded in the recommended form, after we receive the answer to our writings, it is compared to the recorded information of the forms, When there is a difference according to article (14) in the instruction of financial disclosure no (2) for the year (2016) will be informed with a formal litter he/she is also asked for an opinion according to the procedures explained in section (A). During this year (87) responsible has sent their names to external auditing and has been compared.

Department activity:

Due to the large number of responsible ones who belongs to Ministry of Peshmarga and the distance of their administrations, this department performed two seminar in cooperation with Despaky Academy, in order to familiarize the responsible and representative to the process of financial interest disclosure to speed up in sending and returning the forms.

The first seminar was held in Ministry of Peshmarga on (17/3/2021).

The second seminar was held in the Directorate of the reform in Ministry of Peshmarga on (8/6/2021).

Third: Activities of Transparency and behavior of employee's department (2021):

According to the authority, that has given to us as transparency and behavior of employee's department by the law of commission of integrity/Kurdistan region No (3) 2011 amended No (7) 2014 our assignment and activities as below:

1. Updating date of (guide of public officials in Kurdistan region) that have been sent by the public officials like the name of the offices and their representative, phone number and representative's number, registering these data in the guide. Designing this guide, printing it, sending a PDF copy of this guide to all the public officials in Kurdistan region, and sharing this guide on commission of integrity's website.

2. We have formed some committees to follow up the implementation of the core generalization No (75/3) in 26/11/2018 that have been sent to all the public sectors in Kurdistan region. That is focused on how to fill the form of pledge for public sector's employees to commitment to instruction No (1) 2016 (Career discipline instruction for public sectors employees in Kurdistan region) the pledge signed by all the employees and have been saved in employees self-document in their office and doing seminars for their employees. At the end, we prepared a report about this issue and hand it to the director general of department of prevention and transparency.

Below are the offices that our committee has visited:

First: Erbil committee:

The committee was formed by all the employees of this department, and visited officials below:

(ministry of planning):

1. Divan of ministry of planning
2. Commission of statistic
3. Directorate of statistic/Erbil
4. commission of standardization and quality control
5. Department of standardization and quality control

(ministry of health):

6. Divan of ministry of health

7. General directorate of health/Erbil

8. Institute of forensic medicine

(Ministry of construction and housing):

9. Divan of Ministry of construction and housing

10. General directorate of roads, construction and housing

11. Directorate of construction and conversation /Erbil

12. Directorate of stations load/Erbil

13. Directorate of construction and housing

14. Directorate of Erbil roads

(independent commission of human rights):

15. Divan of commission of human rights

(ministry of trade and industry):

16. Divan of ministry of trade and industry

17. General directorate of company registration

18. General directorate of trade developing

19. General directorate of trading

20. General directorate of planning and following up

21. Directorate of developing industry/ Erbil

22. Directorate of food supplement/Erbil

23. Directorate of arranging food card /Erbil

24. Directorate of trading cereal /Erbil branch

25. Directorate of trade control/ Erbil

26. Directorate of grain processing/ Erbil

27. Directorate of company registering/ Erbil

(Ministry of Endowment and religious affairs):

28. Divan of Ministry of Awqaf

29. General directorate of Christian affairs

30. General directorate of Izidian affairs

31. General directorate of Hajj and Umrah

32. General directorate of Erbil Awqaf

33. General directorate of Erbil and its outskirt Awqaf

34. Directorate of Erbil Awqaf

(Ministry of electricity):

35. Divan of ministry of electricity

36. General directorate of Erbil electricity

37. Erbil electricity distribution directory /1

38. Erbil electricity distribution directory/2

39. Directorate of transporting Erbil electricity

40. Directorate of controlling Erbil electricity delivering

41. Directorate of controlling central region.

(Ministry of culture and youth):

42. Divan of ministry of culture and youth

43. General directorate of Syriac culture

44. General directorate of Erbil media, printing and distributing

45. directorate of Erbil media, printing and distributing

46. general directorate of Erbil culture and art
47. department of handmade carpets
48. department of cinema
49. general directorate of Turkman culture and art
50. general directorate of Sports
51. directorate of Erbil sports
52. general directorate of youth
53. directorate of Erbil youth
54. general directorate of public libraries
55. directorate of Erbil public libraries

(ministry of justice):

56. divan of ministry of justice
57. presidency of judicial oversight authority
58. council of region's Shura
59. presidency of public prosecution
60. general directorate of justice department
61. directorate of observing disabled /Erbil and its outskirts
62. general directorate of justice institute
63. directorate of implementing / Erbil and its outskirts
64. department of notary /Erbil and its outskirts
65. directorate of registering real estate
66. general directorate of Erbil registering real estate /1
67. directorate of Erbil registering real estate/2

(ministry of Anfal and martyrs):

68. Divan of ministry of Anfal and martyrs
69. general directorate of Erbil Anfal and martyrs
70. directorate of region's political prisoners

(Mine foundation):

Second: Duhok committee

Below are the offices they visit

(ministry of education):

1. general directorate of Duhok education
2. directorate of education Duhok district /East
3. directorate of education Duhok district/ west
4. computer institute
5. institute of fine art
6. sport institute

(Ministry of Trade and Industry):

7. directorate of grain processing
8. directorate of industry developing /Duhok
9. directorate of trading drinking water directorate of real estate
10. directorate of companies Duhok
11. directorate of arranging drinking waters container
12. directorate of trading drinking water/Duhok
13. directorate of trading grains/Duhok

14. directorate of trade observing/Duhok

15. directorate of trading grains

(Ministry of Finance and Economy):

16. directorate of Duhok real estate taxes

17. directorate of Duhok income taxes

18. directorate of Duhok customs

19. Gara bank

20. Directorate of retirements Duhok

21. Directorate Duhok treasure

22. Real estate bank Duhok

23. Directorate of engineering and technical

24. Directorate of company taxes in Duhok

25. Dasnia bank

26. Malta bank

27. Directorate of legal affairs

28. Industry bank

29. Sarhaldan bank

30. Agricultural bank

31. Zanko bank

32. Duhok housing bank

33. Amad bank

34. Mateen bank

35. Central directorate of finance and administrating developing
/Duhok

(Ministry of justice):

36. Department of public prosecution
37. judicial oversight authority
38. Directorate of Duhok notary
39. Directorate of Duhok implementing
40. Directorate of registering real estate in Duhok
41. Directorate of observing disabled in Duhok

(Ministry of municipality and tourism):

42. General Directorate of municipality in Duhok government
43. Directorate of planning / Duhok
44. Presidency of Duhok municipality
45. Directorate of Duhok antiquities
46. Directorate of Duhok water
47. Directorate of water sources in Duhok government
48. Directorate of Duhok's outskirts water

(ministry of electricity):

49. General directorate of electricity in Duhok government
50. Directorate of distributing electricity in Duhok
51. Directorate of delivering electricity
52. Directorate of controlling and delivering /Duhok

(ministry of agriculture and water resource):

53. Directorate of veterinary/Duhok
54. Directorate of underground water/Duhok

55. Directorate of irrigation/Duhok
56. Directorate of Duhok dams
57. Directorate of forest/Duhok
58. Directorate of planting/Duhok
59. General directorate of planting /Duhok

(Ministry of Awqaf and Religious affairs):

60. General directorate of Awqaf and religious affairs in Duhok
61. Directorate of Awqaf Duhok
62. Directorate of Christian affairs in Duhok
63. Directorate of Hajj and Umrah in Duhok
64. Directorate of Izedian affairs in Duhok

(Ministry of Culture and Youth):

65. Directorate of sports/Duhok
66. Directorate of youth/Duhok

(Ministry of Transportation):

67. Posting and delivering Duhok

(Ministry of natural resource):

68. Oil and minerals/Duhok

(The independent high electoral commission):

69. General directorate of Dohuk government

Third: Sullaimania committee:

Below are the offices they visit:

(Ministry of Trading and Industry):

1. Directorate of Sullaimania food trading
2. Directorate of observing Sullaimania trading
3. Directorate of arranging Sullaimania food card
4. Directorate of Sullaimania registering companies
5. Directorate of processed grains in Sullaimania

(Ministry of Finance and Economic):

6. Directorate of Sullaimania real estate taxes/1
7. Directorate of Meri real estate/ Sullaimania
8. Sarwary bank
9. Directorate of companies taxes/Sullaimania
10. Directorate of Sullaimania taxes/1
11. Directorate of Sullaimania taxes/2

(Ministry of labor affairs):

12. Directorate of social security for workers/Sullaimania
13. Directorate of observing disabled

(Ministry of justice):

14. Department of Sullaimania notary
15. Directorate of Sullaimania implementing

(Ministry of planning):

16. Directorate of statistic

3-Our employees have participated in some training course and workshops for building their capacities.



Dr. Ahmad Anwar Muhammed

Chairman Of Commission Of Integrity Of Kurdistan Region