IDENTIFYING SUCCESSFUL COLLECTIVE ACTION APPROACHES AGAINST KLEPTOCRACY

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Table of Contents

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Summary

The rise of kleptocracy is a threat to democracy and a contributing factor to the ongoing democratic recession that is negatively affecting the lives and livelihoods of millions of people around the world. In kleptocracies, powerful actors weaponize corruption and globalization to amass authority and wealth. Kleptocrats use a broad set of tactics to maintain the political and economic influence necessary to cement control and suppress dissent, relying on local and global networks of enablers.

In contrast to the sophisticated web of enablers that kleptocrats rely on, the actors best positioned to prevent and mitigate kleptocracy have a collective action problem. Government institutions, civil society organizations, and businesses focused on combating corruption are often constrained by a lack of jurisdictional and delegated authority, expertise, and resources to cooperate effectively. In addition, these actors often have competing agendas and comprise a wide variety of interests within them that make collaboration harder.

This has hindered anti-kleptocracy efforts because while kleptocrats have been able to rely on transnational flows and actors, responses have tended to be isolated, uncoordinated, and uninformed by international practice. Yet, there are examples from across the world where non-violent collective action efforts—strategic collaboration by citizens, civil society, or other interested parties to take joint actions in support of shared objectives or a shared issue—have attempted to push back against kleptocratic governance, or at least create a window of opportunity for meaningful anti-corruption and pro-democracy reform.

This report analyzes seven case studies, representing a geographically diverse group of countries with a variety of political systems, that highlight the factors that contribute to the success or failure of non-violent collective action movements against kleptocracy, and offers recommendations for policy makers, reformers, and the business community. The report contributes evidence to addressing DEPP Learning Agenda (See Annex 1) question *3.2 Under what conditions is collective action of civil society actors most effective in holding government actors and institutions accountable?*

The key success factors that emerged from the analysis of the seven cases include:

- Multi-sectoral coalitions that were diverse in gender, age, and social class.
- Decentralized structures without reliance on a clear leader or figurehead to coordinate action.
- Protests and collective action movements were peaceful and actively avoided engaging in violence.
- Civil society and media actors were primed to take advantage of a new moment of citizen dissatisfaction, having had experience with social movements around smaller-scale issues.
- Civil society organizations had evidence-based analysis and policy proposals ready to share with lawmakers.
- International partners played a complementary role in collective action by providing resources and knowledge that helped activists, civil society, and media actors to mobilize citizens.

List of Acronyms

1MDB	1Malaysia Development Berhad
ALDE	Alianța Liberalilor și Democraților
APPGM	All-Party Parliamentary Group Malaysia
BBC	British Broadcasting Corporation
BERSIH	The Coalition for Clean and Fair Election
C4	Center to Combat Corruption and Cronyism
CAC	Collective Action Against Corruption
CEPPS	Consortium for Elections and Political Process Strengthening
CICIG	Comisión Internacional Contra la Impunidad en Guatemala
CIPE	Center for International Private Enterprise
DEPP	Democratic Elections and Political Processes
DNA	Direcția Națională Anticorupție
DRG	Democracy, Human Rights, and Governance
EU	European Union
FCPA	Foreign Corrupt Practices Act
FEPA	Foreign Extortion Prevention Act
GDP	Gross Domestic Product
IOD	Thai Institute of Directors Association
IRI	International Republican Institute
LGBTI	Lesbian, Gay, Bisexual, Transgender, and Intersex
MACC	Malaysian Anti-Corruption Commission
MP	Ministerio Público (Guatemala), Member of Parliament (Ukraine)
NCCC	National Counter Corruption Commission
NGO	Non-Governmental Organization
PSD	Partidul Social Democrat
SME	Small and Medium-Sized Enterprise
SOE	State-Owned Enterprise
UN	United Nations
USAID	United States Agency for International Development

Key Terms and Definitions

Kleptocracy

- According to **The Kleptocrat's Playbook**, kleptocracy is defined as systemic transnational corruption involving political, business or criminal elites and their professional intermediaries for the purposes of illicit self-enrichment or furtherance of political objectives. As such, kleptocratic rule is linked to authoritarians who use state resources to enrich themselves and further consolidate their political grip, as well as to countries where political elites and transnational criminal networks are intertwined, and where grand corruption systematically undermines democratic processes.

- Kleptocratic Practices are domestic and transnational tactics employed by kleptocrats, elites or government officials to siphon off state resources for private gain and to maintain and perpetuate their hold on power.

Collective Action

- USAID defines Collective Action as a form of strategic collaboration that takes an intentional and agreed-upon process that engages interested parties to take joint actions in support of shared objectives or a shared issue. Collective action can tackle complex development problems through an organized approach to find and implement different and sustainable solutions.

Introduction

Kleptocracy poses a rising threat to democracy around the world. Kleptocrats weaponize corruption domestically to neutralize their adversaries and project it abroad strategically to bend the rule of law in their favor. While internationally these kleptocratic tactics are often deployed through intermediaries and enablers aimed at burnishing their image and keeping their assets safe, kleptocrats' attempts to suppress dissent and silence their critics at home are sometimes so blatant and outrageous as to inspire citizens, fed up with subpar services or a lack of basic rights, to rise up en masse.

Such large-scale, non-violent protest movements often arise organically, triggered by a scandal or shameless power grab. Other times, they are led by organized civil society, opposition parties, or other stakeholders, such as the private sector. In the initial days and weeks, these protests can often seem like a real sea change, and occasionally do result in substantive systemic reform. However, this is far from the norm. More often, mass protests only lead to symbolic victories, if any. In many cases, once the movement loses momentum, things return to how they were, either because new leaders are not actually committed to reform and only use the idea of anti-corruption to gain political support, or because genuine anti-corruption reformers are unable to follow through and overcome systemic hurdles or powerful special interests. In the case of the latter, reformers and civil society are often left to push for reform on their own without the support of a sustained popular movement.[1]

Regardless of the outcome, what these movements do provide is a window of opportunity for collective action against kleptocracy or kleptocratic practices. They give the political opposition, local civil society, members of the media, business representatives and other actors a chance to work together to advance their shared goal of tackling large-scale government corruption, denouncing repression, and ensuring that state funds go where they are supposed to. The most successful collective action movements take advantage of a moment when citizens are paying attention to the issue to undercut kleptocracy, keep kleptocrats and their enablers accountable, and effect real and sustainable reform.

This report presents seven case studies of non-violent collective action against kleptocracy from around the world and examines the different factors that contributed to their successes or failures, with the goal of distilling lessons that are broadly applicable to different contexts. The analysis forms the basis for recommendations for policy makers, reformers, and the business community on how to facilitate collective action against kleptocracy and take advantage of windows of opportunity to effect sustainable reform.

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1 Bellows, Abigail. "Bridging the Elite-Grassroots Divide Among Anticorruption Activists." Carnegie Endowment for International Peace, January 2020. https://carnegie-production-assets.s3.amazonaws.com/static/files/files__WP_Bellows_EliteGrassroots.pdf.

Methodology

This project on Identifying Successful Collective Action Approaches Against Kleptocracy is an activity conducted under the United States Agency for International Development (USAID)-funded Democratic Elections and Political Processes (DEPP) cooperative agreement, carried out by the Consortium for Elections and Political Process Strengthening (CEPPS). It is co-implemented by two DEPP partners: the International Republican Institute (IRI) and the Center for International Private Enterprise (CIPE) and accompanied by related case studies. Under DEPP, consortium partners developed a learning agenda, intended to advance the Democracy, Human Rights and Governance (DRG) sector's understanding of interventions that effectively and sustainably promote self-reliant, citizen responsive, and resilient democratic governance and respect for human dignity, rights and rule of law. This report contributes to the DEPP Learning Agenda theme pertaining to "Inclusive Accountability through an Engaged Civil Society and Independent Media," addressing question *3.2 Under what conditions is collective action of civil society actors most effective in holding government actors and institutions accountable?* For more information, please see Annex 1.

In producing this report, CEPPS/IRI and CIPE conducted desk research encompassing a broad range of existing literature, including analytical reports and international and local media, on examples of collective action against kleptocracy or kleptocratic practices by governments from all around the world.

Based on this desk research, and in coordination with our partners across the CEPPS and USAID, CEPPS/IRI and CIPE selected seven cases of collective action against kleptocracy or kleptocratic tactics, representing a geographically diverse group of countries with a variety of regime types (see Annex 2 for a sampling matrix), to determine if there were common approaches to collective action against kleptocracy that work in multiple contexts. IRI led the production of the Armenia, Guatemala, Romania and Malaysia case studies while CIPE led the production of the case studies for Moldova, Thailand, and Ukraine.

A combination of desk research and key informant interviews (KIIs) was used to produce each of the seven case studies. For each case study, CEPPS/IRI and CIPE worked with their country teams or local researchers to conduct semi-structured interviews with key informants, including activists, journalists, anti-corruption experts, private sector leaders, and government officials. A total of 23 interviews across the seven case studies were conducted between September 2023 and April 2024. See Annex 3 for a breakdown of key informants by stakeholder type and demographics for each case study.

Evidence Review

Kleptocrats use a broad set of tactics to maintain the political and economic influence necessary to cement control and suppress dissent, relying on local and global networks of enablers. These include, though are not limited to, bribing public officials and media, outright theft from the public treasury, the takeover of private corporations, creating state-owned monopolies in lucrative sectors of the economy, awarding government loans to loyalists, and the extortion of bribes in awarding procurement contracts.[2]

In contrast to kleptocrats' sophisticated webs of enablers,[3] government institutions, civil society organizations, and businesses focused on combating corruption are often constrained by a lack of jurisdictional and delegated authority, expertise, and resources to coordinate effectively. In addition, these entities often have competing agendas and comprise a wide variety of interests within them that make collaboration harder.[4]

In short, the actors best positioned to prevent and mitigate kleptocracy have a collective action problem. This has hindered anti-kleptocracy efforts because while kleptocrats have been able to rely on transnational flows and actors, responses have tended to be isolated, uncoordinated, and uninformed by international practice.[5] CEPPS/IRI's kleptocracy programming — including in-depth research to develop the Kleptocrat's Playbook[6] — has reinforced that undercutting kleptocracy requires mobilizing coalitions of stakeholders, whether through large-scale exposes like the Panama and Pandora Papers, or through locally-led political, social, and private-sector reform movements.[7]

Coalitions are most effective because each member brings expertise in and access to influence a specific sector that kleptocrats rely on to hide wealth and amass power. Acting alone, these actors can undermine single components of a given kleptocrat network; together, they have the potential to dismantle the entire apparatus. For example, as shown by CEPPS/CIPE's work over the last decade, cooperation between businesses to adopt and uphold voluntary anti-corruption standards can restrain kleptocratic networks by putting in place transparency

2   Dixon, Dominic F. *KLEPTOCRACY: Exploitation of Nations*. Dr. Dominic F Dixon, 2017. See also: Cooley, Alexander, John Heathershaw, and J. C. Sharman. "Laundering cash, whitewashing reputations." *J. Democracy* 29 (2018): 39. And, Heathershaw, John, A. C. Cooley, Tom Mayne, Casey Michel, Tena Prelec, Jason Sharman, and R. Soares de Oliveira. *The UK's kleptocracy problem: How servicing post-Soviet elites weakens the rule of law*. Chatham House, 2021.

3   Heathershaw, John, and Tom Mayne. "Explaining suspicious wealth: legal enablers, transnational kleptocracy, and the failure of the UK's Unexplained Wealth Orders." *Journal of International Relations and Development* 26, no. 2 (2023): 301-323.

4   Mailey, J. R., and Jacinth Planer. "Bankrupting Kleptocracy." (2016).

5   Sibley, Nate, Ben Judah, and KLEPTOCRACY INITIATIVE. *Countering Global Kleptocracy: A New US Strategy for Fighting Authoritarian Corruption.* Hudson Institute, 2024.

6   "The Kleptocrat's Playbook: A Taxonomy of Localized and Transnational Tactics." International Republican Institute, 2021, https://www.iri.org/wp-content/uploads/2021/12/the_kleptocrats_playbook_final-1.pdf.

7   Sharman, Jason Campbell. *The Despot's guide to wealth management: On the international campaign against grand corruption*. Cornell University Press, 2017.

and accountability standards[8] that become the norm in countries such as Thailand, Armenia, and Moldova.[9]

USAID's Dekleptification Guide[10] outlines strategies that international donor organizations can utilize before, during, and after windows of opportunity for dismantling kleptocracy and kleptocratic networks open up, and acknowledges that reformers often look to other examples of such windows in other countries and what lessons were learned. CEPPS research has also revealed that practitioners require detailed, standardized qualitative data to counter transnational corruption. However, there is a significant dearth of data available which makes measuring kleptocracy a challenge.[11] Available examples and data are mostly focused on other types of corruption, and there is a need to continue to break down anti-corruption reform and examine how different characteristics of corruption and context interplay.[12]

This report aims to fill in some of this data gap by looking at specific cases of non-violent collective action against kleptocracy and analyzing the factors that led to their success or failure. The seven cases presented in this report represent instances where kleptocracy or the use of kleptocratic practices by democratically elected leaders were the primary triggers of non-violent collective action that led to short-term positive outcomes and a range of positive and negative long-term outcomes. The table below summarizes the outcomes and key takeaways from each case. By comparing these instances of collective action and their outcomes, this report hopes to provide insight and recommendations for practitioners on utilizing collective action against kleptocracy across a variety of contexts. Given that, historically, political and environmental factors do not significantly impact whether or not a collective action movement succeeds or fails,[13] the lessons and recommendations gleaned from these case studies aim to be broadly applicable, even where the conditions for civic action are difficult.

It should be noted that while collective action is usually associated with promoting democracy and good governance, kleptocrats can also engage in collective action for more nefarious outcomes through their networks of enablers and special interest groups. These types of cases were excluded from the sample of cases selected for this report. The non-violent collective action cases featured highlight the successes and challenges of standing up to these vested interests.

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8   Zemko, John. "Kleptocracy: Its Global Impact on Markets and Democracy" Forum 2000 Foundation, Center for International Private Enterprise, and Raoul Wallenberg Centre for Human Rights, 8 February 2023. https://www.forum2000.cz/files/kleptocracy-policy-brief-v2-5.pdf

9   "Strategies for Policy Reform Volume 3: Case Studies in Achieving Democracy That Delivers Through Better Governance." Center for International Private Enterprise, 2015. https://www.cipe.org/wp-content/uploads/2015/04/CIPE-Strategies-for-Policy-Reform-vol3_web-version_20220104.pdf

10 "Dekleptification Guide: Seizing Windows of Opportunity to Dismantle Kleptocracy." United States Agency for International Development, 2022. https://www.usaid.gov/sites/default/files/2022-12/USAID_Dekleptification_Guide_FINAL.pdf

11 The Kleptocrat's Playbook, 5.

12 Marquette, H.; Peiffer, C.; (2015) Corruption and collective action. Bergen: U4 Anti-Corruption Resource Centre, Chr. Michelsen Institute (U4 Issue).

13 Beyerle, Shaazka. *Curtailing Corruption: People Power for Accountability and Justice*. Lynne Reinner Publishers, Inc., 2014. https://www.nonviolent-conflict.org/wp-content/uploads/2014/06/Curtailing-Corruption-full-book.pdf.

Summary of Background, Outcomes, and Key Takeaways from Case Studies

Country	Trigger Point	Collective Action	Short-term outcomes	Long-term outcomes	Key takeaways
Armenia (2018)	In 2018, then-President Serzh Sargsyan attempted to stay in power after the end of his second term by transitioning into the role of Prime Minister.	Over 250,000 Armenian citizens took to the streets over the course of five weeks, supported by civil society. Independent media created alternative sources of information to state-run media.	Sargsyan resigns, My Step coalition secures significant victory in next election.	The oligarchic system was more-or-less dismantled, but judicial and anti-corruption reforms have stalled due to national security priorities.	• Protests were peaceful and decentralized. • Coalition that mobilized was diverse. • Civil society had experience organizing around similar issues. • Effective use of social media. • International organizations helped to build capacity and create networks of passionate youth.
Guatemala (2015-17)	In 2015, the *La Línea* corruption case exposed the extent that the regime led by President Otto Pérez Molina and Vice President Roxana Baldetti had captured the state.	Over the course of several months, over 1 million Guatemalans joined the protests, culminating in a nation-wide strike. Civil society and their government allies pushed through reforms to combat kleptocracy, while investigations into government corruption continued.	President Perez Molina and Vice President Baldetti resign and are eventually tried and imprisoned. Some reforms are pushed through.	The reform process stalled, and some reforms were rolled back. Anti-corruption bodies were targeted by government actors, forcing dozens of judges and prosecutors involved with CICIG to flee the country.	• Protests were peaceful and decentralized. • Activists were strategic in their actions. • Civil society had proposals for reform. • Symbolic victories such as resignations are not enough. • Civil society should build cross-sectoral alliances and have a roadmap ready for when a window of opportunity arises.
Romania (2017-19)	In 2017, the new PSD government attempted to raise the financial threshold at which abuses of power could be prosecuted as a criminal offense. Despite widespread criticism, the government proceeded with its reforms via emergency decree, bypassing parliamentary procedure.	Over 500,000 citizens protested as the government attempted to pass the reforms. Protests against corruption in the ruling party would continue at a smaller scale for over a year.	Reforms were repealed and the ruling coalition lost power.	PSD returned to power in 2021 as part of a ruling coalition, though no longer under the influence of former party leader Liviu Dragnea, who was imprisoned for incitement of abuse of office in 2019.	• Protests were peaceful and decentralized. • Effective use of social media. • Protests built on a decade of citizen mobilization. • Protesters lacked long-term objectives beyond toppling the government. • Mass protests can have significant short-term effects against kleptocracies, but in the long run, kleptocrats adapt to new circumstances.
Malaysia (2015-Present)	In 2015, media investigations revealed that Malaysia's kleptocratic elite had been using their sovereign wealth fund (1MDB) to embezzle billions of US dollars, implicating then-Prime Minister Najib Razak, who had $700 million deposited directly in his bank account.	Independent media and investigative journalists continued to report on the scandal. US DOJ and other international agencies launched investigations into the embezzlement of 1MDB funds. Civil society groups educated and mobilized citizens to demand accountability from their leaders.	Najib Razak lost the 2018 elections, and was later arrested, tried, and imprisoned for corruption.	US authorities have seized and returned over $1.2 billion in assets stolen via 1MDB to date and continue to recover funds. However, enablers largely avoided consequences.	• Civil society organizations were able to take a complex scandal and communicate it to citizens in a way that was easy to understand. • International cooperation was also key in holding kleptocratic elites accountable. • Collective action can succeed when a diverse coalition can pool their efforts to seek accountability, combined with international support.

Thailand (2010-Present)	In 2010, Thailand's leading private sector organizations formed the Collective Action Coalition Against Corruption (CAC), believing that if the government couldn't tackle the demand side of corruption, then they could target the supply side.	CAC mobilized business leaders to create a certification program that encourages compliance with international anti-corruption standards.	Currently 500 companies have been certified by CAC, including half of all companies on the Thai stock exchange, and hundreds more have made commitments to be certified.	Through their certification program, CAC has set a compliance standard close to the international standard for anti-corruption. They are looking to expand their reach to more SMEs and partner with government anti-corruption agencies on further reforms, as well as create a roadmap for other countries interested in a similar model.	• Having strong partners or champions in government, civil society, and the private sector on your side can be critical in engaging other stakeholders. • It is important to meet stakeholders where they are and provide incentives for compliance. • CAC was able to, and continues to, learn from their mistakes along the way and adapt accordingly.
Moldova (2019-Present)	Dissatisfied by decades of oligarchic rule, a massive bank fraud scandal, and a constitutional crisis, Moldovans saw the 2020 election as a window of opportunity to rally around a reform candidate and to demand more transparency, accountability, and a pivot away from Russia toward the EU.	In 2020, civil society, political parties, and grassroots movements mobilized to support Maia Sandu's candidacy for President. Supporters of reform continued to engage in collective action to ensure that Sandu's government would deliver on their promises.	Sandu was elected president in 2020 and began implementing some anti-corruption and judicial reforms. Many in the private sector have also supported the reforms and increased transparency in the economy. However, progress has been slow.	There has been a surge in civic engagement and political participation since 2020. The EU granted Moldova candidate status in June 2022 and agreed in December 2023 that Moldova met conditions to begin formal accession talks.	• Social media was a critical tool in organizing protests, mobilizing voters, and engaging the youth and the diaspora. • There is a broad-based, multi-sectoral coalition supporting reform in Moldova, including civil society, the private sector, and government. • By leveraging international mechanisms, Moldova's reform coalition was able to secure external support for reforms, attract investment, and provide legitimacy to collective action efforts. • The slow pace of reform and systemic challenges highlight the gap between expectation and reality.
Ukraine (2013-14)	In November 2013, President Viktor Yanukovych decided not to sign an EU association agreement after Russia introduced trade restrictions on Ukraine in August.	Mass protests, which came to be known as Euromaidan or the Revolution of Dignity, lasted for several months despite escalating crackdowns by the government. Civil society supported protesters, providing shelter, food, and other services.	Yanukovych was ousted and fled to Russia. Russia used the Revolution of Dignity as a pretext to invade Crimea and eastern Ukraine.	Russian aggression in the aftermath of the Revolution of Dignity galvanized and accelerated public support for democracy, anti-corruption reforms, and EU integration	• Ukraine's culture of strong horizontal ties and engaged civic actors, built over a period of years, have been the foundation of multiple mass protests. • The protests were politically, economically, and socially diverse and spanned the entire country. • They also included a diverse array of stakeholders, including the media, civil society political actors, and celebrities alongside ordinary citizens. • Social media played a pivotal role in mobilizing Ukrainians to take to the streets.

Case Studies

The following section presents seven case studies of collective action against kleptocracy or kleptocratic practices in different countries. The case studies consist of a background section that presents the country context in which the collective action unfolded, followed by a summary of how the collective action took place. The case studies end with an analysis of the outcomes of the collective action, including success and challenges. Recommendations for further reading on the case studies, as well as kleptocracy and collective action, are listed in the following section.

Armenia: The Velvet Revolution and Taking Steps Against Kleptocracy

Background

For nearly thirty years, starting shortly after its independence in 1991, a few elites came to control major economic assets and political power in Armenia. As the country ushered in a post-socialist capitalist system, oligarchs siphoned funds off the state budget and infrastructure to line their own pockets. In exchange for political support, the government afforded them business privileges and legal coverage. In this context of decades-long elite kleptocratic grip on Armenia's institutions, President Serzh Sargsyan, after serving two presidential terms, sought to remain in power by transitioning to the role of Prime Minister in early 2018. This move to retain power catalyzed widespread discontent, mobilizing approximately 160,000 individuals to flood the streets and bring the capital to a standstill for several weeks. Employing civil disobedience tactics and harnessing the influence of social networks, the Velvet Revolution, as the movement came to be known, aimed to dismantle the kleptocratic system, restore democratic governance, and champion transparency.

The 2018 Velvet Revolution in Armenia can be attributed to several decades of civil society development in the country. Protests in 2008, triggered by alleged election rigging, marked a crucial precursor. Youth and protesters from different regions mobilized against government violence, revealing a stark disconnect between the citizens and the state. Over the next decade, various movements addressing issues from electricity prices to pension reforms fueled societal mobilization. This period witnessed the growth of a professional civil society sector in Armenia which acted as watchdogs, promoted human rights, and contributed to democratic discourse. International development partners, mainly through their continued support to civil society organizations and broader civic education work, nurtured norms of accountability and citizen participation. While civic activism played a role in mobilizing citizens, the 2018 movement was spearheaded by young Armenians. Protestors united behind a former journalist and "Civil Contract" party leader, Nikol Pashinyan.

How Collective Action Unfolded

What began as isolated protests converged into a massive national movement culminating in the resignation of Serzh Sargsyan and the eventual election of Nikol Pashinyan as the Prime Minister. In 2015, despite prior assurances that he had no ambition to hold higher office in the future, President Sargsyan held a controversial referendum that would transform Armenia from a presidential system to a parliamentary system, which was viewed by critics as a way to entrench the ruling party and allow Sargsyan to stay in power beyond his second and final term in office. Though the referendum passed, there were numerous allegations of electoral fraud by both local and international observers. This move by Sargsyan, along with citizen's perceptions of pervasive corruption within the government, sparked widespread outrage.

The discontent culminated in early 2018 when Sargsyan announced his candidacy for Prime Minister, which is widely considered the trigger point for the Velvet Revolution. The movement, initiated by activists and grassroots efforts, gained momentum rapidly. On March 1, 2018, thirty opposition members and civil society activists started the "Reject Serzh" movement, which consisted of a series of protests in Yerevan demanding that former President Serzh Sargsyan not be nominated for the position of Prime Minister. Soon after, on March 31, Nikol

Pashinyan launched the "My Step" protest walk, a 140km (87 miles) march starting from Gyumri and ending in Yerevan on April 13. At that point both campaigns merged under the "Take a Step, Reject Serzh" slogan. The members of the "My Step" initiative, marching from Gyumri to Yerevan, were greeted by members of the "Reject Serzh" initiative on the outskirts of Yerevan. The two groups proceeded to march to Freedom Square, where a gathering of citizens awaited. Nikol Pashinyan addressed the crowd during the rally, urging participants to block the main avenues of downtown, resulting in the paralysis of traffic in that area. The movement intensified on April 22, when the police detained Pashinyan. In response, 160,000 people took to the streets, forcing Sargsyan's resignation the next day.

On May 8, Pashinyan assumed the role of Prime Minister through parliamentary elections, followed by general elections in December where his coalition secured a significant victory, winning 70 percent of the vote. The elections saw high voter turnout and a substantial reduction in electoral fraud reports.

Collective Action Outcomes – Successes and Challenges

The strength of the revolution lay in its decentralized nature, widespread grassroots participation, and focus on peaceful protest, which increased its legitimacy and momentum. The "Reject Serzh" protests saw a blend of new and seasoned organizers from prior movements like "Mashtots Park" (2012), "No Pasaran" (2015), "Electric Yerevan" (2015), and "For the Development of Science" (2017). These earlier movements laid the groundwork for "Reject Serzh."

Initially, in early March, the unaffiliated public initiatives did not aim for a revolution but sought to voice public discontent against Serzh Sargsyan's abuse of power. Activists shared general guidelines on social media, counting on individuals to organize local actions independently. On April 20, around 50,000 people took to the streets, exemplifying the movement's organic and widespread mobilization. The civil society and political movements eventually merged, with Nikol Pashinyan emerging as the movement's de facto leader.

Utilizing social media and independent news outlets, the movement rapidly disseminated information, bypassing state-controlled media. Recent youth movements, like Electric Yerevan in 2015, adeptly used technology, particularly social media, to coordinate and disseminate their protests. With state-controlled media, online platforms were crucial, especially as internet and social media usage surged in the years leading up to the Velvet Revolution, notably on Facebook and Messenger.

In a media landscape favoring the Sargsyan regime, independent media also played a vital role, actively covering and amplifying the protests and countering traditional media bias through extensive use of social platforms. Factor TV, a YouTube channel started by an independent journalist, stood out by offering 24/7 live broadcasts from the movement's early days. Its success was boosted by timely reports on government provocations. Crucially, the success of Factor TV and its significant impact on the movement can be attributed to the long-time and sustained grant support it received from Western foundations, particularly the Open Society Foundations, to invest in professional equipment and capacity building.

The success of the movement hinged on its commitment to peaceful civil disobedience, which fostered a sense of safety among participants and garnered broad popular support. The deliberate avoidance of violence not only legitimized the movement but also facilitated widespread participation. Unique methods, such as honking during commutes and banging

pots and pans in support, allowed even those not physically marching to express solidarity. This tactical approach proved highly effective. The protesters didn't seek to antagonize the police, and there was a consistent emphasis on portraying the police as a part of "us."

In terms of tactics, the collective action relied on peaceful marches, roadblocks, and strikes, which became daily occurrences. The protesters paralyzed the system by employing a decentralized, networked organizational structure. Their actions were dispersed across various parts of Yerevan, avoiding centralized gatherings. This approach left the police uncertain and unsure of how to respond effectively—at one point resorting to smashing cars that were left to block roads and pulling people over for honking, though everyone in the city was honking. This networked style of protest proved effective in various parts of Armenia such as Ijevan, Vanadzor, and Gyumri. And it happened just as the authorities began sending law enforcement to Yerevan from different parts of the country, who they then had to send back to their respective towns.

The movement's composition leaned heavily toward the young, but it effectively bridged generational gaps, attracting support from various segments of society, transcending ideological and geographical divides. The strategic use of social media played a pivotal role in rallying thousands who might not have otherwise engaged in protests, preventing societal fractures from the outset. A significant surge in youth participation occurred during road-blocking initiatives in Yerevan from April 16 onwards. The foundation laid by international organizations through capacity- and knowledge-building programs in civic education and activism proved instrumental in cultivating a network of impassioned youth, well-versed in democratic principles and election monitoring. These activists formed the nucleus of the youth movement, acting as catalysts for broader involvement among their peers.

Another noteworthy aspect was the extensive participation of young women in the protests, showcasing remarkable resilience against patriarchal societal norms. This created a cultural shock within both the police system and broader society. Women on Armenia's streets were not only advocating for a change in government but also for their rights in a traditionally patriarchal setting. Throughout the month of revolutionary fervor, women of all ages from across the country were actively engaged, from lying down on pedestrian crossings to leading chants, delivering speeches at rallies, and mobilizing men to join the crowds. Acting as peacekeepers, they shielded the movement from violence and garnered international media attention. Their engagement, especially alongside their children, signaled the non-violent nature of the movement and inspired more individuals to join the cause. By taking advantage of traditional social norms, in which women and children are supposed to be "protected" by men, the mere presence of women, often with their children, discouraged the police from retaliating against protesters.

Human rights NGOs, such as the "Article 3" Human Rights Club and the local chapter of Transparency International, played a crucial role in supporting protesters during police detentions. With around 70 volunteer lawyers and dedicated hotlines, they ensured detainees were not alone and facilitated their prompt release. This strategy eliminated the fear of detainment among protesters, neutralizing the police's main instrument of instilling fear through mass detentions and thereby sustaining the momentum of the movement.

Guatemala: The La Línea Corruption Case and the Fight for Justice

Background

The signing of the 1996 peace agreement that put an end to the decades-long civil war did not fulfill democracy's promise in Guatemala. Widespread corruption, poor infrastructure and organized crime continued to limit citizens' access to public goods and services, especially in rural areas. Yet, the transition to democracy allowed for the establishment of the International Commission against Impunity in Guatemala (*Comisión Internacional Contra la Impunidad en Guatemala*, CICIG), an anti-corruption body supported by the United Nations (UN) and the first institution of its kind in the world. The Government of Guatemala and the UN agreed to set up CICIG in 2006 to support the Public Prosecutor's Office (*Ministerio* Público, MP) and other justice sector agencies in investigating, prosecuting, and dismantling illegal groups and clandestine security apparatuses. As an international organization, its leadership and staff enjoyed prerogatives that granted them a degree of autonomy and security to conduct in-depth investigations into corruption.

In 2012, the Patriot Party government, led by President Otto Pérez Molina and Vice President Roxana Baldetti, came to power by reaching transactional agreements with the legislature to secure parliamentary support in exchange for contracts, positions, and bribes. As the Pérez Molina administration captured the state, corrupt practices became more entrenched in what several observers have described as a kleptocracy. At the time, certain investigative journalists started to publish exposés in the media. Several investigations conducted by the MP and CICIG also exposed the level of corruption and illegal practices of the central government cabinet. However, a few independent judges allowed the MP and the CICIG investigations to continue and reach the highest levels of the executive, legislative, and judicial branches.

In 2015, an election year, the *La Línea* case was presented by the MP and CICIG. This case was about a network of smuggling and customs fraud involving a complex web of complicity between companies, customs, and tax administration workers, the private secretary of the Vice President, and later linked to the Vice President and President themselves. This investigation was based on scientific evidence and investigative tools such as wiretaps, testimony, and document analysis. The evidence created public outrage among a citizenry that had grown more aware of the direct harm caused by corruption and prompted broad sectors of society to demand the resignation of the President and Vice President so that they could be tried. After months of citizen mobilization, including protests and strikes, Roxana Baldetti resigned on May 8, 2015, and later, Otto Pérez Molina resigned on September 2, 2015.

International partners were also critical in promoting dialogue and consensus over the need to demand that the authorities step down and face justice, promoting a coordinated response across different sectors of society.

How Collective Action Unfolded

Several corruption scandals during the mid-2010s created the conditions for collective action against kleptocratic capture in Guatemala in 2015-2017. A particularly relevant scandal was the testimony by a judge that in 2014, a government party official had offered her to be appointed in exchange for favoring Vice President Baldetti in a judicial process related to the party's general secretary. Subsequent cases affecting the Vice President further revealed not only the extent of state capture but also the impunity with which political leaders were used to operating.

A seismic change occurred when, in April 2015, the MP and the CICIG put forward the *La Línea* case, a scheme involving the party in power in customs fraud, illicit association, and bribery, including the Vice President and the President. Against a backdrop of citizens' dissatisfaction being expressed on social networks and in the media, the *La Línea* case results sparked indignation and motivated unprecedented collective action. The nationwide mobilizations began with a call on Facebook for the first demonstration at the central park of Guatemala City on April 25, organized by two young people with no political and or civil society affiliation. This call went viral and led to peaceful meetings in squares, viral publications on social networks, and demonstrations of rejection in stores, restaurants, and businesses where warning signs denied entry to the "corrupt." Between April and August, nearly one million Guatemalans mobilized at least once over a period of twenty weekends in plazas throughout the country, culminating in a national strike on August 27. The self-proclaimed "Renuncia Ya" ("Renounce Now") student group called for the strike, which gathered the support of other groups of demonstrators. The strike was the last mass demonstration. Vice President Roxana Baldetti resigned on May 8, 2015, and was detained on August 21. For his part, President Otto Pérez Molina presented his resignation on September 2, and on September 3, he appeared in court, where he was arrested and tried. Both were tried and sentenced for passive bribery and a special case of customs fraud in December 2022 to 16 years in prison and the payment of a fine of USD $1.1 million.

All in all, the two-year window of opportunity (2015-2017) restricted the enabling environment for kleptocracy in Guatemala. The MP and the CICIG continued to present investigative cases that linked judges, magistrates, members of Congress, mayors, company representatives, and the brother and son of President Jimmy Morales. Morales was elected in September 2015, a few days after the resignation and arrest of Perez Molina and at a time when citizens opted for an outsider to give a new direction to Guatemalan politics. However, these far-reaching investigations eventually led to the closing of the window of opportunity, as the anti-corruption push lost the support of the president, the members of Congress, and the private sector. Feeling corralled, President Morales declared the then-Commissioner persona non grata and decided not to renew the mandate of CICIG in 2018. This also followed a concerted lobbying effort by Guatemalan elites to undermine CICIG's support internationally. Similarly, Congress decided not to proceed with reforms to the justice sector and began undoing the legislative progress. Several companies publicly expressed their support for President Morales and Congress's measures, withholding their support for the work of the MP and the CICIG. What ensued was the implementation of a regressive agenda and the institutionalized repression of anti-corruption actors, including judges, prosecutors and activists, which continued under the administration of Morale's successor, Alejandro Giammattei. Since 2018, several dozen judges, magistrates, and prosecutors that had been involved in anti-corruption investigations were forced to flee Guatemala after facing legal action from the government.

Collective Action Outcome - Successes and Challenges

The Guatemalan collective action against kleptocracy, characterized by two years of civic action and legislative reform, was successful from three perspectives: organizational, symbolic, and structural. In terms of organization, the rise of new social and political actors, the emergence of pro-reform entities within the private sector, and the leadership of young people who have since joined civil society organizations and political parties were critical for the movement's success. Further, the resignation of high-ranking government officials following unprecedented demonstrations held great symbolic significance for citizens. It reinforced the belief that collective demands can bring about change and that voting every four years is not the only means of promoting change. Lastly, from a structural standpoint, the actions taken against kleptocracy created an opportunity to promote legal reforms that improved the justice system's performance and promoted transparency, accountability, and the fight against corruption, even if these were later rolled back as the movement lost momentum.

Four key drivers brought together various sectors that had traditionally not worked together to fight against corruption and kleptocracy in Guatemala. First, overwhelmingly, people demonstrated peacefully. Citizens gathered in parks without blockades or disturbances, which allowed entire families, from grandparents to children, to participate. Second, demonstrations remained neutral regarding ideology and political affiliation. There was no stage or microphone, and elected politicians were not allowed to participate as such. If they demonstrated, they did so like any other citizen. Third, the demands were organic. Protestors had petitions related to the electoral system, rights recognition, justice, and civil service reform, among others. The only common denominator among them was the rejection of the political class. Fourth, no actor or group publicly claimed leadership, which was crucial for diverse actors to converge. As the protests grew, Guatemalans from all walks of life and from both urban and rural areas joined the protests, including women, families, indigenous groups, LGBTI individuals, persons with disabilities, and Guatemalans from the diaspora.

Although the demonstrations were intergenerational, many young people participated, notably university students between 18 and 25 who were born after the democratic transition and the signing of the peace accords. This is significant given that traditionally the youth had appeared apathetic towards the country's political affairs. Civil society organizations, farmers and indigenous groups, small and medium-sized business owners, and middle-class urban citizens from all over the country joined the students. During the national strike in August 2015, some of the largest private companies decided to also participate in the protests.

The 2015 mobilizations were never a movement per se; instead, they represented a heterogeneous and spontaneous expression of citizen rejection of corruption. While there were no leaders, the "Renuncia Ya" students developed strategic actions that ended up having significant impact. Among other strategies, they requested support from independent media to publicize the calls for protests and broadcast the demonstrations live. They coordinated actions by mapping key actors, including social organizations, cooperatives, analysts, think tanks, and private sector representatives. They developed a communications strategy including indicators and designed content for social networks, which was then shared on WhatsApp, Facebook, and Twitter. Finally, they facilitated discussions with analysts who transferred their opinions to the media, supporting the creation of critical narratives to influence the public.

Ultimately, citizen pressure opened a window of opportunity to accelerate legislative reform processes that were necessary to combat kleptocracy, such as the reforms of the Organic

Law of Congress, the Law of State Contracts, the Electoral Law, and changes in the judicial system that included the judicial career and the Organic Law of the Public Prosecutor's Office. Legislators also engaged in discussions to reform the civil service and the justice sector; however, these did not go through in the end.

Civil society organizations played a fundamental role during this time. They were prepared with the necessary analysis and proposals for parliament to consider when the space became available. They also identified the political actors who would embrace the demands for reform and use the favorable political momentum to seek the necessary votes to pass the necessary laws.

The Guatemalan experience with collective action against kleptocracy had a concrete goal with a short-term vision focused on identifying the corrupt and bringing them to justice. This created enormous pressure on weak institutions and forced public officials to implement sweeping anti-corruption measures without clear orientation and guidelines. The legal reform processes put forward promoted responses to complex problems without assessing the existing institutional capacity to implement them, their consequences over time, or their sustainability. In tandem with the political backlash that followed the 2015-17 protests, these are the reasons why the well-intentioned changes adopted during that period did not take root.

Romania: Protesting Corruption and Impunity

Background

In February 2017, Romania saw the largest protests since the end of communism, with over 500,000 people taking to the streets against a government that was seen as undermining the fight against corruption.

A decade after accession to the European Union, Romania had consolidated a liberal democratic system guaranteeing human rights and enshrining modern European norms around integrity and control of corruption into law. However, the ruling elite continued to bypass enforcement and avoid accountability by undermining the judiciary and ensuring most media outlets were owned by friendly business interests. It was a "free" country, by Freedom House's standards, but only a "semi-consolidated democracy."

The escalating waves of mass protest that began in January 2017 represented the culmination of a decade of citizen mobilization: against austerity in 2010, in support of environmental protection in 2012, and against perceived government incompetence and corruption after a deadly fire at a nightclub in 2015. However, the 2017 protests were larger and more ambitious than those that came before. They also lasted longer, contributed to the resignation of a recently elected government, and unnerved elites who had appeared too entrenched to dislodge and too comfortable in their impunity.

How Collective Action Unfolded

As in many Western countries, 2016 had been a polarizing year in Romanian politics, culminating in hotly contested parliamentary elections in December. The Social Democratic Party (PSD) secured the support of the Alliance of Liberal Democrats (ALDE) to form a coalition government under Prime Minister Sorin Grindeanu. Early in 2017, the new government decided to explore two legislative reforms that would pardon certain crimes and enact changes to the Penal Code, under the ostensible rationale of easing the overcrowding in Romanian prisons. Among other initiatives, the proposed bills would raise to 200,000 Romanian Lei (approximately 45,000 euros) the financial threshold at which abuse of power could be prosecuted as a criminal offense.

When the bills were made public by the Ministry of Justice, they were met with negative opinions by judicial institutions and equally negative reactions by media and civil society. These bills were interpreted by opposition supporters and citizens fed up with corruption as a deliberate effort to protect corrupt politicians, including PSD leader and President of the Chamber of Deputies Liviu Dragnea, who had been convicted for electoral fraud and was subject to investigation by the National Anticorruption Directorate (DNA).

On January 18th the public learned that the government intended to proceed with its reforms via emergency decree, bypassing parliamentary procedure. That day around 5,000 people took to the streets, the first pebble in what would become an avalanche.

In the face of widespread discontent, the government decided to withdraw its proposal. However, this did not deter protestors, who continued to gather in growing numbers, drawing explicit support from President Klaus Iohannis and opposition party leaders. On January 29th, an estimated 90,000 people protested around the country. Those figures would be dwarfed by the popular reaction to the cabinet's decision to approve its legislative reforms through an

emergency decree two days later, which brought 300,000 people into the streets. Though government actions were the catalyst for the protest, citizen motivations would remain ill-defined throughout the period of mobilization — an amalgamation of anti-corruption backlash, partisan rancor, group-specific grievances, and generalized disaffection with political elites.

The "#rezist" protests, as they came to be known, did not emerge from organized collective action by unions, NGOs, or activist networks. Instead, they were primarily an organic process of online mobilization, mostly via social media. Social media platforms had already played a role in the 2015 protests after the Colectiv nightclub fire, which were galvanized by the online group "Corruption Kills" led by the young activist Florin Badita. Social media was instrumental in disseminating information on government decisions, coordinating local protests, and engendering a shared protest language and identity via messages and hashtags like #rezist, which were used in social media posts and profile image overlays but also in physical placards. Social media was critical for importing and adapting the language, symbology, and tactics of other protest movements of the early 2010s. It was also invaluable for mobilizing students and youths who were otherwise uninterested in traditional media and generally distrustful of politics and institutions.

Foreign governments and the European Union issued statements condemning government proposals, and opposition parties soon jumped on the protest bandwagon; indeed, PSD leaders resorted to claiming that anti-government mobilization on such a scale could only be explained as a nefarious partisan ploy.

Between 500,000 and 600,000 people had joined the #rezist protests by February 5th, when cabinet finally repealed its previous decrees. The achievement of this immediate goal did not stop the mobilization, however, as protestors began to demand the government's resignation. The Minister of Justice was the first to go, resigning on February 9th, 2017. Pressure on the ruling coalition continued during the ensuing months, and on June 21st, Prime Minister Sorin Grindeanu lost a vote of no confidence in parliament, leading to his replacement by a succession of new governments made up of PSD and ALDE. However, the removal of Grindeanu's government was not an attempt to appease protesters but the result of an internal PSD power struggle. It was widely seen as a move by party leader Liviu Dragnea, who himself was barred from becoming Prime Minister due to his criminal convictions for electoral fraud, to install someone more amenable to his influence.

Thus, the end of the Grindeanu government did not put an end to protests, although they continued with lower intensity and smaller scale. An anti-corruption march on January 20th, 2018, saw between 50,000 and 100,000 people take to the streets in Bucharest. And in August of that year around 100,000 people joined the "Diaspora at Home" protest in front of the Victoria Palace, seat of the prime minister and cabinet, with an additional 40,000 showing support across the country. But these were different protestors: relatively well-off, Western-minded expats who were on vacation and thus able to afford the time to attend the protest. And their target had broadened far beyond individual cabinet decisions to the perceived corruption of the entire PSD-led government, as exemplified by the dismissal of DNA Chief Prosecutor and anti-corruption champion Laura Codruța Kövesi in July 2018, and by the continuation of PSD leader Dragnea at the head of the Chamber of Deputies despite his 2016 conviction for election fraud and an investigation into the misuse of EU funds. Dragnea was also alleged to have orchestrated violent retaliation against the "Diaspora at Home" protests, which resulted in over 400 protesters being injured.

The PSD would lose power several years later to the center-right PNL-USR coalition largely due to citizen dissatisfaction with their rule between 2017 and 2019. Though they returned to power in 2021 as part of the current ruling coalition, they have been rid of the influence of Liviu Dragnea, who was sentenced to prison in May of 2019 for incitement to abuse of office and has gone on to back other parties since his release in 2021.

Collective Action Outcome - Successes and Challenges

The corruption-related protests of 2017-2018 in Romania illustrate the power of citizens to stand up to overt kleptocratic actions and perceived democratic backsliding, but also the limits of using non-institutional means to seek institutional transformation.

On the face of it, the largest social mobilization since the end of communism in Romania managed to achieve its critical objectives: withdrawal of the January 2017 decrees that triggered the wave of protests and the resignation of the Minister of Justice overseeing the perceived decriminalization of corruption, which contributed to the dissolution of the Grindeanu cabinet in June 2017. However, the protests did not result in any significant institutional changes, and corruption in Romania remains widespread.

The main impediment to sustainable institutional change was the organic, informal, and inconsistent approach to collective action. The swift escalation, massive size, and heightened intensity of protests was disproportionate to the scant supply of potential anti-corruption leaders. This was less of a collective action movement and more of a collective action moment, a cascade of pent-up citizen distrust and frustration in response to deeply unpopular political choices.

The 2017-18 protests were a largely urban, Western-oriented phenomenon, mobilized to a significant extent via social media and alert to political trends and collective action techniques from outside the country. Though in early 2017 it looked as if everyone (aside from PSD stalwarts) was taking to the streets, the protests did not actually have a broad social base. Demonstrators were largely young and middle-class, based in urban areas and active on social media. Social media may have amplified citizen discontent and forced the government's hand, but the lack of a persistent structure for mobilization in places with lower internet usage or social media exposure meant that protestors struggled to convince Romanians outside of major cities, who tend to vote along traditional lines, that there was a broader cause worth supporting.

The Romanian protests of 2017 can be interpreted as a sign of healthy citizen activism. This case also demonstrates how difficult it can be to coordinate, lead, or even support from outside an organic, citizen-led movement. For democracy supporters, protests can create a window of opportunity for pressuring kleptocratic leaders, but that window is narrow and momentum for change is fleeting. The fight against kleptocracy can make for a useful framing device for Western-minded protesters distrustful of political elites, but it does not automatically translate into a program of government, let alone a governing coalition.

Malaysia: Holding Kleptocrats Accountable after 1MDB

Background

The 1Malaysia Development Berhad (1MDB) was created in 2009 as a state fund to boost Malaysia's economy. The fund, incorporated under the Ministry of Finance Incorporated, which is a corporate entity in Malaysia that holds and manages the government's investments in various sectors on behalf of the Minister of Finance, was led by then-Prime Minister Najib Razak and amassed more than 11.5 billion US dollars over the period from its inception in 2009 to its emergence in international headlines around 2015. However, 1MDB soon became mired in corruption and embezzlement, with its financial handling marked by significant irregularities and a lack of transparency.

The extent of the fraud came to light in 2012 when Tony Pua, a notable Malaysian politician, who was then an opposition member of Parliament, publicly described 1MDB as a "massive Ponzi scheme." This set the stage for a larger scandal, which escalated dramatically in 2015 when The Wall Street Journal reported that approximately 700 million USD had been transferred into Najib Razak's personal account. In response, Najib took assertive measures to retain power, including dismissing significant political figures such as the Deputy Prime Minister and the Attorney General, and attempting to curtail investigations by the Malaysian Anti-Corruption Commission (MACC). These actions signaled a shift towards more authoritarian governance.

In response to the escalating scandal and Najib Razak's authoritarian measures, a broad-based collective action emerged, driven by civil society, opposition politicians, activists, and the general public. This movement, encompassing widespread protests and an extensive campaign for transparency, sought to hold those responsible for the 1MDB scandal accountable, recover the misappropriated funds, and enforce systemic reforms to prevent future instances of corruption. The aim of the movement was threefold: to achieve justice, reclaim the misused funds, and implement reforms that guard against future corruption. This movement led to significant outcomes, playing a crucial role in the 2018 elections, when Malaysia changed government for the first time since the country's independence in 1957. This showed how powerful people coming together for a cause can lead to real political and social changes.

How Collective Action Unfolded

The 1MDB scandal significantly increased public awareness and action against corruption and kleptocracy in Malaysia. The media, non-governmental organizations, activists, journalists, politicians, and Malaysian citizens played diverse roles in exposing the scandal, mobilizing political opposition, and advocating for accountability, transparency, and systemic reforms.

The collective action against the 1MDB scandal unfolded over several years, marked by intermittent peaks and plateaus of interest and action. An inflection point was the disclosure of confidential documents that provided tangible evidence of misconduct. These included the joint venture agreement between 1MDB and PetroSaudi, an oil company, and the confidential prospectus by Goldman Sachs. These revelations drew attention to overpriced acquisitions and kickbacks, linking directly to the Prime Minister's office.

Subsequent investigations revealed that the misappropriated funds from 1MDB were laundered through a complex web of financial transactions across multiple countries, including the United States, Switzerland, and Singapore. These countries' financial systems played enabling roles

in the global movement of these illicit funds. Hollywood's involvement in the 1MDB scandal added a sensational element to the case. A portion of the embezzled money was used to finance major Hollywood films, including "The Wolf of Wall Street", a film, ironically, about financial fraud. This direct link to the entertainment industry brought an additional layer of public interest and media attention to the scandal.

The role of the media, both domestic and international, was crucial in the collective action against the 1MDB scandal. Local outlets MalaysiaKini and The Edge reported on the 1MDB scandal before the international media took notice. However, their reach was limited to niche readers of political, business and finance news. The complexity of the case meant that the average citizen had an incomplete at best understanding of the circumstances surrounding 1MDB, but they knew of the name "1MDB" and that large amount of money has been alledgely appropriated from it.

The U.S. Department of Justice's involvement, starting in 2016 with the filing of civil forfeiture complaints to recover more than $1 billion in stolen assets, brought renewed international focus, with The Wall Street Journal, The Guardian, and the BBC all reporting on the scandal, marking a turning point in the scandal's exposure. Global coverage brought global attention to the issue and increased the credibility of the overall reporting, though local political dynamics led to pressure on Malaysian media's ability to cover the scandal domestically. These dynamics included the government's control over mainstream media, political affiliations influencing media coverage, and varying levels of public engagement with the scandal based on political allegiance. Such factors led to restrictions to the media's coverage of the scandal within the country, further influencing the narrative and urgency of the 1MDB scandal in Malaysian media.

Despite the crucial role of the Malaysian media in revealing the 1MDB scandal, mainstream outlets were often cautious reporting issues tied to the Najib administration, which illustrated the constraints investigative journalists faced. The closure of The Edge by domestic authorities highlighted the limitations of freedom of information and the extent of the control exerted over local media in Malaysia. This was also evident for politically affiliated outlets like The Sun and Utusan Malaysia. Regardless, independent media such as KiniBiz, MalaysiaKini, and The Edge (until its closure) stood out for their active reporting throughout the scandal despite the risks and repercussions.

Individuals and civil society organizations also played pivotal roles in the collective response to the 1MDB scandal. Whistleblower Xavier Justo provided crucial documents linking 1MDB to PetroSaudi, which journalist Clare Rewcastle Brown of Sarawak Report then investigated. Politician Tony Pua was key in making the complexities of the scandal understandable to the Malaysian public. Several NGOs, including Transparency International Malaysia, the Center to Combat Corruption and Cronyism (C4), and The Coalition for Clean and Fair Election (BERSIH), an electoral-focused movement, all helped in driving societal pressure and advocacy against corruption.

While BERSIH's involvement in uncovering financial misconduct within 1MDB was indirect, its impact on driving governmental change was considerable. Initially seeking government engagement, BERSIH later adopted more direct actions, such as street protests and demonstrations in response to the government's failure to meet citizen expectations. In response to the 1MDB scandal, they organized two massive rallies in 2015 and 2016 calling for Najib's resignation. BERSIH's diversity and inclusivity were its strengths, uniting various groups,

including women, ethnic and religious minorities, different social classes, and the Malaysian diaspora under a common cause by fostering a sense of community that bridged racial, social, generational, geographic, and urban-rural divides. Women leaders like Maria Chin Abdullah and Ambiga Sreenevasan, who became symbols of this unity, played a critical role in steering BERSIH's efforts.

Ultimately, it was the active involvement and vocal participation of the Malaysian people that amplified BERSIH's influence. Their grassroots mobilization was instrumental in driving governmental change and bringing the 1MDB scandal to a prominent position in both national debate and international news coverage. This widespread attention forced the issue into the public and political spotlight, demonstrating the powerful impact of collective action in advocating for systemic reform and accountability.

Collective Action Outcome – Successes and Challenges

The collective action surrounding the 1MDB scandal marked a critical juncture in Malaysia's history, igniting a powerful movement for change that transcended the boundaries of civil society, media, and political activism. At the heart of this transformative wave were organizations like BERSIH, alongside independent media, and prominent figures like Tony Pua and former Prime Minister Mahathir Mohamad, who played an instrumental role in driving public awareness and outrage through strategic communication and grassroots mobilization. They seized the opportunity to amplify the call for justice, leveraging the growing public disquiet to organize protests and demand institutional reforms.

This groundswell of collective action culminated in the historical 2018 general elections, which saw the then-ruling coalition ousted from power for the first time since Malaysia's independence. This unprecedented political shift was a clear testament to the power of collective will and action in dismantling entrenched power structures and advocating for democratic principles. The relentless pursuit of accountability was further evidenced by the tireless investigations conducted by Malaysian citizens, journalists, activists, and politicians, who unearthed crucial evidence of corruption and malfeasance under Najib's administration, challenging governmental pushback and risking personal safety to bring the truth to light.

In the aftermath of the scandal, Malaysia embarked on a path of legal and institutional reforms, reflecting a nationwide demand for transparency and the eradication of corruption. Efforts to bolster the independence of the MACC and introduce reforms in political financing were indicative of the significant changes spurred by the collective outcry. The active participation of the Malaysian public in these reform processes, through protests, social media campaigns, and other forms of civic engagement, marked a significant shift towards a more vigilant and engaged citizenry, determined to hold leaders accountable.

The response to the 1MDB scandal also ushered in a notable shift towards collective leadership, highlighting the enduring impact of the scandal on Malaysia's political landscape. This change is exemplified by the establishment of the All-Party Parliamentary Group Malaysia (APPGM) on Political Financing and the APPGM on Integrity, Governance, and Anti-Corruption, marking a concerted effort to foster inclusive, bipartisan discussions on key reforms. Alongside the creation of select committees, these developments underscore Malaysia's move towards a more democratic approach to policy making, focusing on achieving substantive, long-term reforms over short-term, politically expedient solutions. This strategic pivot demonstrates

a unified commitment to enhancing transparency, accountability, and governance in the aftermath of a scandal that challenged the nation's political integrity.

Moreover, the international repercussions of the 1MDB scandal underscored the critical need for international cooperation in combating corruption. The scandal drew critical involvement from entities like the U.S. Department of Justice, highlighting the effectiveness of international cooperation in combating corruption. This international scrutiny has not only led to enhanced global awareness and tightened financial regulations but also spurred significant reforms in cross-border collaboration frameworks. Furthermore, the scandal underscored the importance of whistleblower protections and investigative journalism, fuelling worldwide initiatives to strengthen these safeguards.

A key challenge for the success of the collective action efforts was overcoming the fear-induced resistance some key actors had to join the protests, including in academia, media, the private sector, and non-governmental organizations (NGOs). Academics in particular were hesitant to delve deeply into the scandal due to its politically sensitive nature and the potential legal risks involved. This hesitation underscored the difficulties of investigating high-profile corruption.

The media sector also encountered notable difficulties. Local media outlets such as The Malaysian Insider, The Edge, and MalaysiaKini faced legal threats, raids, and in the cases of The Edge, shutdowns. This situation contrasted with the experiences of international media, which reportedly faced fewer access restrictions.

Similarly, the private sector exhibited caution in engaging with the scandal. There were instances where support for anti-corruption initiatives led to financial and employment repercussions for businesses and individuals. This cautious stance by companies and professionals illustrated a broader reluctance to become involved in politically charged issues.

NGOs faced their own set of challenges in addressing the 1MDB scandal. Not all NGOs were equipped to handle the complex nature of the scandal, as indicated by the need for BERSIH to seek expert advice to fully understand its intricacies. Even though some NGOs like C4 were actively involved, their ability to investigate the financial and legal aspects of the scandal was generally limited.

The overall atmosphere surrounding the scandal was marked by fear and intimidation. Some students participating in anti-corruption movements faced serious repercussions, including arrests and the loss of scholarships.

Thailand: Thai CAC and Businesses Against Bribes

Background

While the other case studies in this report detail collective action led by citizens and civil society, this does not necessarily need to be the norm. Thailand's experience of collective action against kleptocracy differs from other successful movements in both its emergence and approach. The Thai Collective Action Against Corruption (Thai CAC) is a project initiated by the Thai private sector to establish and promote a clean and transparent business community. It has developed into a successful coalition platform for companies to tackle corruption on a voluntary basis through installing and maintaining various actionable anti-corruption mechanisms. As this case shows, collective action against kleptocracy can also be spearheaded by other stakeholders, as in Thailand, where business leaders decided to lead a collective action effort against corruption in the private sector.

Since Thailand's transition from an absolute monarchy to a constitutional monarchy over 90 years ago, a history of bureaucratic hurdles, civil unrest and political turmoil laid an unstable foundation for democratic governance. In times of fluid politico-economic changes, influential provincial businesses came to play important roles in parliament, maintaining influence via local influential and provincial business individuals, or "big brothers" and political barons. Attempts at fighting entrenched corruption, via the emergence of the National Counter Corruption Commission (renamed the National Anti-Corruption Commission (NACC) in 2008), the Organic Act on Counter Corruption 1999, and the more recent Anti-Corruption Act 2018 were and continue to be largely ineffective. Historically, and today, cases very rarely lead to convictions, owing to both the acceptance of corruption in branches of society and NACC understaffing, underfunding and intimidation campaigns from case suspects.

In addition, the ascendance to power of the Thaksin, Thai Rak Thai party did not halt corrupt practice in Thailand and contributed rather minimally to the disruption of patron-client networks. In this sense, corruption in Thailand further weakened the potential of developing and deepening democratic objectives, which was mainly halted by the persistence of bribery, the recurring ascendance of kleptocratic actors to power, and unchallenged patron-client networks embedding corruption into the politics, economy, and cultural practices in Thailand. Money was drawn from socio-economic development in the interest of private gain and further damaged the apparatus of democracy by weakening legitimate economic practices, scaring off foreign investment and undermining formal rules and laws. This pushed Thai business leaders to advocate for improved transparency, accountability, and integrity within the political and private sectors via collective action.

At the time, there was little consensus on how to actionably spark a movement and limited guidance on how to conduct collective action effectively. Thai businesses knew that they wanted to formulate a platform that would publicize a commitment to transparency and send a market signal that they were not corrupt. As there were few initiatives and incentives to combat public sector corruption on the demand-side (i.e., government agencies), business leaders turned their attention to the supply-side. If corruption risks are lifted from supply chains, and bribery controlled, or ideally prevented in the private sector, it would draw in more foreign investment and create incentives for change within the private and public sectors. These were the building blocks for what would become the Thai CAC.

How Collective Action Unfolded

Once a clear objective was set, Thai business leaders rounded up Thailand's eight leading organizations in the private sector around 2010 to act together as co-founders for collective action movement: the Thai Chamber of Commerce, the Joint Foreign Chambers of Commerce in Thailand, the Thai Listed Companies Association, the Federation of Thai Industries, the Federation of Thai Capital Market Organizations, the Thai Bankers' Association, the Tourism Council of Thailand and the Thai Institute of Directors Association (IOD), which took a leading role in driving the initiative.

With the aim of harnessing a shared prospect of successful collective action in the Thai private sector, the Centre for International Private Enterprise (CIPE) approached IOD to discuss partnership opportunities, and in June of 2010, a project was launched to design private sector approaches to combating corruption and bribery in Thailand. Initially, experts and business leaders collaborated at several workshops to discuss collective action approaches and agreed on a strategic roadmap to implement collective action within the Thai business community. Several dozens of the nation's most influential and prominent firms and relevant associations pledged to support the Thai CAC Declaration.

Initially, the Thai CAC would imitate a corporate model, with board members consisting of significant and important individuals in the Thai business and political spheres. For them, it was imperative to signify why companies would want to join, how not to scare off potential members, how to gain positive media representation and how to make their vision clear. The council decided to direct its focus on the sectors of its founders, allowing it to build a critical mass of member companies from the banking, insurance, and finance industries before widening its scope. This laid a foundation of legitimacy, inviting prospective interest from a range of businesses, industries, organizations, and media practices.

Thus, the Thai CAC needed a clear set of objectives that would encapsulate their collective action approach into five main goals: 1. Create a critical mass of clean, transparent and accountable companies; 2. Strengthen compliance standards within businesses; 3. Push for change in the government sector; 4. Pushing for a standardized compliance system consistent with international standards; and 5. Foster trust from prospective members by signifying the importance and benefits of joining the CAC - prospective members were put off by auditing costs, time constraints, relying on bribe payments for income, and reforming their procedures.

The Thai CAC stressed the importance of member benefits, with its desired outcomes being avoiding corrupt exchange, lowering expenses by not having to pay bribes, and being recognized in the international business realm as a non-corrupt entity that promotes transparency, accountability, integrity and fair business practice.

With a clear goal in mind, the Thai CAC designed an approach for certifying compliance by member companies. After signing their intent to become a member, companies have an 18-month period to undergo a three-tiered certification process. First, companies are recommended to attend 'Road to join CAC' sessions that outline the Thai CAC principles and specify the roles and responsibilities to ensure the adoption of best practices. This allows companies to identify gaps early and receive support where necessary. Secondly, the companies are provided with information that further supports them in the process and explains the checklist that must be followed to ultimately become certified. Lastly, firms must undergo the certification process and submit their compliance checklist. Signatory companies must pledge to act as

a role model and publicly announce their commitment to anti-corruption efforts. Badges of certification are awarded throughout the process and each badge represents the companies' position within the coalition, be it signatory or certified.

Companies certified by Thai CAC must also undergo regular review by a third party to confirm that they are meeting and maintaining their commitments. Thai CAC can decertify companies that have gone back on their commitments or otherwise engaged in corruption, but also allow these companies to be recertified if they can prove a commitment to the Thai CAC via reformed compliance standards and internal mechanisms.

Collective Action Outcome – Successes and Challenges

The Thai CAC is among the largest such networks in the world. It holds practical importance for Thai companies and, increasingly, for the Thai government and civil society. This business-driven fight against kleptocracy has been successful by many measures, not just the growing number of certified members. The Thai CAC collaborates with the Anti-Corruption Organization of Thailand, the HAND Enterprise, the Thailand Development Research Institute, and the National Anti-Corruption Commission – creating a broad coalition of actors that fight corruption.

In 2023, the Thai CAC won the Basel Institute's Anti-Corruption Collective Action Award in recognition of its exemplary accomplishments. Furthermore, during the same year, the Thai Institute of Directors signed a Memorandum of Understanding with the Thai National Anti-Corruption Commission, the Securities and Exchange Commission, and 51 state-owned enterprises to fight against corruption. There is a clear commitment to combat kleptocracy on a wider scale across sectors.

To achieve success, it was imperative for the Thai CAC to have a framework and certification regime that was effective, inclusive, and culturally sensitive. Certifications have also empowered small and medium-sized enterprises (SMEs) in the fight against corruption by allowing them to demonstrate their commitment to conducting business with integrity and alleviating their due diligence burden.

In 2018, the regime was amended to ease certification for SMEs which sees the Thai CAC as the only collective action against corruption that holds a dual certification program for both large companies and SMEs. Over 2000 SMEs have attended in-person or virtual events to prospectively join their anti-corruption efforts. Beneficiary companies are further supported to tailor their policies and internal controls in line with the standardized anti-corruption framework. This ensures management and employees, old and new, are trained and take ownership to prevent corruption from the outset. Key here, is how improvisation and modification under-pinned the regime's forward moving and successful development.

With initial support from the banking, finance and insurance industries, the Thai CAC certified 80-90% of all the banks, finance and insurance service companies listed in the Thai Stock Exchange within the first five years. This fostered an anti-corruption narrative in the international business community and sparked their engagement with the Thai Stock Exchange, where currently companies within the Thai Stock Exchange are required to disclose CAC membership and hence promote transparency and publicize corruption red flags. In this sense, the Thai CAC facilitates transparent business practice, which, by proxy, reduces the potential for kleptocratic networks and the withdrawal of funds from the private sector for personal gain, improving the prospect of foreign investment. To date, about half of all the

companies of the Thai Stock Exchange are certified by the Thai CAC alongside 515 other certified companies and 374 signatory companies. For SMEs, out of a total of 215, 30 are certified and 185 are signatory.

Success in member sign-ups can be attributed to the Thai CAC's multi-sector approach and industry-wide collaboration. Developing a good relationship with national anti-corruption agencies and other organizations, have been instrumental in shaping the policies and frameworks that are consistent with anti-corruption efforts to promote whistleblowing channels alongside other private sector and civic engagements. CAC-certified firms are also encouraged to invite business partners to join the coalition, creating a wide-spread community of like-minded and motivated members.

Generating funding was crucial for the Thai CAC's success. Support from the Thai CAC founders, such as IOD, and international actors such as CIPE, sustained the Thai CAC's costly start-up process. When demand for certification increased, more sources of funding were required to ensure and maintain sustainability. Thus, the movement generated its own income from certification fees and training courses. This success is owed to its framework and collaborations with local and international actors. In turn, the Thai CAC has forwarded its collaborative expertise by sharing its best practices with other practitioners and organizations that want to start similar initiatives in the Asia-Pacific region, as well as in Turkey and Ukraine.

Though it receives no direct pushback from government agencies, the Thai CAC has struggled to successfully advocate for government sector reform. Certain government agencies are rifer with corruption and hence anti-corruption efforts in this context move very slowly or don't move at all. This is notable in the transportation, construction and procurement agencies, where the nature and process of transaction invites bribery and hence, suppresses anti-corruption efforts. However, today, the Thai CAC is designing a certification mechanism suited to State Owned Enterprises, representing the first actionable and procedural step toward public sector reform.

The Thai CAC also continues to strive for a compliance framework consistent with international standards, such as the US 1977 FCPA and 2023 FEPA, and the 2010 UK Bribery Act. This signifies the Thai CAC's movement towards achieving critical mass and generating further pressure for remaining companies to sign up. While the Thai CAC has been successful in stemming corruption in the private sector and creating incentives for compliance with its anti-corruption standards, there is still room for continuous improvement, especially in pushing for broader anti-corruption reforms.

Moldova: Collectively Pushing for Reform

Background

Moldova's transition from a Soviet republic to an independent state did not undo decades of state capture. In fact, new oligarchic elites exploited the chaotic privatization processes of the 1990s to entrench themselves within the evolving political and economic systems. These elites used their power to influence the outcomes of elections and serve private interests, severely impacting the country's socio-economic development. Systemic corruption, particularly in the banking and the public sectors, became the norm, culminating in the infamous billion-dollar bank fraud scandal of 2014, which significantly eroded public trust in the government.

Meanwhile, high levels of unemployment, emigration, and poverty rates set the stage for collective mobilization. Disillusioned by the lack of opportunities and decades of rampant corruption, people's desire for a genuine change became a driving force in the cycle of protests and citizen mobilization that began in 2009.

In April 2009, allegations of electoral fraud that quickly became viral on social media sparked popular protests, with significant participation of the youth that rapidly grew the movement through flashmobs, protests, and hashtags. Though these protests became known internationally as the "Twitter Revolution," protesters in Moldova largely self-organized though word of mouth, text messages, and social networks like Facebook. These events marked the beginning of an era spanning a decade where digital activism became a cornerstone of collective action in Moldova, enabling rapid dissemination of information and in turn facilitating mobilization both inside and outside the country.

For more than a decade following the "Twitter Revolution," many different actors have worked together to form broad-based coalitions composed of civil society organizations, opposition political parties, independent media, and international allies to protest against electoral fraud, rampant corruption and oligarchic capture, economic mismanagement, and the 2014 bank fraud scandal.

The collective action against kleptocracy in Moldova over the decade from 2009 to 2019 exposed the limits of the country's democratic façade and laid the foundation for future movements. The collective action movements aimed to expose how the apparatus of democracy—elections, public institutions, and legal frameworks—was co-opted by kleptocratic networks. In response, activists advocated for genuine democratic reforms that would promote transparency, foster accountability, and ensure the rule of law. These efforts focused on electoral reform, judicial independence, and the creation of anti-corruption institutions capable of combating corruption and kleptocracy at all levels of government.

A turning point came in 2019, when parliamentary elections resulted in a hung legislature with no party or coalition in the majority, adding to public frustration with the government. In order to lock the Democratic Party, led by the oligarch Vladimir Plahotniuc, out of government, the pro-Russian Socialist party of the country's then-president, Igor Dodon, struck a deal with an alliance of liberal pro-EU parties known as ACUM that elevated Maia Sandu, a former education minister and World Bank advisor, to the role of Prime Minister. The Democratic Party's refusal to recognize the new government, supported by a Constitutional Court widely seen as under the Democratic Party's influence, led to a week-long constitutional crisis as both sides claimed

to be the legitimate government of Moldova. Ultimately, the threat of mass protests caused the Democratic Party to back down, and Sandu's government prevailed.

Though Sandu's coalition would fall apart several months later, this institutional gatekeeping against a prominent oligarch and the elevation of a reform-oriented prime minister created an opportunity in Moldova for substantive change. The following year, Sandu would run against and defeat the incumbent president Igor Dodon in the November 2020 presidential elections, and her party would win an outright majority in the July 2021 snap elections.

How Collective Action Unfolded

In the run-up to the 2020 presidential election, various civil society organizations, political parties, and grassroots movements mobilized to support Sandu, who campaigned on a platform of judicial reform, closer ties with the EU, and fighting corruption. This mobilization included organizing rallies, online campaigns, and voter education initiatives aimed at ensuring a fair electoral process and encouraging voter turnout. Following Sandu's victory in November 2020, which was seen as a milestone for democratic reforms in Moldova, supporters continued to engage in collective action on the streets and on social media to ensure that the promises of reform and anti-corruption would be implemented. Protests against a move to empower parliament over the presidency following Sandu's victory would bring down the government of Prime Minister Ion Chicu, who was an ally of Dodon, and eventually force snap parliamentary elections in 2021 in which the Party of Action and Solidarity (PAS)—the party founded by Sandu in 2016, though as President she is, per the Moldovan Constitution, apolitical with no ties to any party—would win an outright majority.

The diaspora, comprising between 1.2 and 2 million Moldovans living abroad, already a crucial part of the Moldovan economy through remittances, became a new and dynamic force in Moldovan politics. Despite efforts by the oligarchic government to limit the diaspora's political influence, such as electoral system changes that disenfranchised many abroad and rulings against voting with expired passports, the diaspora's political power continued to grow. Organized Moldovans outside the country played a crucial role in the election. They not only voted in large numbers, contributing to Sandu's victory, but also organized protests and advocacy campaigns abroad.

Post-2019, segments of the private sector, especially those favoring EU integration and anti-corruption objectives, showed more support for the movement. The alignment with European values motivated the diaspora and new entrepreneurs to invest in the Moldovan economy. Since 2021, the Moldovan government, international partners, and organizations like the Organization for the Development of Entrepreneurship have bolstered support for these entrepreneurs and other SMEs, offering funding, mentorship, and training. In light of the ongoing war in neighboring Ukraine and Russian threats against Moldova, as well as the resulting energy crisis, these support programs have focused on resilience, sustainability, and social impact, enhancing the entrepreneurial ecosystem. Development partners, including the EU, the U.S., Sweden, the U.K. and Switzerland, have provided crucial resources and assistance to navigate the crisis and foster economic development.

Collective Action Outcome - Successes and Challenges

The success of the collective action movement in Moldova can be attributed to the formation of a broad-based coalition that included civil society organizations, opposition political parties,

independent media, and international allies. In the decade after 2009, several independent platforms were created, composed of NGOs and journalists. The movements demonstrated remarkable adaptability, employing a range of tactics from peaceful protests to strategic litigation and international lobbying. For instance, following the 2014 bank fraud scandal, collective action movements strategically utilized international platforms, such as the EU and the Council of Europe, to advocate for Moldova's adherence to anti-corruption measures and democratic standards.

The election of President Maia Sandu, a leader with a strong pro-European reform agenda, was one of the immediate outcomes of the collective action. Sandu's presidency has set the stage for a series of reforms aimed at strengthening democratic institutions, increasing government transparency, and improving the rule of law. Her administration's commitment to these principles was a direct response to the demands voiced through collective action.

Despite this reformist path, some challenges persist. Judicial reform was seen as critical for establishing the rule of law and ensuring fair and impartial legal processes. While some key milestones have been achieved, such as increasing the capacity of the Constitutional Court through a new database and staff trainings, the process is still ongoing. Similarly, the appointment of leaders to critical anti-corruption bodies like the National Anti-Corruption Center and National Integrity Authority has highlighted the enduring hurdles in Moldova's anti-corruption campaign. Instances of canceled contests and allegations of manipulation cast a shadow on these efforts, undermining public trust and spotlighting the entrenched corrupt networks. These challenges underscore the complexity of actualizing anti-corruption reforms and the need for a steadfast commitment to integrity and transparency.

The public's expectations for decisive anti-corruption action remain high, fueled by optimism following the political changes that started in 2019. People anticipated swift action against corrupt officials, particularly those in the judiciary with evidently illicit wealth. However, the slow pace of reform and the stumbling blocks encountered along the way have highlighted the gap between public expectations and the on-ground reality of reform implementation.

The collective action movements of recent years have also steered Moldova's foreign policy towards closer integration with the European Union, which offers a framework for systemic reforms. Another enduring outcome of the post-2019 collective action has been the surge in civic engagement and political participation. This period has witnessed a remarkable increase in citizen involvement in the political process, especially among the youth and the diaspora.

While the post-2019 period marked a hopeful chapter in Moldova's fight against corruption and for democratic reforms, the journey ahead is complex. The collective action's outcomes have set a foundation, but the path ahead requires sustained effort from both domestic and international actors to realize the vision of a democratic and prosperous Moldova.

Overall, Moldova's cycle of advocacy and protests against kleptocracy shows that collective action can significantly impact political outcomes and initiate reform. The country's rapid progress in pushing back against kleptocratic networks and securing a European future is remarkable and unique in the region. Yet, the Moldovan example shows that maintaining the momentum for genuine change requires vigilance, ongoing public engagement, and robust mechanisms to safeguard against political interference and ensure the credibility of anti-corruption efforts.

Ukraine: Euromaidan and the Revolution of Dignity

Background

Once Viktor Yanukovych became the president of Ukraine in 2010, the pursuit of EU-integration, democratization, and global trade and economic relations were rolled back. In its place, Russian banks and Ukrainian State-Owned Enterprises (SOEs) took an even more prominent role in the economy, drawing money out of the Ukrainian state budget and siphoning it into kleptocrats' pockets. Russian investments in the financial and insurance sector peaked in 2011, with nearly 10% of Ukraine's banking sector owned by Russians.

Yanukovych used a web of kleptocratic networks, including oligarchs who controlled the steel and banking industries and the military, to exploit his political power for personal gain. He siphoned assets from key public sectors like coal, mining, and energy, privatized state-owned enterprises, and provided them with zero-interest loans, tax relief, reduced land leases, zero-customs-duty imports, and high "green tariffs," enriching the oligarchic "Yanukovych Family." This corruption severely degraded Ukraine's economy, increasing the debt burden exponentially. Employment in SMEs dropped by one million people by late 2010, leading to the "Tax Maidan" protests in response to the new taxation policies.

During this period, Russia took further advantage of the established kleptocratic regime to advance its geopolitical goals. In 2010, Yanukovych signed the "Kharkiv agreement" that extended the lease on Russia's naval base in Crimea in exchange for discounted Russian natural gas. The Ukrainian people saw it as a deliberate weakening of national security. Russia's influence in Ukraine also manifested in the shift in language and information platforms, where Ukrainian-language products were Russian ones, sparking the "Language Maidan" protests. By the spring of 2013, widespread discontent was expressed through a myriad of protests in Ukraine.

How Collective Action Unfolded

Since 1998, Ukraine had been pursuing an EU-integration strategy. When this was abandoned by the Yanukovich government in favor of closer ties with Russia, heated debates on the topic permeated social media, particularly Facebook, with citizens voicing their frustrations with a decision widely seen as an abandonment of widely anticipated and popular reforms. On November 21, 2013, a Facebook post by a well-known journalist encouraging people to come out to Independence Square (Maidan) and to bring friends went viral and led to a protest that grew to 1,500 protesters overnight and 100,000 in just two days. Due to the protesters' demands for closer integration with the EU, and the myriad of EU flags in hand, the protest was named "Euromaidan." This coincided with the 10th anniversary of the Orange Revolution 2004, the experience with which enabled civil society organizations and opposition political forces to promptly provide the protesters with practical resources such as heated tents, stages, speakers, and microphones. This empowered and sustained the movement.

However, despite massive rallies and strikes, Yanukovych ultimately refused to sign the EU Association Agreement during the Eastern Partnership Summit in November 2013 in Vilnius. Afterwards, the protest quickly turned violent as the government began taking repressive action against the protests. At dawn on November 30, 2013, a pivotal moment occurred in the peaceful protests, when the "Berkut" special force unit brutally assaulted nearly a hundred demonstrators in the center of Kyiv. In response, Kyiv residents and opposition leaders gathered

for an impromptu rally demanding the government resignation, impeachment of Yanukovych, and punishment of those responsible for the beatings.

By December, protesters began forming self-defense units and organizing facilities for the million people coming from across Ukraine to Kiev. A series of *viche* (a Ukrainian word referring to a gathering of citizens to express their requests and claims to a king, or hetman) were regularly held near the main stage. The National Resistance Headquarters was established on the premises of the Kyiv City Council and the House of the Trade Unions. Meanwhile, the pro-government political Party of Regions organized much smaller "anti-Maidan" rallies. This camp became known as "Titushsburg" or the "cage with *titushky*," referring to the pro-government plain-clothes mercenaries hired and transported to Kyiv to take part in the "Anti-Maidan" counterprotests. On 8 December, the "March of Millions" took place in Kyiv countering the significantly smaller "Anti-Maidan" rally of 15,000 people. The media played a key role in amplifying the anti-government protests, with even the state-owned TV "Channel 1" refusing to broadcast the "Anti-Maidan" rally.

Yanukovych and representatives of the political opposition agreed on negotiations, though the Yanukovych regime kept on trying to repress protesters. On 13 December, Yanukovych agreed for the first time to a roundtable with opposition leaders but denied the use of violence and refused to resign. Then he proceeded to sign a Customs Union with Russia on December 17. By January, in a desperate move by Yanukovych, a majority of MPs adopted laws which severely restricted citizens' rights to protest. These anti-protest laws — some borrowed from Russian legislation — targeted fundamental civil freedoms and gave legal grounds for censorship and persecution of government dissenters. Galvanized by this brazen attempt to suppress the protests, citizens organized a number of civic initiatives, such as "Euromaidan-SOS," "Maidan Self-Defense," "Civil Sector of Euromaidan," and "Open University of Maidan," many of which are still active. These constituted the germ of what would be known as the Revolution of Dignity.

Faced with increased popular pressure, the government's repression of protests became increasingly violent. Special forces and *titushky* abducted, assaulted, tortured, and murdered captured protesters. On January 22, the police kidnapped 21 protesters, and then beat and locked them in a freezing police van, resulting in the death of four people. Reports of the cruelty of the repressive methods deployed fueled people to mobilize, with protesters occupying administrative buildings across regions of Ukraine. A Self-Government Committee formed a temporary Kyiv City Administration on 27 January, involving opposition MPs and civil society. Together with Kyiv, protesters controlled 10 oblast administrations, and their control of the capital weakened Yanukovych's position.

The turning point came on 28 January when Prime Minister Mykola Azarov resigned, and the Parliament repealed the anti-protest laws. The resolution of the Parliamentary Assembly of the Council of Europe regarding the situation in Ukraine called on the government to engage in negotiations with the opposition and reminded Russia to refrain from pressuring other countries. The threat of sanctions made an impact and Yanukovych ultimately signed a decree repealing the anti-protest laws and signed a law granting amnesty to detained protesters.

However, violent repression continued. On 18 February, as the Parliament convened for its session, the Maidan tent camp was burned down, and the forces pushed protesters out of Independence Square with automatic weapons, sniper rifles, and armored vehicles. On February 20, 2014 — "Black Thursday" — protesters from other regions arrived to support the

Kyiv Maidan. In response, the head of the Security Service started an "anti-terrorist operation" resulting in more deaths of protests in makeshift protective gear.

Overall, the mass killing of more than 100 unarmed civilians in Kyiv led to demoralization within the security force structures and the pro-government camp. It was the decisive factor in the fall of the Yanukovych regime. On the evening of 20 February, 236 of the 238 MPs present (out of a total of 450 members of the Ukrainian parliament) "adopted a resolution declaring the "anti-terrorist operation" unlawful and calling for the withdrawal of all security forces. On the same day, talks between European ministers with the opposition and Yanukovych resulted in agreeing early presidential elections by December 2014, surrendering weapons within 24 hours, and returning to the 2004 Constitution. This helped to restore national trust.

On 22 February, Yanukovych and his closest circle fled to Russia. The Chairman of Parliament resigned. In response, 314 MPs adopted a resolution on taking political responsibility for the situation in Ukraine. The resolution tasked Turchynov, the newly elected Chairman of Parliament, to coordinate the work of the Government. Many top officials were dismissed. In the evening of that day, Parliament adopted a resolution stating the self-removal of Yanukovych from exercising his constitutional powers as the President. In the meantime, the Russian Federation began a special military operation to successfully seize Crimea, and eight years later, on 24 February 2022, a full-scale invasion of Ukraine.

Collective Action Outcome - Successes and Challenges

The episode of collective action in Ukraine was successful in several regards. First, the Revolution of Dignity strengthened Ukrainian civil society as an actor that can effectively advocate for democratic values and push back against government repression. Further, the revolution was able to activate volunteer movements and civic initiatives rooted in previous protests. Ultimately, the collective action, best illustrated by the resilience of the Maidan protesters, affirmed Ukraine's commitment to European integration.

The collective action movement also faced challenges. First and foremost, protesters faced serious dangers, starting with their physical security. In addition to government repression, the presence of domestic and foreign "third forces" that aimed to provoke violence made it very difficult to push for change without great sacrifice. Protesters also did not have a robust network of allies in either the public or private sectors. The lack of effective gatekeeping institutions in government or the financial sector undermined the prevention, detection, and prosecution of domestic and transnational corruption. This environment of impunity sowed the seeds of public discontent.

Overall, about 8 million Ukrainians participated in protests from November 2013 to February 2014. The diversity of actors behind the collective action against kleptocracy, bringing in people from across Ukraine and bridging social, linguistic, generational, and gender divides, strengthened and sustained the movement. Nevertheless, national protest movements and revolutions can be exploited by foreign powers or agents. In this case, Russia used Euromaidan and the Revolution of Dignity as a pretext to invade and illegally annex Crimea. Global watchdogs of democracy and international law should be wary of such interference and act promptly to prevent escalation.

Key Takeaways

The case studies above represent varying levels of success of collective action against kleptocracy. Broadly, they show us that success is not guaranteed, and that short-term successes do not necessarily turn into long-term sustainable change. Symbolic victories, such as officials resigning and the government backtracking on harmful legislation, only go so far in addressing the root causes of kleptocracy, and without institutional reform and substantive policy change, any gains may only be temporary. Kleptocrats can usually adapt to new situations quickly and will take advantage of any opportunity to reestablish themselves, often employing even more sophisticated tactics than before.

There are a few success factors that emerge from the case studies presented:

- **Successful examples of collective action mobilized multi-sectoral coalitions that were diverse in gender, age, and social class.** In virtually every case, the coalitions that formed to demand change were comprised of actors from different sectors (civil society, media, private sector, political opposition, etc.) and were diverse in age, gender, and class, and were able to put aside their differences in favor of common goals and objectives. Often, these movements were led by youth, women, and minority groups, sometimes in defiance of social expectations. In Armenia, for example, heavy participation in the protests by women, who often brought their children along, took advantage of social expectations that men needed to "protect" women to ensure that the police did not violently retaliate against protesters.

- **Coalitions involved in successful collective action were generally decentralized, not relying on a single leader or figurehead to coordinate action.** While in some cases, such as Armenia, a figurehead eventually emerged, there was no single leader or organization coordinating mass movements against kleptocracy. Similarly, while in Guatemala the "Renuncia Ya" student group played a key organizing role of key protest actions, there was no single identifiable leader. The generally decentralized nature of the collective action movements made it more difficult for the government and police to suppress them by targeting specific leaders. Decentralization also preserved the organic nature of the mass movements and gave protesters more ownership of the movement. However, long-term, clear political leadership might help articulate a more strategic effort against kleptocracy, as the Moldova example illustrates.

- **Protests were peaceful and actively avoided engaging in violence, which helped give them legitimacy.** In some cases, such as Ukraine and Romania, protesters faced violent crackdowns by the government or police forces anyway. In other cases, like in Guatemala and Armenia, the non-violent nature of the collective action did not give the government any excuse to retaliate with force. The legitimacy created by non-violent protests and collective action movements also allowed the international community to lend more support to civil society and government reformers such as the continued international support for CICIG in Guatemala.

- **In several cases, civil society and media actors were primed to take advantage of a new moment of citizen dissatisfaction following experience with social movements around smaller-scale issues.** In Guatemala, for instance, civil society had already identified and formed relationships with other reform-minded actors and champions within government

and had preexisting alliances they could rely on when the right moment came. Citizens were also primed to get involved after several other high-profile movements/protests in previous years, such as in Armenia and Romania.

- **Civil society organizations that had evidence-based analysis and policy proposals ready to share with lawmakers were more effective in contributing to sustainable change.** In Guatemala in particular, civil society organizations were prepared with specific policy proposals for parliament to consider. To take advantage of more political will to address kleptocracy and corruption, organized activists, think tanks and business sectors should outline their proposed integrity reforms.

- **International partners played a complementary role in collective action by providing resources and knowledge that helped activists, civil society, and media actors to mobilize citizens.** Capacity-building activities and financial support helped these actors to push for sustained reforms while also building bridges between sectors and creating networks of changemakers. In Armenia, for example, capacity-building by international organizations, as well as support for independent media, helped activists and civil society take advantage of the window of opportunity to mobilize citizens and counter disinformation. In the case of Malaysia, international partners, such as the US Department of Justice, played a prominent role in investigating individuals involved in the 1MDB scandal and recovering stolen assets.

- **Social media played a critical role in successful collective action against kleptocracy.** The use of popular communication networks (such as Facebook) allowed NGOs, independent media, activists, and ordinary citizens to spread messages, report on the protests, combat dis/misinformation, mobilize and coordinate action, and create symbols and a narrative around the protest movement. Slogans like "Renuncia Ya" in Guatemala and "#rezist" in Romania were widely used to mobilize and coordinate the protests through social media, while in Armenia and Malaysia, independent media outlets leveraged social media to combat government disinformation.

- **Collective action does not necessarily need to be led by civil society.** As in the case of Thailand, collective action can be spearheaded by the private sector or other stakeholders. However, while the push for collective action can originate in any sector or initiated by any group, it is vital that it is multi-sectoral and involves a diverse array of stakeholders.

These cases contribute in-depth evidence in support of the ability of organized civic actors to hold decision-makers accountable, with regards to DEPP Learning Agenda question *3.2 Under what conditions is collective action of civil society actors most effective in holding government actors and institutions accountable?* Specifically, these cases support and exemplify the concept of diagonal political accountability, in which the media, civil society, and the private sector were able to act collectively to hold kleptocratic actors accountable. Working as a diverse, multi-sectoral coalition, they were able to take advantage of moments of citizen frustration to advocate for anti-kleptocratic measures and policies, using traditional and social media to organize collective action, combat disinformation, and maintain pressure on the government to address the needs of its citizens.

However, while in all cases, collective action was able to meet short-term objectives and gain symbolic victories, it did not always result in sustainable and long-term change. In Armenia and Moldova, slow progress on meaningful reform has not lived up to high expectations, while Guatemala and Romania both saw a rollback in some of the achievements of the collective

action. Where collective action did result in sustainable long-term change, it was due to sustained engagement by civil society (or in the case of Thailand, the private sector) and their local and international partners beyond the mass movements and protests.

There were also several contextual factors that influenced the scope and scale of the collective action in these cases. Firstly, in several of the cases, the youth who led or made up a significant portion of those participating in collective action had higher expectations of their leaders than previous generations who had lived under authoritarian regimes. For example, in Guatemala, the leaders of the "Renuncia Ya" protests grew up after the country had transitioned to democracy and after the end of the civil war. In Ukraine, Moldova, Armenia, and Romania, the youth participating in the protests had few if any memories of living under authoritarian Communist regimes. Growing up with more civil liberties than previous generations, combined with a higher exposure and connection to the wider world through the internet and social media, youth in these countries were less afraid of speaking up and protesting against injustice and were thus more likely to lead or join the mass movements against kleptocracy.

In Ukraine, Moldova, and Armenia, the view that Russia increasingly posed an impediment to further European integration may have been a motivating factor in citizens' dissatisfaction with their leaders. This was directly the case in Ukraine, where Yanukovych's backtracking on the EU association agreement was the spark that ignited the Euromaidan protests. More indirectly, as the oligarchs in Moldova and Armenia were widely associated with Russia, citizens likely drew a line between their adoption of kleptocratic tactics and closer ties with Russia and thus a move away from Europe despite popular demand for closer ties with the EU.

Finally, national scandals and revelations that leaders were embezzling public funds were in many of these cases the final straw for citizens already dealing with poor economic conditions and subpar public services. Having a perceived culprit to rally against likely influenced the massive scale of these protests, opening a window of opportunity to fight back against kleptocracy.

Recommendations

Drawing from the takeaways of the case studies, policymakers, reformers, and the business community committed to countering kleptocracy, with assistance from international partners, should focus their efforts on the following:

- **Support the establishment of broad-based coalitions.** In forming a coalition for collective action, diversity is key. Coalitions should bridge the gaps between sectors and social groups and be as inclusive as possible, particularly of marginalized populations, such as women or indigenous groups, who are more likely to be affected by the negative impacts of kleptocracy. This not only lends legitimacy to the collective action by demonstrating that the movement captures a broad swath of society, but it allows for different groups to contribute to the ultimate objectives and makes sure a wide range of needs are being addressed by the collective action.
- **Prepare for the opening of a window of opportunity.** Most mass mobilizations occur organically in response to a trigger, such as a big political scandal, but coalitions should be ready to act when a window of opportunity arises and have a roadmap for sustainable reform already developed. This includes evidence, analysis, and policy proposals that can be presented to policymakers to ensure that the measures taken to address kleptocracy are effective and sustainable. It also includes having a media strategy to create a narrative

around the collective action, translate the complexities of corruption scandals to citizens, and combat mis/disinformation using both traditional and social media, as well as a strategy to ensure the non-violent nature of the collective action and to support and protect protesters who are victims of legal or physical government repression.

- **Identify and build relationships with reform champions within the government who can act from the inside during a window of opportunity.** Through stakeholder mapping and other techniques, members of coalitions should gain a good understanding of would-be veto-players and spoilers, as well as potential allies within government institutions, both elected and unelected officials. Once identified, and as much as possible, reformist actors should try to establish good relationships with them.

- **Sustain engagement beyond the window of opportunity.** Kleptocrats and other corrupt actors are often able to adapt to new situations and entrench themselves in more subtle ways once the public pressure subsides. Sustainable reform and institutional change that will prevent a rollback of progress requires coordinated, sustained engagement on the issue by civil society and other stakeholders, with clear long-term goals and objectives.

- **International development partners can play a vital role in supporting collective action.** By assisting local networks of civil society to bridge sectoral gaps through coalition-building and knowledge-sharing activities and providing them with knowledge skills and resources through training or direct investment in organizational infrastructure, foreign donors and implementers can help set local civil society up for success when a window of opportunity opens and beyond. With the help and support of donors, civil society can create roadmaps for addressing kleptocracy, map stakeholders, and engage in strategic communication and mobilization efforts before and during windows of opportunity. They can also take advantage of their existing international networks to help put international pressure on governments to address issues of kleptocracy.

Additional Reading

Kleptocracy and Collective Action

- 7 ways to keep the momentum behind anti-corruption reforms
- Anti-Corruption Rapid Response
- Committing to Combat Kleptocracy: A Guide for OGP Members
- Dekleptification Guide: Siezing Windows of Opportunity to Dismantle Kleptocracy
- The Kleptocrat's Playbook: A Taxonomy of Localized and Transnational Tactics
- Local and Regional Measures to Combat Kleptocracy: Transparency Tools to Uncover Illicit Transactions
- Nonviolent Collective Action in Democratic Development
- Protest to Policy: A Framework for Supporting Democratic Transitions
- Supporting Nonviolent Action and Movements: A Guide for International Actors

Armenia

- After the Revolution: State, Civil Society, and Democratization in Armenia and Georgia.
- Armenia's Democratic Dreams
- Armenia's Velvet Revolution
- Armenia's Velvet Revolution: Authoritarian Decline and Civil Resistance in a Multipolar World
- Civil Society and Media in Armenia: An Evidence Review for Learning, Evaluation and Research Activity II (LER II)
- Power of the people: What made Armenia's Velvet Revolution successful?

Guatemala

- Curbing Corruption after Conflict: Anticorruption Mobilization in Guatemala
- Too Much Success? The Legacy and Lessons of the International Commission Against Impunity in Guatemala
- Youth-Led Anti-Corruption Movement in Post-Conflict Guatemala: 'Weaving the Future'?

Romania

- #rezist – Romania's 2017 anti-corruption protests: Causes, development and implications
- After Protest: Pathways Beyond Mass Mobilization in Romania
- Shaping Civic Attitudes: Protests and Politics in Romania.

Malaysia

- 1MDB: The Scandal That Brought Down a Government
- Billion Dollar Whale: The Man Who Fooled Wall Street, Hollywood, and the World
- Democratic Breakthrough in Malaysia – Political Opportunities and the Role of Bersih
- Malaysia's 1MDB Decoded: How Millions Went Missing

Thailand

- Anti-Corruption Initiative for Asia and the Pacific 11th Regional Conference
- Local certification through Collective Action: An innovative approach to anti-corruption compliance and due diligence
- Thailand: Collective Action Against Corruption
- Why Thai SMEs are seeking anti-corruption certification through Collective Action

Moldova

- Disrupting Dysfunctionality: Resetting Republic of Moldova's Anti-Corruption Institutions
- Justice reform as the battleground for genuine democratic transformation in Moldova: Insights for the Eastern Partnership
- Moldovan presidential elections driven by insecurity not geopolitics: President-elect Sandu may have found a cure against populism
- Moldova's Maia Sandu: 'They would like to remake the Soviet Union.'
- Moldova's "Twitter Revolution"

Ukraine

- Euromaidan and the Revolution of Dignity: A Case Study of Student Protests as a Catalyst for Political Upheaval
- Euromaidan Revolution in Ukraine
- Ukraine: Civic Volunteerism and the Legacy of Euromaidan
- Ukraine's revolution of dignity: The dynamics of Euromaidan
- The Ukrainians: Unexpected Nation

CEPPS
Strengthening Democracy Through Partnership

DEPP Learning Agenda
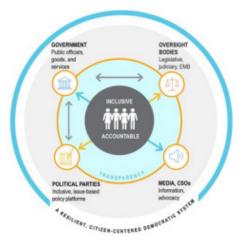2023-2026

WHY A LEARNING AGENDA?

A learning agenda is a systematic plan for identifying and addressing gaps in our knowledge about our work. The purpose of the Democratic Elections and Political Process (DEPP) Learning Agenda is to advance the democracy, rights, and governance sector's understanding of interventions that effectively and sustainably promote self-reliant, citizen-responsive, and resilient democratic governance and respect for human dignity, rights and rule of law. CEPPS is well-situated, due to the breadth and depth of our programming worldwide as well as our commitment to cross-partner collaboration, to both investigate and immediately apply findings from this learning agenda initiative in our programs.

The DEPP Learning Agenda includes **five core themes**, selected based on their alignment with and importance for testing the DEPP Global Theory of Change, which is both relevant to DEPP programming and programming across the DRG sector at large.

DEPP's Global Theory of Change, included in the approved DEPP proposal, posits that:
IF all individuals have access to information pertaining to their rights, equal opportunity to participate in political processes, and the power and space to freely voice and advocate for their interests,
AND IF political representatives, governing bodies, and oversight institutions have the power, will, and capacity to exercise accountability and deliver services to all,
THEN the democratic ecosystem will be responsive to the needs and concerns of all individuals in society and resilient to risks and shocks.

Each of the five core themes of the DEPP Learning Agenda focuses on the relationships of accountability between key stakeholders within a democracy – citizens, political parties, civil society and media, government institutions and oversight bodies, and transnational bodies and coalitions – to explore the ways in which each set of stakeholders can leverage their respective democratic mechanisms for ensuring that government is inclusive, responsive, and accountable to all its citizens.

CEPPS | The Consortium for Elections and Political Process Strengthening

CEPPS   DEPP Learning Agenda

1

Inclusive Accountability through Citizen Participation in Electoral and Political Processes

1.1 What are the factors that contribute to and/or constrain the **access of marginalized communities** (including but not limited to women, youth, Indigenous Peoples, LGBTQI+, persons with disabilities, ethnic/religious/linguistic minorities) to meaningfully participate in civic and political life?

1.2 What are effective prevention and mitigation interventions to **address electoral violence** in a way that accounts for its relationship to other types of violence, including state-sponsored violence, gender-based violence, and violence against other marginalized groups?

1.3 Under what conditions are interventions effective at building **resilience to information manipulation** for different stakeholders?

2

Inclusive Accountability through Multi-Party Systems of Representation

2.1 What strategies have helped and/or hindered democratically inclined parties to overcome **anti-democratic incumbents?**

2.2 What are the signs that anti-corruption campaigns are being used as a political strategy to target opponents rather than a sincere interest in **addressing corruption?**

2.3 In representative democracies, under what conditions is **cross-party coalition formation** most and least effective in enhancing issue based political competition and accountability between citizens and their representatives?

3

Inclusive Accountability through an Engaged Civil Society and Independent Media

3.1 Under which conditions are civil society and media actors more **resilient to autocratic tactics** to close civic space and quash dissent?

3.2 Under what conditions is **collective action** of civil society actors most effective in holding government actors and institutions accountable?

3.3 How can civil society be supported to meaningfully **affect narratives or national discourse around political reforms** in closed and closing spaces?

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CEPPS DEPP Learning Agenda

4

Inclusive Accountability through Checks, Balances, and Oversight across Independent and Government Institutions

4.1 What factors **encourage parliaments to improve government transparency and accountability**, and how can those factors be leveraged in strategies to foster good governance, address corruption, and counter external interference?

4.2 Under what conditions are interventions effective to **safeguard the institutional integrity of Electoral Management Bodies (EMBs)** from politically-motivated attacks?

4.3 Under what conditions has increased **coordination and collaboration between national and sub-national governments/institutions** been effective for democratic resilience in times of crisis?

5

Inclusive Accountability through Transnational Bodies and Coalitions

5.1 What are effective programming approaches that can be used to **activate multi-stakeholder coalitions for addressing transnational corruption?**

5.2 What are effective approaches to building democratic **resilience to foreign malign/illiberal influence** into DRG programs?

5.3 Under what conditions do local political and civic actors effectively leverage **transnational human rights mechanisms** to address rights violations?

CEPPS partners recognize that there are a variety of emerging questions of increasing relevance and importance to the DRG sector and have left space within the DEPP Learning Agenda to adapt and respond to issues of importance identified over time.

Current emergent questions that CEPPS partners may seek to explore include:

E.1 How do we effectively use democracy, human rights and governance approaches to address climate, environmental, and natural resource governance challenges?

E.2 How do we effectively work with displacement/displaced persons (IDPs, refugees, economic or climate migrants, etc.) in DRG programming?

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Annex 2 – Case Study Sampling Matrix

The below table outlines the sampling criteria applied to the selection of the seven case countries. Countries were selected based on three key criteria: the region, period of study, and classification of regime type during the period of study based on the V-Dem Regimes of the World (RoW) Measure.[14] V-Dem classifies regimes on the following scale:

- 0-1: Closed Autocracy
- 2-4: Electoral Autocracy
- 5-7: Electoral Democracy
- 8-10: Liberal Democracy

Country	Region	Period of Study	Regime Type	RoW Measure[15]
Armenia	Eurasia	2018	Electoral Autocracy / Electoral Democracy	3 (2017)[16] 5 (2018)
Guatemala	Latin America	2015 - 2017	Electoral Democracy	6 (2015-17)
Romania	Europe	2017 - 2019	Electoral Democracy	6 (2017-19)
Malaysia	Southeast Asia	2015 - Present	Electoral Autocracy	3 (2015) 4 (2019) 3 (2020-21) 4 (2022) 5 (2023)
Thailand	Southeast Asia	2010 - Present	Electoral Autocracy / Closed Autocracy	3 (2010) 4 (2011-12) 3 (2013) 0 (2014-22) 3 (2023)
Moldova	Eurasia	2019 - Present	Electoral Democracy	6 (2019-20) 7 (2021-23)
Ukraine	Eurasia	2013 - 2014	Electoral Autocracy	4 (2013) 3 (2014)

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14 Lührmann, Anna, Marcus Tannenberg and Staffan I. Lindberg. "Regimes of the World (RoW): Opening New Avenues for the Comparative Study of Political Regimes." *Politics and Governance* 6 (2018): 60-77.

15 Coppedge, Michael, John Gerring, Carl Henrik Knutsen, Staffan I. Lindberg, Jan Teorell, David Altman, Fabio Angiolillo, Michael Bernhard, Cecilia Borella, Agnes Cornell, M. Steven Fish, Linnea Fox, Lisa Gastaldi, Haakon Gjerlow, Adam Glynn, Ana Good God, Sandra Grahn, Allen Hicken, Katrin Kinzelbach, Joshua Krusell, Kyle L. Marquardt, Kelly McMann, Valeriya Mechkova, Juraj Medzihorsky, Natalia Natsika, Anja Neundorf, Pamela Paxton, Daniel Pemstein, Josefine Pernes, Oskar Rydén, Johannes von Römer, Brigitte Seim, Rachel Sigman, Svend-Erik Skaaning, Jeffrey Staton, Aksel Sundström, Eitan Tzelgov, Yi-ting Wang, Tore Wig, Steven Wilson and Daniel Ziblatt. 2024." V-Dem [Country-Year/Country-Date] Dataset v14" Varieties of Democracy (V-Dem) Project. https://doi.org/10.23696/mcwt-fr58.

16 Armenia was classified as an Electoral Autocracy prior to the Velvet Revolution and moved up to an Electoral Democracy in the 2018 index.

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Annex 3: Key Informant Interviews

The table below lists the number of interviews conducted in each case country and specifies the types of individuals engaged by stakeholder group and demographics, specifically gender.

Key Informant Interview Sampling Frame

Country	Number of KIIs	Stakeholder Type	Demographics
Armenia	5	Journalists, civil society, public officials	4 women, 1 man
Guatemala	5	Journalists, civil society, former public officials.	1 woman, 4 men
Romania	2	Journalists, civil society	2 men
Malaysia	4	Journalists, civil society, academia, former public officials	1 woman, 3 men
Thailand	2	Civil society	2 men
Moldova	2	Civil society	2 women
Ukraine	3	Civil society	2 women, 1 man