



**The Republic of South Sudan
Office of the President
Press Secretary's Office**

A Response to The Sentry Report on
“The Taking of South Sudan:
The Tycoons, Brokers, and Multinational Corporations Complicit
in Hijacking the World’s Newest State”

The Office of the President

Juba, South Sudan

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Foreword



South Sudan is a country so misunderstood by many in the region and internationally. Although South Sudan came to be what it is by virtue of the resilience of its great people, anything about its positive potentials is given less attention by those who have less knowledge of it. Of course, we are part of the blame – given that our hard-won independence did not last long before we found ourselves seriously divided. The 2013 war that has almost ravaged our social fabrics has given right to those who do not know much about us. These people and their organizations now speak for us, assuming responsibility of telling the world about our social and political problems. The local and international media buzzes with their news and analyses about our supposedly failing society.

Nonetheless, their analyses and news are not often accurate. We are not a failed society. Instead, we are a people in transition, more like other countries before us. In fact, we have achieved a lot in a very short period of time, compared to a number of other countries that gained independence before us. Our government, although limited in capacity, is functional, delivering the basic of services. Millions died to create a country they call their own. Yet, many people around the world only see the ills of the recent war, which resulted from power struggle. We are also seen as the most corrupt in the world, next to Somalia. With nothing or limited real information about corruption cases facing South Sudan, some members of the international community have had the liberty of mischaracterizing the South Sudanese experience with governance and accountability. Granted, South Sudan, due to weak institutions, which is expected of an emerging state, suffers corruption. But this vice is not left unchecked. The Government, amid managing an overwhelming political crisis, is undertaking important strides to strengthen its institutions of accountability and transparency, with the Procurement Bill recently passed by the National Parliament.

These efforts and achievements notwithstanding, organizations such as The Sentry find solace in exaggerating South Sudan's political crisis and its ills. In the preceding periods, however, The Sentry played an exceedingly significant role in shedding light on border conflicts with Sudan, especially in the Abyei region. This changed soon after independence. The Sentry started to undermine peace processes in the country. It is now leading a smear campaign against South Sudan in the name of corruption, publishing phony evidence into this phenomenon. It is now a common feeling among the South Sudanese leadership to look at The Sentry as more of a machine for distraction. Given example,

researchers at The Sentry now tend to target the President and his Family, even as little reason to do so exists. Perhaps they think their work becomes more relevant and interesting by linking the members of the First Family to corruption that they struggle to factually ascertain.

The Sentry's recent study faults the First Family and its associates with establishing extractive and destructive economic ventures. I am happy to let the South Sudanese and the world know that this Response sheds a necessary light on these accusations, providing alternative facts where necessary. As expected, the Research Team found many of The Sentry's allegations erroneous. For example, the association between the exploration license Fortune Minerals received and atrocities committed in Mundri, Western Equatoria, could not be ascertained. The First Lady, Mary Ayen Mayardit, never held shares in Gemtel Limited. Mrs. Adut Salva does not run some of the companies The Sentry accuses her of owning. At least 50% of the companies The Sentry has profiled are not active. Finally, The Sentry struggled to provide traceable research references. In fact, several irrelevant references were forced into the story in a desperate attempt to incite the South Sudanese public against the First Family.

These insights could have not been generated without a team of seasoned researchers. I am very grateful to the Research Team for producing a Response that tells the true story about corruption and human rights conditions in our country. Their painstaking research and robust coordination with the Government staff, both at the Presidency and at other institutions, produced an incredibly informative document. Hopefully, the world will pay attention to our own voice. I also thank colleagues at the Presidency and accountability institutions for supporting the Study, giving the researchers necessary support. Lastly, this Study would have not been possible if it were not for the firm support of His Excellency the President, General Salva Kiir Mayardit, who personally monitored the process to the end.

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Press Secretary
The Office of the President

Executive Summary

The Office of the President of the Republic of South Sudan greatly appreciates the advocacy work of The Sentry around the world. In the past, the Government of the Republic of South Sudan benefited significantly from The Sentry's security surveillance in Abyei, keeping the state and central governments and the general public more informed about the border conflicts with the Sudan, an initiative that dates back to 2012. As of recent, however, some of The Sentry's research exercises in South Sudan, particularly on allegations about corruption and human rights violations, have demonstrated serious scientific deficits, essentially fomenting local, regional, and international political hostility towards South Sudan's leaders. Instead of being a force for good, including fostering a genuine fight against any perceived economic and political vices, The Sentry is increasingly choosing the opposite path: propagating falsehood and hurting the young nation with such warped stratagem. Two of its recent publications, aimed at unearthing corruption and its link to political violence in South Sudan, for example, have produced a phony proof into the many claims they make. Rather, The Sentry arrogates that stabilizing South Sudan politically demands, as a prime remedy, exposing the kleptocratic network as well as subjecting this perceived destructive web of extractors to an internationally administered financial 'coercion.' This proposition ignores the prevailing, widely documented political drivers that have culminated in the cycle of vicious wars in the Republic of South Sudan.

This Response provides a contrary perspective into The Sentry's insights presented in its recent publication. Its investigation into The Sentry's allegations offers unique features into the real experiences of the South Sudanese with corruption and political instability, and it ends with the Government's resolve to bring about peace and stability in the country. Providing an alternative evidence via illustrative examples, the Response demonstrates how The Sentry's investigative research is inadequate to be utilized as a basis for constructing measured policies that foster peace and security, ensure political stability, and sustain shared prosperity in South Sudan.

Throughout this Response, the Government takes a holistic approach, agreeing with The Sentry where pertinent or when truth holds, and disagreeing with it and pointing out falsehood where relevant. A word about these broader issues and superficiality of The Sentry's assertions is in order.

The Sentry offers a laundry list of allegations as evidence into its claims, including:

- Accusing a multinational oil consortium (DAR Petroleum) of fueling war by financing militia.
- Presenting accounts of public money embezzlement, for example, an unsanctioned public spending on Gen. Malek Reuben's son education, and Hon. Ezekiel Gatkuoth's lodging spending, among others.
- Accusing local businesses of wrongdoing through extractive entrepreneurial engagements.

- Accusing regional and international businesses of fueling war by trading with South Sudanese profiteers.
- Accusing the First Family of engaging in corruption, with unsubstantiated claims about owning or holding major shares in corporations, and
- Inflating its claim by shining a spotlight on companies that do not exist or registered a decade ago but ceased to operate.

Review of Businesses

- There is evidence suggesting that the accused businesses do exist in the South Sudan's business registry at the Ministry of Justice. The Government confirms that they all have a legal standing according to the legal documents reviewed, yet none of the businesses referenced by The Sentry is engaged in an enterprise that the nation's laws do not sanction.
- Nevertheless, many of these businesses have since collapsed, hence they are not involved in the activities The Sentry alleges as damaging to the country (e.g., Gemtel, Meta International, and Sekoko).
- A number of shareholders accused of wrongdoings have either fewer shares or have completely sold them off, meaning they are no longer involved in the businesses for which they are accused, and
- In most cases, some members from the First Family, presented as principal agents, are not the majority shareholders in some of the alleged ventures.

Unearthing facts related to the alleged malpractices by businesses in South Sudan, here is a list with illustrative examples that undercut The Sentry's claims:

- Since incorporated in April 2016, Sekoko Power (SS) Ltd never undertook a single business activity, eventually collapsing the same year
- Conex Real State Ltd is reportedly owned by Mrs. Adut Salva. Available evidence indicates that Mrs. Adut Salva relinquished her shares in the said company prior to The Sentry Report.
- The Report links Gemtel to the First Lady, Mary Ayen Mayardit. The evidence shows that Gemtel Limited was incorporated in South Sudan in November 2006, with Gemtel (Uganda) Limited holding 95 percent of the shares and Mr. Atem M. Lual (unrelated to the First Family), a South Sudanese, holding the remaining 5 percent of the shares.
- The same Report claims that "Fortune Minerals is among dozens of companies controlled by President Kiir's immediate family". However, available evidence shows that Ms. Winnie Salva Kiir Mayardit owns only 11 percent of the shares, compared to the Chinese who hold 69 percent, making her a minority shareholder. Further, the company never took off since obtaining the licenses, a revelation that underscores the fact that Fortune Minerals has never been involved in the alleged pillaging or plundering of South Sudan.

Zeroing in on The Sentry's Evidence Sources

- There is no evidence suggesting that the multinational oil consortium has fueled war in South Sudan.
- Although the allegations could prove useful for future investigations, appreciating The Sentry for enabling a point of departure, the authenticity of the embezzlement could not be confirmed or linked to war.
- Confusing correlation with causation can be misleading and devoid of any meaningful substantiation. The Sentry should know better, accentuating that receiving a business license does not by default result in committing atrocities, and
- A number of sources (both links and citations) could not be verified. In a number of cases, the links The Sentry provides as endnotes are either broken or completely inactive.

Here are a few more examples, again illustrating the unreliability of these sources as evidence cited by The Sentry:

- Endnote 4 alleges that a large multinational oil consortium is fueling war in South Sudan by funding militia groups. The evidence is drawn from a UN report. The source The Sentry uses takes a reader to the UN's condemnation of renewed violence in Makalal, released on May 18, 2015. The referenced material has absolutely nothing to do with the involvement of the multinational oil companies or militia groups in the war. In this news report, the United Nations Security Council (UNSC) actually condemned the Sudan People's Liberation Army in Opposition (SPLA-IO) for attacking Malakal on May 15, 2015, threatening sanctions against the main warring parties for failing to observe the then ceasefire obligation. Second, the link was poorly embedded, perhaps deliberately to make the story less traceable
- Endnotes 5, 6, 7, & 8 supposedly expose the former Minister of Petroleum, Hon. Ezekiel Lol Gatkuoth, for spending nearly \$700,000 on himself at a local hotel, accuse a US sanctioned SSPDF General, Malek Reuben Riak, of spending community funds on his son's education, and criticize Dar Petroleum for overlooking hazardous environmental pollution in the oil producing communities. While corruption of any kind is unacceptable, with the Government planning to investigate the two accounts separately, none of these allegations directly sticks with The Sentry's thesis that multinational oil companies are underwriting deadly militia groups in South Sudan. Accordingly, the news The Sentry misinterpreted as proof of transgression actually credits South Sudan's Government for admitting "that the oil production was a threat to local populations"
- Endnote 33 accuses Dar Petroleum of involvement in the conflict using evidence from Small Arms Survey. It draws from Joshua Craze, "The Conflict in Upper Nile State" (Geneva: Small Arms Survey, March 2016). While the cited source discusses Padang's conflict with the Shilluk over control of Malakal and the oilfields, it does

not indicate that Dar Petroleum was involved in bankrolling it in any way, shape, or form.

- Endnotes 46, 47, 48, 49 allege the use of local militias by the government to destabilize communities. The AP news report The Sentry enlists only references oil resumption in the western Upper Nile region (former Unity State). It does not, nonetheless, examine the government's use of militia to attack civilians or defend oilfields, and
- Endnotes 111, 112, 113, & 114 contend that the issuance of a mining license to Fortune Minerals 6 weeks prior in 2016 resulted in violence, mass rapes, and population displacement in Mundri, West Equatoria. Drawing from the Armed Conflict Location Event Data (ACLED) records The Sentry partly relies upon, this suggests the company must have obtained the license by the first week of August 2016. A detailed investigation reveals the following:
 - First, the AP news report cited does not single out the Government's attacks in Mundri, and
 - Second, available evidence shows that the relationship between conflict events in Mundri and the Fortune Minerals' acquisition of operational license in the same location is only coincidental. To be sure, The Sentry based its conclusion on the below event as reported in the ACLED database: "On October 18, 2016, suspected SPLA soldiers killed at least four people, including the diocese priest, in Greater Mundri, Mundri East and Medwu, as well as looted and destroyed several primary health care centers in Bari, Medwu, Bangolo, Kotobi, and Karika in Mundri West counties."

In this respect, this analysis reveals the following:

- i) Between August and December 2016, Fortune Minerals obtained 5 licenses (2 in Eastern Equatoria, 1 in Central Equatoria, 1 in Western Bahr el Ghazal, and 1 in Western Equatoria)
- ii) Although licensed, Fortune Minerals never undertook operation in any of the 5 locations, with 2 of its licenses already revoked (and one under way) due to inactivity and inability to pay the concessional rental fees, and
- iii) Fortune Minerals was licensed on the 18 of August, 8 weeks (not 6 weeks as The Sentry purports) before the alleged atrocities were committed in Mundri.

Other facts worth highlighting about the same area include:

- iv) In 2016, there were 12 episodes of violence and 36 deaths in Mundri
- v) Between January 2014 and November 2015, however, the same location suffered 23 conflict events and 214 deaths. On May 27, 2015 alone, 60 civilians were killed in Mundri. The Sentry makes no mention of all these facts, and
- vi) According to ACLED, "On October 17, 2016, SPLA-IO forces reportedly attacked Kadibi in Amadi, Mundri West, killing 11 people. Government forces

repulsed them. A number of farms in the area were destroyed in the clashes.” The Sentry makes no mention of this deadly attack either, confirming that the advocacy institution is indubitably partial.

- Endnote 114 cites AP news on rape in Mundri. It says: Rape reaches ‘epic proportions’ in South Sudan’s civil war. One of the main excerpts from the news reads: “After months of being raped by her rebel captors in the middle of South Sudan’s civil war, the young woman became pregnant.”
 - i. First, this story refers to a woman who was kidnapped and raped by the rebel MTN.
 - ii. Second, the story came out in 2017, not 6 weeks after Fortune Minerals received the operational license as The Sentry claims, and
 - iii. Third, the story, looking at the bigger picture of war, accuses both the opposition and the government forces of violence and ensuing atrocities. The Sentry blames the Government instead.

In summary, in several cases, The Sentry offers unverifiable (it seems to have conscripted) sources, forcing them into the story. Various sources either do not cohere with the story, do not exist, or have a link that is not easily traceable.

1 Introduction

On September 19, 2019, The Sentry, a subsidiary of the Enough Project, a human rights advocacy group based in Washington, DC, released a damning report on alleged economic and war crimes in South Sudan. This is one of the many documents The Sentry has released on South Sudan since 2016. The Sentry first published a report that accused numerous South Sudanese political and military leaders of using war to enrich themselves and their families. The Sentry, as of recent, has enlisted a rhetoric that seems to directly or indirectly attack the country in the name of corruption and human rights abuses. The Report under this assessment does exactly just that. What is more is that it does this using very shaky evidence, as the organization at times draws from social media, citing information that is difficult to verify. In its 2016 Report, The Sentry used sensational Facebook poses by one Lawrence Lual Malong as evidence of corruption¹. Drawing from this experience, The Sentry’s methodological frameworks toward building a case that purports to unearth graft, are shockingly unorthodox, hence readily questionable in yielding credible knowledge into these issues.

Evidently, South Sudan’s Western friends feel morally burdened by the ongoing, catastrophic instability in the country. The Government gets that. The Government submits that many of these allies participated in the creation of the infant state, giving them an

¹ On social media, Mr. Lual has posted numerous photos of himself in the first-class section of commercial aircraft. Most of these photos are accompanied by the caption, “Smart boy for life enjoying first class.” Note: Lual is not General Paul Malong Awan Anei’s relative.

obligation to help the country stabilize and recover from a multi-layered carnage. Nonetheless, the work of some of these individuals or the organizations they run, perhaps inadvertently, hurts the country more. The prevailing campaigns to discredit the military and political leaders, particularly at the time of peace, pose far-reaching, negative consequences for the people of South Sudan. In particular, these spiteful campaigns distract the President, an R-ARCSS principal, from devoting his full attention to the stabilization and recovery agenda in an obviously troubled country.

While accountability for war crimes or mismanagement of common resources remains material and central to the long-term development of South Sudan, as outlined in the Agreement, little gets achieved by antagonizing the very implementing partners. Hence, what the report and its recommendations mean for the people of South Sudan, especially as the country prepares for full implementation of the R-ARCSS, is at the heart of the present Response.

This Response investigates these allegations, generating facts and providing direction for policy. Thus, the emphasis is on the existence and registration of businesses accused of economically profiting from human rights violations. It also attempts to verify various materials The Sentry uses to substantiate its claims. Most specifically, the analysis proceeds in sections as follows. Section 2 Offers a review of the Sentry Report; Section 3 establishes facts, corroborates, or demystifies the allegations by generating information from various sources, including government departments, businesses, and relevant parties; Section 4 reviews the status of the alleged companies, including those involving the First Family and clarify where necessary, the legal standing of these businesses; Section 5 profiles The Sentry, Enough Project, and their Executives to have a nuanced understanding into their fundamental objectives or intentions; Section 6 highlights the government's recent efforts and the President's manifested aspirations to restore peace and improve livelihoods in South Sudan, and finally, Section 7 outlines policy action-oriented pointers to build a better image for the Government of South Sudan in the US, the region, and beyond.

2 Review of The Sentry Report

The first part of this section highlights the allegations, as well as the policy remedies The Sentry advances in tackling them. The second part addresses the implications of this work to peace processes in South Sudan. Supplementary information from academic and policy studies is also referenced.

The Report accuses South Sudan's freedom fighters, alternatively known as Sudan People's Liberation Movement (SPLM) leaders, of capturing state institutions, erecting self-serving networks, and squandering national resources, subsequently triggering wars that have had devastating humanitarian, security, and socioeconomic effects. Instead of developing the country, these leaders have used state resources to fund violence, shattering livelihood, the Report declares. The network indicted of profiting from the South Sudanese ferocious war, supposedly robbing the fragile country of billions of US dollars, comprises

powerful regional and international players, many of them businessmen. Partnering with local economic interest groups rooted in the governing SPLM party, these commercial agents from near and far-flung areas, including from Ethiopia, Eritrea, Kenya, Uganda, China, Malaysia, and the Great Britain are faulted for playing part in a six-year political violence that has killed hundreds of thousands, according to the London School of Hygiene and Tropical Medicine's paper published in 2018. The war has displaced millions, and precipitated jaw-dropping financial scandals. The Sentry nicely sums up the combination of these ills in *The Taking of South Sudan*.

Theoretically submitted, the race for wealth drives these tragic events, according to The Sentry. Supposedly fueling this tragic condition is the international financial system that enables the corrupt leaders to facilitate such ill-gotten wealth, with multinational corporations, foreign banks, and real estate sponsors enabling an organization that only enriches the families of the violent kleptocrats.

Furthermore, The Sentry entertains the proposition that corruption in South Sudan is a product of violence: "These include network sanctions, anti-money laundering measures, prosecutions, compliance actions by banks and other private companies, asset recovery, as well as economic and legal pressure, all means to shut those benefiting from violence out of the international financial system." Many sources, including several Government reports and investigations, point to the existence of this tragic vice. The Auditor General's reports, going as far back as 2006, and at least a dozen of the President's speeches, have demonstrated how corruption has increasingly become destabilizing, materializing as a malignant cancer in the South Sudanese public sector.

Aimed at untangling the extent to which this violent and resource-driven network manifests itself in this complicated system, the result of which essentially culminates in the *Taking of South Sudan*, The Sentry hopes to nudge the international community towards responding with a host of 'targeted' measures, both political and economic in nature. In this connection, The Sentry sees merits in a mechanism that dismantles the illicit financial system² that the network enjoys, both regionally and internationally, with an intent to restore stability and engender provision of services in the country. This recommendation surfaces rather circumstantially: The Sentry's fundamental explanation of the war in the country, marked, for example, by Government's defense for oil fields, is competition over resources. The Sentry alleges that 'the illicit financial activity causes atrocities, conflict,

² The Sentry states in its summary: However, if serious policy tools of financial coercion are aimed at this kleptocratic network, the possibility exists to alter those incentives, which currently favor pillage and plunder, and in turn impact the calculations of the kleptocrats and their international collaborators in the direction of peace and good governance. Dismantling South Sudan's violent kleptocratic system, which attracts financial facilitators and commercial enablers from the world over, is the key to creating the necessary conditions for peace, human rights and good governance in the country.

and state capture in South Sudan.’ This is far from truth. While correlation is evident, causation is not.

More compactly, The Sentry pushes two contradictory theses at the same time. First, it suggests that corruption in South Sudan is a product of violence. Evidence includes proposing a network of sanctions in order to ‘shut those benefiting from violence out of the international financial system.’ So, if violence, then corruption. Second, it also claims that ‘the illicit financial activity causes atrocities, conflict, and state capture in South Sudan. And so, if corruption, then violence. Any keen reader cannot miss this confusion or the failure to clearly identify a particular policy problem that is amenable to a practical response.

Summarily, The Sentry maintains that stabilizing South Sudan politically demands, as a prime remedy, exposing the kleptocratic network, as well as subjecting it to an internationally administered financial ‘coercion.’ This policy recommendation manifestly discounts the enduring role of dysfunctional politics in goading violence in a context that has evidently been characterized by instability for much of its history. Taken as such, The Sentry places little value in the Revitalized Agreement on the Resolution of Conflict in South Sudan (R-ARCSS)³ as a crucial mechanism toward re-establishing political normalcy in the country. Notably, the R-ARCSS recommits the conflicting parties to restore stability and security, while embarking on vital reforms, particularly in the realms of accountability, justice, security, and governance.

2.1 Major Emphases of the Government’s Response

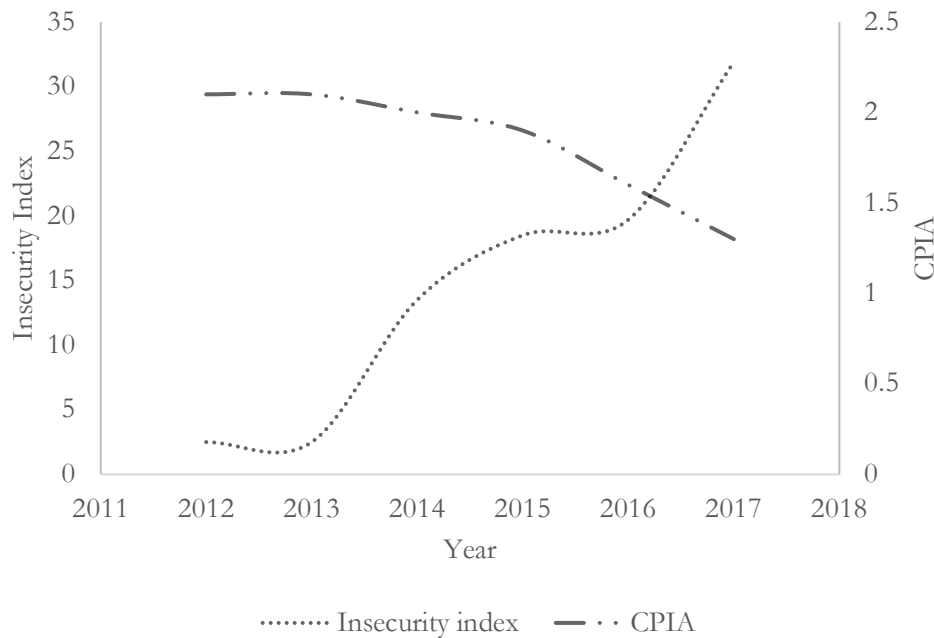
Ordinarily, substantial evidence is demanded in order to hold the demerits accountable. The Sentry, based on several revelations discussed in the executive summary and below, does not provide enough in this respect, which is the point of contention for this Response. Instead, the evidence the Government has generated indicates that this kind of work is politically inspired, targeting national leaders and their families, evidently a mistaken solution for resolving the country’s ongoing crisis. This is a reminder to any crusaders out there that any attempt to successfully combat corruption demands presenting credible or demonstrable evidence. Although appreciated for immense courage to shed light on these issues, with an intent to rid the people of South Sudan of an intractable instability, The Sentry Report is actually more of a nuisance to the current peace processes on two major grounds: first, it indirectly discourages investment in the current Peace Agreement, and second, it antagonizes the peace partners, hence undermining the possible implementation of the accountability measures stipulated in the Agreement.

Research shows that accountability measures are difficult to enforce at the time of war or during transitional periods, which place greater emphasis on stability over accountability and development. A recent study by the Sudd Institute indicates that political violence

³ R-ARCSS, brokered by IGAD and signed in Addis Ababa in September 2018, recommits the warring factions to the ARCSS, signed in August in 2015.

degrades institutional capabilities, weakening the state's ability to enforce accountability or human rights measures (Mayai 2019). Viewed from this context, The Sentry can be easily accused of basically attempting to frustrate efforts intended to restore stability in South Sudan, setting the country on a path to an obstinate instability, the kind that is now experienced in the Congo, Libya, and other hotspots globally.

Figure 1. Insecurity and institutional capability (CPIA)



Source: Mayai, 2019.

The Government is acutely aware that corruption remains a major threat to South Sudan but also observes that it must be addressed through facts and appropriate methods, not through measures derived using unconventional procedures, which The Sentry seems to promote. Corruption remains distinctly persistent in South Sudan, costing the country billions of dollars in just under a decade, which President Salva Kiir Mayardit recognized in 2012, in a letter addressed to former and current colleagues. Likewise, in 2009 and 2010, South Sudan's Anti-corruption Commission conducted studies that revealed a growing concern of corruption in the population (SSACC 2009/10). Accordingly, over 90 percent of the surveyed population expressed the existence of such a vice. The studies also link the emergence of corruption in South Sudan to institutional futility, with ACC and the Judiciary, evidently under-capacitated, unable to fully perform their investigative and judicial functions. Therefore, this Response does not attempt to refute the existence of corruption in South Sudan.

Diagnosed as such, the current Response considers the country's institutional capability deficits as majorly responsible for widespread corruption in the country, an indication that

the solution to restore good governance in the country lies in ending the war, as well as increasing efforts toward institutional fortification. A recent formed partnership among the Government of South Sudan, Embassy of the Royal Kingdom of Norway, and UNDP provides direly needed resources to further these efforts, eventually enhancing governance and economic management (GEMS) capabilities during the R-ARCSS era. The Government of South Sudan is grateful to the people of Norway for its unwavering financial support worth nearly \$30M, and other development partners, including the United States for unfailing humanitarian assistance and more. The Government is currently positioning itself to leverage such partnerships and opportunities for the benefit of the people of South Sudan.

Furthermore, the President has also outlined his efforts to fight corruption. This is self-evident in most of his public utterances and policy statements, including his sworn affidavit of “*zero-tolerance to corruption.*” Toward this end, South Sudan acceded to the United Nations Convention against Corruption (UNCAC) in January 2015. It conducted self-assessment checklists for the review cycles in January and February 2019 as required under UNCAC and held meetings with Country reviewers in Vienna in May this year.⁴ During the review meeting in Vienna, the Government and civil society representatives established a multi-stakeholder working group to pursue cooperation with the world body. The Government further commits to the self-assessment exercise and promises to promote an unfettered expression of opinions and open criticism into corruption related practices. To further strengthen institutions and address governance vulnerabilities, South Sudan also plans to seek membership in the Financial Action Task Force (FATF), as well as the Eastern and Southern African Anti-money laundering Group (ESAAMLG).

2.2 Examination of The Sentry’s Text

This section examines a few assertions in The Sentry Report and points out their shortcomings using a number of examples:

- a) Endnote 4 concerns the role of large multinational oil consortium in fueling war in South Sudan by funding militia group⁵. It states: “Contemporaneous media accounts report that the militia forces fighting for the government were engaged in military operations that included violence against civilians during the same period the fuel was provided.”

First, according to this examination, the referenced information, a UN condemnation of renewed violence in Makalal, released on May 18, 2015, has absolutely nothing to do with the involvement of the multinational oil companies or militia groups in the war. In this news report, the UNSC actually condemned the Sudan People’s Liberation Army in

⁴ See Country Review at <https://www.unodc.org/unodc/treaties/CAC/country-profile/CountryProfile.html?code=SSD> (accessed. 15.10.2019)

⁵ The largest multinational oil consortium in South Sudan – led by a Chinese state-owned oil company – has provided direct support to deadly militias, according to The Sentry.

Opposition (SPLA-IO) for attacking Malakal on May 15, 2015, threatening sanctions against the main warring parties for violating the ceasefire agreement. Secondly, the link was poorly embedded, perhaps deliberately to make the story less traceable (we provide the correct link herein⁶).

- b) Endnotes 5, 6, 7, & 8 supposedly expose the former Minister of Petroleum, Hon. Ezekiel Lol Gatkuoth⁷, for spending nearly \$700,000 on himself at a local hotel, accuse a sanctioned SSPDF general, Malek Reuben Riak, of spending community funds on his son's education, and criticize Dar Petroleum for overlooking hazardous environmental pollution in the oil producing communities.

While the acts, if proven factual, surely constitute corruption which is indeed unacceptable, none of these accounts directly sticks with The Sentry's thesis that multinational oil companies are endowing deadly militia groups in South Sudan. Accordingly, the news⁸ The Sentry misinterpreted as travesty actually credits South Sudan's Government for admitting "that the oil production was a threat to local populations."

- c) Endnote 33⁹ accuses Dar Petroleum of involvement in the conflict using evidence from Small Arms Survey. Joshua Craze, "The Conflict in Upper Nile State," (Geneva: Small Arms Survey, March 2016), available at <http://www.smallarmssurveysudan.org/facts-figures/south-Sudan/conflict-of-2013-14/the-conflict-in-upper-Nile.html>.

While the cited report discusses Padang's conflict with the Shilluk over control of Malakal town and the oilfields, it does not indicate that Dar Petroleum was involved in bankrolling this conflict.

- d) Endnotes 46, 47, 48, & 49 allege the use of local militias by the Government to destabilize communities. Sam Mednick, "Oil-rich South Sudan to resume production in war-hit region," AP News, August 30, 2018, available at: <https://www.apnews.com/aeff5bfb2f-294469b84abf94aa600d6b>.

⁶ <https://news.un.org/en/story/2015/05/499002>

⁷ Hon. Ezekiel L. Gatkuoth is currently under government investigation on corruption related charges. http://www.xinhuanet.com/english/2019-06/27/c_138179147.htm

⁸ <https://www.dw.com/en/600000-people-in-south-sudan-said-to-be-at-risk-from-contaminated-drinking-water/a-43442030>

⁹ <http://www.smallarmssurveysudan.org/fileadmin/docs/archive/south-sudan/conflict-crisis-2013-15/upper-nile/HSBA-Conflict-Upper-Nile-March-2016.pdf>

The AP news report¹⁰ only references oil resumption in the western Upper Nile region (former Unity State). It does not discuss the Government's use of militia to uproot the civilians or confront the opposition forces.

- e) Endnotes 111, 112, 113, & 114 allege that the issuance of a mining license to Fortune Minerals 6 weeks prior in 2016 resulted in violence, mass rapes, and population displacement in Mundri. Armed Conflict Location & Event Data Project (ACLED), available at: <https://www.acleddata.com/data/>.

The above endnotes, in reference to Fortune Minerals licensing, which supposedly culminated in violent activities in Mundri, cite ACLED, inter-agency assessments, and AP news written by Sam Mednick. Our review of these sources for accuracy results in the following:

Fortune Minerals received its operational license in Mundri, Amadi state, on August 18, 2016. On October 18, 2016, The Sentry reports that 4 people were killed in Mundri due to the mineral exploration license the Government granted 6 weeks prior. According to ACLED, the October 18 attack resulted in 4 fatalities, confirming what the Sentry reports. As ACLED reported, however, the news reads: "Suspected SPLA soldiers killed at least four people, including the diocese priest, in Greater Mundri, Mundri East and Medwu, as well as looted and destroyed several primary health care centers in Bari, Medwu, Bangolo, Kotobi, and Karika in Mundri West counties." But this event took place exactly 8 weeks, not 6 weeks, following Fortune Minerals' acquisition of the operational license. Second, despite being licensed to explore 5 locations (2 in Eastern Equatoria, 1 in Central Equatoria, 1 in Amadi, and 1 in Western Bahr el Ghazal), Fortune Minerals has yet to commence its activities. With no operations on the ground, the company has not paid rents for most of its concessions since awarded a license 3 years ago. As a result, two of Fortune Minerals' licenses have been revoked, with a third one underway.

Other facts worth noting about the violence in Mundri are in order. On October 17, 2016, a day before the event The Sentry reports above occurred, the opposition forces attacked and killed 11 people in Mundri. According to the source ACLED drew from, the "SPLA-IO forces reportedly attacked Kadibi in Amadi, Mundri West, leaving 11 people dead. Government forces repulsed them. A number of farms in the area were destroyed in the clashes." Other statistics indicate that on May 27, 2015, 60 were killed in Mundri. In 2016, the year The Sentry focuses on, we observe 12 episodes of violence and 36 deaths in total. In contrast, between January 2014 and November 2015, Mundri suffered 23 conflict events and a total of 214 deaths.

Clearly, the evidence The Sentry provides leaves a lot to be desired. First, the Sentry does not report the rest of the incidents, even as those appear more injurious, in terms of death toll. The AP news The Sentry cites above, which was written in 2017, does not suggest the

¹⁰ <https://apnews.com/aef5bfb2f294469b84abf94aa600d6b/Oil-rich-South-Sudan-to-resume-production-in-war-hit-region>

SPLA carried out the attacks and rapes in Mundri. Likewise, there is no reference to ‘population displacement’ as The Sentry suggests. Instead, *endnote 114*¹¹ references rape in Mundri, entitled: ‘Rape reaches ‘epic proportions’ in South Sudan’s civil war. But this AP story refers to a woman who was captured and raped by the rebel MTN. The story reads: “After months of being raped by her rebel captors in the middle of South Sudan’s civil war, the young woman became pregnant.”

No doubts about it. Rapes have been widespread since the outbreak of the war in South Sudan. Mundri, and many other locations in the country have suffered this indignity. In Juba, for example, 35 women and girls were reportedly raped in two separate incidents on July 18, 2016 at an SPLA checkpoint in Jebel. In Yei, deadly attacks on civilians and looting of private property have been reported. In Kajo-Keji, those in uniform were accused of looting, harassment and rape. In 2016 alone, Yambio witnessed 49 violent events and 134 fatalities, with people abducted, property looted, and shops set on fire. The same year the SPLA was accused of raping “a number of women outside the Bentiu IDP camp on the day of the visit by the UN Independent Commission on Human Rights in South Sudan mid-November as well as a woman in Leer three days prior to their visit. The Commission denounced the use of rape as a tool used by armed groups and government forces for ethnic cleansing, having reached "epic" proportions throughout the country since the renewed clashes in Juba in July.”

f) Mr. Al Cardinal and President Salva Kiir’s Family¹²

According to The Sentry, Mr. Al-Cardinal, whose real name is Ashraf Seed Ahmed Hussein and who is equally indicted for partaking in ‘The Taking of South Sudan,’ has been involved in South Sudan since 2006 by partnering with a businessman, Mr. Kiir Gai Thiep, supposedly a relative and an associate of President Kiir. The mogul holds major shares in two of the three accused South Sudan’s registered ventures: Al Cardinal Technologies Company Ltd and Southern Al Cardinal for Building & Construction Co. Mr. Kiir Gai Thiep holds the remaining shares. The third company is Junub Technologies Ltd. What is material for The Sentry to shade light on the three companies is that they are engaged in supplying the Government with ‘military-grade weapons,’ essentially inflaming instability. This investigation confirms that the three companies are indeed registered and incorporated partly to do business as found by The Sentry—to procure military equipment and supplies. There is, however, no proof of any wrongdoing in light of Companies Act of South Sudan. The Sentry’s main contention with respect to these companies’ objectives

¹¹ <https://apnews.com/0ed9bcd9bb4d641ddae1184babbf4ffef>

¹² Since his involvement in the 2006 Toyota scandal, Al-Cardinal has often partnered with the Government, prominent politicians, senior officials and their relatives. In November 2006, he incorporated three companies alongside Salva Kiir’s relative and close associate, Kiir Gai Thiep: Al Cardinal Technologies Company Limited, Junub Technologies Company Ltd and Southern Al Cardinal for Building & Construction Co.

is that a single company should not do business that covers all sectors. For The Sentry, this is unique to South Sudan and, therefore, MUST be dangerous, even as the companies brand their operation as general trading, an expression of intent to cover a wide range of economic sectors. Further, The Sentry’s assertion that Mr. Kiir Gai Thiep is President Kiir’s relative is false. Perhaps the obvious reality that the two share the same name, Kiir, prompted The Sentry’s erroneous conclusion.

- g) The Sentry asserts that “With the outbreak of war in 2013, Al-Cardinal’s logistics company imported spare parts for the army’s recently acquired GAZ-34039 armored vehicles. Russian export records available through a public database indicate that the first shipment of GAZ 34039-32 vehicles consigned to Green for Logistics Services LLC was declared in Mombasa, Kenya on August 11, 2014.”
- a) Primarily, The Sentry refers to a Russian own Green for Logistics Services LLC as the company responsible for procuring and shipping the above military equipment. None of the three companies The Sentry indicts is evidently linked to this undertaking.
- b) Second¹³, instead of an actual evidence into the purchase and shipment of the alleged military hardware, The Sentry provides a link to a shipment sample as pictured below.

Sample shipment record for Green For Logistics Services Llc			
Green For Logistics Services Llc is a buyer that buys products from ЗАО Заволжский Завод Гусеничных Тягачей			
BILL OF LADING			
Overseas Consignee Name	Russian Shipper Name	CARGO CUSTOMS VALUE IN ROUBLES	0.00
GREEN FOR LOGISTICS SERVICES LLC	ЗАО ЗАВОЛЖСКИЙ ЗАВОД ГУСЕНИЧНЫХ ТЯГАЧЕЙ	CARGO DELIVERY POINT	МОМБАСА
Producer Name	Russian Payee Name	CARGO RELEASE DATE	2014-12-15
ЗАО ЗАВОЛЖСКИЙ ЗАВОД ГУСЕНИЧНЫХ ТЯГАЧЕЙ	ЗАО ЗАВОЛЖСКИЙ ЗАВОД ГУСЕНИЧНЫХ ТЯГАЧЕЙ	CARGO STATISTICS VALUE IN US DOLLARS	1407.60
Detailed Cargo Description		DECLARATION NUMBER	10130210/151214/0027788
		GROSS WEIGHT KILOS	13.36
ИЗДЕЛИЯ ИЗ АСБЕСТОВОГО ВОЛОКНА ДЛЯ ГУСЕНИЧНОГО СНЕГОВОЛОТОХОДА ГАЗ-34039-32:		INCOTERMS	CIF
		NET WEIGHT KILOS	11.44
		NUMBER OF PACKAGES	1.00
		ORIGIN COUNTRY	РОССИЯ

- h) The First Family

¹³ 133 “Sample shipment record for Green for Logistics Services LLC,” ImportGenius.com, available at: <https://www.importgenius.com/russia/buyers/green-for-logisticsservices-llc>.

The Sentry alleges that “Kiir’s relatives have multiple partnerships with foreign investors, being part of a corporate network. “Corporate records reviewed by The Sentry indicate that Kiir family’s business portfolio includes dozens of companies, some of which list young children as shareholders.” According to this exercise, several First Family members, including children, are indeed involved in some of the businesses that The Sentry has identified. Nonetheless, this Response could not establish any legal grounds that inhibit the participation of the members of the First Family in the economic activities of their own country. Second, according to the business registry reviewed, the First Lady, Mary Ayen Mayardit, does not hold shares in Gemtel, a Ugandan owned telecommunication operator registered in South Sudan in 2006, as alleged by The Sentry. Third, Ms. Adut Salva Kiir does not hold shares in Conex Real Estate Ltd. Lastly, The Sentry’s investigation does not supply the list or names of young children it alleges to have been involved in the businesses. As noted elsewhere, The Sentry smears but provides no sufficient evidence to back up its claim.

3 Review of Businesses in Question

This section covers what is both known and unknown about the companies alleged to be involved in atrocious businesses. The facts, collected from various sources Government departments, including Ministry of Justice, Ministry of Mining, Chamber of Commerce, Audit Chamber, Ministry of Trade, Ministry of Finance and Planning, and individual firms, are used in conjunction with what The Sentry alleges in the Report. While the Government’s intention is not necessarily to prove The Sentry wrong on everything, its fundamental thesis is that The Sentry is likely to have very limited evidence on most of its allegations, a correction of which is appropriate.

The Sentry Report alleges that international investors have been partnering with top Government officials and members of their families, even during the conflict period. The report categorically alleges that President Kiir’s global corporate network includes immediate members of his family as shareholders and directors in companies alongside dozens of foreign nationals from 13 different countries. Without mention of instances where the alleged companies have involved in business scandals, the Report goes ahead and lists the number of companies linked to the family members and associates of the President.

Going forward, this section reviews the status of these companies, including their incorporations and operational status in an attempt to verify some of the claims The Sentry makes. It was pointed out in the foregoing discussions that being a shareholder or a director in a company alone does not constitute a criminal offense under the domestic laws of South Sudan, or under international laws, for that matter. More so, majority of the companies cited in The Sentry Report are not operational, to say the least. As a matter of fact, some of these companies never operated since incorporation. For example, since incorporated in April 2016, Sekoko Power (SS) Ltd never undertook a single business activity before it

eventually collapsed the same year, yet it featured in the Sentry Report as one of the companies involved in *The Taking of South Sudan*.

While The Sentry's efforts to fight corruption in South Sudan is plausible and commendable if done right, there is value-addition in adhering to certain principles. Such work should not be carried out on false grounds or in total disregard of the laws of the land. The case in point pertains to The Sentry's claim that Ms. Winnie, the President's daughter and three Chinese investors, formed a Joint Venture, the Fortune Minerals and Construction Ltd in mid-2016. Contrary to this, Fortune Minerals and Construction Ltd is not a joint venture but a legally registered company under the laws of South Sudan with six individuals as shareholders. The Sentry further claims that "Fortune Minerals is among dozens of companies controlled by Kiir's immediate family". It is odd that The Sentry claims that a 11 percent shareholder (minority shareholder) controls this business. To set the records straight, here is the allotment of shares of the Fortune Minerals and Construction Ltd (See Table 1).¹⁴

Table 1. Fortune Minerals Shareholders

Share holder	Shares (%)	Nationality
Chen Huiping	26	Chinese
Chen Yongqiang	25	Chinese
He Yuheng	18	Chinese
Winnie Salva Kiir	11	South Sudanese
Rebecca Nyanruach Dhol	10	South Sudanese
Athil Ayiik Akol	10	South Sudanese

Source: Business Registry, Ministry of Justice.

The Sentry singles out Ms. Winnie Salva and accuses her of violence in the company of six shareholders because of her relation to the President. This *guilt by association* violates her constitutional rights to work and earn income for a living anywhere in the country. Employment is an integral facet of a meaningful right to life and human dignity provided for under the Transitional Constitution of South Sudan (TCSS).

The Sentry links Mrs. Adut Salva, another daughter of the President, to Conex Energy Co. Ltd as a shareholder. Indeed, Conex Energy Co. Ltd was incorporated on June 28, 2012, with Mrs. Adut as one of the shareholders. However, Mrs. Adut eventually sold her shares in the said company. Similarly, The Sentry reports Conex Real Estate Ltd as another company Mrs. Adut Salva owns. This investigation shows that Mrs. Adut has also sold her shares in this company prior to the Report.

More examples abound. Gemtel Limited is listed among the companies owned by the First Family. In particular, the Report links the company to the First Lady, Mary Ayen Mayardit. Gemtel Limited was incorporated in South Sudan on November 2, 2006, with Gemtel

¹⁴ Registry of Business, Ministry of Justice: Fortune Minerals and Construction Ltd. Reg. No. 25845. 23.03. 2016.

(Uganda) Limited as the first shareholder with 95 percent and Mr. Atem M Lual, a South Sudanese national with 5 percent shares. In September 2015, the shares were transferred, with Lap Green Networks (80), Mr. Mulenga Augustus (10), Ms. Charity Basaza (5) and Mr. Atem M Lual (5) becoming the new shareholders. Second and third transfers were conducted in September and October 2015, respectively, before the company eventually suspended its operation in South Sudan later that year.

3.1 Nature of Company Businesses in South Sudan

Companies' registration in South Sudan is regulated by Companies Act, 2012. Section 7 of the Companies Act provides that "any seven or more persons, or, where the company to be formed will be a private company, any two or more persons associated for a lawful purpose may, by subscribing their names to a memorandum of association and otherwise complying with the requirements of this Act in respect of registration, form an incorporated company, with or without limited liability." To gain an insight into the nature of businesses in South Sudan, including ownership and proportional shares, here is a snapshot of some of these companies that feature in The Sentry Report (see Table 2).

Table 2. Company operational status

Company	Owner	Shares (%)	Status
Fortune Minerals	Winnie Salva Kiir	11	Not active
	Chen Huiping	26	
	Chen Yongqiang	25	
	He Yuheng	18	
	Rebecca N. Dhol	10	
	Athil Ayiik Akol	10	
Conex Energy	Nazret Amara	45	Active
	Akot Lual Areech	45	
	Belay Abebe	10	
Vukani Aviation	Mr. Donovan Norman Foley	69	Not active
	Obote Mamur Mete	31	
Conex Real Estate	Donato Giovanni Spinaci	25	Active
	Belay Abere	25	
	Lucas Demisay Nardos	50	
Finejet	Adut Salva Kiir Mayardit	40	Active
	Finejet Africa Holdings Limited	40	
	Krupa Patel	20	
Rocky Mining	Adut Salva Kiir Mayardit	50	Not active
	Ali Khalil Myree	50	
Mango Airlines	Adut Salva Kiir Mayardit	20	Not active
	Matabishi Mango	25	

	Mbumba Kasereka	25	
	William Deng Deng	10	
	Peter Garang Ngor	10	
	William Agar Anyar	5	
	Chol Cola Biem Bilkuei	5	
Sekoko Power	Thiik Salva Kiir Mayardit	20	Not active
	Timothy Tebeila	51	
	Garang Malong Awan Anei	20	
	Lawrence Lual Malong	9	
Inter-state Airways	Mary Ayen Mayardit	33	Active
	Atem Kuol Atem Biar	47	
	Ibrahim Yousif Ishag	20	
Gemtel	LAP Green Networks	80	Not active
	Mulenga Augustus Caesar	10	
	Charity Basaza Mullenqa	5	
	Atem M. Lual	5	
Yiekarot General Trading	Atak Santino Majak Deng	31	Not active
	Yosef Simon Okubamicael	69	
Cannington Investments	Anok Salva Kiir Mayardit	44	Could not
	Abdikadir Osman Ahmed	56	be verified
Euro-Afro Trade	Anok Salva Kiir Mayardit	20	Could not
	Mamdouh Meniawi	40	be verified
	Chrisitne Malek Reuben	20	
	Aker Maker Benjamin	20	
GST Andromedia Internatinal	Anok Salva Kiir Mayardit	20	Could not
	Kogili Chandrasekhar Reddy	19	be verified
	Sanjay Kumar Pandit	19	
	Lual Chol Kur Dudi	12	
	Rajeev Kumar Tandon	20	
	Partha Mukhopadhyay	20	
Meta International	Manut Salva Kiir Mayardit	89	Not active
	Stephen Angong Salva Mathok	10	
	Tukwasibwe Innocent Gideon	1	
Al Cardinal Limited Technologies	Ashraf Saed Ahmed Hussein	75	Not active
	Kiir Gai Thiep	25	
Southern Al Cardinal for Building and Construction	Ashraf Saed Ahmed Hussein Mohammed	55	Not active
	Ashraf Saed Ahmed	10	
	Kiir Gai Thiep	25	
Junub Technologies	Grace Apandang Dau	20	

Grace Apandang Dau	20
David Apach Chol	20
Deng Ayiik Deng	20
Reserved	20

Source: Business Registry, Ministry of Justice.

Companies owned by foreigners are required to allot at least thirty percent of shares to the locals, depending on the agreement among the shareholders. This has prompted any foreigner wanting to open a company in South Sudan to seek for a local partner in order to meet the requirement of registering a company. As well, there are no financial prerequisites in forming such partnerships, as there is no start-up capital requirement under Companies Act, 2012. The absence of start-up capital as a requirement under the company laws explains why there are many companies that are registered at the Ministry of Justice but do not exist operationally (see Table 2 for this evidence). This investigation, for example, reveals that 55.5 percent of the 18 companies The Sentry pursues either never took off or ceased operations soon after commencing. It is, therefore, not wholly convincing to use company's registries without first checking other facts as the basis for operations and accusation on being a conduit for siphoning off of national resources.

As highlighted earlier, the next section sheds some light on the origin and the activist work of The Sentry and its affiliates. This is done to provide an understanding into The Sentry's activities in South Sudan.

4 The Sentry and The Enough Project

Not many in South Sudan understand how The Enough Project and The Sentry started out and who exactly runs these agencies. In this context, the Government's research team dug a little deeper to profile these institutions as a point of departure into understanding their current activities and intentions. An emphasis is placed on both the institutions and the celebrities running them, especially John Prendergast and George Clooney. Enough information about both is online, with this part examining their articles that explore celebrities' role in peace-building and other unintended consequences.

Founded in 2007 by John Prendergast and Gayle Smith, The Enough Project was instituted to raise public awareness through appealing to and building a vibrant constituency that can respond swiftly to extreme conflicts and alleged mass atrocities in East and Central Africa. Using his past activist clout in the Clinton administration, John Prendergast found it unproblematic to bring many celebrities on The Enough Project Board of Directors, including actors such as George Clooney, Don Cheadle and others. The Enough Project created a platform through which John Prendergast and his associates can speak to human rights and other global issues at the UN, US Congress and other corridors of power. Though well-intentioned, frantic efforts of The Enough Project over the years to "beat drum" of peace and hold bad political actors accountable has come to create controversies and in-your-face-stunts as we speak.

These activists did not stop with just founding The Enough Project. Following their visit to South Sudan in 2010, John Prendergast and George Clooney used seed money derived from the *Not On Our Watch Project (NOOW)* to establish the Satellite Sentinel Project, with an expressed aim to provide satellite imagery and early warnings on conflicts within and across two Sudans. Their objective was to prevent a full-scale war between Southern and Northern Sudans. This novel project came to an end in 2015 and on September 2016, the said activists launched another project: The Sentry, which set out to hold those responsible for corruption and mass atrocities accountable. The Sentry has come to focus its crusade on South Sudan, Sudan, the Democratic Republic of Congo, Somalia, and the Central African Republic. Swearing to follow dirty money and expose perpetrators, they had this to say on The Enough Project website: *Our next decade will prioritize making war criminals and their kleptocratic networks pay for destroying their countries and using policy instruments that target the illicit financial flows of these war criminals as a means of providing real leverage to revitalized peace processes and strategic human rights advocacy.*

Judging from the above narrative, it is obvious that The Enough Project and NOOW have hatched The Sentry to help them expose any perceived *corrupt lords* across the world, avowing to advocate real consequences for mass violence, especially for the African regions. Their mantra, “War Crimes Shouldn’t Pay” speak volumes about this machination and more.

Yet, the ten-billion question is this: how did South Sudan get here? The simple answer boils down to the fact that these do-gooders were once friends of South Sudan, who obviously played a positive role in supporting people’s collective efforts to attain a hard-earned statehood.

To this end, South Sudan gives these well-wishers credit for their past, constructive, role. Indeed, the birthing of South Sudan can be likened to an African proverb that says, ‘it takes a village to raise a child.’ While South Sudanese from all walks of life paid a lot to liberate a country, they now call their own, they are mindful about many people of goodwill and friends across the globe who helped them in one way or another. To these innumerable friends, the people and Government of South Sudan remain eternally grateful to their advocacy, benevolence and material support before, during, and in the lead up to independence in 2011. In particular, the Government of the Republic of South Sudan appreciates the role played by the group fondly referred to as *policy wonks*. These are individuals in Washington who, in the late 1980s through independence in 2011, kept the issue of South Sudan alive on the capitol hill. They pushed, lobbied and *sold Washington on the cause* of South Sudan (Vertin, 2019). Some of them, including George Clooney, Roger Winter, Susan Rice, and John Prendergast, among others, made sundry efforts to visit Juba before and after independence in 2011(see a picture showing Prendergast and Clooney posing with herders in Southern Sudan in 2010). In the eyes of our populace, they were and remain true friends of South Sudan, underscoring that these *policy wonks* have been friends in need, indeed.



Source: Matt Brown, The Enough Project, 2010.

However, the unfortunate incident of December 2013 and the ensuing conflicts in South Sudan has disappointed many of South Sudan's friends and for these reasons, some of the *policy wonks* became disillusioned with the people they once advocated for earnestly. As friends who are now immeasurably disappointed, they have chosen to go down a road that does not bode well for the national interest of South Sudan. To demonstrate their love-hate relationship, they claim to fight alleged corruption and atrocities using methods that seem underhanded.

As some accounts show, these activists are driven by anger, and sheer disappointment with the political actors in South Sudan. Out of these raw emotions and misguided humanitarianism (Budabin, 2015), they have gone on to publish a number of reports that smack of an assault on the people and their leaders, exacerbating an already dire situation.

Since then, The Sentry has released numerous reports, with their watchers having probably lost counts already. To jog your memory, we elect to highlight a few of these devious reports: *The Nexus of Corruption and Conflict in South Sudan* (July 2015); *Country Briefs: South Sudan* (July 2015); *War Crimes Shouldn't Pay: Stopping the looting and destruction in South Sudan* (September 2016); *Making a Fortune While Making a Famine: The illustrative case of a South Sudanese general* (May 2017); *Fueling Atrocities: Oil and War in South Sudan* (March 2018); *East Africa's Leverage for Peace: Target Real Estate in Kenya and Uganda Connected to South Sudan's Spoilers* (June 2018); *Consequences for Kleptocrats: Financial Pressures to Support Peace in South Sudan* (August 2019); *Banking on War: Ending the abuse of South Sudan's banking sector by political elites and pushing for peace* (October 2018); *"The Profiteers": Documentary Shines New Light on*

South Sudan's Neighbors' Role in the Conflict (October 2018), and *Al-cardinal: South Sudan's Original Oligarch* (October 2019).

Comparatively, The Sentry has gone rogue in its latest report. *The Taking of South Sudan: The Tycoons, Brokers, and Multinational Corporations Complicit in Hijacking the World's Newest State*," which was released on September 19, 2019, generated notable controversies and heated debates, both online and in the print media. Their latest debacle is the subject of this Response by the Government. Just like those before it, this report emphatically brings to the fore a host of methodological deficiencies, including their thoughtlessness vis-à-vis a statecraft and state-building as well as one-dimensional arguments, especially a singular faith on unverified sources and claiming that some documents are on file with The Sentry. As pointed out above and elsewhere, including by the Anonymous Writers (2019) in their brief rebuttal, these reports suffer major flaws and missed a point on accountability and the rule of law.

Ipsa facto, the Government of the Republic of South Sudan disagrees with The Sentry on some of its reports, including the latest profiling of the President's children, which aims to isolate and incite the public against the First Family. The Sentry evidently tolerates guilt by association, especially when they recommend strategies that target families of the alleged culprits; list strange security company names purported to belong to the ruling elites, which cannot be verified; confuse external agency with internal agency, burden the country with a position that calls upon external actors to do more for this country than South Sudanese themselves; expose their extreme prejudice about the SPLA, alleging that the people's army roam the bushes of South Sudan while pillaging and murdering the innocent; show insignificant passion when shedding light on activities of the international companies in oil producing areas; take a narrow view regarding the role of the international financial institutions (IFIs), naively presuming that the IFIs can at will choose to investigate any corrupt practices without being sanctioned by a government, and finally, conclude that any government transactions provide a sneak peek into or act as a sign of corruption, thereby failing to appreciate the fact that a check authorizing payments here and there does not always symbolize malfeasance per se. Hence, it seems folly to assume that corruption is proven just because Minister X wrote to Minister Y demanding a payment for services rendered or to be rendered. This is a blatant blackmail against South Sudan in general and its public servants in particular.

To state the obvious, the Government of the Republic of South Sudan agrees with The Sentry on the need to uphold the rule of law and address human rights violations that might arise or could have arisen within the country's borders. As the preparations for the formation of the Revitalized Transitional Government of National Unity (R-TGoNU) early next year gets underway, the Government looks forward to cooperating with other partners to adopt policies that are consistent with longstanding ideals of human race, including the rule of law, good governance, and respect for human rights. That said, the point of departure is that these objectives cannot be achieved through fabrications and malice molded to denigrate South Sudan and more broadly, hurt the innocent citizens. Most of The Sentry's reports, past and present, portray major conflict of interest in the affairs of

South Sudan, something that has the potential to further the unjustifiable characterization of the country's political turmoil.

5 Government's Commitment to Peace and Economic Development

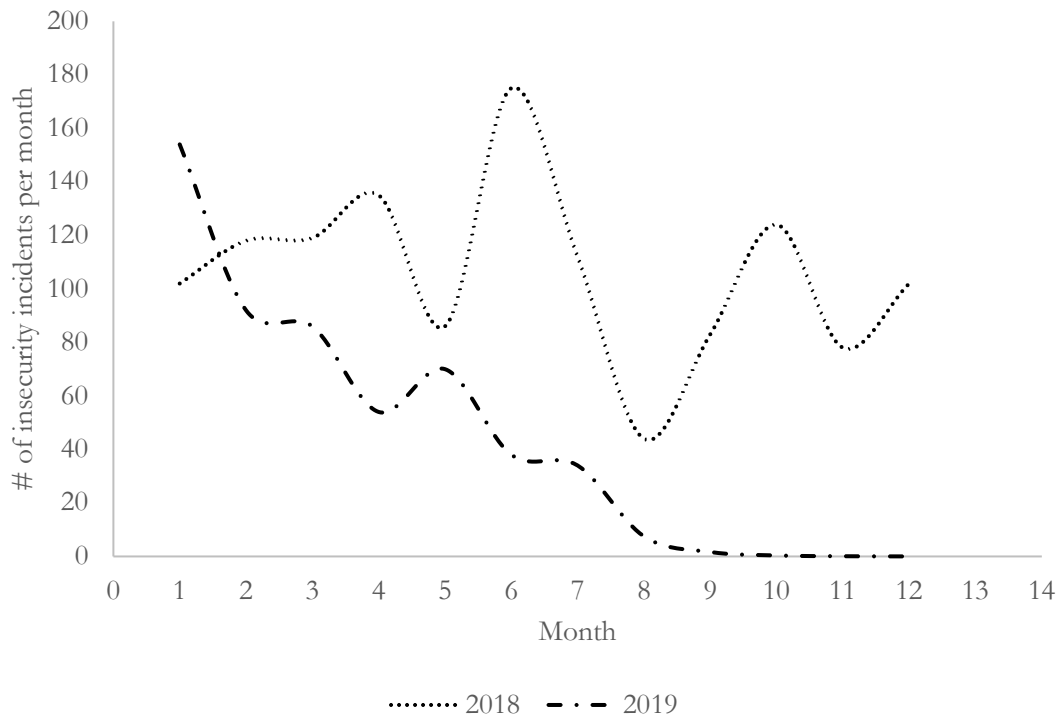
This section lends credence to the Government's commitment to restore peace in the country and advance inclusive development.

To restore peace in the country, the Government and the opposition groups signed a new political settlement in September 2018. Although the parties have been facing logistical challenges in implementing the Agreement, there exists commitment to peace from the leaders, resulting in marked decreases in hostilities, and renewed hope for the formation of the R-TGoNU in early March 2020, following the recent 100-day extension by the peace principals. Preparatory exercises indicate that the Government and the Opposition are both committed to peace and long-term development objectives of South Sudan.

Drawing from additional sources, there appear to be signs that the security situation in South Sudan is, indeed, improving as Mayai (2019) argues:

This news is quite reassuring, as the R-ARCSS parties get ready to form a unity government this November. In 2018, the number of insecurity incidents ranged from 44 in August to 175 in June, with a monthly average of 106.5 incidents. By July 2019, however, the average number of conflicts per month had dropped to 44, underscoring a security improvement of 58.6 percent in under a year since the signing of the R-ARCSS. Secondly, these personal security enhancements following the signing of the Revitalized Agreement have been met with an appreciating return migration. For example, current statistics from various locations across the country show that an increasing number of South Sudanese are returning to their habitual homes (IOM 2018).

Figure 2. Improving security in South Sudan, January 1, 2018 - July 31, 2019



Source: Mayai, 2019.

In December 2016, the President of the Republic initiated the National Dialogue (ND). This project has made remarkable progress, with many achievements registered across the country. Some of these achievements include a successful grassroots consultation, followed by three regional conferences. The ND leadership recently concluded the third regional conference, with the whole process expected to be concluded with a National Conference. Based on these consultations, the people of South Sudan have candidly spoken, offering their views on issues facing them and unveiling their preferred form of governance. The Government patiently waits to implement the resolutions of the ND in accordance with the people's aspirations and demands.

The Government is also keeping an eye on socioeconomic conditions of its people, investing little resources it has in them. The Government cares deeply about investing in human capital, especially in basic education. To this end, South Sudan celebrated an outstanding performance of its secondary school students on their national exit exam in June this year. To contextualize this commitment, Michael Dut Arok of Promise Land Secondary School made his parents and the nation extremely proud by topping the country with a score of 96 percent. South Sudan is equally keen on gender equality, an objective that can be advanced through equal opportunity in workplace and education. Thus, the Government is creating an enabling environment for all children to achieve quality education. To further exemplify, another Promise Land Secondary School student, Kuei

Garang Akok, scored 93 percent, again, making her the best performing female student in South Sudan this year.

Second, the Government remains relentless in its pursuit of other reform agenda and infrastructure investment. The Government, with support from international partners, understands that constructing all weather roads is one of the means of improving local productivity, facilitating intrastate commerce, and moving South Sudanese people out of abject poverty. To this end, the Government has decided to allocate 30,000 barrels of oil per day to be deposited into an escrow account, which can then be used to procure roads. A decision is being made to identify a credible foreign company to construct a road linking Juba, the capital, with Bahr el Ghazal, one of the regions. This oil for roads program will be critical in linking rural South Sudan with urban centers, with positive implications for local production, trade, economic growth, and employment.

Work on the city's electricity is also on course. A few years back, the Ministry of Electricity and Dams under Hon. Dr. Dhieu Mathok Wol, signed a deal with the African Development Bank to construct a power station in Juba. This project is only months away from electrifying the nation's capital. This will be of great use to the people, businesses, and health and educational institutions.

Third, the Government is making concerted efforts from the health front. Ebola poses a great deal of health threat to the region, including South Sudan. Several Ebola related incidents have been reported both in the Congo and Uganda in the last 2 years. The Ministry of Health is doing everything possible to keep everyone safe from this deadly disease. So far, the Government has been able to keep Ebola out of South Sudan. In addition, with generous support from the People of China, South Sudan has made good progress in renovating Juba Teaching Hospital. South Sudan, to state the obvious, experiences some of the worst health outcomes in the world, including high rates of maternal, child, and infant deaths. By renovating the country's flagship health facilities and equipping them with state-of-the-art tools and professionals, it should be able to address some of these public health challenges. Mothers should be able to deliver safely, and their children vaccinated against childhood diseases. With electricity to be restored in Juba in a few months from now, our doctors, though few and overworked, should be able to attend to emergencies every hour of the day, saving lives.

Finally, South Sudan's economy continues to improve. With a slow return to political stability, economic troubles are beginning to ease, with inflation moderating to double digits, exchange rate stabilizing, and revenue performance strengthening. Oil production is now on the upward trajectory given that the country has recently resumed production in Western Upper Nile, boosting output. Unfortunately, these benefits are yet to trickle down to the ordinary citizens due to the country's financial obligations to the Sudan and mounting salary arrears over the years. These challenges notwithstanding, the Government economic policy to enhance production, increase social spending away from security sectors, stabilize prices, reduce debt, and engender inclusive and sustainable growth, is firmly on track.

As peace returns, the government plans, therefore, to do all it can to restore productivity, particularly food production, for this is where people's prosperity lies. This is the most viable response to a nagging food insecurity facing the nation. In this regard, Hon. Onyoti Adigo, the Minister of Agriculture and Food Security and his team, for example, are on track to strengthen partnerships with the African Development Bank and the World Bank to access necessary resources to restore food production across the nation. As the R-ARCSS implementation comes into effect, the Government will use oil money to fuel agricultural sector, creating jobs particularly for young graduates while strengthening key institutions of governance and making the broader economy work for everyone, including foreign investors.

6 Government Plans¹⁵ on Governance and Resource Management

As the foregoing sections highlight, the Government of the Republic of South Sudan is not adversative to the rule of law, human rights protection, and good governance. As a matter of policy, these ideals are enshrined in the basic documents of South Sudan, including the Bills of Rights and the Constitution, among others. While the pursuit of these ideals is currently constrained due to competing needs and wants for political stability, the Government will pursue these objectives with zeal, going forward.

As a first principle, the Government cannot just always react to issues, allegations or criticisms. It will be on the offense this time, serving the people of South Sudan and helping them unleash their untapped potentials. In this regard, the Government expects to reprioritize investment in human capital, including in education, health, and technical skills. These issues will be among the first order of business once the unity government is in place.

Second, a proper utilization of natural resources will be front and center of South Sudan's governing philosophy. In this context, inappropriate use of public resources will be punishable to the extent possible and in accordance with the laws of South Sudan. It would equally be in order to state the Government's interest to re-enlist the World Bank's STAR (Stolen Asset Recovery) initiative as a way to investigate and punish economic crimes. To bring this matter home, the Government's policies will be forward-looking. In particular, efforts to enforce accountability and human rights preservation measures, as well as pursuing liberal democracy, with endeavors to align with regional and international standards, will be prioritized.

Finally, the Government will accord the media the necessary space to do their due diligence as the Fourth Estate, discharging their role as a public watchdog. To this end, the role of the civil society will be revamped, for good.

¹⁵ While some of these policies are presently operational, the Government expects them to be a lot high on the agenda when R-TGoNU is place.

7 Conclusions and Recommendations

The Republic of South Sudan has had the pleasure of drawing very useful policy lessons from The Sentry's investigative work in the early years of its establishment as a public watchdog. Its recent outputs, although uncharacteristic of quality policy advice, are similarly valued.

This Response, nonetheless, attempts to offer alternative views into The Sentry's claims presented in its recent publication. The *Taking of South Sudan* takes an activist lens, consequently subjecting South Sudan to international political and economic hostility. Largely focusing on corruption, The Sentry ignores the danger the faulty politics of the country poses to the people of South Sudan, in turn recommending a financial 'coercion' as a solution to the pervasive violence. A summary of the findings, as well as policy recommendations, is provided below.

In response to the various allegations The Sentry advances, this investigation finds the following:

Review of Businesses

- The business registry at the Ministry of Justice offers evidence that confirms the existence of the businesses The Sentry indicts in its Report. However, there is no ground, at least as offered by The Sentry, to suggest that these businesses are involved in any wrongdoing.
- Similarly, over 50 percent of the alleged businesses have either collapsed or have never taken off since registering with the Ministry of Justice (see Table 2).
- Some of the shareholders blamed for conducting destructive businesses have either fewer shares or have completely sold them off long before The Sentry's research, contrary to what The Sentry claims.
- Finally, in most cases, members of the First Family are not the majority shareholders as The Sentry asserts.

More telling examples are in order.

- Since incorporated in April 2016, Sekoko Power (SS) Ltd never undertook a single business activity, eventually collapsing the same year.
- The First Lady, Mary Ayen Mayardit, has never been involved in Gemtel's business. Thus, Gemtel Limited was incorporated in South Sudan in November 2006, with Gemtel (Uganda) Limited holding 95 percent of the shares and Mr. Atem M. Lual, a South Sudanese, holding the remaining 5 percent.
- Ms. Winnie Salva Kiir Mayardit only holds 11 percent of the shares in the company (Fortune Minerals) that is on the verge of total collapse, having already lost 2 operational licenses.
- Allegations about DAR Petroleum funding militia groups could not be established. The source The Sentry uses in corroborating its charge is to the UN condemnation of renewed violence in Makalal, released on May 18, 2015. According to this source, the USC actually condemned the Sudan People's Liberation Army in

Opposition (SPLA-IO) for attacking Malakal on May 15, 2015, subsequently threatening sanctions against the main warring parties for failing to observe the ceasefire agreements.

- The Government appreciates The Sentry for flagging a possible case of corruption in relation to Ambassador Ezekiel Lol Gatkuoth's lodging expenditure and General Malek Reuben Riak's use of community funds to educate his son. Efforts will be made to investigate these accounts. The Sentry also criticizes Dar Petroleum for a dangerous environmental pollution in the oil producing areas. Nevertheless, none of these accusations sticks with The Sentry's thesis that multinational oil companies are endowing deadly militia groups in South Sudan. Accordingly, the news The Sentry has misinterpreted actually credits South Sudan's Government for admitting "that the oil production was a threat to local populations."
- The Sentry alleges that the issuance of a mining license to Fortune Minerals 6 weeks prior in 2016 resulted in violence, mass rapes, and population displacement in Mundri, Western Equatoria.
 - First, the AP news report The Sentry cites does not single out Government's attacks in Mundri.
 - Second, the relationship between conflict events in Mundri and the Fortune Minerals' acquisition of operational license in the same location is only coincidental. Statistics from ACLED, the source the Sentry referenced, show the following:
 - In 2016, there were 12 episodes of violence and 36 deaths in Mundri.
 - Between January 2014 and November 2015, however, the same location suffered 23 conflict events and 214 deaths. On May 27, 2015 alone, 60 civilians were killed in Mundri.
 - On October 18, 2016, suspected SPLA soldiers killed at least four people, including the diocese priest, in Greater Mundri, Mundri East and Medwu, as well as looted and destroyed several primary health care centers in Bari, Medwu, Bangolo, Kotobi, and Karika in Mundri West counties.
 - On October 17, 2016, SPLA-IO forces reportedly attacked Kadibi in Amadi, Mundri West, leaving 11 people dead. Government forces repulsed them. A number of farms in the area were destroyed in the clashes.

The Sentry does not present a complete picture of the conflict in the area as above.

- The Sentry accuses the national army of rapes in Mundri, citing an AP news entitled: Rape reaches 'epic proportions' in South Sudan's civil war. "After months of being raped by her rebel captors in the middle of South Sudan's civil war, the young woman became pregnant."
 - First, this story refers to a woman who was kidnapped and raped by the rebel MTN.
 - Second, the story came out in 2017, not 6 weeks after Fortune Minerals received the operational license as The Sentry claims.

- Third, the story accuses both the opposition and the government forces of atrocities. The Sentry makes attempt to highlight these facts.

In light of the above select examples, The Sentry offers an incomplete evidence for the policy solutions it proposes. What exists in terms of proof is either misrepresented, misinterpreted or doctored. In a host of cases, The Sentry has unverifiable sources, or has used traditionally questionable sources of information. Actually, various sources either do not cohere with the story, do not exist, or have a link that is not easily traceable. The Sentry's work, therefore, is broadly sensational.

The Sentry continues to have a comparative advantage in the policy world of South Sudan, however. This is in light of the fact that corruption and maladministration are widespread in the country. An anticorruption commission study shows, for instance, that over 90 percent of the South Sudanese population views corruption as a serious obstacle to effective delivery of services in the country. The Sentry's work fits within the frameworks of transitional justice and accountability¹⁶ and economic reforms¹⁷ in the R-ARCSS. It can focus on corruption and provide credible evidence in order to boost efforts toward combating this deadly vice.

In addition to strengthening the Anticorruption Commission, the Government proposes a range of measures in response to corruption and mismanagement of public resources. First, the Public Accounts Committee at the National Parliament is making progress toward instituting a Special Court tasked with trying cases related to mismanagement of public resources and corruption. The Committee is building its case based on the Auditor General's reports, which indicate an extreme case of fiscal indiscipline and waste of public resources. The Auditor General is currently set to present the remaining audit reports to the Parliament after the Unity Government is formed. Second, various audit reports indicate that a vast majority of the Government institutions do not have internal financial control systems¹⁸. This weakens the Government's ability to enforce procurement laws and

¹⁶ The mandate of the Commission for Truth, Reconciliation and Healing (CTRH), for example, states: Without prejudice to the administration of and access to justice, the CTRH shall inquire into all aspects of human rights violations and abuses, breaches of the rule of law and excessive abuses of power, committed against all persons in South Sudan by State, non-State actors, and or their agents and allies. In particular, the CTRH shall inquire into the circumstances, surrounding the aforementioned and any other. connected or incidental matters. Such inquiry shall investigate, document and report on the course and causes of conflict and identify or review cut-off timeframes for the operations of the CTRH, as may be determined by legislation, this Agreement or both.

¹⁷ On Resource Management, the Agreement states: The RTGoNU, through the Ministries of Petroleum and Finance and Planning, shall implement the provisions of the Petroleum Revenue Management Act (PRMA), 2012, within three (3) months of the Transitional Period.

¹⁸ Most of the ministries keep no records. Essential basic documentation would require cash books, expenditure analysis books, treasury books and period bank reconciliations. There were no internal

regulations. In response, the Government endeavors to enforce the procurement laws and regulations, strengthen budgetary oversight and control, and draw from international transparency and accountability best practices to monitor progress and punish substandard performance. As a matter of policy, the Government plans to uphold the rule of law, adhere to proper resource management, including prosecuting corruption, enhancing growth and pushing for shared prosperity. Without getting drawn into the politics of the country, focusing instead on generating credible evidence to support the fight against corruption, The Sentry would make an invaluable partner in putting these efforts to work.

In summary, the Government of the Republic of South Sudan has plans for her people and in this respect, it will consider the following policies and priorities during the transitional period and beyond:

- Strengthening security and upholding the rule of law, including drafting and enacting the permanent constitution.
- Adhering to the principles of good governance, which would entail fighting corruption, enhancing proper resource management, espousing transparency, and championing accountability.
- Investing in key infrastructure projects such as roads linking the states to facilitate trade and improve security.
- Embracing mutual regional and international cooperation, including having a strong foreign policy and contributing to regional peace, and
- Investing in the people of South Sudan through reorienting spending away from security to social causes, including enhancing social safety nets, health, education, and imparting employable skills.

auditors across the entire government system. In many instances, there was no segregation of the duties of authorization, custody, recording and execution. One official was allowed to perform several of these functions singlehandedly. Worse still, the frequency and magnitude of financial mismanagement suggests collusion. Where officials conspire to abuse the system of checks and balances, internal dies. Here is one example: The Directorate of Procurement, Ministry of Finance and Economic Planning purchased capital goods worth SDG 67million based on single sourcing, in contravention of the Interim Public Procurement and Disposal Regulation 2006, against a budget of SDG 3 million. Out of the SDG 67 million, SDG 51 million was allegedly used for purchase and construction of tents and stores in the states for grain storage. In the absence of adequate documentation, the auditors were unable to verify these transactions. National Audit Chamber, 2010.

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Appendix

The Sentry's Cited Sources

Information source	Claim	Legal status if an entity	Remarks
Memorandum and Articles of Association of Fortune Minerals & Construction Ltd, South Sudan Ministry of Justice, March 23, 2016.	Six weeks after Fortune Minerals received a license to explore for minerals near a town called Mundri, South Sudan's military reportedly launched a sustained military campaign in the area, destroying healthcare centers, committing mass rapes and forcibly displacing tens of thousands of people (endnotes 15, 16,17,18).	Registered but had its 2 out of a total of 5 licenses revoked.	The Sentry's claim of violence being a product of the operational license obtained by Fortune Minerals is only correlational. Prior periods saw more violence than October 18, 2016 as The Sentry claims.
http://www.smallarmssurveyesudan.org/facts-figures/south-sudan/conflict-of-2013-14/the-conflict-in-upper-nile.html .	A multinational oil consortium in South Sudan controlled by China National Petroleum Corporation and Malaysia's state-owned oil company, Petronas, provided material support to a pro-government militia that went on to commit atrocities, including burning of entire villages, targeting civilians, and an attack on a U.N. protection-of-civilians site (endnote 1).		Link not found. More search resulted in information related to conflict between Padang and the Shilluk over Malakal. No reference to Dar Petroleum's activities.
Fox News https://www.foxnews.com/world/residents-saysouth-sudan-troops-remove-5000-from-church 80 "Fueling Atrocities: ew;	The links between the NSS and Dar Petroleum reflect a broader trend of the security agency's involvement in the country's oil sector (endnote 79).		Page not found. The result reads: it seems you clicked on a bad link and stumbled upon our 404 page.
Human Rights Commission report, March 2019	The armed conflict in South Sudan is being driven primarily by the need to control the oil-producing areas in Unity and Upper Nile states," the report said. The oil industry in South Sudan, including the state-owned petroleum company, Nilepet has been militarized and securitized, with the National Security Service having expanded its involvement in oil production and management (endnote 81).		The Report was found, but it has no reference to evidence that the security sector is trying to take over oil sectors in South Sudan.
The Sentry https://desmondlatham.blog/tag/nhlanhla-dube/ ; www.politicsweb.co.za/news-and-analysis/vukani-	In 2014, South Africa-based Vukani Aviation, owned by South African Nhlanhla Dube, formed a joint venture with the NSS, a secretive police force within the President's office reportedly responsible for abductions, extrajudicial	Not active.	Most of these webpages are not active. Vukani Aviation, however, was shut down by South African authorities circa 2015/2016. Second,

<p><u>aviation-project-has-failed--belinda-bozzol;</u></p> <p><u>www.kathrynsreport.com/2015/01/nhlanhla-dubesh-fly-bynight-flight.html</u></p> <p><u>https://www.apnews.com/84f49cd827864a3494bf90d6c44172df</u></p> <p><u>https://www.hrw.org/news/2014/10/15/south-sudan-abusive-security-bill</u></p>	<p>killings, arbitrary detention, violence against civilians and intimidation of international aid workers and foreign government delegations in South Sudan to monitor the peace Agreement. Other documents reviewed by The Sentry show that Vukani is among several international firms that partnered with the NSS between 2014 and 2016. Vukani's (endnotes 83-100).</p>		<p>Vukani Aviation never had operations in South Sudan.</p>
<p>130 Documents on file with The Sentry.</p> <p>131 Documents on file with The Sentry.</p> <p>141 Documents on file with The Sentry.</p> <p>142 Documents on file with The Sentry.</p> <p>143 Documents on file with The Sentry.</p>	<p>Since his involvement in the 2006 Toyota scandal, Al Cardinal has often partnered with the government, prominent politicians, senior officials and their relatives. In November 2006, he incorporated three companies alongside Salva Kiir's relative and close associate, Kiir Gai Thiep.</p>	<p>Active</p>	<p>The business registry confirms that these businesses were indeed incorporated to trade in arms, among other sectors. The Sentry does not provide proof of any of these companies shipping military supplies to South Sudan. Second, Giir Gai is not an associate or President Kiir's relative. Lastly, Kiir Gai has since left these companies, with Al Cardinal and his children owning all of the shares.</p>
<p><u>https://beta.companieshouse.gov.uk/</u></p> <p>186 Investigation reviewed by The Sentry. Letter from Uganda Attorney General's Chambers to Judge Vladimir Tufegjic in Basic Court Skopje Macedonia, February 8, 2011.</p> <p>187 Investigation reviewed by The Sentry.</p>	<p>David Greenhalgh and his company are implicated in a government investigation into \$65 million that reportedly left South Sudan for services that South Sudanese authorities and government correspondence indicate were never delivered as payment for "a mobile system for aviation management and monitoring central unit, complete with radar and other equipment."</p>	<p>N/A</p>	<p>Couldn't be confirmed.</p>

189 Investigation reviewed by The Sentry.			
190 Investigation reviewed by The Sentry.			
<p>115 Special Resolution for Conex Energy Co. Plc.,” South Sudan Ministry of Justice, August 20, 2014; “Memorandum and Articles of Association of Caltec Corporation Ltd,” South Sudan Ministry of Justice, February 20, 2014.</p> <p>116 “Memorandum and Articles of Association of Lukiza Limited,” South Sudan Ministry of Justice, February 12, 2010.</p> <p>117 “Company History,” Caltec Corporation Limited, accessed August 22, 2019, available at: http://www.calteccorporation.com/index.php/our-company.</p>	<p>Just two months after the December 2013 massacres in Juba, Conex Energy Co., a company controlled by Kiir’s daughter Adut, his son-in-law Nardos Ghebeyehu and Akot Lual Arech—a close advisor to the president affiliated with the NSS—formed the joint venture Caltec Corporation with South Sudan-registered Lukiza Limited. Gideon Moi, an influential senator who is the son of former Kenyan President Daniel Arap Moi, has a partial ownership stake in Lukiza. Caltec’s website describes the firm as a “Special Purpose Vehicle (SPV) to specifically engage in the provision of services in the oil sector.” Waste management, drilling, logistics and air transportation are among the services it says it provides.</p>	Active	Mrs. Adut sold her shares years before The Sentry’s Report.