

# Targeting Natural Resource Corruption

Harnessing knowledge, generating evidence, and supporting innovative policy and practice for more effective anti-corruption programming



This event is made possible by the generous support of the American people through the United States Agency for International Development (USAID). The contents are the responsibility of the Targeting Natural Resource Corruption project and do not necessarily reflect the views of USAID, the United States Government, or individual TNRC consortium members.

# TNRC Learning Series

**Whistleblower protection: An essential tool for stopping corruption that threatens the world's forests, fisheries and wildlife**



# TNRC Learning Series

**Whistleblower protection: An essential tool for stopping the corruption that threatens the world's forests, fisheries and wildlife**



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# Ground rules...

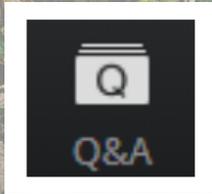
Audio Settings ^

Chat

Raise Hand

Q&A

Leave Meeting



**1. Pose questions at any time by clicking on the “Q&A” icon**



*“Like” questions to “upvote” them for the moderator and/or answer from your experience*



**2. Exchange thoughts with other participants via chat**

*Introduce yourself and share your own insights and ideas in the chat window*

The screenshot shows two panels of a poll interface. The left panel, titled 'Polls Connection', has two sections. The first section asks '1. How are you attached to the meeting?' with radio button options for Windows PC, Mac PC, Android phone/tablet (selected), iOS phone/tablet, and Other. The second section asks '2. How are you attached to the audio?' with radio button options for Phone (selected) and VOIP/computer speakers. A 'Submit' button is at the bottom. The right panel, titled 'Polls Host is sharing poll results', shows the same questions with progress bars. For the first question, Windows PC is at 67%, Mac PC at 33%, and others are at 0%. For the second question, Phone is at 0% and VOIP/computer speakers is at 100%. A 'Close' button is at the bottom.

**3. Respond to polls as they are launched**

*Make your selections and remember to click “submit”!*

**POLL**

Where are you based?

- a. Africa
- b. Asia
- c. Latin America and the Caribbean
- d. North America
- e. Europe
- f. Other

# Whistleblower protection: An essential tool for stopping the corruption that threatens the world's forests, fisheries and wildlife

## LEARNING QUESTIONS

1. What are effective strategies for reporting corrupt practices under U.S. whistleblower laws?
2. What are some of the most important innovations in whistleblower protection?
3. How do we assess opportunities to advance whistleblowing, and strategies for managing risks, in a wide variety of contexts?



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Founder and Chairman of the Board  
*National Whistleblower Center*  
Partner at *Kohn, Kohn, & Colapinto*



# WHISTLEBLOWER PROTECTION:

An Essential Tool for Stopping the Corruption that Threatens  
the World's Forests, Fisheries and Wildlife

| Stephen M. Kohn and John Kostyack  
| National Whistleblower Center

## Goals of Today's Presentation

*By the end of this webinar, participants will be able to:*

Understand effective strategies for reporting corrupt practices under U.S. whistleblower laws

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Identify the most important innovations in whistleblower protection

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Assess opportunities to advance whistleblowing, and strategies for managing risks, in a wide variety of contexts

## The Problem Facing Fraud Detection

“*Honest behavior is not rewarded . . . Given [the] costs [of whistleblowing] the surprising part is not that most employees do not talk, it is that some talk at all.*”

— Alexander Dyck, et al., “[Who Blows the Whistle on Corporate Fraud?](#)” The University of Chicago Booth School of Business Working Paper No. 08-22 (2009).

## The Solution

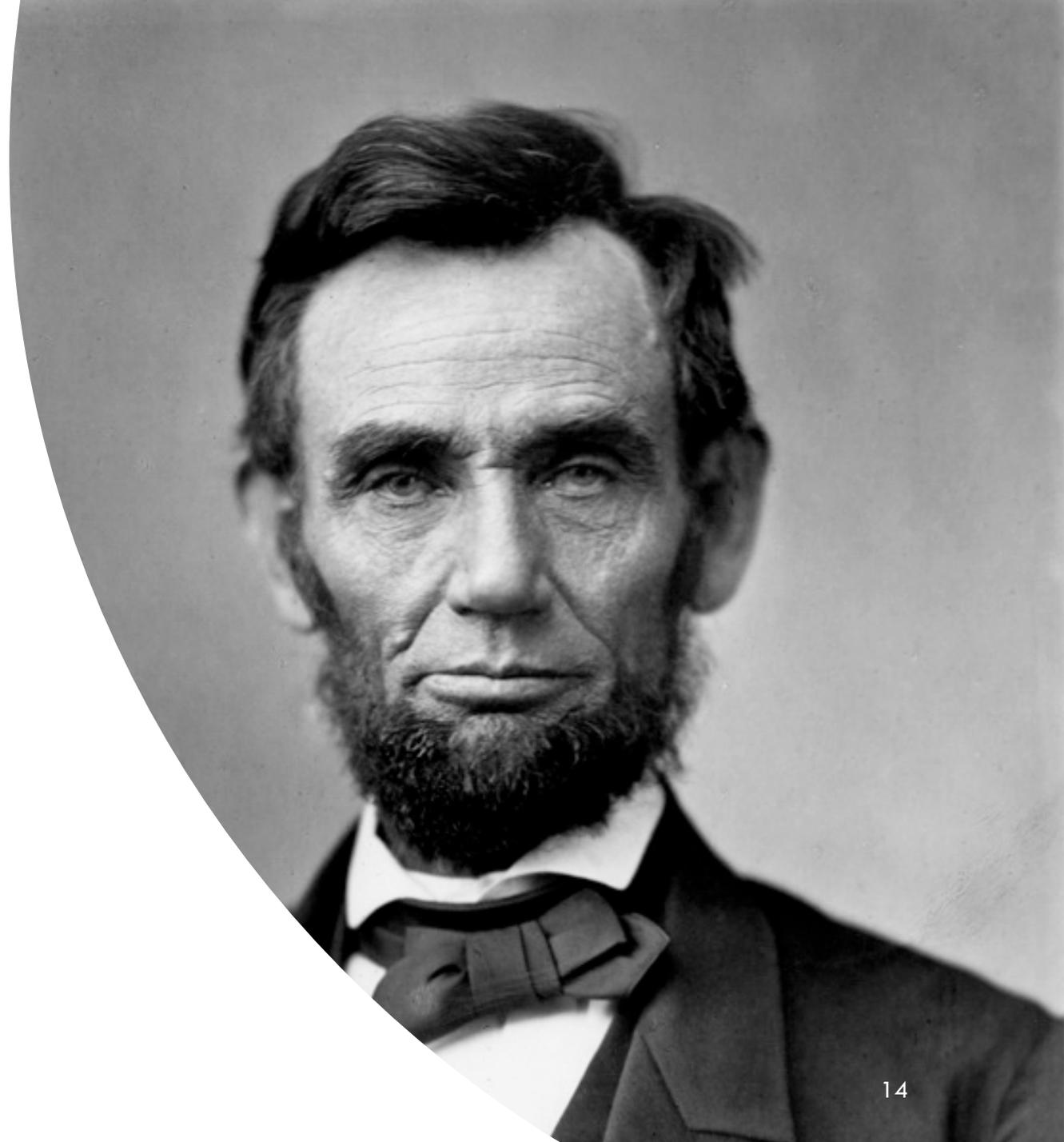
### *Qui Tam* - “The Lincoln Law”

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On March 2, 1863, President Abraham Lincoln signed the original whistleblower [qui tam reward law](#), the False Claims Act (“FCA”), targeting fraud in government contracting.

It was modernized in 1986.

The FCA incentivizes reporting and is the model for all current whistleblower reward laws.



# How whistleblowing under U.S. law works around the world

Case Study – The Act to Prevent Pollution from Ships (APPS)

Offers whistleblowers a reward of up to 50% of sanctions obtained

Covers transnational crimes and is available to non-U.S. whistleblowers



# Act to Prevent Pollution from Ships (APPS)

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- Pollution on the high seas occurs outside of the U.S. territorial waters
- The ships and crew members violating the laws are almost all non-U.S.
- Corruption is at the heart of the crimes (saving money, greed, falsification of documents)
- The U.S. is the number one enforcer of MARPOL because of whistleblowers



## The Reality “On The Ground”

“The availability of the award aptly reflects the realities of life at sea... A monetary award both rewards the crew member for taking that risk and may provide an incentive for other crew members on other vessels to alert inspectors and investigators regarding similar crimes.”

— U.S. Department of Justice, Natural Resources Division  
Brief in *U.S. v. Odfjell*

# Whistleblowers Rewarded for Reporting Worldwide Ocean Pollution

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In 2015, Overseas Shipping Group, Inc., which operates one of the largest oil tanker fleets in the world, was prosecuted for illegally discharging sludge and oily waste and concealing the pollution by falsifying records.

Overseas Shipping paid a US\$37 million penalty, which included a criminal fine.

Twelve Filipino whistleblowers reported APPS violations and received a US\$5.2 million reward (largest ever under APPS)

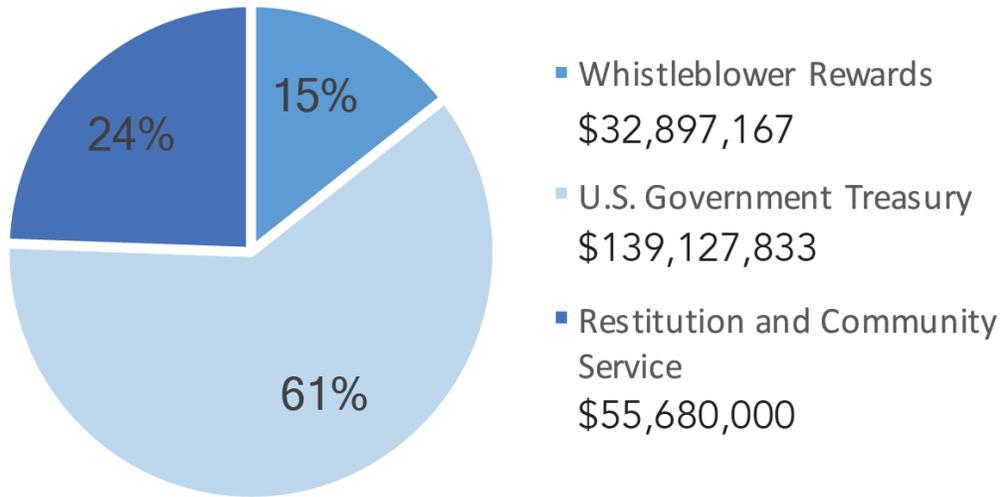




Whistleblowers were key to \$60M penalties imposed on Carnival Cruise Lines for pollution & cover up

*Absent crew members with firsthand knowledge of the illegal conduct coming forward, APPS violations are extremely difficult to uncover.*” (U.S. DOJ Filing in *U.S. v. Noble Drilling*)

## Revenue Distribution from APPS Cases Involving Whistleblowers<sup>1</sup>



Total Money Recovered Based on Whistleblower Information: **\$177,593,000**

- The U.S. government has awarded 205 whistleblowers a sum of approximately \$33 million in the 100 most recent prosecution under APPS.
- The largest reward paid for an individual whistleblower was \$2,100,000 (*USA v. Omi Corporation*).
- \$5,250,000 is the largest amount paid to a group of APPS whistleblowers from the Philippines (*USA v. Overseas Shipping*).
- The average reward paid per whistleblower in a recent survey of 75 cases was \$163,575.

## Sample of Groups That Obtained Restitution or Community Service Payments

- The National Fish and Wildlife Foundation
- The National Marine Sanctuary Foundation
- The National Parks Foundation
- The National Marine Fisheries Service of Oceanic and Atmospheric Administration (NOAA)
- Smithsonian Environmental Research Center
- Florida National Keys Marine Sanctuary
- Alaska Sealife Center
- Pinellas County, Florida Environmental Fund (PCEF)
- International Arctic Research Center
- Puget Sound Marine Conservation Fund
- Stenson Bank National Marine Sanctuary
- North American Wetlands Conservation Fund
- Columbia River Conservation
- Channel Islands National Park

## Examples of Projects Targeted for Use From These Payments

- Benefit, preserve and restore the environments and ecosystems in U.S. waters
- Activities of conservation and management of fish, wildlife, and plant resources of the U.S. coastline
- Restoration of marine and aquatic injured resources and protected coral reefs, sea grass beds, and species dependent on that habitat
- Scientific research of marine resources and habitats
- Education regarding protection of the marine environment from pollution
- Louisiana habitat conservation

## The Framework for *Qui Tam* and Reward Laws

Initial disclosures are filed with the agency responsible for enforcing the whistleblower law. Most laws have confidential reporting procedures

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Emphasis is on the quality of the information, not on a whistleblower's employment discrimination case.

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Whistleblowers who provide original information that leads to a successful enforcement action are entitled to a **mandatory reward** under the modern reward laws of between 10-30% of the collected proceeds triggered by their disclosures.

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Mandatory rewards available under the False Claims Act, Dodd-Frank Act, Tax and Money Laundering, Foreign Corrupt Practices Act, Securities and Exchange Act and Commodity Exchange Act.



## False Claims Act | 31 U.S.C. § 3729-3732

Rewards for reporting fraud in government contracting, procurement or failure to pay mandatory fees, including customs violations.



## Foreign Corrupt Practices Act | 15 U.S.C. §§ 78m, 78dd, 78ff

Rewards to whistleblowers who provide original information about bribes paid to foreign government officials.



## Securities and Exchange Act | 33 U.S.C. § 1908(a)

Rewards to individuals who provide information to the SEC which leads to the recovery of monetary sanctions which exceed \$1 million.



## Commodity Exchange Act | 7 U.S.C. § 26

Rewards to qualified persons who provide information concerning violations of the Commodities laws,, including violations of money laundering laws.



## Act to Prevent Pollution from Ships | 33 U.S.C. § 1908(a)

Permits federal courts to grant rewards to whistleblowers whose disclosure pollution on the high seas

## Fish and Wildlife Improvement Act | 16 U.S.C. § 7421(c)(3)

Rewards for reporting violations of any wildlife protection laws enforced by the U.S. Fish and Wildlife Service or the National Marine Fisheries Service. Rewards can be paid for information prior to a prosecution.

## Endangered Species Act | 15 U.S.C. § 78u-6 and Lacey Act Act | 16 U.S.C. § 3375(d)

Permits the Departments of Agriculture, Commerce, Interior, and Treasury to reward whistleblowers who disclose violations of the Endangered Species Act.

## Internal Revenue Act | 26 U.S.C. § 7623

Rewards to IRS whistleblowers who report tax frauds and underpayments of taxes. Covers all laws investigated by the IRS, including international money laundering.

“*The False Claims Act whistleblower law is “the most powerful tool the American people have to protect the government from fraud.”*”

— Former Assistant Attorney General Stuart Delery - [Remarks](#) at American Bar Association’s 10th National Institute on the Civil False Claims Act and Qui Tam Enforcement (2014)



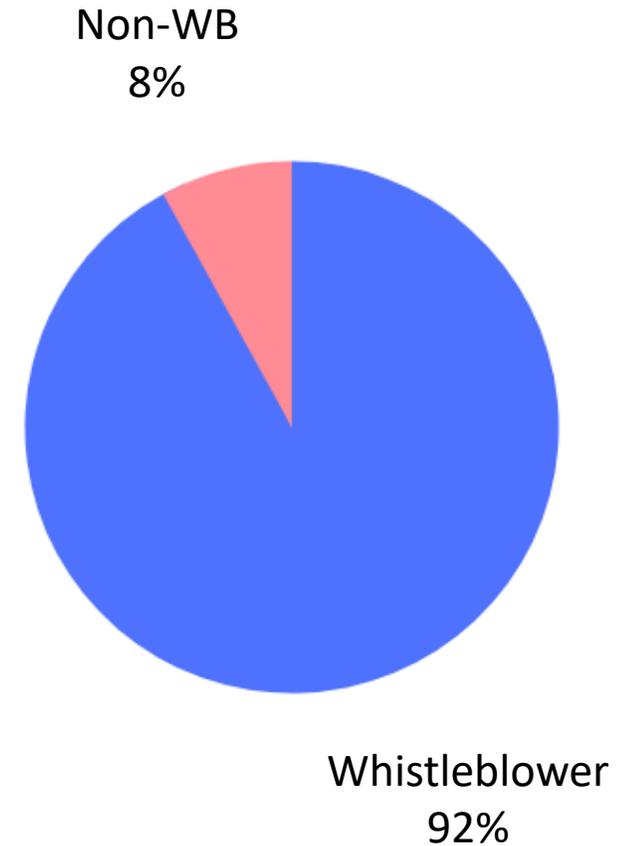


“ *[T]he False Claims Act has provided ordinary Americans with essential tools to combat fraud . . . their impact has been nothing short of profound.*

— Former Attorney General Eric Holder, U.S. Department of Justice, [remarks at the 25th anniversary of the False Claims Act](#) (January 31, 2012).

## A Whistleblower Program Delivers Significant Benefits

- In FY 2017, the U.S government recovered over \$3.7 billion through its civil fraud program.
- Of this amount, whistleblowers were directly responsible for the detection and reporting of over \$3.4 billion under the FCA.
- Whistleblowers were the source of the detection of 92.8% of civil fraud recovered in FY 2017.



In 2017, of the \$3.4 billion recovered through the FCA and as a result of whistleblower assistance, \$392 million (11.5%) was awarded to whistleblowers.

# How You Can Help

## How can you strengthen laws within the country you work in?

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The most effective whistleblower laws have the following components:

- Confidential handling of whistleblower disclosures
- Financial awards linked to the whistleblower's role in producing a successful outcome
- Executive branch reporting channels

## How can you build cases under U.S. laws?

- Confidential and anonymous reporting using qualified attorneys to ensure rights are protected
  - Work with NGOs to network internationally and provide local support for whistleblower
  - Focus on cases where there are strong civil, criminal and administrative sanctions or significant environmental impact
- ...Learn more in the next section*



APPLYING U.S.  
WHISTLEBLOWER LAWS  
TO HELP STOP NATURAL  
RESOURCE CORRUPTION  
AROUND THE WORLD



Many people witness corruption every day that threatens their forests, fisheries and wildlife

BUT law enforcement agencies in most countries do not adequately protect whistleblowers

*Long Term Solution:* Strengthen whistleblower programs in home countries

*Short Term Solution:* Report under U.S. laws with track records of providing confidentiality and awards





“ Whistleblowers, whether they are located in the U.S. or abroad, provide a valuable service to investors and help us stop wrongdoing... This award recognizes the continued, important assistance provided by the whistleblower throughout the course of the investigation.

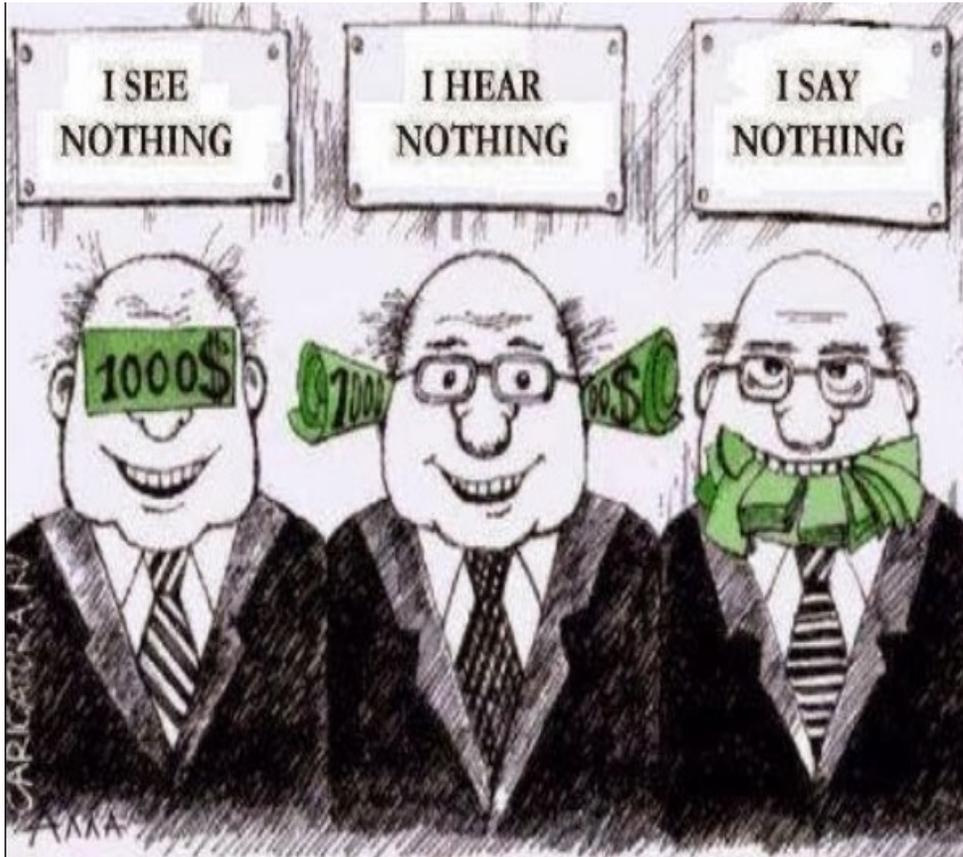
— Jane Norberg, Chief of the Office of the Whistleblower, Securities and Exchange Commission, [Press Release](#) on award to overseas whistleblower

## Foreign Corrupt Practices Act (FCPA)

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- Between 2011-17, 2,655 whistleblowers from 113 countries outside the U.S. have filed claims under the Foreign Corrupt Practices Act whistleblower reward provision.
- Over \$40 million has been paid to non-U.S. citizens who reported bribes paid overseas, in a single case.

*The focus of the FCPA is prosecuting bribes paid abroad*



## Key FCPA Provisions

The FCPA prohibits publicly-traded corporations that trade through ADRs,, from paying **bribes to foreign officials** and mandates proper financial **recordkeeping**.

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The FCPA establishes U.S. jurisdiction for **bribes paid in foreign countries by foreign nationals**.

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FCPA whistleblowers can obtain financial rewards even if bribes are paid in a foreign country and the whistleblower is a foreign national.

# Case Study: Whistleblower Rewarded for Reporting Corruption by Mining Company

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In 2015, BHP, the world's largest mining company, paid US\$25 million to settle allegations that the company paid bribes to dozens of foreign government officials

The case was brought to the SEC by a whistleblower who ultimately received a US\$3.75 million reward



# Other FCPA Cases For Which Whistleblowers Are Eligible For Rewards

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- **Quad/Graphics** : Bribes paid in Peru and China — \$10 million sanction
- **Telefonica Brasil** : World Cup bribery — \$4.125 million
- **Fresenius Medical** : German based company — \$231 million
- **Petroleo Brasileiro** : Brazil based company —\$1.78 billion
- **Sanofi** : corrupt payments in Kazakhstan and Middle East — \$25 million
- **Credit Suisse** : Swiss based company corrupt payments in Asia-Pacific—\$77 million
- **Telia** : Sweden-based company — bribery in Uzbekistan — \$965 million
- **SQM** : Chilean based company — \$30 million
- **Biomet** : Polish based company — \$30 million

# U.S. False Claims Act

*The most powerful whistleblower law*



Whistleblowers can file cases “qui tam” (in the name of the government) and receive 15 to 30 % of amount recovered, plus attorney fees and costs



Government intervenes and litigates 20% of these cases itself



Treble damages provision, plus mandatory penalty (US \$5500 -\$11K per false claim) sends powerful message to wrongdoers



Applies to conduct outside the U.S. – so long as there is a financial transaction with the U.S. government



Anyone with original information can serve as a whistleblower, including NGOs



Suitable for building criminal cases as well as civil

## Attacking Corruption in Global Supply Chains:

## Fraud at the Point of Entry into U.S. Ports

“ As global supply chains grow more complex, it is important for American businesses to know their suppliers and be confident of their integrity. The outcome of this case is a testament to [our] dedication . . . in enforcing our nation’s trade laws and holding accountable those perpetrating this type of fraud.

[U.S. Department of Justice Press Release in U.S. v. Yingshun Garments](#)

## Prudent Importers Avoid FCA Liability by Understanding their Supply Chains

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- “The FCA is a particularly powerful enforcement tool as it allows for treble damages and penalties, and because FCA claims can be initiated by private qui tam plaintiffs [whistleblowers].”

[Jones Day law firm \(April 2015\)](#)



# Key Cases Using False Claims Act to Prosecute Importers

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- **Tokyo Ink SC Holdings Ltd:** Misrepresenting the country of origin — \$45 million sanction, \$7.8 million whistleblower reward
- **Z Gallerie LLC:** Evading antidumping duties — \$15 million sanction, \$2.4 million whistleblower reward
- **Basset Mirro Co:** Evading antidumping duties — \$10.5 million sanction, \$1.9 million whistleblower reward
- **Noble Jewelry:** Underpaying customs duties — \$3.8 million sanction, \$726,000 whistleblower reward
- **Motives Inc.:** Underpaying customs duties — \$13.3 million sanction, \$2.1 million whistleblower reward

# Securities and Commodity Exchange Acts

Whistleblowers can file anonymous and confidential claims of fraud in connection with purchases or sales of securities and commodities futures

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Eligibility does not depend on U.S. citizenship

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Whistleblowers who provide original information that leads to a successful enforcement action entitled to a mandatory reward of between 10-30% of the collected proceeds.

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Since 2012 the SEC has paid over US\$500 million in rewards.

# Whistleblower Exposes Securities Fraud in Connection with Wildlife Trafficking on Facebook

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In August 2017, an anonymous whistleblower supported by the National Whistleblower Center filed a complaint with the SEC, detailing how Facebook failed to disclose to shareholders its lack of controls of illegal wildlife trafficking on its website

The complaint explains how Facebook sells advertisements on web pages it knows or should know are being used by traffickers to market endangered species



# Lacey Act and other U.S. wildlife reward laws

Corruption is a key facilitator of wildlife crime and, conversely, wildlife crime facilitates other law-breaking

The Lacey Act is the most powerful law for addressing illegal trafficking in timber, seafood and wildlife parts

This and other wildlife reward laws enable U.S. law enforcement authorities to enlist allies in other countries to assist in broader campaigns against corruption

## Current wildlife whistleblower laws identical to the Lacey Act's provisions:

- Endangered Species Act | 16  
U.S.C. § 1540(d)
- Rhinoceros and Tiger Conservation Act | 16  
U.S.C. § 5305a(f)
- Antarctic Conservation Act | 16  
U.S.C. §§ 2409; 2439
- Fish and Wildlife Improvement Act | 16  
U.S.C. § 7421(c)(3)
- Wild Bird Conservation Act | 16  
U.S.C. §§ 4912(c); 4913(b)

*These laws were enacted after Congress amended the Lacey Act in 1981 to include whistleblower rewards.*

## Other laws that permit rewards to whistleblowers who report trafficking in fish, animals, and plants:

- African Elephant Conservation Act
- American Fisheries Act
- Atlantic Tunas Convention
- Bald and Golden Eagle Act
- Fur Seal Act
- Illegal, Unreported, and Unregulated Fishing Enforcement Act
- Magnuson-Stevens Fishery Conservation
- Marine Mammal Protection Act
- Migratory Bird Treaty Act
- National Wildlife Refuge System
- Ocean Thermal Energy Conservation Act
- Shark Finning Prohibition Act
- Sustainable Fisheries Act
- Whaling Convention
- ... among numerous other wildlife protection laws

Whistleblowers  
Key to Jail Terms  
for Smuggling  
Jaguars into U.S.  
from Mexico in  
Violation of  
Lacey Act



# Whistleblowers Key to Large-Scale Penalty for Smuggling Illegally-Harvested Lumber into U.S. from Russia in Violation of Lacey Act



Siberian Tiger - Beneficiary of whistleblower's contribution to prosecution in *Lumber Liquidators* case

Credit: Magnus Johannsen,  
<https://www.flickr.com/photos/120374925@N06/35241818024>

## FWS Recognizes the Critical Role of Whistleblowers in Successful Wildlife Prosecutions

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- The whistleblower *“provided crucial information resulting in saving the U.S. Fish and Wildlife Service thousands of dollars and investigator hours.”*

[Asian Elephant Tusk and QT Aquarium Cases, FOIA document p. 630.](#)

- *“In order to complete the mission and purpose of the USFWS, Office of Law Enforcement, it is extremely important and critical to provide a monetary award to the individuals who come forward and provide information to investigators.”*

[Case Name Redacted by FWS, FOIA document p. 132.](#)

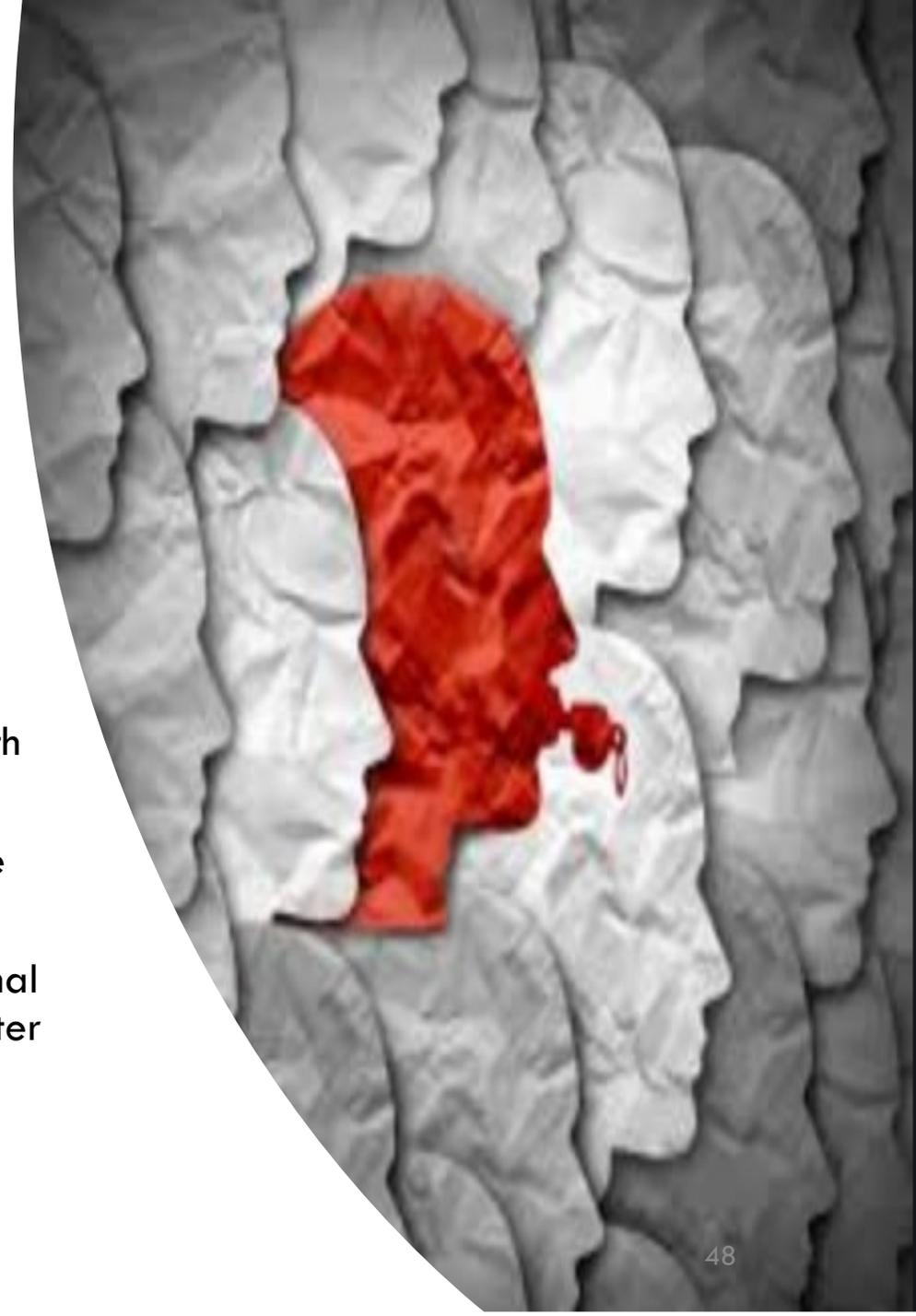


## Are Concerns About U.S. Whistleblower Laws Valid?

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### Key Findings from U. Chicago Study:

- “A strong monetary incentive to blow the whistle does motivate people with information to come forward.”
- “There is no evidence that having stronger monetary incentives to blow the whistle leads to more frivolous suits.”
- “Fraud tends to be revealed by people who find out about it in their normal course of business and who do not have a strong disincentive (or even better some positive incentive) to reveal it.”



# How Can You Help?

## Tips for NGOs and Other Whistleblower Allies

Urge governments to establish confidential reporting procedures

Learn how to protect whistleblower communications (e.g., encrypted channels) and effectively deliver their information

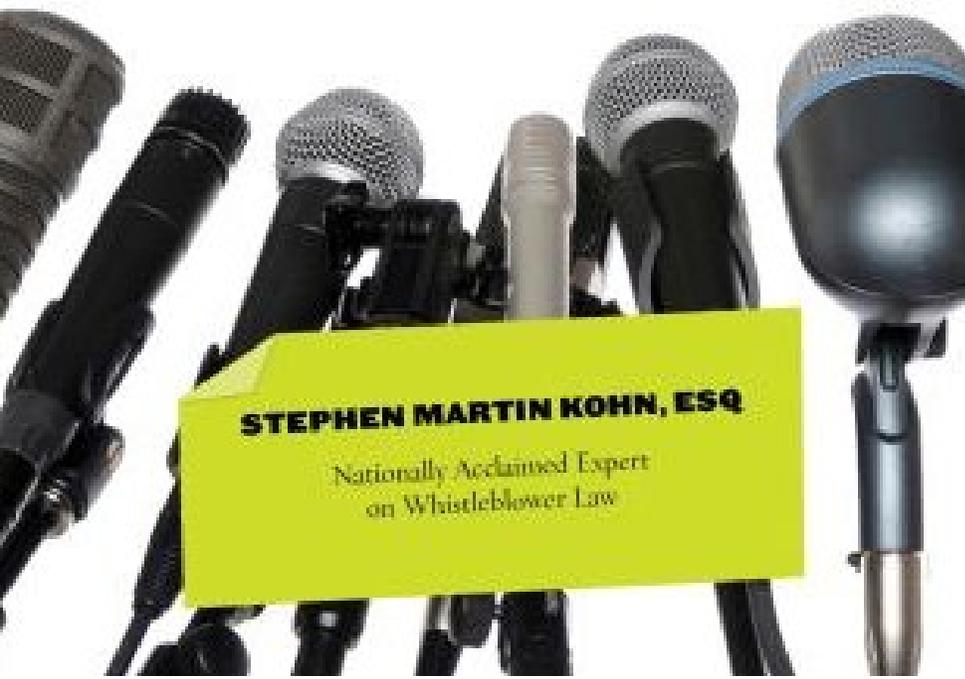
Anti-corruption laws must also have strong civil, criminal and administrative sanctions and incentivize informants to come forward (rewards)

Use transnational anti-corruption laws with a track record of success

Updated with new information on rewards,  
wildlife trafficking, and Wall Street whistleblowing

# THE NEW Whistleblower's HANDBOOK

**A Step-by-Step Guide to Doing  
What's Right and Protecting Yourself**



***“You may want to add this book to your... wish list. Just don't let your boss catch you reading it.”***

*–Wall Street Journal*

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Links to the legal authorities including statutes, regulations, and cases relied upon in *The Handbook* can be found [online](#), including:

- New Legal Tools: [Rule 1](#)
- False Claims Act / Qui Tam: [Rule 6](#)
- Tax Whistleblowers: [Rule 7](#)
- Foreign Corrupt Practices Act: [Rule 9](#)
- Non-Disclosure Agreements: [Rule 28](#)
- International Whistleblowing: [International Toolkit](#)

## Contact

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## Partner with NWC on Whistleblower Assistance and Policy Advocacy!

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@NationalWhistleblowerCenter



@StopFraud



National Whistleblower Center

[www.whistleblowers.org](http://www.whistleblowers.org) | [www.whistleblowersblog.org](http://www.whistleblowersblog.org)

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# APPENDIX

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**Most Important Mandatory Reward Laws**

**Statements from Officials**

**Reports**

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## **Most Important Mandatory Reward Laws**

- False Claims Act | [31 U.S.C. § 3729-3732](#)
- Internal Revenue Code | [26 U.S.C. § 7623](#)
- Securities Exchange Act | [15 U.S.C. § 78u-6](#)
- Commodity Exchange Act | [7 U.S.C. § 26](#)
- Foreign Corrupt Practices Act

## Statements from Officials

- Bill Baer - Remarks at [American Bar Association's 11th National Institute](#) on the Civil False Claims Act and Qui Tam Enforcement (2016)
- Chad A. Readler, Department of Justice, Civil Division, in press release titled, "[Justice Department Recovers Over \\$3.7 Billion From False Claims Act Cases in Fiscal Year 2017](#)" (December 2017).
- Charles Grassley, Chairman of Senate Judiciary Committee, speech given on National Whistleblower Day (July 30, 2018) --- Watch the [Video](#) --- Read the [Speech](#)
- Christopher Ehrman, Director of the CFTC's Whistleblower Office, [Press Release](#) "CFTC Announces Multiple Whistleblower Awards Totaling More than \$45 Million"
- Eric Holder, U.S. Department of Justice, [remarks at the 25th anniversary of the False Claims Act](#) (January 31, 2012).
- John A. Koskinen, Commissioner of the IRS, [Remarks](#) before the U.S. Council for International Business-OECD International Tax Conference
- Kevin M. O'Neill, Deputy Secretary, Securities and Exchange Commission, [Order](#) Determining Whistleblower Award Claim
- Mary Jo White, Securities and Exchange Commission, [Remarks at the Securities Enforcement Forum](#), Washington DC (October 2013)
- Stuart Delery - [Remarks](#) at American Bar Association's 10th National Institute on the Civil False Claims Act and Qui Tam Enforcement (2014) and U.S. Department of Justice, [remarks at American Bar Association's 10th National Institute](#) on the Civil False Claims Act and Qui Tam Enforcement (June 5, 2014).
- SEC Press Release (Petrobras): <https://www.sec.gov/news/press-release/2018-215>
- SEC Enforcement Action on NDAs, [In re KBR](#).

## U.S. Securities and Exchange Commission

“ . . . it makes no difference whether . . . the claimant was a foreign national, the claimant resides overseas, the information was submitted from overseas, or the misconduct comprising the U.S. securities law violation occurred entirely overseas.”

— Kevin M. O’Neill, Deputy Secretary, Securities and Exchange Commission, [Order](#) Determining Whistleblower Award Claim



## U.S. Securities and Exchange Commission

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*The SEC “whistleblower program . . . has rapidly become a tremendously effective force-multiplier, generating high quality tips, and in some cases virtual blueprints laying out an entire enterprise, directing us to the heart of the alleged fraud.*

— Chairman Mary Jo White, Securities and Exchange Commission, [Remarks at the Securities Enforcement Forum](#), Washington DC (October 2013)



## U.S. Fish and Wildlife Service

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- “Rewards expand the informant reporting network critical to law enforcement success.” [Case Name Redacted by FWS, FOIA document p. 199.](#)
- “Without [the whistleblower’s] candor in coming forward with this information, his willingness to aid Service agents by contacting former employees, and to provide testimony in federal court, this case would have never reached fruition.” [Lochrige Ranch Case, FOIA document p. 104.](#)
- The whistleblower’s “assistance was of such significance that it is highly unlikely this case would have been successful without [it].” [Case Name Redacted by FWS, FOIA document p. 423.](#)

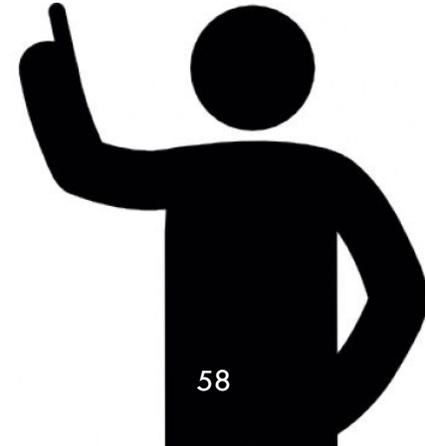
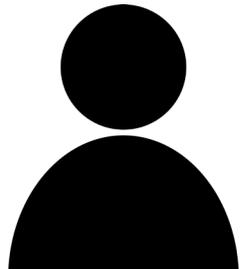
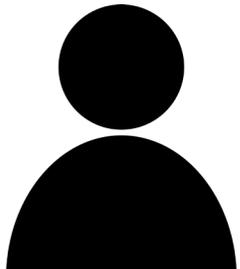


**U.S. Fish and Wildlife Service** to U.S. Congress: “It has been found in case after case that the most effective technique for combatting this type of crime [wildlife trafficking] is purchasing evidence and information through informants and offering cash rewards to private citizens for useful information.”

*“Without the assistance of [the whistleblower] it would have been unlikely we would have received the information about the illegal activity and never been able to identify the subjects involved in the activity.” “The initial targets are believed to have ties to organized crime organizations in Mexico and were suspected of having created fake identities to acquire U.S. citizenship and travel freely between both countries.”*

*“This case would not have been possible had [the whistleblower] not first made law enforcement aware of the crime and second, worked with law enforcement over a two and one-half year period to gather evidence necessary to charge and convict those involved in criminal activity...”*

*“I have approved the payment ...for an individual who provided crucial information resulting in saving the U.S. Fish and Wildlife service thousands of dollars and investigator hours. Without the individual’s cooperation, knowledge, and commitment, the investigation would not have been successful.” “The recipient was instrumental in obtaining three successful felony convictions [for trafficking in Endangered Species...”*



## Reports

- Alexander Dyck, et al., “[Who Blows the Whistle on Corporate Fraud?](#)” The University of Chicago Booth School of Business Working Paper No. 08-22 (2009)
- National Whistleblower Center, [Foreign Corrupt Practices Act: How the Whistleblower Reward Provisions Have Worked](#) (2018)
- National Whistleblower Center, [Exposing a Ticking Time Bomb, How Fossil Fuel Industry Fraud is Setting Us Up for a Financial Implosion – and What Whistleblowers Can Do About It](#) (2020)

# TNRC Learning Series

**Whistleblower protection: An essential tool for stopping the corruption that threatens the world's forests, fisheries and wildlife**



**John Kostyack**  
National Whistleblower  
Center  
(Presenter)



**Stephen M. Kohn**  
National Whistleblower  
Center  
Kohn, Kohn, & Colapinto  
(Presenter)



**Vanda Felbab-Brown**  
Center for 21st Century  
Security and Intelligence  
The Brookings  
Institution  
(Discussant)



**Dr. Louise Shelley**  
Terrorism, Transnational  
Crime and Corruption  
Center  
George Mason University  
(Discussant)



**Rachel Kramer**  
Targeting Natural  
Resource Corruption  
(Moderator)

# Questions & Answers



**POLL**

**TNRC's goal is to expand and deepen understanding of anti-corruption in natural resource management. Did this event provide you with new information?**

- a. Yes**
- b. No**
- c. Unsure**

**After attending this webinar, would you say that you have:**

- A better understanding of effective strategies for reporting corrupt practices under U.S. whistleblower laws?**
- A better understanding of important innovations in whistleblower protection?**
- A better sense of assessing opportunities to advance whistleblowing, and strategies for managing risks?**

# Targeting Natural Resource Corruption

Harnessing knowledge, generating evidence, and supporting innovative policy and practice for more effective anti-corruption programming

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