

United States Institute of Peace
Association for Diplomatic Studies and Training
Iraq Experience Project

**SHARON ISRALOW
EXECUTIVE SUMMARY**

Interviewed by: Mark Gribbin
Initial interview date: October 6, 2004
Copyright 2004 ADST

Sharon Isralow is a career USAID officer who has spent the majority of her career working on conflict, democracy, and governance issues in Latin America and Africa. She arrived in Iraq through a connection with a colleague. She headed the transparency and prevention pillar of the newly-formed Commission on Public Integrity. Most of her work involved standing up her section of the commission.

The Commission on Public Integrity was one of three independent institutions established to fight public sector corruption. The others were (1) the Board of Supreme Audit; and (2) an Inspectors General system. The commission was composed of four pillars: (1) administration; (2) transparency and prevention; (3) education and outreach; and (4) investigations. Isralow was Senior Advisor for the transparency and prevention pillar.

The Commission on Public Integrity was established by a CPA order, drafted in consultation with the Iraqi Governing Council. Isralow worked closely with the senior coalition advisor for the commission, Charles Grinnell, to turn the law into a workable system. She drew on her experience, intuition, and discussions with coalition colleagues to develop viable anticorruption systems. For example, she worked out how to develop an independent investigative authority to give the commission "teeth". In this vein, she also hashed out the roles of investigators (as ethics officers, for example) and worked on establishing their relationship with other authorities such as the Ministry of Justice.

Aside from institutional design, Isralow's main tasks included formulating tactical approaches and strategies to combat corruption. On the tactical level she helped develop a code of conduct for civil servants, set up forms for an anticorruption hotline, designed fiscal disclosure regulations (for high-level government officials), and drafted publications (such as brochures outlining the new expectations of government). On the strategic level, Isralow coordinated general anticorruption activities in Iraq through the anticorruption Donor Consultative Group.

The Donor Consultative Group was responsible for developing overall anticorruption strategy and for coordination of efforts. The group as composed of coalition and ministry representatives, including the Inspectors General, the Board of Supreme Audit, and USAID (who was conducting anticorruption outreach with civil society groups, the "demand side"). BearingPoint was another player: they were contracted to implement and integrated financial management system for the Iraqi government.

Isralow describes an institution building process dominated by coalition personnel. However, at the time she left, Isralow notes that Iraqis were beginning to have a larger role in the commission. An Iraqi commissioner had been appointed and had begun appointing his staff. She notes that the ultimate goal was to transition the Commission to Iraqi control.

Isralow believes transparency and the elimination of corruption are essential to democratic society. She notes the importance of educating the public and civil service about corruption and new expectations of public officials. She does not regard Iraqi society as a culture naturally inclined to corruption. An original lack of physical resources (space, office equipment) was an early challenge. Security was not an issue for her. Support from CPA and Washington was outstanding, as were her coalition colleagues and Iraqi support staff (chiefly translators).

United States Institute of Peace
Association for Diplomatic Studies and Training
Iraq Experience Project

SHARON ISRALOW

*Interviewed by: Mark Gribbin
Initial interview date: October 6, 2004
Copyright 2004 ADST*

Q: Today is October 6th. My name is Mark Gribbin. Today I'll be interviewing Sharon Isralow. Let's start off with your basic background: education, work experience, and how that flowed into this whole Iraq business.

ISRALOW: I've been at AID since 1979. Most of my work history has been spent in Latin America and Africa working on conflict, democracy, and governance issues.

Q: For the Iraq job, how were you called up? Did you just get a phone call one day that said, "Sharon, we need you"?

ISRALOW: I knew the Regional Coordinator for Baghdad, Ted Morse, from my work with the Contra demobilization. He knew I was interested in coming out, and he called and asked me if I'd like to deploy. He gave me the option of coming out for anywhere between a month and six months. I stayed six months, from December 18th '03 to June 17th '04.

Q: Before you went out did you have any special training? Did they give you a crash course in Arabic culture or anything like that?

ISRALOW: No. I was supposed to have taken the security training, but I just had a very short time to deploy, so I didn't. I went straight in. Of course, I've been working on wars for 15, 20 years now.

Q: You already had a background, then.

ISRALOW: It wasn't completely foreign to me to work in that kind of environment.

Q: You were mostly working in Baghdad?

ISRALOW: I was working solely in Baghdad.

Q: Were you moving around the city or were you primarily stationed in the Green Zone?

ISRALOW: I was moving around the city initially, when I worked for Baghdad Central. That was the regional coordination office for Baghdad. A month later I went to work on anticorruption

for the Ministry of Justice, with the Senior Advisor in the Ministry of Justice, and from then on I pretty much stayed in the Green Zone.

Q: You actually had two different jobs while you were there?

ISRALOW: Yes. The first one was short; the second one was longer.

Q: Can you tell me a little bit more about your first job?

ISRALOW: The first one, I was working for Baghdad Central for Andy Morrison. I'm not exactly sure what his capacity was – I'm sorry I can't remember – democracy, governance, or something like that. They were standing up local and city governments. So for the first month I was implementing a series of town hall meetings to promote discussion among the Iraqis in different districts in Baghdad on the TAL, the Transitional Administration Law.

Q: Sort of like town hall meetings?

ISRALOW: Yes, town hall meetings, town council meetings.

Q: Was this related to the caucuses that were to select municipal governments?

ISRALOW: No. But this same office administered those and stood up the city government in Baghdad.

Q: And the second job was...?

ISRALOW: The second job was where I spent most of my time in Baghdad, doing that. I think the title was Senior Advisor for Transparency and Prevention of anticorruption. We stood up an anticorruption commission for the [Iraqi] government, the Commission on Public Integrity. It had a number of components. [There were four pillars: (1) administration; (2) transparency and prevention; (3) education and outreach; and (4) investigations. I was Senior Advisor for the transparency and prevention pillar.

Q: What were the major programs or initiatives that were being developed for prevention and transparency, or were you just institution building at this point?

ISRALOW: I was institution building. As I say, I left the country shortly after Judge Radhi was appointed, so what I was doing was laying the groundwork, designing the systems, developing a code of conduct, trying to provide some models for a financial disclosure system, setting up forms for hotlines, drafting publications, working with the other donors to have some kind of coherent, cohesive approach and plan and that sort of stuff.

Q: Was the commission being stood up inside one of the ministries, or was it a freestanding organization?

ISRALOW: It's a freestanding organization. It's an independent commission.

Q: Is that something that was and is continuing to be run by an international contingent, or is that supposed to be an Iraqi institution?

ISRALOW: It's an Iraqi institution with an Iraqi commissioner.

Q: You must have been starting from scratch, though, given the rampant corruption of the Hussein regime.

ISRALOW: We did start from scratch. I wasn't there for the initial meetings. As I understand it, the Iraqi Governing Council said they wanted to do something about corruption. Lieutenant Colonel Charles Grinnell, who was my boss and based out of the Ministry of Justice, went and met with the Governing Council on several occasions. They identified what they were interested in, and then he came back and helped draft a CPA order that created the Commission on Public Integrity. Ambassador Bremer signed and authorized it, and then turned around to Chuck and said, "Fine. Implement it," and so we did.

Q: What kind of recommendations was the IGC giving to him?

ISRALOW: I don't know; I wasn't privy to those conversations. What I know is that the idea of an anticorruption commission was initiated by the Governing Council and that there were discussions within the Governing Council on what they would like to do. I think it included things like an education campaign and a code of conduct for government employees. All these things were included in the CPA order that created the commission. They recognized that you need to be able to investigate and prosecute cases. Eventually there were linkages between the commission's investigatory authorities and the criminal justice system's prosecutorial authorities. There were also components for community/public education on corruption and financial disclosure.

Q: When you say "corruption", you are looking at the Iraqi government?

ISRALOW: Corruption experts tend to define corruption as abuse of public office for private gain. We were focused on public sector corruption, but everybody knows it takes two to tango. This focus was on public sector corruption, since the government was pretty much all "para-statals" .

Q: "Para-statals"?

ISRALOW: Government owned or government controlled [enterprises and industries. For example, the] transportation sector [was controlled by the state].

Q: From what I understand, the previous regime was not exactly a bunch of Boy Scouts. I've read about Oil For Food and how corrupt that system was. I've also heard that the ministries were not run necessarily for bureaucratic efficiency, but were often more like patronage systems. Were you focusing on transforming this culture? How was it envisioned that this would happen? What was that the broad goal?

ISRALOW: The broad goal, obviously, is to try to reduce the level of government/public sector corruption in the country. But we have to recognize that it was a centralized government for over 40 years. We have to recognize the job can't be done overnight. What we were focused on, at least what I was focused on, was trying to stand up the systems of government that would be necessary to try to bring about some degree of accountability and transparency, at least in terms of where this Anticorruption Commission was concerned. There were two other CPA orders [that related to anticorruption]. One reestablished the Board of Supreme Audit and the other creating an Inspectors General system for the government.

One of the first things that we did was form the Donor's Consultative Group. The group was composed of Americans, Brits, and others. We discussed how combating corruption requires a multi-pronged approach and how it requires a number of institutions and a lot of coordination among those institutions. So we set up the Donor's Consultative Group to try to begin to coordinate the various institutions created by Ambassador Bremer and the Governing Council to tackle corruption issues.

Q: The group sounds like it was mainly Coalition representatives. Was there a UN involvement, or World Bank? I know they have corruption programs. There's also civil society groups like Transparency International. Were any of those groups involved, or was it mainly coalition members?

ISRALOW: This was before the transference to Iraqis, and I don't think TI was in Iraq. I don't think they had a chapter in Iraq at the time. I don't think the World Bank was running anticorruption programs or looking at corruption in Iraq at the time. I don't know. You'd have to check with Danny Kaufman and the folks over at the bank on that.

What we were doing was standing up institutions of government, and different people had different orders to stand up different institutions. We were trying to synchronize that work in a coherent way. Eventually it's to be turned over to the Iraqis. In fact, there is now an Iraqi commissioner, Judge Radhi. There were also Iraqi inspector generals in the different ministries, Iraqi auditors on the Board of Supreme Audit, and Iraqi investigators and ethics officers were being trained to carry out the work.

Q: So a lot of this effort was standing up these two institutes to create more transparency in the system, the auditor system and the inspector general's office?

ISRALOW: There were three institutes. One was reconstituted, and that's the Board of Supreme Audit. It had existed before the liberation. Two other institutions were created [from scratch: the Commission on Public Integrity] and the system of inspector generals. There were a lot of inspector generals created, some ministries had up to 100. They answered to the minister. Their job was to investigate, inspect, and make recommendations about internal criminal or administrative infractions.

The whole purpose of all of these institutes, of course, is to promote accountability and transparency. You said that you had studied anticorruption when you were in graduate school.

I'm sure you're familiar with Bob Wittgard's book where he talks about impunity, monopoly, discretion, and how a concentration of power can lead to corrupt acts that are not exposed or prosecuted. So we're shining a light on the system there.

Q: The Federalist papers idea – ambition to counteract ambition – is that right? So there are these three groups (the Board of Supreme Audit, there's a system of inspectors general, and there's the Commission on Public Integrity). Was there anyone else involved?

ISRALOW: USAID, the agency I work for, also is working on anticorruption but they are doing it through civil society promotion. In societies that are transitioning to democratic regimes... How should I put this?

We work on the demand side and the supply side for transparency and accountability. Sometimes regimes don't really want to reform themselves or make changes because they're getting rich. They're reaping the benefits of illicit enrichment from their control over natural resources, like oil revenue, or [by skimming taxes and tariffs] from customs or port fees. All that sort of stuff. So you have to build pressure on the citizen side to demand more accountability and transparency on the part of their government.

At the same time, you need to help train the government to be able to deliver more transparent and accountable government by doing things like helping establish congressional oversight offices, congressional research services, budget oversight offices, and that sort of thing. That way, more people weigh in and are aware of budgetary decisions on the part of the government.

USAID and other groups are working on the demand side, with civil society, to try to get a critical mass of demand for accountability and transparency. We want to get that going at the same time as some of us are working on the government side to create the institutions that could teach people what to expect from a government and could punish the people that know what the right thing to do is but aren't doing it. That involves doing investigations, teaching, etcetera.

Q: The Commission on Public Integrity wasn't working with civil society?

ISRALOW: The Commission on Public Integrity had a mandate to do civic education, public education, and awareness. So, yes, they were. They were designing and implementing public education programs. I can tell you some of the things we did.

One was we developed a code of conduct for government employees. The CPA order creating the commission says that you have to sign the code of conduct as a condition of employment. So once we had a code of conduct, we had to ask ourselves, "How do we get these to the government employees? Who's going to explain what a conflict of interest is? Who's going to explain why you can't accept a one-time gift worth more than \$20, or accept more than \$50 a year from one source? Who is going to explain to government employees what all these rules and regulations that are in a code of conduct mean?"

We had to think about who was going to administer the code of conduct in these various ministries of government, how they would do it, what tools would they need, and what questions

might come up from employees who have to sign it. So we developed brochures, guidelines, and instruction manuals. We then worked with the new inspector general's office to kick around the idea of having inspectors general serve as the ethics officers, because they are already in the government ministry – and if they receive training in ethics and how to administer a code of conduct – that would be a good dovetailing of the two institutions. That was the plan on the book when I left. I'm not exactly sure what happened.

Another one was financial disclosure. The CPA order called for financial disclosure of the assets of the top echelon of government. We started with the general CPA order, a piece of paper. We had to design financial disclosure forms, figure out what goes in them, and figure out how to protect people who were laying out their assets. At the same time, we had to allow for a freedom-of-information type system where people would know what the assets were of senior leaders in government, what they are when they come out of government, and figure out systems for those officials to make those disclosures. We had to decide if disclosures should be yearly or biyearly, whether it should happen when they enter a job and then leave a job.

There were also questions like: how do you protect them? How do you protect their families? What kind of assets do you want them to list? How will the people asking them to fill out the form know what to ask, what to look for, or what to review? How will the auditors know what to look for? What markers merit further investigation? What will be considered a conflict of interest? What do they do if they find discrepancies in the financial disclosure forms? How do you build a case? Who do you take it too? All that sort of stuff. That's what we were doing.

Q: It was modeled on our own U.S. system of disclosures?

ISRALOW: We used a lot of different models. I relied heavily on the Office of Government Ethics, the U.S. system, to get the structure that we needed in standing up these new government institutions. We also looked at UK models and models of other countries for financial disclosure and for codes of conduct. We worked very closely with the Iraqis to make sure we were culturally sensitive and in keeping within their laws. We reviewed the legal frameworks that were on the book in Iraq to begin with and made sure whatever we were recommending....

What we did in CPA – in the Ministry of Justice – was make recommendations for the commissioner, Judge Radhi. It was up to him to accept, reject, modify, comment, or do whatever he wanted to do. It's an Iraqi process, but we thought it would facilitate his work to a degree if we could help lay out some basic documents and ideas,.

Q: Judge Radhi was the integrity commissioner. Did he have a staff of Iraqis that were working with him and that he was consulting with?

ISRALOW: When I left, he was beginning to interview and hire his staff. I understand that now there are, like, 17 Iraqis to every coalition member at the commission. But my information is a tad outdated. The game plan is for us [foreigners] to go out of business and have the Iraqis take over. That's exactly what's been happening.

Q: How did Judge Radhi get to his post? I've heard of different groups and political parties trying to get their people in place....

ISRALOW: He was a judge on the criminal court. I don't know if he was a chief justice. You can go online and try to pull his CV.

Q: So he wasn't a political concession or anything like that?

ISRALOW: Absolutely not. He's an extraordinarily thoughtful, insightful, and honorable man. He was also a victim of torture under the Saddam regime. He was, as I say, seated in, I think, the criminal court, the high criminal court, but we'd have to check that fact.

Q: Earlier you'd mentioned ethics training and the need to go out and explain to people what the anticorruption guidelines mean in practice. Given the fact they are coming from an authoritarian regime which was, by all accounts, highly corrupt – not to mention those arguments that "corruption" is a Western cultural value that is being thrust onto other societies – how challenging was it to reform that system? I imagine it would be somewhat easier to do it at the macro, national-government level, but when you getting down to the local level to the guy who's taking the extra 10 bucks to stamp your card....

ISRALOW: We'll have to go back and do an evaluation to see how the commission is doing, to see if there are attitudinal changes and if people's perception of corruption levels has changed. One of the things are instituting is a hotline so that citizens can call in complaints or suspicions of corruption. Those complaints will be investigated by the commission's investigators and the Ministry of Interior. One of the challenges is sifting through complaints. When people call in on the hotline, you have to figure out whether it's a corruption case versus a criminal case versus a neighbor being mad a neighbor for stealing their car. You've got to figure out what calls come in and how they will be distributed among the various government entities charged with following up on alleged criminal or administrative matters.

As far as citizen education, citizen awareness, and changing cultural values, I don't know the answer to that. What I do know about the Iraqi culture is that the Code of Hammurabi started there. It was the first country in the world to ever have a system of laws to govern behavior. I think, from the Iraqis that I've interacted with, that they are a very proud culture and that corruption is not historically rooted in Iraq. It is something that came in with the Baathist regime. From what everybody tells me, it used to be a country where corruption was not a problem, where they lived by the rule of law, where they honored and respected the law of the land. I think there's probably a burning desire for people to get back to that place of pride in their hearts. So I don't know if it will be quite the challenge that it's made out to be. We'll see.

Q: You said you were working with fostering civil society groups. That was one of AID's main programs?

ISRALOW: Yes, the USAID mission. They hadn't gotten it underway, but they were in the planning stages. That was a major component of a project that was going to be advertised for bid when I left.

Q: Did you have any interaction with that? Do you know where they were heading? What type of groups they were working with?

ISRALOW: I don't know the answer to that. The USAID mission was represented on the donor committee. They had a number of projects. They also supported BearingPoint, who was setting up an integrated financial management systems in the ministries. That is another key element in any fight against corruption. I'm not sure under what contract that was going forward, but I know that USAID was engaged to some degree on the civil society side (or was [at least] planning to become engaged on the civil society side). [Meanwhile,] BearingPoint was working with ministries on integrated financial management, transparency and accountability of government resources.

Q: In setting up these programs, you mentioned earlier that Ambassador Bremer wrote you guys a check and said, "Make this happen."

ISRALOW: He didn't write us a check; he gave us the equivalent of an executive order and said, "Make this happen". Then he had to go find the money to do it.

Q: Where was that money coming from? Was it the supplemental? Was it DFI funds?

ISRALOW: I think some was DFI and some was supplemental.

Q: You also mentioned there was the Donor Consultative Group. Was this just donor nations who were giving money to the effort?

ISRALOW: The people around the table were the people who were implementing different components of a transparent and accountable government. DFID (the UK's Department for International Development) had had a contract with Adam Smith International, working to some degree on civil service reform. They were at the table. And the policy office at CPA, David Kirk was a Brit who was basically coordinating the Board of Supreme Audit and all the work related to that. They were at the table. We had the Education Ministry at the table because there was a big public education component...

Q: So there were Iraqi institutions represented as well?

ISRALOW: I can only speak about before the transition. The plan certainly was to have Iraqis replace coalition members in these working groups and coordination bodies. I assume that's what's taking place. You don't need us if you've got Judge Radhi at the helm. He is coordinating with his counterparts in the other institutions and with the ministries.

Q: I know there were a lot of state-owned enterprises in the former regime: the "para-statals". Were those being maintained and were you also implementing anticorruption efforts there? That seems like it would be an especially tricky field given. For example, there was Kimadia – the state-run pharmaceuticals company – which would apparently take the drugs from Oil for Food, sell them on the black-market, and pocket the change.

ISRALOW: That's a good question that I don't have an answer to. I'm not the right person to speak to that.

What I can say is that I think Judge Radhi and his advisors would probably want to focus and concentrate their initial efforts on various sectors and ministries. [Rooting out corruption in parastatals] would be a decision that he would make. He's a very smart man. I don't think he can begin to work in every single ministry and every single enterprise. My understanding is that he'll focus his attention on two or three ministries at first and then expand from there.

Q: So the Commission on Public Integrity is mainly focused on actively reforming systems within the national government?

ISRALOW: They're focused on educating people about the perils of corruption and what it costs a country, both in terms of lost revenue (which would ordinarily go into the budget and be used for development or other purposes) and lost private sector investment (companies not wanting to do business with Iraq because corruption makes the costs too high). When a country does not attract the good investors, you leave yourself open to mafias and criminal gangs. You become a magnet for very unsavory businesses and characters because you're basically running an illegitimate regime.

The purpose of the commission is to make the public aware of the costs of corruption, to try and develop and institute systems that teach people about it, like the code of conduct. You want people to know that there are certain expectations of you, that you can't behave however you want to behave without consequence. By giving a government employee a code of conduct, they're putting their honor on the line when they sign it. They [have now agreed to a set of] guidelines about what [behavior] is and is not acceptable.

The ethics officer (or whoever administers the code of conduct) makes sure that they understand every single point in a code of conduct, like, "I won't take a gift," "I won't give favors," "I won't hire my relatives under direct line supervision," and "I'll have open competition processes for procurement." People understand that they have rules that they have to live by if they want to keep their job. If they don't live by those rules, somebody is going to find out and they're going to have to pay the price, either through criminal charges, administrative sanctions, or [some other type of] punishment. That's what the commission does.

Q: Your effort really was twofold then. The Commission on Public Integrity was making people, not just civil servants but also the Iraqi public in general, aware of the values that they should now expect of public officials.

ISRALOW: Absolutely.

Q: You also had alternate institutions, such as the Board of Supreme Auditors and the various offices of inspector generals, acting as the sword which was making sure that these values were actually being followed and that people respected them; trying to normalize them...

ISRALOW: I don't know if I'd call them the sword, because they also have education and awareness functions also.

Q: Such as the ethics officers?

ISRALOW: Well, I don't even know if they did create ethics officers. The game plan was to have ethics officers at the different ministries administering the codes of conduct and financial disclosure, as well as being available for people who work for the government who have ethical dilemmas that they want guidance on. I have no idea if the inspectors general actually fulfill that function, if another system was devised to do it, or if it was administered from another office within a different ministry.

What I'm trying to think of is my friend Chris King, who is one of the people working on the public education side for the commission, who used the [Islamic] serenity prayer and adapted it to a corruption framework. I can't remember exactly what it was.

Q: That's creative.

ISRALOW: Yes, he was very, very creative. It was, "Teach the people the difference between right and wrong, give them an opportunity to do the right thing, and for people who choose wrongly, punish them." It was really cute. I can't remember the exact words; I should send him an email and get them, or you can send him an email and get them. But that's basically what we did.

That is the purpose of the commission, to try and teach the people the difference between right and wrong. For people who choose right, that's great, let them know what right is. For people who choose wrongly, they're going to get investigated and they're going to get prosecuted and they're going to be punished. That's what the commission does.

Q: What were the challenges you faced in implementing these anticorruption reforms? Did you find a lot of corrupt bureaucrats who were still operating under the old rules?

ISRALOW: I think one of the difficulties with this interview is you're looking to talk about corruption at large in government. But what I was doing was building a system – or laying the foundation of a system – that the Iraqis will continue to build on. I was not out there prosecuting people or investigating cases or doing any of that, because it was still very early on in the process. We got three or four pieces of paper from the CPA order that Ambassador Bremer signed and said, "Okay, do this." So we had a pile of clay and were asked to sculpt it into something that the Iraqis, once the government took over and once the new commissioner was named, could use if they wanted to. If they didn't want to, that was fine too.

So what we were trying to do was create the institutional foundation of a commission that never existed before in the history of the country. We were thinking through what kind of tracking systems were needed for cases or what kind of coordination needed to take place between commission investigators and prosecutors.

It's a Napoleonic system in the judiciary, so they have investigative judges there. Where do we fit? What's our relationship with the courts? What's our relationship with cases that are investigated? What happens with recommendations made by inspectors general? There's a link between what the inspector general of each ministry does and the Commission on Public Integrity; well, what is that link and how does it operationalize itself in real life?

When I was there, we were figuring out how the systems would work and how they would work together. I was one pillar, transparency and prevention, developing forms and systems. There were three other pillars: public education and outreach, administration, and investigation. I did not engage in the investigation side, so I don't know if they actually went after people. I don't know if they're developing cases or have developed cases, if the cases went to the courts, if the courts are prosecuting them and adjudicating them. I just don't know that.

Q: All right, that helps a little bit.

ISRALOW: I worked under the leadership of Lieutenant Colonel Charles Grinnell. Right before I left, Judge Radhi was named the commissioner, appointed the commissioner, of the Commission on Public Integrity and, of course, he took the lead once he became the commissioner.

Q: I imagine that one of the long-term goals was to put an Iraqi at the head of all these four pillars. Was that process underway when you were there?

ISRALOW: It was Judge Radhi's job to hire his staff.

Q: And that's what he was looking at?

ISRALOW: Certainly our goal was to have all of us replaced with Iraqis. Absolutely and positively. We wanted to train Iraqis to carry out certain functions.

[END SIDE]

Q: Why don't we run through your experience chronologically. You started off with an order from Ambassador Bremer saying, "We need set up this institution." What's the first plan of action? You said you were thinking through systems.

ISRALOW: Lieutenant Colonel Chuck Grinnell got the order, got the order from Ambassador Bremer to "Implement this order." I said, "Chuck, I'm bored. I don't have anything to do. I'll come work with you and help you stand up the anticorruption commission." He said, "Fine, come on along. Can you start today?" I said, "Sure." He said, "But we don't have a desk or computer." I said, "Fine. I'll just sit in Baghdad Central until they kick me out."

Q: You didn't get the "ministry in the box" kit?

ISRALOW: I didn't get the "ministry in the box" kit. I sat in Baghdad Central a couple of months until they kicked me out. I sat there at my little computer and I said, "What am I going

to do?" He said, "Well, let's take a look at what the structure of the commission should look like." So Chip Borman, who was initially the head of personnel for all of CPA, came and worked with us on the commission. Chuck and I sat down and said, "Well, let's see. We need somebody to do education and outreach, and we need an investigative arm, and we need somebody to set up the systems of government...."

Q: Was this just brainstorming or was there a model you were looking at?

ISRALLOW: No, we were just brainstorming. We figured out what the organizational structure would look like, what kind of positions we needed, and what kind of technical experts/advice we needed. I needed forensic auditor, for example. I said, "I think I need some people who have experience in forensic auditing. We need people to train Iraqis in modern audit practices. We need to be able to establish some audit standards." We needed to do all these kinds of things, and we needed to work on the civil society side and have outreach and education as well. It was all in Bremer's order, we knew that, but we thought, "How are we going to structure this?"

Q: Were you also working with general guidelines provided by the IGC?

ISRALLOW: Actually, from what Colonel Grinnell tells me, he met with the Governing Council at their request and worked through what they'd like to see in an anticorruption commission, what they'd like to see the country do in that area.

Q: So that was the genesis then. It wasn't just you and the colonel batting around ideas?

ISRALLOW: No, no, no. I didn't come in at the ground floor of the process. I came in a little later. There was already a CPA order signed (I had seen draft copies of it and commented on draft copies of it). The initial work was carried out by folks in the Ministry of Justice including Colonel Grinnell. I came in after the order was signed and worked with them full time on that. We looked at things like staffing patterns. It wasn't quite as loose as I described it. We had a framework, we had a law, and we had to implement the law. We were consequently looking at how to best do that, what kind of personnel we would need, what kind of support we would need, what kind of systems we would need, etcetera.

Q: Has this ever been tried before? Did you do this in your experiences in Latin America and Africa, or was it a brand new thing to up and make a commission like this?

ISRALLOW: No, it's not a new thing to set up. I've worked in lots of countries that wanted anticorruption commissions, because they know they have to do something to combat corruption for any number of reasons. One possible reason is attracting donor funds.

Q: Like the millennium challenge account?

ISRALLOW: Actually, you know, a big incentive is you do something about corruption and you get more money coming into your country. So conventional wisdom has it that countries set up anticorruption commissions left and right, but they're basically fig-leaf and don't have much authority, don't have much bite, and don't really accomplish that much.

People whom I know who've worked on corruption look at different approaches, like supporting the business community, auditing associations, accounting associations, and trying to improve integrative financial management. There's a guy named Jim Westberry who's dedicated his whole entire life to combating corruption in Latin America. He and the donors have worked together to stand up integrative financial management systems in every single country in Latin American except two, Cuba and Chile. Chile's okay and Cuba's a communist country, so there you go.

Generally speaking, anticorruption commissions don't work. The one in Hong Kong is the model that does work. There might be some other emerging models that I don't know about because I don't spend full time on anticorruption anymore like I did 10 years ago. What we did know was that for a commission to be effective, it needs to be independent and it also needs to have some kind of investigative authority, subpoena authority. It needs to have teeth.

Q: Some way to prosecute somebody if they break the law?

ISRALOW: Well, this commission doesn't have prosecutorial authority but it does have investigative authority. It would build a case and turn it over to the prosecutor, to the judicial system.

Q: You had also mentioned working groups at some point.

ISRALOW: That was my initiative. Based on the Latin American model that my friend (and a mentor) Jim Westberry started, I thought we needed to... There were three CPA orders. They all had something to do with transparency and accountability. They all had something to do with corruption, and there were different players out there working on different parts: a holistic approach to tackling corruption in the country. But the holistic approach had not yet been described as a strategy; the different players were not formally coordinating. So I suggested – and everybody agreed – to pull together in a more formal venue. So we formed a consultative committee where all the different players in anticorruption came together and shared information, discussed linkages, discussed problems, figured out solutions, and that sort of thing.

Q: That was the Donor Consultative Group?

ISRALOW: That was the Donor Consultative Group that I initiated and coordinated and Colonel Grinnell led for the Commission on Public Integrity. Dr. Charles Johnson led for the IG system, and David Kirk led for the Board of Supreme Audit (I also just got an email from a friend of mine in Iraq who has set up another coordinating body). The game plan for this body was that we would turn it over to Iraqis and they would take over the different roles as different directors came on line.

Q: Was the Donor Consultative Group meeting a one-time shot aimed at feeling everything out, or was it something that's become a regular occurrence?

ISRALOW: We met once a week and there were lots and lots of side meetings throughout the week. It was a coordinating committee.

Q: So it wasn't so much a planning committee saying, "This is what we're going to do down the line," as it was a coordinating committee saying, "This is what we need to do now. What are you doing over here?"

ISRALOW: It was both. What I had said was, "You know, there's a lot of players in this field. We're not talking to each other. I'm not even sure what some of these guys are doing or what they are supposed to be doing. I don't want to do all this work and have it duplicated."

So I said, "Let's get together every single week, pull in all the players, and we will talk about what needs to be done, what hasn't been done, what each of us is doing, where areas complement each other, and where there are areas of dissension." We talked about things like, "Okay, how do we train these auditors? How do you train the inspectors general? What kind of institution is going to be there for sustaining the momentum?" That was something that was forwarded by Dr. Charles Johnson. Then we also liaised with backstops in Washington and the other capitals. I think the consultative group is still on line.

Q: So they pretty much handled coordination difficulties. Was that organization created because of coordination difficulties you encountered or just because it was an obvious need?

ISRALOW: It was created because there was an obvious need. We each had our own orders. We were each trying to set up systems of government, create brand new institutions that nobody had any experience with before, and we thought, you know, you just need to sit down and talk to each other in some kind of organized way, so we did.

Q: Was the committee also where issues and approaches were hashed out, where the strategy was formulated?

ISRALOW: Yes. We said, "We need the strategy. We don't have the strategy." At one point someone asked, "Has anybody briefed the senior advisors and the ministers about all this?" [The answer was "No",] so we put together a Power Point, and at one of Ambassador Bremer's senior-level meetings, our [anticorruption] troika went in and gave a presentation for the ministers and deputy ministers.

Q: The troika being the integrity commission, the IGs, and the auditors?

ISRALOW: Yes. It was Colonel Grinnell's job to coordinate the whole thing, to help interview and work with the [public integrity] commissioner, help him however he needs help, and insure his safety. That was a very big issue. Making sure all the four pillars within the commission, like me and my counterparts, were working together was another issue. [Colonel Grinnell] was the leader.

Q: He was the equivalent of a senior advisor to the ministries, except in this case it was the commission?

ISRALOW: Chuck's boss was the senior advisor to the Ministry of Justice. Anticorruption was one of the things in there. Prison systems were also there. Training judges was there, judicial training, prosecutorial training, and legal defense training. All of that fell underneath his banner. Chuck was the lead for the anticorruption stuff, and I worked under him.

Q: But it was the CPA orders that set your goals and objectives?

ISRALOW: Those were laws.

Q: Okay, so they were obviously more than goals and objectives. They were things that definitely had to be achieved. Did you work with Justice devising administrative law at all, incorporating transparency initiative into law?

ISRALOW: No, that was something different.

Q: Okay, so the law came to you as forming...?

ISRALOW: If you go on the CPA website, you'll see there's a number of CPA orders, and those are basically laws. Some of those orders have to do with anticorruption and those are the ones we implemented. The TAL was something else.

Q: In developing your strategy, were you working on the fly?

ISRALOW: On the fly?

Q: You knew where you were going, but you were discussing things and saying, "Maybe we're not seeing everything here."

ISRALOW: I basically said, "Let me just lay out a strategy where we take a look." It's really a comparative analysis of what the three laws said and what the relationships were between the three institutions, the Board of Supreme Audit—that's like the GAO—the Inspectors General, and the Commission for Public Integrity.

Q: Who was the board attached to? Were they attached to a legislative body? Well, there's obviously no legislative body yet, but was that the idea?

ISRALOW: They're free. I don't know. I think they're an independent unit also.

Q: Okay, some other more general comments: How did security affect your ability to get your job done? How do you think that affected the ability for the commission to do its job?

ISRALOW: I worked for an Army colonel. I didn't have a problem with security.

Q: If you were mostly in the Green Zone, I imagine security wasn't....

ISRALOW: I was in the Green Zone and sitting in the Bureau of Prisons, so we had our own shooters, our own guns.

Q: Did it affect your planning, like, "Well, we need to train these officers but we don't want..."?

ISRALOW: All that started after I left. I know that Chuck Grinnell was extremely concerned, as was Judge Radhi, about his security. They work very hard to insure that he has security, but that's all I want to say about that. I don't want to say anything else about that.

Q: The systems that you put in place for transparency, what were the principal systems that you were trying to use? You mentioned integrated financial systems.

ISRALOW: That's not something the commission did; that's something that's going on in the country with funding from USAID. I'm a USAID employee, but I wasn't working for USAID when I was there. The work with BearingPoint and the financial system was one of the things that they were funding.

Q: That's the integrative system?

ISRALOW: That's the integrative financial management system.

Q: What were the major problems or challenges, if any, that you encountered. For example, if you're doing publications, you have to find somebody who speaks Arabic and then you have to find a printing press.

ISRALOW: No, we had wonderful translators working in the palace, just topnotch Iraqi people who put their life on the line every single day they come to work. They helped explain nuances with us, they worked with us. We had some attorneys who were working as translators.

Q: So they could provide the legalese and all that.

ISRALOW: They're wonderful. They're heroes, heroines and heroes.

Q: Do you have any other things that pop into mind, outlooks, any successes, notable successes, notable problems, or lessons learned? What would you do if you were going to go in again and do it all over again?

ISRALOW: I think poor Colonel Grinnell is the one that has the lessons learned. He's such a leader. He's just a marvelous, marvelous leader, and he had any number of barriers to overcome, and he just charged and charged ahead. You have to find funding, you have to find people to come in. We were waiting a long time for funds to be released, for the investigative trainers to come in, and they were still waiting when I left country four, five months after all this began.

Q: Were those trainers and foreign nationals or contractors?

ISRALOW: Someone had said that they were going to provide support to train investigators. See, I don't want to get into this because I don't know the details. Well, I do know the details, but it's not my lane. We used to say, "Stay in your lane, stay in your lane, stay in your lane." My lane was the transparency and prevention. My lane expanded some to coordinate what everybody else was doing or bring us together so we could coordinate.

Q: That's fair enough.

ISRALOW: So those were my two lanes. I'm not going into any other lanes.

Q: Well, my last question on the coordination is: How are these things mediated? Do you just have a big round table and everybody's shouting out ideas? You must have had somebody in charge of the meetings.

ISRALOW: Early on when we had our orders and were beginning to stand up our institutions – not our institutions, the Iraqi institutions – Colonel Grinnell pretty much led it. We had an agenda. We're all adults. I did an agenda, we typed minutes of the meetings and circulated the minutes to Washington and people around the palace. We gave them to Judge Radhi [when he came onboard] so he could see the history of what we had done before he got there. It's common practice. You could call it an interagency working group, you could call it a consultative group, you could call it a principals group, you can call it whatever you want. It was just a way for people working on the same issue to share ideas and coordinate what they are doing. I found it to be very useful.

In terms of security, I didn't have any. I was perfectly happy working in the palace. The only problem was you had to wait for somebody to get up off a computer and then get the computer, because we didn't have enough chairs. It was musical chairs a lot of the time.

Q: That sounds like my office.

ISRALOW: That was a pain in the neck. I used to work nights because I could get a computer at night a lot easier than I could get a computer in the morning or the afternoon.

We had a good team. We brought on other people, some of whom had government experience. One of the things is... I come from a bureaucracy and I'm quite used to working for government and I'm used to government systems, processes, and that sort of stuff. I think that might have been helpful [to me], because not everybody has worked for the State Department, USAID, Treasury, or something like that.

Q: It's especially helpful if you're trying to get funding and you actually understand how long it takes.

ISRALOW: That was Chuck's problem! He's great and he could do anything. It was fun. It's really neat to have a clean slate. You have an opportunity to be as creative as you possibly can. I had virtual help back here by our General Counsel's office, who were just wonderful. We had a technical office—we used to call it Democracy Center; now it's "Dacha Dichi"—who has an

anticorruption specialist on staff named Jerry O'Brien. He was absolutely superb. He helped me every step of the way. I would get an idea or develop a document, and I'd run it by Jerry and by the lawyers up in the General Counsel's office and they would give me very constructive feedback.

Q: What kind of documents are these?

ISRALLOW: The code of conduct, the guidebooks, the financial disclosure, the hotline, you know, public information. PowerPoints. All kinds of stuff. They were really helpful and nice and provided very constructive feedback. Plus it was fun because we had, like, four months to stand up an institution of government. We were working very hard as a team, working around the clock when we were on the ground. There was a lot of activity and a lot of energy.

Anticorruption is something that's very important to a sustainable democracy. I'm totally committed to working on anticorruption, even though I tend to do more on conflict because I'm the head of the conflict division for Africa, so I'm kind of busy on that. It was great, it was fun. It was a good experience.

Q: Good. That was very interesting stuff.

ISRALLOW: I hope we'll leave a legacy. I hope there's a lasting institution there that really is effective and does some things in the country.

Q: I like the model that you guys used where you were having lots of interaction. People have commented how the previous regime was all stovepipes and there's absolutely no cross-fertilization. If you wanted to order a \$5 hammer, you went to the minister of your ministry to get it approved because you didn't want to risk doing something on your own initiative. In my opinion the best way to tackle corruption is have people talking to each other. So it's nice to see that you guys were doing that, that you built that into the system.

ISRALLOW: Thank you very much.

Q: You're welcome. I guess my only other question would be: The Iraqis you were working with, everybody I've ever talked to has said that they're very quick to learn, very excited about the new systems, and a smart, intelligent, hard-working people. Was this the case that you found?

ISRALLOW: Absolutely.

Q: And they were picking up these new ideas?

ISRALLOW: I left before we started training Iraqis to take our place, so I can't say that. But the people whom I worked with in the palace were wonderful; the translators, everybody. It was just incredible.

Q: Do you have any last thoughts, comments?

ISRALOW: Thank you.

Q: Thank you, Sharon.

ISRALOW: I appreciate your coming over.

[END INTERVIEW]