

SPECIAL REPORT

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MARGARET THATCHER CENTER FOR FREEDOM

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Interpol serves a valuable purpose and deserves to be properly funded. Its democratic member nations have a particular stake in ensuring that Interpol can fund itself through its normal budgetary processes, for the less Interpol relies on statutory contributions, the more likely it is to fall into the financial clutches of the autocracies that seek to abuse it for their own ends. The U.S. and its democratic allies in Interpol need to start laying the groundwork now for the election of the organization's next Secretary General in 2024. No reforms of Interpol's finances or of Interpol more broadly, no matter how necessary or far-reaching, will be effective if Interpol's leaders are not committed to upholding and advancing them.

Interpol, an organization of police and law enforcement organizations, is funded by its member nations and through other channels. As Interpol has grown since 9/11, its budget has grown apace, as has its desire to raise funds from new sources. Over these years, Interpol has faced criticism, both for its increasing reliance on autocratic sources of funding and for failing to live up to its constitutional requirement that it avoid becoming an instrument of oppression for autocratic regimes such as China and Russia.¹

China is one of the most important abusers of Interpol. It uses Interpol to intimidate dissidents who have escaped to other nations and to pressure them into returning to China. Preventing Chinese abuse of Interpol is part of the wider U.S. and democratic struggle to thwart the autocratic takeover of international organizations. Russia is an even more visible abuser of Interpol. Russia's abuse is part of Vladimir Putin's campaign against the West and those who dare to oppose his regime, a campaign that runs the gamut from harassment to assassination to war. If the U.S. does not take the lead against these abusers, their abuses will continue and Interpol, which provides important assistance

to U.S. law enforcement, will fall into disrepute. Ensuring that Interpol is properly and transparently funded by its democratic member states is a central part of a wider program of restoring its integrity and blocking malicious autocratic influence.²

Although Interpol was originally supposed to be funded primarily by statutory contributions paid by its member nations, it now relies increasingly on less transparent forms of funding. Particularly serious is Interpol's financial relationship with the Interpol Foundation for a Safer World, which in reality is a front for donations from the United Arab Emirates (UAE), a notorious abuser of Interpol's systems.³ While Interpol is partly to blame for these failings, its member nations' demands that it undertake new activities have also encouraged it to raise funds without sufficient care for either the appearances of or the realities behind its funding.

Interpol serves a valuable purpose and deserves to be properly funded. Its democratic member nations have a particular stake in ensuring that the organization can fund itself through its normal budgetary processes, for the less Interpol relies on statutory contributions, the more likely it is to continue to fall into the financial clutches of the autocracies that seek to abuse it for their own ends.

Interpol's member nations need to increase their statutory contributions, reduce voluntary contributions, and show greater responsibility in demanding that the organization undertake expensive new activities. For its part, Interpol must focus on its core duty of helping the world's police communicate with each other; step away from its reliance on voluntary contributions; and put its future firmly in the hands of its democratic member nations, which must have confidence that the organization is upholding the values on which the democracies founded it.

What Interpol Is and What It Is Not

Media portrayals often depict Interpol as an international police force that investigates crimes, issues international arrest warrants, and has armed agents around the world who arrest criminals. Every part of this depiction is incorrect. As traditionally operated, Interpol is better understood as a sophisticated electronic bulletin board on which its member nations can post "wanted" notices and other information.

At the request of a member nation, Interpol can publish a Red Notice, which notifies all other Interpol member nations that the nation that requested the Red Notice is seeking an individual for trial or to serve a sentence. An Interpol member nation can also transmit a diffusion to

communicate directly through Interpol's network with one or more member nations. Red Notices and diffusions can contain the same information and request the same actions. Red Notices are more widely known, but diffusions comprise more of the traffic over Interpol's network.

Like all of Interpol's activities and communications, Red Notices and diffusions can concern only ordinary crimes, such as murder or robbery, and must have no political, military, racial, or religious character. Interpol abuse occurs when a nation fails to respect this restriction and uses Interpol to pursue or harass an individual for any reason other than those of legitimate law enforcement.

Publicly Available Information on Interpol's Finances

Interpol currently publishes five major kinds of information on its finances:

- Annual financial statements, available for 2010 through 2020;
- Member country statutory contributions, available for 2010 through 2021;
- External contributions, available for 2014 through 2020;
- New contribution agreements, available for 2019 and 2020; and
- Lists of transactions valued at more than 60,000 euros (€60,000), available for 2014 through 2021.

All of these documents (along with Interpol's annual reports, which contain summary financial information) are available on Interpol's Internet site.⁴ Interpol does not publish its budget.

Interpol has grown substantially in the years since 9/11. While this report looks back to 2000 and the decade between 2000 and 2010, as records allow, to provide historical context on Interpol's growth since 2000, it focuses primarily on the period from 2010 (the first year for which a full annual financial statement is available) through 2020 (the most recent year for which a full annual financial statement is available). This report is concerned primarily with Interpol's revenue, but it also examines Interpol's expenses and overall financial position.

TABLE 1

Interpol Growth, 2001–2010

	Interpol Expenditures (Millions of Euros)	Total Staff	Seconded Staff	Red Notices Published	Percentage of Expenditures Paid by Statutory Contributions
2000	€22.2	381	95	1,204	Not available
2001	€27.5	391	128	1,481	80%
2002	€32.3	406	131	1,277	70%
2003	€28.3	431	146	1,397	98%
2004	€34.3	443	145	1,924	105%
2005	€42.7	502	ca. 146	2,206	82%
2006	€46.7	541	ca. 170	2,804	82%
2007	€48.1	562	ca. 182	3,131	86%
2008	€54.6	588	ca. 190	3,126	83%
2009	€58.8	645	207	5,020	81%
2010	€61.1	Not stated	Not stated	6,344	80%

NOTES: From 2005 through 2008, Interpol provided the number of seconded staff as a percentage of its overall staff.

SOURCES: Interpol, “Documents: Annual Reports,” 2000–2010, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed May 11, 2022). The number of Red Notices published in 2001–2003 is taken specifically from Interpol, *Interpol at Work: General Secretariat 2003 Activity Report*, p. 5, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed May 11, 2022).

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Interpol’s Growth Since 2000

The quality, thoroughness, and clarity of the information available on Interpol’s finances has increased considerably since 2000 in line with the growth in Interpol’s budget and level of activity. Interpol began to publish annual financial statements in 2010. Before 2010, it published only its annual reports, which contained a summary of Interpol’s budget and, in many years, staff levels.

As Table 1 shows, from 2000 through 2010, Interpol’s expenditure grew by 175 percent. Its staff (from 2000 through 2009) grew by only 69 percent, while its seconded staff grew by 118 percent. The growth in Red Notices vastly outpaced all other increases, rising by 427 percent. This reflects, above all, the significance of the launch in 2003 of Interpol’s I-24/7 global communications system.

TABLE 2

Interpol Growth, 2011–2020

	Interpol Expenditures (Millions of Euros)	Total Staff	Seconded Staff	Red Notices Published	Percentage of Expenditures Paid by Statutory Contributions
2011	€58.3	673	Not stated	7,678	85%
2012	€69.8	703	Not stated	8,136	73%
2013	€78.0	756	Not stated	8,857	66%
2014	€84.1	819	ca. 238	10,718	64%
2015	€116.3	Not stated	Not stated	11,492	45%
2016	€113.7	Not stated	Not stated	12,878	46%
2017	€122.2	890	238	13,048	44%
2018	€130.4	Not stated	254	13,516	43%
2019	€146.7	1050	275	13,377	39%
2020	€133.2	995	252	11,094	44%

SOURCES: : Interpol, “Documents: Annual Reports,” 2011–2020, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed May 11, 2022). The number of seconded staff in 2018 is taken from Interpol, *Annual Financial Report and Financial Statements 2019*, p. 62, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed May 11, 2022).

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From 2001 through 2010—with the exception of the three years immediately after 9/11—Interpol regularly derived at least 80 percent of its funding from its statutory contributions. In short, from 2002 through 2010, Interpol grew rapidly but in ways that were in line with its financial position as of 2001.

As Table 2 shows, the decisive break in Interpol’s financial and operational history came in the years from 2011, when Ronald K. Noble of the United States began his third and final five-year term as Interpol’s Secretary General, to 2015, when the current Secretary General, Jürgen Stock of Germany, completed his first year in office and the new INTERPOL Innovation Centre in Singapore was fully opened.

From 2011 to 2015, Interpol’s expenditure grew by 99 percent, and the number of Red Notices published increased by 50 percent. The increase in staff cannot be calculated, but Interpol added around 150 staff and about 30 seconded staff during those years.

Most important of all, the share of Interpol’s expenditure funded by its statutory contributions declined dramatically from 85 percent in 2011 to 45

percent in 2015. While this decline was caused in part by the opening of the Innovation Centre, this facility and the resulting growth of in-kind contributions from Singapore accounted for only a part of the change in Interpol's funding model, as shown by the fact that the share of Interpol's expenditure funded by its statutory contributions declined steadily from 2011 through 2015.

Since 2015—with the exception of a significant jump in operating expenses in 2019, which was caused primarily by an increase in pay costs and an increased provision for doubtful debts, and a contraction in 2020 caused by the COVID-19 pandemic—Interpol has grown steadily but more modestly. It remains to be seen whether the organization will continue to grow at the rate it achieved from 2018 to 2019 or whether the pandemic year of 2020 will slow or even reverse this growth, though the fact that Interpol's 2021 budget was €145.8 million (bringing it back to the 2019 level) implies that 2020 did not in fact apply the brakes to Interpol's growth.⁵ In any case, it is clear that Interpol can no longer fund a substantial majority of its budget through statutory contributions.

Interpol's 2020 Operating Revenue: An Overview

In 2020, Interpol's operating revenue was €135,904,000, which it derived from five principal sources:

- Statutory contributions by member states,
- Voluntary in-kind contributions,
- Voluntary cash contributions,
- Reimbursements and recoveries, and
- Regional Bureau financing.

Interpol also derived a small amount of revenue from interest on bank balances and investments (€417,000 in 2020) and from "Other" sources (€367,000 in 2020). These other sources included receipts from sales of Interpol-branded merchandise; revenue from Interpol's I-Checkit system (a document screening system used by the private aviation and maritime sectors); and other "miscellaneous receipts." Together, these sources were responsible for €784,000 in revenue, which is less than 1 percent of Interpol's operating revenue for 2020.

Interpol's 2020 Operating Revenue by Category

CATEGORY #1: Statutory Contributions by Member States

In 2020, Interpol assessed €58,811,000 in statutory contributions, an increase from the €48,615,000 it assessed in 2010 and the €52,783,000 it assessed in 2015.⁶ The increase in assessed statutory contributions from 2010 to 2020 was €10,196,000, an average growth rate of 2.1 percent that in practice was not sufficient even to keep pace with inflation.

Statutory contributions are mandatory: Interpol's rules impose sanctions on member states that fail to pay. The scale for statutory contributions is approved by Interpol's governing General Assembly, which in 2018 adopted a new scale for gradual implementation from 2020 through 2022. This scale, essentially based on the size of a nation's economy, requires a minimum payment of 0.033 percent of total statutory contributions with contributions from member states that pay more than the minimum (such as the U.S.) set by the application of an adaptation of the latest United Nations scale of contributions. While the U.S. is required to pay 22 percent of U.N. assessed contributions, its scale of assessments in Interpol is capped at 20 percent. The U.S. paid 19.627 percent in 2020, paid 19.813 percent in 2021, and will pay 20 percent in 2022.⁷

Interpol was supposed to be funded primarily by statutory contributions. As specified in Article 38 of Interpol's Constitution:

The Organization's resources shall be provided by:

(a) The financial contributions from Members;

(b) Gifts, bequests, subsidies, grants and other resources after these have been accepted or approved by the Executive Committee.⁸

Interpol itself states that “funding for our activities comes mostly from governmental sources” and that “[w]e have two main sources of income: statutory contributions from our membership, and voluntary funding for our activities.”⁹ It might therefore be supposed that Interpol relies primarily on statutory contributions. In fact, in 2020, while statutory contributions were Interpol's largest source of revenue, member state dues represented only 44 percent of Interpol's operating revenue.¹⁰

The fact that statutory contributions now provide less than half of Interpol's operating revenue has not come about by accident. Interpol has a deliberate

policy of “diversifying its income streams, so as not to become too dependent on any one source. Notably it has been increasing its voluntary cash and contributions in-kind...”¹¹ Thus, while Interpol is still funded primarily by its member nations (and therefore by “governmental sources”), the kind of payments that Interpol receives from those governments has shifted rapidly. In 2010, statutory contributions were approximately 80 percent of Interpol’s operating revenue, but by 2020, those contributions were only 44 percent.¹² Interpol’s desire to avoid dependence on a single revenue source might appear to be prudent, but it has led to significant problems and challenges.

Under Article 52 of Interpol’s General Regulations, a member nation must be suspended from voting in Interpol’s General Assembly if it has failed to pay its statutory contribution for both the current and the previous financial years.¹³ The 15 nations in what Interpol’s 2020 financial statement describes as “long-term payment arrears” are therefore known as “Article 52 countries.” Together, they owe €3.8 million and comprise 8 percent of Interpol’s membership.¹⁴ Those 15 nations are not expected to pay what they owe, though their legal obligation to pay has not been suspended or removed.¹⁵ There is no clear trend in long-term arrears: The number of states in long-term arrears fell from 2016 to 2018 and then rose in 2019 and 2020, as did the amount owed.¹⁶

Interpol’s 2020 financial statement contains an intriguing note about one of these nations: “[T]he Organization continued its dialogue with countries with the notable success of the voluntary support of a member in long-term payment arrears by a third country.”¹⁷ Interpol does not identify either the “third country” that came to the rescue of the indebted nation or the indebted nation itself, but the suspicion must be that the “third country” is the People’s Republic of China.¹⁸ Regardless of the identity of this “third country,” Interpol cannot allow itself to maintain secrecy in this regard: If an Interpol member state is having its dues paid by a third country, both the member state and the third country should be named. More broadly, it is against Article 18 of Interpol’s General Regulations for one member state to vote on behalf of another member.¹⁹ It should also be against Interpol’s rules for one member state to pay dues for another member.

Interpol on occasion enters into debt-rescheduling agreements with member states that have not paid their dues. As of 2020, eight nations had signed agreements to pay their outstanding dues over a specified period. Interpol thus expects to receive an additional €218,000 in statutory contributions from these member states. Interpol is also owed €585,000 from non-current debt-rescheduling agreements, a categorization that implies doubt that these debts will ever be paid.²⁰ Unfortunately, Interpol’s accounts

do not specify which debt-rescheduling agreements are current and which are not likely to be paid.

Finally, 32 Interpol member states owed dues at the end of 2020. Collectively, these nations are €1.193 million in debt; at the end of 2019, member states owed only €579,000.²¹ In total, Interpol is owed €5.745 million by its member states, though it is likely to receive only €1.411 million at most.²² Fifty-five member states (15 in long-term arrears, eight under debt-rescheduling agreements, and 32 that had unpaid dues at the end of 2020) owe statutory contributions.

While any shortfall is unfortunate, the payment record of Interpol's member states is generally good: Approximately 28 percent have not paid their dues in full. A comparison can be made, for example, with the record of the contributors to the Arms Trade Treaty, which is supposed to have received contributions from 153 states, 64 (42 percent) of which have not paid what they owe.²³

Interpol also succeeds in collecting a high share of statutory contributions owed to it. It collected 98.5 percent of its expected dues in 2019, for example, and 97.6 percent in 2020.²⁴ This high collection percentage reflects the fact that most of the amounts owed to Interpol are minor. The most seriously indebted states are Venezuela (€787,000); São Tomé and Príncipe (€492,000); Guinea-Bissau (€485,000); Iran (€343,000); Comoros (€340,000); Gambia (€329,000); and Nauru (€303,000). Only seven other states owe more than €100,000, and the only state that owes more than €100,000 and is not under Article 52 sanctions or in a debt-rescheduling agreement is Iran.²⁵ Similarly, most of the debts are recent: Only 18 member states owe dues dating back before 2019, though this in part reflects the fact that the General Assembly cancelled debts owed in 2001.²⁶ Interpol's record likely reflects the value that Interpol's member states attach to it as well as the effect of Article 52.

While Interpol has collected almost all of the statutory contributions pledged to it, those contributions are not spread equally. In 2020, the top five contributors were responsible for 48.67 percent of the statutory contributions; the top 15 contributors paid 75.87 percent.²⁷ A long tail of 112 states each contributed approximately 0.03 percent of Interpol's revenue from statutory contributions—approximately €20,000 per member state.²⁸ These minor contributor states command an absolute majority of 57.7 percent in Interpol's 194-member (as of 2020) General Assembly, which operates on majority rule with one vote per member state, but collectively are supposed to contribute just over €2 million (approximately 3.4 percent of statutory contributions) to Interpol.²⁹ This disparity between voting power in the General Assembly and statutory contributions made to Interpol is stark.

The divide between statutory contributions on a regional basis is almost as stark. For purposes of voting for leadership positions in its General Assembly, Interpol is divided into four regions: Europe, the Americas, Asia, and Africa. Interpol's statutory contributions are paid by Europe (41 percent); the Americas (29 percent); Asia (24 percent); and Africa (2 percent). For budgetary purposes, Interpol breaks out the Middle East and North Africa as a separate region, which accounts for the final 4 percent of the statutory contributions.³⁰ The Middle East, North Africa, and Africa pay approximately 6 percent of the statutory contributions but control 67 votes, or 35 percent, in the General Assembly.³¹

Breaking the sources of Interpol's statutory contributions down into contributions from "Free," "Partly Free," and "Not Free" states as defined by Freedom House³² reveals another stark disparity.

- The 77 free states in Interpol comprise 40 percent of its membership but pay 81 percent (€47.6 million) of its statutory contributions;
- The 58 partly free states comprise 30 percent of Interpol's membership but pay only 6.1 percent of its statutory contributions; and
- The 54 not free states comprise 28 percent of Interpol's membership but pay only 12.8 percent of its statutory contributions.

In other words, the free states pay a substantial majority of Interpol's statutory contributions but control less than half of its votes.³³

This disparity continues if Interpol's statutory contributions are sorted by size. Of the top 15 contributors in 2020, 12 (the U.S., Japan, Germany, France, the United Kingdom, Italy, Canada, Spain, Brazil, Australia, the Republic of Korea, and the Netherlands) are democracies.³⁴ Only three of the top 15 contributors (China, the sixth largest at 5 percent, or €2.941 million; Russia, the 11th largest at 2.16 percent, or €1.27 million; and Mexico, the 15th largest at 1.588 percent, or €933,347) are not full democracies.

The only other non-democracies that contribute (or are supposed to contribute) more than €100,000 in statutory contributions are Colombia, Iran, Hungary, India, Indonesia, Kuwait, Malaysia, Qatar, Saudi Arabia, Singapore, Thailand, Turkey, the UAE, and Venezuela (although Iran and Venezuela have not paid their bills). Several of these 14 states—Turkey, the UAE, and Venezuela in particular—are among Interpol's most abusive members, but their statutory contributions, taken together, amount (or are supposed to amount) to only €3.467 million.³⁵ The statutory contributions

of all non-democracies that are supposed to contribute more than €100,000 amount (or should amount) to €8.611 million.

Debts from unpaid statutory contributions are not spread evenly across free, partly free, and not free nations. The 77 free states in Interpol comprise 40 percent of its membership but are responsible for only €229,000 of these debts. The 58 partly free states owe €628,000, and the 54 not free states owe €696,000. Interpol's partly free and not free states are thus responsible for a disproportionate share of this indebtedness.

The past decade has seen a modest erosion in the budgetary position of Interpol's free members, at least as far as statutory contributions are concerned. In 2010, the free nations (as classified in 2010) paid 87.9 percent of Interpol's statutory contributions, the partly free paid 4.7 percent, and the not free paid 7.2 percent. The free share of statutory contributions has thus declined from 87.9 percent to 81 percent, the partly free share has risen from 4.7 percent to 6.1 percent, and the not free share has almost doubled from 7.2 percent to 12.8 percent. This is significantly (though not exclusively) the result of the rise of China, which paid €1.11 million in statutory contributions in 2010 and €2,940,513 million in 2020, a nearly threefold increase—though contributions from the UAE and Russia, among other members, have grown by about the same proportion, albeit from a lower base.³⁶

By contrast, the U.S.'s contributions have not even doubled, growing from €6.847 million in 2010 to €11.535 million in 2020. The U.S.'s record, however, looks generous compared to Japan's (an increase of €930,000 since 2010) and Germany's (a nominal decrease).³⁷ This is not because Germany and Japan, for example, are refusing to pay their assessments; it is because the scale of assessments, now set ultimately at the United Nations and modified by the Interpol General Assembly, has not required them to pay more.³⁸ In short, the decline in the financial power of the democracies has been caused partly by increased autocratic contributions but also—and more significantly—by smaller increases (or even decreases) in democratic contributions.

The position of the democracies as statutory contributors will continue to worsen in the coming years as China's contributions increase from its 2021 assessment of 6.27 percent. In 2022, for example, China will be assessed 7.536 percent—more than any other contributor except the U.S. and Japan.³⁹ Other factors being equal, China's assessment will continue to increase in the years to come, as will its influence.

In 2021, the Interpol General Assembly voted to increase statutory contributions by €22 million over the three years from 2022 through 2024.

After the vote, Interpol noted that statutory contributions “currently only represent 41 per cent of the overall budget.”⁴⁰ The U.S. will pay 20 percent of this additional €22 million, which means that by 2024, it will be paying approximately €15.94 million in statutory contributions (about \$18.27 million at current exchange rates) annually.

If Interpol’s budget remains stable (which is not likely to happen), the increase will allow statutory contributions to fund 56 percent of the budget by 2024. But if Interpol’s budget continues to grow by €15 million a year, statutory contributions will fund only about 43 percent of Interpol’s spending in 2024. In practice, therefore, even this unprecedented rise in statutory contributions—the first in real terms since 2009—will most likely ensure that statutory contributions continue to fund only slightly more than 40 percent of Interpol’s budget.

In announcing the General Assembly’s vote, Secretary General Jürgen Stock referred to statutory contributions as “the financial backbone of our Organization and the only way to ensure sustainability.”⁴¹ That statement is at odds with the most striking fact about these statutory contributions: Interpol has adopted a deliberate strategy of reducing its reliance on them. Interpol’s free member states make the lion’s share of these contributions and are overwhelmingly (though decreasingly) its most important statutory contributors while nevertheless commanding a minority of the votes in Interpol’s General Assembly. The situation can be summed up as follows: Six of the top seven contributor states as of 2020 (the U.S., Japan, Germany, France, the U.K., and Italy) are democracies and make 53.11 percent of the statutory contributions, but they control only 3 percent of the votes in the Interpol General Assembly.

CATEGORY #2: Voluntary In-Kind Contributions

Voluntary in-kind contributions are a vital and growing part of Interpol’s operating revenue. In 2020, in-kind contributions were valued at €34.9 million, or 25.7 percent of Interpol’s operating revenue.⁴²

Interpol’s financial statements provide significant detail about its in-kind revenues. These revenues are broadly comprised of two streams: the rent-free use of buildings and equipment (€11.936 million in 2020)⁴³ and payments to seconded officials (€22.965 million in 2020).⁴⁴ Much of the first sum is provided by the government of Singapore, where Interpol opened its Innovation Centre in 2015.

There was no obvious reason for Interpol to open this facility, except to gratify a desire to have a physical presence in Asia (and perhaps to escape

the effects of France's restrictive labor laws), but the Innovation Centre's impact on Interpol's finances is clear. Interpol received "in-kind premises running costs" valued at €2.117 million in 2014 and €9.935 million in 2015.⁴⁵ Singapore's in-kind donations have made it Interpol's second-largest funder, behind only the United States, if statutory contributions and in-kind support are taken together. In 2020, Singapore provided in-kind premises support valued at €10.403 million.⁴⁶ Interpol also received in-kind premises support from seven other member states as well as the United Nations in 2020.⁴⁷

Interpol also derives significant value from in-kind payments to seconded officials. In 2020, according to its annual report for that year, Interpol had 995 staff employees, 25 percent (252) of whom were seconded.⁴⁸ The trends in in-kind payments to seconded officials are difficult to analyze, as Interpol's accounts have not always broken out these payments. In 2010, Interpol received €7.424 million in "Other Income," a line item that likely includes in-kind payments and premises costs.⁴⁹ By 2015, in-kind pay costs were broken out and amounted to €20.917 million, not far short of the €22.965 million that Interpol received in 2020.⁵⁰ Interpol did not report its number of employees in 2010 or 2015, but as with its in-kind premises costs, it would appear that this growth in the organization's in-kind pay costs relied significantly, though not decisively, on the value derived from seconded officials.

Interpol's seconded officials represent 77 nationalities.⁵¹ The nations that provided the most seconded support in 2020 were France (21 officials); Germany (13); Singapore (13); Argentina (11); the U.S. (10); Brazil (eight); Italy (eight); Cameroon (seven); South Korea (seven); and the U.K. (seven).⁵² The prominence of France and Singapore is explained by the fact that Interpol's two major facilities are in Lyon and Singapore.

Of the notoriously abusive Interpol member nations, and as of 2020, Russia had no seconded officials, China had six, the UAE had five, and Turkey had two. There appears to be no serious reason for concern that Interpol will be dominated by officials of any particular nationality or region, but this does not mean that it can afford to ignore the mischief that even a single seconded official from an abusive member state could commit.⁵³ The free nations have seconded 135 officials (54 percent of the total); the partly free nations have seconded 62 (25 percent); and the not free nations have seconded 53 (21 percent).⁵⁴ The seconding of officials is thus a significant factor in reducing the dominance of funding (and staffing) from democratic member states inside Interpol.

These seconded officials are widely distributed by region: 81 are from Europe, 38 are from the Americas, 61 are from Africa, and 69 are from

Asia. Interpol provides no information on the duties of these officials, their levels within Interpol, or the size or composition by nationality of its departments.

Interpol clearly relies heavily on seconded officials and in-kind payments for premises. It is difficult to see how Interpol could continue to operate on its present scale without these in-kind contributions, though the payments received from Singapore for Interpol's facility there are not necessary to its core functions, which are carried out at its headquarters in Lyon, France. Interpol's reliance on in-kind payments, and specifically its reliance on seconded officials, undoubtedly has advantages, but it also creates considerable staff turnover, making it harder for Interpol to control the quality of the officials who work for it, and increases Interpol's vulnerability to nations that may use their seconded officials to influence its operations or simply to gather data about how Interpol works.

CATEGORY #3: Voluntary Cash Contributions

Interpol defines "voluntary contributions" as "donations received with no specific or defined purpose."⁵⁵ In 2020, Interpol received €3.460 million in voluntary contributions.⁵⁶ This was essentially the same as the €3.493 million it recorded receiving in 2019.⁵⁷

These funds derive from two sources: voluntary contributions from member states (€460,000 in 2020) and a contribution from the INTERPOL Foundation for a Safer World (€3 million in 2020). The Foundation was credited with making a similar payment in 2019,⁵⁸ though this payment is recorded as a receivable account, meaning that this 2019 payment had not been made by the end of 2020.⁵⁹

The voluntary contributions from member states came from nine nations (Albania, the Bahamas, Bangladesh, Barbados, Liechtenstein, Malaysia, Monaco, Pakistan, and St. Kitts and Nevis). None of the contributions were for more than €80,000, and all of these nine nations gave roughly similar amounts in 2019.⁶⁰

The INTERPOL Foundation is one of the most controversial aspects of Interpol's revenue, if not *the* most controversial. Not all of the revenue from the Foundation is classified as a voluntary contribution; much of it is part of Interpol's Trust Fund and Special Accounts and is recorded as revenue booked for specific projects. Nevertheless, all revenue from the Foundation is classified as support from a "Government Agency." This reflects the fact that the Foundation is simply a conduit for funding from the UAE, one of Interpol's most abusive members.

Interpol makes no effort to conceal the source of the Foundation's funding. In its 2020 annual report, Interpol identified "Our Top Donors in 2020" as including "United Arab Emirates/INTERPOL Foundation for a Safer World."⁶¹ Interpol and the Foundation have had a cooperation agreement since 2014.⁶² In 2016, Interpol entered into a five-year agreement with the Foundation for a €50 million donation from the UAE, to be made from 2016–2020 in annual gifts of €7 million "to support the execution of special projects" and €3 million "as an unrestricted voluntary contribution" to Interpol's budget. This funding agreement ended in 2020.⁶³ The Foundation was slow to keep its side of the agreement: By the end of 2020, it owed Interpol €10 million for 2019.⁶⁴

Interpol does not appear to have established the Foundation solely as a conduit for the UAE's funds. Interpol's Executive Committee created the Foundation during the General Assembly's meeting in 2013, and the General Assembly endorsed this search for "Extrabudgetary resources" on the grounds of Interpol's "increasing financial needs and the insufficient income from statutory contributions."⁶⁵ At least initially, therefore, the Foundation seems to have represented a good-faith effort to create an external fundraising mechanism. On its website, the Foundation refers to itself optimistically as "the rallying point for an alliance where likeminded organizations and persons can unite with INTERPOL and the global law enforcement community in a joint response to today's challenges."⁶⁶

However, the Foundation has not succeeded in raising any funds apart from those donated by the UAE, and Interpol's financial statements do not refer to any contributions from the Foundation other than those from the UAE. In response to a question posed by attorney Michelle Estlund, proprietor of the *Red Notice Law Journal*, Interpol stated that:

All of the funding from the Foundation to INTERPOL is from the EUR 50 million donation over a five year period...by the United Arab Emirates...

It is the Foundation which receives the funds directly from the UAE government, and the General Secretariat does not have specific details from which Ministry or other body the donation is received each year.⁶⁷

Thus, for €50 million, Interpol, while remaining ignorant of any relevant details, has tied itself financially to an unfree state that is one of its most abusive members.

The voluntary donations that Interpol has received from the Foundation amount to only €15 million or, at €3 million annually, only 2.2 percent of

its operating revenue in 2020. The Foundation has therefore made only a limited contribution to sustaining Interpol's core operations by providing unrestricted funds.⁶⁸

Interpol believes otherwise: Its 2017 financial statement noted that “the funding of EUR 3 million that was received from the INTERPOL Foundation during 2016 has been of tremendous support in converting the operating deficit during the year into a reported surplus.”⁶⁹ Without the Foundation's support, however, Interpol would have run a deficit of only €7.2 million from 2016 through 2020—approximately €1.44 million annually.

The most serious contributors to Interpol's deficits during those years were the provisions it made for unpaid statutory contributions (which in 2020 amounted to €3.749 million, or more than half of the deficit Interpol would have run) and, secondarily, the overall growth in its budget.⁷⁰ The Foundation's support has therefore not saved Interpol from unmanageable deficits so much as it has both subsidized Interpol member states that do not pay their dues and sustained a level of activity that those states vote for in the General Assembly but are unwilling to support through their statutory contributions.

CATEGORY #4: Reimbursements and Recoveries

Interpol defines “reimbursements and recoveries” as “amounts reimbursed for operating expenses under a specific agreement” or “revenues from conferences from the sale of exhibitor booths or for hosting events.”⁷¹ The second of these two sources is insignificant: In 2020, as a result of the COVID-19 pandemic, Interpol made nothing on the sale of exhibitor booths, and in 2019, it made only €175,000 from booths and €485,000 from conferences.⁷² In 2020, on the other hand, Interpol received a net €36.577 million from projects for which it could be reimbursed for operating expenses.⁷³ This makes “Reimbursements and recoveries” the second most important source of Interpol funding, behind only its assessed contributions.

Because of the COVID-19 pandemic, Interpol significantly underperformed its budgetary expectation in this revenue category in 2020; it had expected to receive operating revenue of €51.347 million from “reimbursements and recoveries” (and related in-kind contributions).⁷⁴ Nevertheless, the trend is clear: Interpol booked only €25.207 million in revenue from “reimbursements and recoveries” in 2015⁷⁵ and recorded a mere €1.189 million in 2010.⁷⁶ The growth of Interpol's budget from €58.797 million in operating revenue in 2010 to €135.904 million in 2020 has been driven

more by an increase in “reimbursements and recoveries” (an increase of €35.388 million over those 10 years) than it has been by any other factor, including the growth of in-kind contributions.⁷⁷

The result has been to transform Interpol. It is no longer an organization that relies largely on statutory contributions to fund a stable core of Interpol employees focused on a set of enduring operations centering on its Notice system. It is now an organization that relies significantly on contractual payments to fund a far larger pool of employees whose numbers have grown considerably because of the influx of seconded personnel and who work on a range of designated projects. This is the most important change in Interpol’s structure and operations over the past decade.

Interpol’s “reimbursements and recoveries” are held either in a dedicated Trust Fund—the INTERPOL Fund for International Police Cooperation—or in a Special Account.⁷⁸ Thus, these revenues are often described as Trust Fund and Special Accounts revenues. The Trust Fund is substantially dominated by the INTERPOL Foundation (in other words, the UAE). In 2020, the Fund’s operating expenses were €7.035 million (down from €9.038 million in 2019), of which expenses related to the Foundation were €6.393 million (down from €7.781 million in 2019).⁷⁹ In short, apart from its voluntary contributions of €3 million annually, the Foundation’s support for Interpol flows largely through the Trust Fund, and the Trust Fund for all intents and purposes is the holding pot for the Foundation’s—and thus the UAE’s—support.

The Fund was created by the General Assembly in 2014, but its activities are opaque. It is not mentioned in Interpol’s annual reports for 2015 through 2020 and is barely referenced in any other document on Interpol’s website. A 2018 cooperation agreement between the Foundation and Interpol makes it clear that the Foundation’s contributions will be made through the Fund but states only that this support will be used to “financially support INTERPOL’s missions,” “contribute to increasing the visibility of INTERPOL’s activities,” and “achieve other objectives to be agreed upon by the Parties.”⁸⁰ The 2014 General Assembly resolution states only that the Trust Fund is to “receive extrabudgetary sources that may be used to implement the Organization’s strategic priorities and the programme of special activities.”⁸¹ Dominated by the Foundation and the UAE and conducting its activities in an almost completely opaque fashion, the Trust Fund is the least transparent aspect of Interpol’s finances.

Interpol’s remaining “reimbursements and recoveries” derive from its Special Accounts. In 2020, the top sponsors were the European Commission (€7.848 million); the INTERPOL Foundation (€6.393 million, directed

to the Trust Fund); the U.S. Department of State (€4.729 million); Global Affairs Canada (€3.89 million); the German Federal Ministry for Foreign Affairs (€1.964 million); NORAD—Norwegian Agency for Development Cooperation (€1.556 million); and the U.S. Agency for International Development (€1.317 million).⁸² Interpol lists an additional 23 major sponsors—among them the Pew Charitable Trusts, Underwriters’ Laboratory, the Federal Bureau of Investigation, and the International Olympic Committee (IOC)—and notes that it booked a final €784,000 in revenue from smaller, unnamed sponsors.⁸³

While Interpol is commendably open about the sources of its “reimbursements and recoveries” revenue, its descriptions of the activities that these revenues fund are generic. The INTERPOL Foundation, for example, is cited as funding the following projects in 2020: “Counter Terrorism Programme; Criminal Analysis Programme; Cybercrime Programme; Drugs and Organised Crime Programme; Human Trafficking Programme; INTERPOL Organization Support; Stolen Motor Vehicles Programme; Stolen Works of Art Programme; Trafficking in Illicit Goods and Counterfeiting Programme.”⁸⁴ These areas of funding are substantially similar to the programs the Foundation states that it supports, but neither Interpol nor the Foundation offers more than these descriptions. In response to an inquiry, Interpol stated that its “General Secretariat provides a summary by sponsor and does not provide details by individual project.”⁸⁵

In some cases, it is possible to determine how funding for a particular program was used, at least in part. For example, Interpol states that its new “ID-Art mobile app,” which “helps to identify stolen cultural property,” was “developed thanks to founding [sic] from the INTERPOL Foundation for a Safer World.”⁸⁶ But in most cases, Interpol does not reveal how the revenue supported the program in question. Interpol has published a list of its “New Contributions Agreements” since 2019 and has listed its “External Contributions” since 2014, but these documents are similarly general.

There are, of course, legitimate reasons for Interpol to decline to reveal operational details of its counterterrorism efforts, but these revenues are the result of contractual arrangements with external funders. Because Interpol does not explain how revenue from each funder supported the program in question and how much support for each program was provided by a particular funder, it is not possible to assess who is paying what bills at Interpol, what those bills are supporting, and how significant any particular funder is to any Interpol activity. Unless Interpol decided not to accept the funding proposal, an external donor apparently could set up and pay for an entire Interpol program. No one external donor should have that kind of power.

The Special Accounts—in other words, the revenue that Interpol derives from “reimbursements and recoveries”—are, thanks to Interpol’s annual financial statements and its “New Contributions Agreements” and “External Contributions” publications, modestly transparent. The operation of Interpol’s Trust Fund, as noted, is almost completely opaque. Given the enormous significance of extrabudgetary funding to Interpol’s new operating model, the very limited transparency of the Trust Fund, and the potential risks inherent in allowing an external donor to create and fund a program, Interpol does not reveal enough information about the revenues it derives from “reimbursements and recoveries.”

CATEGORY #5: Regional Bureau Financing

Interpol defines Regional Bureau financing as “statutory contributions from specific member countries linked to each RB [Regional Bureau].”⁸⁷ Interpol has Regional Bureaus in Cote d’Ivoire, Argentina, Zimbabwe, Kenya, El Salvador, and Cameroon.⁸⁸ In 2020, it recorded €1.371 million in operating revenue as a result of Regional Bureau financing, though its collection rate was only 59.49 percent, meaning that Interpol actually received only €815,000.⁸⁹ Regional Bureaus are therefore not a significant source of Interpol revenue.

While Interpol’s collection record with respect to Bureau financing in 2020 was particularly poor, this rate is generally low: Between 2017 and 2019, it hovered between 72.67 percent and 76.36 percent.⁹⁰ Of the €5.745 million that Interpol is owed by its member countries, a remarkable €1.646 million relates to the Bureaus.⁹¹ Thus, while the Bureaus contribute only about 1 percent of Interpol’s revenue on a nominal basis, Bureau financing is responsible for 29 percent of overdue statutory contributions. The Bureaus in Cote d’Ivoire, Kenya, and Cameroon—three of the four African Bureaus—have a particularly poor collection record, though the record of the Zimbabwean Bureau is the best of the six.⁹²

The Bureaus spend little on pay costs; most of their expenses relate to “Missions and meetings” (€660,000 out of a budgeted total of €1.346 million in operating expenses in 2020); “Office expenses” (€109,000); “Maintenance” (€196,000); and “Telecommunication costs” (€218,000).⁹³ Interpol provides few details about the Bureaus, stating only that “[o]ur six regional bureaus bring together police within a region to share experiences and tackle common crime issues.”⁹⁴

The Bureaus are a small but regular drag on Interpol’s finances and a significant source of member nations’ indebtedness to the organization. In addition, Interpol’s poorest member nations owe a disproportionately

large share of these debts. Given their reluctance to pay for the Bureaus' activities, it would seem that these countries either do not attach much value to the Bureaus or do not have the money to pay for their activities. With the rise of online meetings reducing the need for in-person meetings, Interpol should consider closing all of its Regional Bureaus and cancelling all debts related to them.

Dominance of U.S. and Democratic Funding in Interpol

One of the most important questions about Interpol is the extent to which the U.S. and the democratic world in general dominate the organization's funding. Interpol operates on the basis of one member state, one vote in its General Assembly, which is its supreme body, so financial dominance does not translate easily into outsized influence. By the same token, however, the question of who pays the bills always matters.

The democracies clearly do not dominate Interpol numerically. By Freedom House rankings, Interpol's 77 free states comprise 40 percent of its membership and are outnumbered by the 58 partly free states that comprise 30 percent and the 54 not free states that comprise 28 percent. (The remaining 2 percent is comprised of five small nations not ranked by Freedom House.) But the democracies—the U.S. and Europe in particular—do dominate financially.

No nation's total financial contributions to Interpol can be assessed simply by looking at statutory contributions, which now comprise less than half of Interpol's revenue. Total financial contributions include statutory contributions; in-kind contributions in staff and property; revenues from reimbursements and recoveries (contractual arrangements between member nations and Interpol); and any Regional Bureau revenues and voluntary contributions (which do not exist in the case of the U.S.) minus any unpaid statutory contributions (which also do not exist in the case of the U.S.).⁹⁵

In total, the U.S. contributed a minimum of €20,248,571 (approximately \$23.212 million at current exchange rates) to Interpol in 2020. This means that the U.S. provided a minimum of 14.9 percent of Interpol's total revenue in 2020. (See Table 3.)

In practice, however, the U.S. paid more, both because Interpol does not specify all of its minor donors and because the U.S. share does not include the U.S. proportion of the €107,000 contributed in 2020 by the Commission for the Conservation of Antarctic Marine Living Resources, of which the U.S. is a member, or such U.S.-based sources as Underwriters'

TABLE 3

Total U.S. Financial Support for Interpol in 2020

Category	Amount in Euros
Statutory Contributions	€11,535,769 (more than €5 million more than any other member nation)
In-Kind Premises	€360,534 (more than any other nation except Singapore)
In-Kind Personnel	€1,258,269 for 10 individuals (more funding than any other nation except France or Singapore and more personnel than any other nation except France, Singapore, Germany, and Argentina)
Reimbursements and Recoveries	U.S. Department of State: €4,729,000
	U.S. Agency for International Development: €1,317,000
	U.S. Defense Threat Reduction Agency: €864,000
	Federal Bureau of Investigation: €184,000

SOURCE: Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 66, 70–74, and 87–88, <https://www.interpol.int/fr/content/download/16951/file/Financial%20Statements%202020.pdf>, (accessed June 21, 2022).

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Laboratory or the Pew Charitable Trusts, or revenue derived from such funders as UNICEF and the IOC, which is partly of U.S. origin.⁹⁶ Thus, through direct government sources, the U.S. provides at least 15 percent of Interpol’s revenue. (For the other top contributors to Interpol’s revenue in 2020, see Table 4.)

The top 20 contributors provided €108,691,554 in revenue to Interpol in 2020, or 79.97 percent of the organization’s total revenue. Of these 20 contributors, Freedom House rates 14 as Free; two (Singapore and Mexico) as Partly Free; and four (the UAE, China, Russia, and Qatar) as Not Free. The top 14 Free contributors contributed €79,515,163 to Interpol in 2020, or 58.51 percent of its total revenue. Overall, the 77 Free contributors provided €89,175,168 (65.62 percent); the 58 Partly Free contributors provided €19,959,588 (14.69 percent); and the 54 Not Free contributors provided €22,121,656 (16.27 percent).⁹⁷

The position is skewed against the free nations by Singapore (which, however, is a Western-aligned country and provides most of its support in kind) and by the UAE (which provides cash support through the Foundation). The top 14 free contributors control only 7 percent of the votes in Interpol’s General Assembly. With the major exception of the UAE and the

TABLE 4

Other Top Contributors to Interpol in 2020

Country	Total Contribution	Percentage of Interpol's Revenue
Singapore	€12,054,761	8.87%
UAE	€10,162,823	7.48%
Japan	€8,003,574	5.89%
Germany	€7,650,826	5.63%
Canada	€5,752,889	4.23%
United Kingdom	€5,519,777	4.06%*
France	€5,200,823	3.83%*
China	€3,627,060	2.67%
Italy	€3,484,310	2.56%*
Norway	€3,145,895	2.31%
South Korea	€2,364,442	1.74%
Brazil	€2,153,375	1.58%
Netherlands	€2,107,241	1.55%*
Spain	€2,068,995	1.52%*
Australia	€1,496,802	1.10%
Russia	€1,270,128	0.93%
Argentina	€1,257,061	0.92%
Qatar	€1,105,439	0.81%
Belgium	€1,060,582	0.78%*
Mexico	€956,180	0.70%

SOURCE: Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 66, 70–74, and 87–88, <https://www.interpol.int/fr/content/download/16951/file/Financial%20Statements%202020.pdf>, (accessed June 21, 2022).

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significant exception of China, the large democracies provide a majority of Interpol's revenue—but only a nominal share of its voting power.

In short, while the 77 free members control only 40 percent of the votes in Interpol's General Assembly, they provide 66 percent of its revenue.⁹⁸ The substantial contractual and in-kind contributions from the democracies (particularly the U.S. and the European democracies) partly balance Singapore's in-kind contributions, as well as the UAE's support through the Foundation, and continue to represent a disproportionate share of Interpol's revenues. However, because of Singapore's and the UAE's in-kind or voluntary contributions and the fact that 46 percent of seconded officials

at Interpol are from partly free or not free states, the democratic share of statutory contributions, at 81 percent, is considerably higher than the democratic share of Interpol's overall funding.

The free world's financial leadership in Interpol is not secure. There are three reasons for this.

- China's significance as a statutory contributor will increase in the coming years.
- There are few barriers to entry in Interpol. If China or other autocratic nations wish to provide more in-kind support or propose projects that contribute to Interpol through its "reimbursements and recoveries" line item, they are free to do so. China is already doing this: In 2020, it signed an agreement with Interpol to contribute \$500,000 to Interpol's Operation Trigger, which targets firearms trafficking.⁹⁹ In 2022, as set out below, China will provide even more project support to Interpol.
- While Interpol's agreement with the INTERPOL Foundation ended in 2020, the Foundation is still in existence, and there is nothing to prevent Interpol from renewing or even expanding its cooperation with the Foundation or to prevent other malign actors, such as Russia, from contributing to it. In fact, as set out below, Interpol plans to continue to raise funds through the Foundation.

The U.S. has a very significant financial position in Interpol, but it is not a dominant position. If the U.S. wishes to use financial leverage in Interpol, it should do so in coordination with Germany, Japan, Canada, the U.K., and France, which together control approximately 40 percent of Interpol's revenue. If these seven powers cooperate, they will have a financial voice that Interpol (and its member nations) cannot ignore, even though they control only seven votes in Interpol's General Assembly.

Interpol's Operating Expenses

In 2020, Interpol had €135.904 million in operating revenue and €133.199 million in operating expenses, leaving it with a surplus of €2.705 million.¹⁰⁰

Interpol's financial statements provide thorough treatment of such subjects as interest rate sensitivity, deferred staff costs, and other technical matters relevant to its overall financial health. Its main expenses,

predictably, are pay (€69.104 million in 2020); in-kind pay costs (€22.965 million); and in-kind premises running costs (€11.936 million). Pay and premises costs thus account for €104 million, or 78 percent of Interpol's operating expenses.¹⁰¹ Interpol's other expenses, which include such expected items as maintenance, missions and meetings, office expenses, telecommunication costs, third-party costs, exchange rate losses, and depreciation, amount to €29.194 million.¹⁰²

The only element of Interpol's regular expenses that raises an eyebrow is its expenditures (totaling €6.762 million) on "Third Party and other costs," in particular through its Trust Fund and Special Accounts, where Interpol spent €5.76 million on these costs in 2020.¹⁰³ Interpol breaks its "Third party and other costs" into "Consultancy expenses" (€2.859 million); "Provisions for member country contributions" (€1.069 million); "Equipment donated" (€1.903 million); and "Other administration expenses" (€931,000).¹⁰⁴

In 2020 Interpol spent nearly €3 million on consultants (much of which was spent on contracted projects or from funds from the INTERPOL Foundation)¹⁰⁵ and gave away nearly €2 million in equipment from the same sources. Many of the payments to consultants appear to have gone to Accenture France, which received €2.258 million in 2020 for "intellectual services."¹⁰⁶ The recipients of Interpol's donations of equipment, which amounted to 1.4 percent of its operating expenses in 2020, are not identified. This is another aspect of the Trust Fund and Special Accounts—and of its financial statements as a whole—that Interpol should treat with more transparency.

Another area in which Interpol falls short on transparency is staff costs. It is perhaps reasonable that Interpol does not publish the salaries of every one of its employees, but the organization also provides little information about its overall staff structure. Its annual reports, financial statements, and website do not provide an organization chart, explain how many staff work in each department or on identified projects, or provide any explanation of where seconded officials from member nations work within Interpol. Interpol does publish a chart of salary scales (and a staff manual), but without information on how many officials are ranked at what levels, this chart is of limited use. Interpol used to publish a chart showing how staff were allocated across its units,¹⁰⁷ but it stopped providing this information more than a decade ago. Interpol is transparent on its overall staff costs but provides almost no useful information about its internal structures.

Interpol does emphasize the significant value it derives from in-kind payments to seconded officials. In 2020, Interpol had 995 staff, of which

25 percent (252) were seconded.¹⁰⁸ This implies that the average “financial benefit of the seconded officials” was €91,130 (approximately \$104,500 at current exchange rates),¹⁰⁹ which is slightly less than the average cost Interpol pays for its own contracted staff, which numbered 743 in 2020.¹¹⁰

Interpol’s 2020 financial report provides more complete information on one kind of staff costs. It states that the top seven management personnel received an aggregate remuneration of €1.296 million in 2020, though this does not reflect the fact that three of these staff are seconded and paid in part by their home governments.¹¹¹ Taking this into account, the average aggregate remuneration of Interpol’s senior staff is approximately €298,000 (about \$342,000 at current exchange rates). This is a substantial sum, but at least comparatively, it is not excessive: The World Bank’s president, for example, received \$524,970 and \$345,344 in additional benefits in 2020.¹¹² Interpol’s compensation package is therefore generous but not out of line with prevailing international norms—though the normal level of pay in the senior levels of most international organizations is too high.

Unsurprisingly, Interpol occasionally incurs legal expenses. The most significant of these came in 2015 when Interpol paid out a net €1.511 million in the “Red Notice Case Settlement.” This settlement represented almost 48 percent of Interpol’s operating deficit of €3.179 million in 2015.¹¹³ Interpol has divulged little information about the Red Notice case, which concerned Indonesian nationals who were subject to an Indonesian Red Notice and eventually filed a case at the Permanent Court of Arbitration (PCA) in The Hague. At that time, Interpol’s headquarters agreement with France gave the PCA the authority to hear the case. Rather than allow the case to proceed and risk a defeat that would cost millions of euros, Interpol paid legal fees and compensation in return for an agreement to drop the case. Interpol then negotiated an amended headquarters agreement with France.¹¹⁴

The Red Notice case caused widespread concern within Interpol, as the organization suddenly realized that “it is exposed to considerable risks for any shortcomings in the quality of such data” uploaded into its databases by member nations. It began to assess “the risks of litigation cases” on a regular basis and to implement “adequate mitigating measures and precautions.” It also instituted “[a]dditional safeguards” that included “(1) better review of red notices and wanted person diffusions; (2) stricter criteria for publication of extracts on INTERPOL’s public website; and, (3) separation between notices and diffusions in the notice form.”¹¹⁵ (The “better review” was led by Interpol’s newly created “Notices and Diffusions Task Force.”¹¹⁶) Interpol’s 2017 financial statement concluded with the hopeful assessment that “there have been no red notice litigation actions since 2015.”¹¹⁷ But

there is no reason to believe that Interpol is immune to further legal challenges: Since 2017, it has faced lawsuits in the PCA and in the United States, and both lawsuits are ongoing.¹¹⁸

The biggest unknown in Interpol's operating expenses are its future legal bills, which could amount to very little but could also impose enormous liabilities. Even aside from its concerns in the courtroom, the need to raise enough money to fund operations that have expanded enormously since 2000 represents a chicken-and-the-egg problem: Interpol needs more money because it has grown, but it has grown because it has been able to raise more money. Overall, Interpol gives the appearance of an organization that is clearly being driven by its member nations to do more but is also both eager to grow and not interested in resisting pressures to do more.

Interpol's Private-Sector Fundraising

As of 2020, Interpol derived €133.617 million from government agencies (including the UAE's contributions to the Foundation); €5.55 million from its own investments, recoveries, and sales; €737,000 from international organizations; €550,000 from foundations; €402,000 from non-governmental organizations (NGOs); and €790,000 from the private sector.¹¹⁹ All of the funding from foundations, international organizations, NGOs, and the private sector goes through the Trust Fund and Special Accounts. There is therefore little reason to be concerned about whether Interpol is being unduly influenced by funding from sources other than governments—but this was not always the case.

- From 2012 to 2016, Interpol received €15 million from Philip Morris International for its “Trafficking in Illicit Goods and Counterfeiting Programme” to support “Interpol's operations to disrupt tobacco counterfeiting.”¹²⁰ This funding agreement was not renewed after it expired in 2015.¹²¹
- From 2012 to 2016, the organization received €4.530 million from the Pharmaceutical Industry Initiative to Combat Crime, which (predictably) focused on “Pharmaceutical Crime.”¹²²
- In 2015, Interpol terminated an agreement with FIFA, the corrupt soccer organization from which it had received €1.695 million in 2014 to promote “Integrity in Sport,” and returned the unspent portion of FIFA's donation, which totaled €20 million.¹²³

Interpol has also received lesser amounts of funding from other potentially problematic sources.

- From 2014 to 2018, it received €195,000 from Kaspersky, a software security firm that in 2017 was banned for use by the U.S. government because of the firm's possible links to Russian security services.¹²⁴ According to Kaspersky, its cooperation with Interpol continues; according to Interpol, the new cooperation agreement signed in 2019 did not include a financial contribution and is for "cooperation in areas including technical training support and provision of cyber-crime threat data for crime analysis."¹²⁵
- For years, Interpol has received funding from the regularly scandal-plagued IOC, which contributed €162,000 to Interpol in 2020.
- In 2021, Interpol signed contribution agreements with several private entities, including the Guangdong Public Security Protection Technology Association of the People's Republic of China.¹²⁶

For several years, Interpol was very proud of its fundraising. In 2011, it established an International Partnerships and Development Sub-Directorate, which by 2013 was reportedly topping up Interpol's budget by €18 million annually. Interpol was also purportedly accepting in-kind contributions from the private sector, including seconded staff.

In 2015, newly appointed Secretary General Stock told *Politico* in a damning story on "How Interpol Got in Bed with FIFA" that Interpol's "due diligence processes" eliminated conflicts of interest, that "[y]ou cannot buy a priority at Interpol," and that "FIFA is [not] dictating what we are going to do and when we are taking action."¹²⁷ This was difficult to accept in view of the priority that Interpol gave to corruption in sport and cigarette smuggling during the years when it was funded by FIFA and Philip Morris and its willingness to praise its contributors for their "key role" in supporting Interpol's programs.¹²⁸

Of course, the illicit traffic in cigarettes is a crime, corruption in sports is a depressing reality, and the counterfeiting of drugs is extremely dangerous to the individuals who take fake drugs in the belief that they are consuming genuine remedies. But the obvious point was that Interpol was taking money from donors that wanted to influence or skew Interpol's priorities and that also (at least in the case of FIFA) appeared to want to benefit from being associated with Interpol's good name.

In practice, Stock was not nearly as blasé as he appeared to be. In 2015, a section on “Ethics and due diligence” appeared in Interpol’s annual report.¹²⁹ Interpol also announced that it was “now prioritizing the public sector as a source for its external fundraising” and “that any proposed contribution from the private sector of more than EUR 500,000 should be referred to the Executive Committee for approval.”¹³⁰

Private-sector contributions to Interpol have since dropped precipitously: In 2013, the private sector contributed €9.1 million, but in 2016, it gave only €1.7 million.¹³¹ The private sector is thus no longer a significant Interpol sponsor. The only named non-governmental sources of funding in 2020 were UNICEF, the Ireland-based Human Dignity Foundation, the Pew Charitable Trusts, Underwriters’ Laboratory, the Council of Europe, and the IOC. All other external funders together contributed no more than €784,000 (with an additional €988,000 of in-kind support from unnamed sponsors).¹³²

Interpol’s reliance on private-sector support is now mostly a matter of history, but it also provides a cautionary tale. From 2011 to 2015, Interpol leapt eagerly into a series of financial relationships with very little thought for the risks, both reputational and financial, that those relationships might pose. It took several years, much critical news coverage, and the arrival of a new Secretary General for Interpol to turn away from private-sector funding and toward a focus on raising funds from governments. Unfortunately, it achieved this through in-kind support, contract work, and the Interpol Foundation and its relationship with the UAE. Thus, while Interpol has belatedly dodged the bullet of private-sector support, it has not solved the problem of how to raise funds without becoming entangled in practical and ethical compromises.

Interpol’s Controls, Oversight, and Transparency

Interpol’s financial controls, oversight, and transparency have improved dramatically since 2010. Its financial statements, though still lacking, are clearer and more complete. It publishes far more, and much higher-quality, information on its financial processes than it used to publish and is relatively responsive to requests for information. This is not to endorse all of Interpol’s current practices, but rather to recognize that the direction of travel, particularly since 2015, has been positive.

Interpol notes that its financial management is governed by its legal framework: its Constitution, General Regulations, and Financial Regulations.¹³³ It is currently audited annually by the Office of the Auditor General of Canada; the Supreme Audit Office of Poland will assume this

responsibility for three years as of the 2022 financial year.¹³⁴ Interpol has Due Diligence Guidelines, adopted in 2015, and specific rules governing private-sector contributions.¹³⁵ The organization also stipulates that no more than 50 percent of operating revenue in a given year can come from the Trust Fund and Special Accounts and that the total annual donation from a single source (with the significant exception of the INTERPOL Foundation) may not exceed 15 percent of operating revenue.¹³⁶

Behind the scenes, Interpol's most important financial mechanism is its Advisory Group on Financial Matters (AGFM). The AGFM is rarely referenced, but it plays a vital role in shaping Interpol's finances. It was created after 2001 when the new statutory contributions scheme was introduced and when the U.S., in recognition of its outsized role in funding Interpol, demanded either a permanent seat on the Executive Committee or veto power over Interpol's budget. Interpol did not believe it would be able to accede to either of these demands, but it did create the AGFM, which is chaired by a representative of the U.S. Department of Justice and composed of the U.S., most of the other major contributors (Italy does not participate), and about 15 other Interpol member nations. In practice, Interpol's Executive Committee and General Assembly would find it very difficult to ignore the AGFM's views on Interpol's budget.¹³⁷

The fundamental problem with Interpol's current system of controls and oversight is that, while it is attentive to the risks posed by private-sector funding, it does not reflect the fact that governments also have agendas and that the risks posed by public-sector funding are potentially even greater than those posed by private-sector funding. It is always possible to cancel an agreement with a private-sector donor, but governments are much more enduring, and it is therefore not as easy to cancel agreements with them. Furthermore, in practice, Interpol is an organization of governments and bound by its own rules to presume that the information provided by those governments is accurate and relevant.¹³⁸ Policing its relations with governments, which ultimately control Interpol through its General Assembly in addition to funding it, is therefore especially difficult.

Interpol's blindness to the problems inherent in public-sector funding are illustrated by its 2015 Due Diligence Guidelines, which state that:

[D]ue diligence shall be performed on non-governmental organizations and other private entities, including foundations and similar institutions.

Conversely, due diligence shall not be performed on any government or inter-governmental organization...

If a donation is made through the INTERPOL Foundation, the General Secretariat will build on the due diligence conducted by the Foundation.¹³⁹

In other words, private-sector and other non-governmental donors receive intense scrutiny, governments and intergovernmental organizations receive no scrutiny, and the Foundation occupies a middle position with Interpol trusting the Foundation to conduct initial due diligence. However, the fact that Interpol avowedly knows nothing about the sources of the UAE's funding through the Foundation implies that in practice, Interpol is not interested in scrutinizing donations made through the Foundation.¹⁴⁰ Because Secretary General Stock sits on the Foundation's board, Interpol exercises considerable control over the Foundation, and this in turn likely explains why Interpol's General Secretariat does not appear to conduct any serious due diligence with respect to the donations that support it.

It is difficult to understand, especially given the Red Notices case of 2015, why Interpol is not more sensitive to the risks of blindly adopting the priorities of individual member nations as embodied in their funding as well as in the data they upload. A politicized Red Notice poses a serious legal risk to Interpol; a politicized Interpol program, or an Interpol that is perceived to be under the financial control of a member state, poses a far greater risk to Interpol's reputation—and, indeed, to its very existence. Interpol's failure to develop due diligence procedures for and rules on donations by governments and intergovernmental organizations needs to be rectified as quickly as possible.

Interpol's Increasing Financial and Programmatic Independence

In recent years, Interpol has emphasized building up its own financial resources. At the end of 2020, Interpol had €151.8 million in total cash, cash equivalents, and investments at its disposal, up from €122.5 million in 2019. Unrestricted cash was equivalent to 6.3 months of spending on Interpol's Regular Budget, and Interpol's General Reserve Fund grew by €2 million to €18 million. Interpol's total assets at the end of 2020 were €187.3 million, an increase of €27.9 million over 2019, and its total liabilities had increased by €25.2 million to a total of €140.3 million.¹⁴¹

The extent to which Interpol has insured its financial future is testimony to its prudence and increased professionalism—but also to the fact that Interpol now holds considerable funds in reserve. Interpol holds €80

million—2.2 years of project execution based on its 2020 implementation rate—in its Trust Fund and Special Accounts.¹⁴² These funds are not an asset; they are a liability to deliver contracted projects. But with more than two years of projects in the pipeline, Interpol is not dependent in the near term on its ability to develop new projects or to collect payments for contracted projects. The same is true of its accumulated reserves, which represented 53 percent of annual statutory contributions as of 2020.¹⁴³

Interpol has significant financial liabilities that include accounts payable, future employee benefits, and contracted projects. It should not put itself in a position that allows the failure of a single nation to pay its statutory contribution to place the entire organization in jeopardy. But Interpol has built up resources that give it a practical independence both from a significant portion of its statutory contributions and (given the fact that it already has the money in the bank) from any effective oversight of its execution of contracted projects. From a financial point of view, it is approaching short-term self-sufficiency.

Interpol should not be held hostage to the failure of a single contributor to pay its dues, but it also should not be able to ride out a default by a significant number of major contributors. If that should happen, Interpol would obviously be engaged in a major dispute with its leading members, but with Interpol's leading contributors having so few votes in its Assembly, there would be little to prevent the 112 states that contribute the minimum from voting down any concerns expressed by the major contributors.¹⁴⁴

Of course, Interpol could not get by forever without its major contributors, but its drive to build up its own resources and to rely increasingly on contract work has had a paradoxical effect: The power of the minimum contributors to control an organization that relies increasingly on contracts that they play no role in funding has remained constant, while the leading democracies are still a tiny minority in the Assembly even as their contracted projects pay a steadily larger share of the bills. Interpol's reliance on contract work is, from this point of view, the worst of all worlds.¹⁴⁵

Much the same is true of Interpol's development of its priorities. It is, of course, important to note that Interpol is responsible to its General Assembly and that these priorities have received the support and backing of Interpol's member nations. In that sense, these are not Interpol's priorities; they are the Assembly's priorities as expressed through Interpol.

But while Interpol still asserts that it works by enabling police authorities to “share and access data on crimes and criminals,” it simultaneously emphasizes the “three global areas we consider the most pressing today[:] terrorism, cybercrime and organized crime”; has four “strategic goals”

(with four sub-goals for each goal); has a further seven “Global Policing Goals” (which in turn supposedly support the U.N. 2030 Agenda for Sustainable Development’s goals); proclaims its desire to build a “global security architecture”;¹⁴⁶ names 17 crimes (from corruption to war crimes) that are additional areas of focus; and undertakes a wide range of supplementary activities (including “field operations”). In addition, as discussed above, it runs a wide variety of contracted projects, only some of which overlap with any of its other priorities. Finally, it has eight priority areas of investment that range from “identifying victims of child sexual abuse” to “establishing a global digital identity for police.”¹⁴⁷

Reading its recent annual reports creates the impression that Interpol is a scattershot organization with innumerable priorities, goals, and operations that include such politically correct commitments as keeping “[g]ender-responsive policing still top of the agenda.”¹⁴⁸ The reports illustrate that Interpol has moved a long way from its traditional focus on enabling police to “share and access data on crimes and criminals.” Its notice and diffusion system is now only one of eight priority areas for investment. There is no doubt that this shift has the support and backing of the General Assembly and that members’ demands that it do more have played a significant role in driving Interpol’s rapid growth since 2001—even as Interpol has seemingly engaged in a significant amount of empire-building, especially under the leadership of Secretary General Noble.

But whatever the causes of its expansion may be, Interpol has grown so much and now does so much contract work that it has developed priorities that are at odds with its original mission of focusing tightly on improving communication among law enforcement agencies across international borders. The risk here is obvious: Interpol must remain politically neutral. It is obligated to do so by its Constitution, and if Interpol were not neutral, it would rapidly lose the trust and support of most of its leading members. In chasing projects and funders and juggling priorities, Interpol has taken its eye off its most important task: ensuring that its notices and diffusion system does not become an instrument of political repression.

Concern about the politicization of Interpol’s systems is reflected in legislation enacted into law in the United States, in congressional hearings, in reports from other legislative bodies and a range of U.S. and other analysts, and in journalism around the world.¹⁴⁹ While this report does not focus on the abuse of Interpol’s systems for political purposes, the problem is nonetheless relevant to any consideration of Interpol’s budget and how it is spent. Interpol’s budget matters not just because it shows that the organization spends a lot of money. In fact, Interpol spends less in

a year (€133.2 million) than the New York City Police Department spends in a week (\$210 million).¹⁵⁰ Interpol's budget matters because money can mean control, and those who exercise this control also get to define an organization's priorities.

As of 2020, Interpol was raising too much money from sources with bad reputations, building too much short-term self-sufficiency, and seemingly focusing on everything except policing its own systems. But policing its own systems is Interpol's most fundamental responsibility. It is also the best way for Interpol to ensure that it is focusing on the crimes that matter the most to its member nations, which will establish Interpol's priorities not by creating new Interpol projects, but by using Interpol's systems to pursue the criminals they seek to bring to justice.

Summarizing and Assessing Interpol's Funding Challenges

CHALLENGE #1: Increased Reliance on Project Funding

Interpol has pursued a strategy of diversifying its funding “so as not to become too dependent on any one source.”¹⁵¹ In particular, it has emphasized contract work for governments and the receipt of in-kind support through governments. This strategy has been very effective in financial terms, but it poses serious challenges.

First, in practice, other sources of funding are not as reliable as statutory contributions. Interpol was owed €5.745 million in statutory contributions at the end of 2020.¹⁵² It has written off much of this debt, which has accumulated over a period of 20 years. It was owed only €1.411 million in current debt arising from statutory contributions at the end of 2020,¹⁵³ and it regularly collects over 97 percent of the statutory contributions owed to it.¹⁵⁴ That is a very high collection level.

By contrast, at the end of 2020, Interpol was owed €9.486 million on its Trust Fund and Special Accounts, €7 million of which was owed by the Interpol Foundation, which also owed an additional €3 million in unrestricted support. The total value of Interpol's accounts receivable was €15.723 million.¹⁵⁵ In practice, therefore, Interpol's pursuit of a diversified funding base has raised more money and has spread its fundraising risk, but it also has increased that risk.

Second, when Interpol undertakes contracted projects, it recovers the cost for services shared between its regular budget and the Trust Fund and Special Accounts as revenue for the regular budget. Interpol describes this as an “initiative to ensure that additional Trust Fund and Special Account activity

does not result in a long-term liability to members.”¹⁵⁶ But the end of a project funded through the Special Account still creates long-term budgetary pressures. Simply put, Interpol must raise new funds to keep that project going, make a provision for the project from its regular budget, or let that project lapse.

Interpol’s new “ID-Art mobile app,” which “helps to identify stolen cultural property,” is a case in point.¹⁵⁷ It was developed with the aid of funding from the Interpol Foundation, but because the funding agreement between Interpol and the Foundation ended in 2020, the costs of maintaining the mobile app and keeping it current with new devices and operating systems now falls on Interpol. If Interpol decides not to pay those costs, the app will soon be useless. Contracted projects help to keep Interpol operating, but they are not sustainable or enduring, and they create budgetary pressures that no amount of cost recovery can eliminate.

CHALLENGE #2: Increased Reliance on the Interpol Foundation

In its search for new revenues, Interpol has repeatedly failed to assess the sources of those revenues and the associated risks to its independence and reputation. It failed to understand the risks of becoming associated with FIFA and only belatedly realized that this association was discreditable. It similarly failed to understand the risks of becoming associated with the UAE through the Interpol Foundation. Again, only belatedly does Interpol appear to be realizing that this association is discreditable.

Apart from sullyng Interpol’s reputation by connecting the organization financially to the UAE, this funding reduced the ability of Interpol’s democratic member nations to control it and created a serious risk of improper UAE influence on Interpol’s activities. The effect of this influence can be judged by the fact that two of the Interpol General Assembly’s four most recent meetings were held or supposed to be held in the UAE and by the fact that in 2021, the General Assembly elected an alleged torturer, the UAE’s Ahmed Nasser al-Raisi, to serve as Interpol’s president.¹⁵⁸

It is particularly sinister that, as noted previously, while Interpol’s rules prevent it from relying on any external source of funding for more than 15 percent of its revenue, those rules do not apply to the Foundation. Through the Foundation, as of 2020, the UAE controlled the largest non-democratic share of Interpol’s funding and contributed more to Interpol than was contributed by any other nation except the U.S. and Singapore. Interpol’s relationship with the UAE through the Foundation ended in 2020. It should never be revived.

CHALLENGE #3: The Declining Significance of Statutory Contributions

Statutory contributions are still Interpol's single most important and most reliable source of funding: Interpol collects a remarkably high percentage of the dues owed to it. They also reflect and embody the fact that Interpol belongs to and therefore must be funded by all of its member nations. No system of statutory contributions can achieve all ends, and any such system will inevitably allow (and indeed require) China to contribute more to Interpol.

The alternative is for Interpol to rely more and more heavily on contracts, charity, and in-kind contributions, all of which are less transparent and even more vulnerable to autocratic manipulation than member dues are. Yet that is precisely what Interpol is doing. According to its rationale, "the needs of fighting crime today go well beyond the traditional resources that member countries can make available to INTERPOL through their police budgets. For this reason, we seek partnerships and additional funding for our activities and special projects."¹⁵⁹

The Interpol General Assembly's decision to increase statutory contributions beginning in 2022 comes in the wake of more than a decade of efforts—which continued after the arrival of Secretary General Stock in 2015—to raise "extrastatutory contributions."¹⁶⁰ But it is not likely to do more than halt the decline in the percentage of Interpol's operating revenue that is derived from those contributions. The only way to increase that percentage on a sustainable basis is to vote for another substantial increase in contributions, refocus Interpol on genuinely core priorities by terminating programs, and mandate that no more than 10 percent of operating revenue (not 50 percent as is currently the case) in any given year can come from the Trust Fund and Special Accounts.

Any increase in statutory contributions will have to come from the major current funders, including the United States, because most of Interpol's member nations pay almost nothing. At least 100 of Interpol's members probably spend more on their airplane and hotel expenses to get to a meeting of Interpol's General Assembly than they do on their statutory contributions to Interpol. It is therefore encouraging that the recently enacted National Defense Authorization Act for Fiscal Year 2022 supports "increasing, to the extent practicable, dedicated funding to the [Commission for the Control of Interpol's Files] and the Notices and Diffusions Task Force in order to further expand operations related to the review of requests for red notices and red diffusions."¹⁶¹ This reflects a simple fact: If the U.S. wants a better Interpol, it is going to have to pay for it.

CHALLENGE #4: A Financial Wild Card—Legal Challenges

Most of the major reforms that Interpol has undertaken in its notice and diffusion system since 2015 were a result not of Interpol's determination to uphold its constitutional mandate to avoid politics, but of Interpol's fear that it would be sued into oblivion if it did not institute reforms.¹⁶² The only change that Interpol has made on its own initiative was its 2014 decision to introduce a new policy on refugees,¹⁶³ and even this change came only after a campaign to highlight how Interpol member nations were abusing the Red Notice system to persecute refugees.¹⁶⁴

In theory, Interpol is supposed to be concerned about the quality of the data that are uploaded to its system because it is obligated by its Constitution to concern itself only with ordinary law crime. In practice, however, Interpol appears to be more concerned with bad publicity and lawsuits than it is with its constitutional obligations.¹⁶⁵

Interpol does have a recognized complaints mechanism, the Commission for the Control of Interpol's Files (CCF), but the CCF has serious flaws. In practice, it does not offer oral proceedings. It has no appeals procedure. It has a very limited discovery procedure.¹⁶⁶ The few case summaries that it publishes are heavily redacted and issued irregularly, providing only limited case law.¹⁶⁷

By limiting victims' recourse to the CCF, Interpol's amended headquarters agreement, negotiated with France after the Red Notices case, could be attacked as contrary to international law, in which case either the European Court of Human Rights or the Permanent Court of Arbitration could decide to take a case against Interpol. In light of the U.S. Supreme Court's 2019 *Jam v. International Financial Corporation* decision limiting the protections accorded to international organizations and given the uncertainty as to whether Interpol even qualifies as an international organization, it is also possible that a victim of Interpol abuse might bring a successful lawsuit against Interpol in the United States.¹⁶⁸

The possibility of legal action against Interpol is a financial wild card. It could amount to nothing, or it could result in Interpol's having to pay substantial damages. Interpol would defend itself vigorously in any court that agreed to take a case and in the court of public opinion. If Interpol is to prevent lawsuits from arising or at least mitigate the consequences of a successful lawsuit, it must continue to improve its oversight of its notice and diffusion system. The U.S. has every interest in supporting Interpol in this aim.

Interpol's 2022 Budget: A Look Ahead

Interpol has not released its 2022 budget, but the author received a copy of *Report No. 8—Programme of Activities and Draft Budget for 2022, and Indications for 2023 and 2024* from a National Central Bureau that prefers to remain anonymous. The report points out that Interpol has been operating on a zero-growth budget, as far as statutory contributions are concerned and after inflation, since 2008.¹⁶⁹

The report specifies how Interpol will spend the €22 million in increased statutory contributions that the General Assembly agreed to provide in 2022, 2023, and 2024. More than half of the funds (€11.6 million) will be devoted to reinforcing Interpol's analytical capacity and to "strengthening information security and maintaining and upgrading INTERPOL's infrastructure."¹⁷⁰ The report also notes that Interpol "will continue to seek voluntary funding, especially from the public sector and via the INTERPOL Foundation." It recognizes a variety of budgetary risks, including the nonpayment of statutory contributions and legal actions, and recommends as risk mitigation strategies the use of "twinning" to reduce the risk of nonpayment and the "strict application of policies" and insurance coverage to reduce the risk of legal actions.¹⁷¹

Given this concern with the legal risks facing Interpol, it is surprising that Interpol proposes to spend only an additional €1,647,000 annually on its notices and diffusions system. Of this, €300,000 will be for insurance payments, €567,000 will be for computer software, and only €630,000 (enough for approximately six new hires) will be for "human expertise." Even though Interpol is well aware that governments need to "know they can rely on our system to stand up under legal pressure," the CCF will receive a mere €150,000 annually in additional funding, will have a budget of only €1.241 million out of Interpol's total projected operating expenditure of €157.236 million, and will employ only 11 people.¹⁷² There can be no clearer evidence of the low priority that Interpol places in practice on overseeing its notices and diffusions system.

Finally, the report sheds important light on China's growing influence in Interpol. In 2022, China's statutory contributions will jump by 33 percent to €5.039 million, making it the third-largest statutory contributor to Interpol behind the United States and Japan. China will also fund two major projects through Interpol, including the INTERPOL Financial Assistance for Secondment Programme, which will provide a "subsidy of 20 secondments from under-represented countries" at a cost of €1.044 million.¹⁷³

The report's mention of "twinning" as a strategy for combatting the risk of the nonpayment of statutory contributions implies that Interpol is actively seeking to link nonpaying member nations to partners that can pay on the debtor's behalf. The possible consequence of Chinese involvement in any "twinning" program is obvious. The report makes it clear that China's influence in Interpol is growing rapidly and that by sponsoring secondments, China is using Interpol to cultivate its influence around the world.

What the United States and Interpol Should Do

The United States should urge Interpol to take the following steps to improve its financial operations:

- **Support improved transparency.** The necessary reforms are broad and go far beyond merely improving Interpol's financial transparency.¹⁷⁴ Through the National Defense Authorization Act for Fiscal Year 2022, the U.S. is already legally obligated to promote greater transparency in Interpol's annual reports about the operation of its notice and diffusion system as well as "the sources of all INTERPOL income during the reporting period."¹⁷⁵

Improved transparency in Interpol's notice and diffusion system and in the rules, work, and results of its Notices and Diffusions Task Force is obviously essential, as it is in the operation of the CCF and Interpol's General Assembly, in the operation of other frequently abused Interpol systems such as its Stolen and Lost Travel Documents database, and in Interpol's elections.¹⁷⁶ The steps the Interpol General Assembly took in 2021 to promote greater transparency in the nomination and election of Executive Committee members were welcome but insufficient.¹⁷⁷

However, Interpol also needs to improve its transparency in many areas that are directly relevant to its finances. To this end, the U.S. should encourage the following measures:

1. Interpol should publish a full budget, not just its financial statement.
2. Interpol should publish a comprehensive organization chart (including its Notices and Diffusions Task Force) that contains the number of officials employed in each of its departments and their

salary levels, identifies the nationality of these officials, describes the duties associated with each of its departments and salary levels, and provides full information about annual staff turnover by department, salary level, and nationality.

3. Interpol should publish full retrospective information on the size of its staff and the number of seconded officials employed since 2010.
4. Interpol should publish comprehensive information about the funding sources, purpose, staffing, and operation of its Trust Fund.
5. Every project funded by an external sponsor through the Trust Fund and Special Accounts and every project or program funded through Interpol's Regular Budget should be summarized in Interpol's annual report. Interpol's annual financial statement should provide a full description of how revenue from each funder supported the project in question and how much of each program was supported by a particular funder.
6. All sponsors, no matter how small, that contributed to Interpol's Special Accounts, either in cash or in kind, should be named in Interpol's annual financial statement.
7. If a General Assembly resolution on financial matters (or any other subject) refers to a report that provided the basis for or informed its debate on that resolution, Interpol should publish that report. If necessary, any such report could contain a confidential annex.¹⁷⁸
8. The beneficiaries of Interpol's substantial donations of equipment should be named, and the value and type of the equipment that each beneficiary has received should be stated, as should the purpose of the donations.
9. All member states that are not current on any debt-rescheduling agreements with Interpol should be named in Interpol's annual financial statement.
10. The "third country" that paid dues on behalf of another nation and was credited for doing so in Interpol's 2020 financial statement should be named.

11. The Interpol Foundation should be ordered to obtain complete information from the UAE on the sources of the UAE's funding, and Interpol should publish this information.

12. All Interpol publications should be in the form of searchable PDFs.

- **Ban the third-country payment of dues and secondments.** At its next meeting, the General Assembly should revise Interpol's rules to ban the third-country payment of statutory contributions. No Interpol member nation is allowed to vote on behalf of another, and no Interpol member nation should be allowed to pay on behalf of another. If a nation cannot pay its dues, it should be suspended in accordance with Interpol's rules, not given the out of third-country payment. Member nations, by the same principle, should also be required to pay for their own secondments: The Interpol Financial Assistance for Secondment Programme, which China is using to promote its own interests and reputation, should be terminated.
- **Immediately place member states that fail to meet their debt-rescheduling agreements under Article 52 sanctions.** Interpol has signed debt-rescheduling agreements with eight member states. Unfortunately, of the €803,000 Interpol is owed under these agreements, it expects to receive only €218,000. This implies that a significant number of these states are not making the required payments. Interpol should adopt a zero-tolerance policy toward breaches of debt-rescheduling agreements: Any failure by a member state to make a required payment should result in the immediate cancellation of the agreement and the imposition of Article 52 sanctions.
- **Ban all private-sector funding.** Interpol has done a great deal to reduce its ethically challenged reliance on private-sector funding from organizations such as FIFA, but it still derives a small amount of funding from the private sector. Interpol should ban all fundraising in the private sector. If Interpol wants to have any relations with the private sector—and such relations are certainly necessary and can be beneficial—they should be on a contractual basis, and those contracts should be published in full.
- **Ban all single-funder projects or programs.** Given Interpol's refusal to provide any meaningful detail with respect to how its

programs are funded, it is impossible to know who pays for what. Apart from improving the transparency of its Trust Fund and its Regular Budget, Interpol should ban any funder from being the sole source of support for any Interpol activity.

- **Prohibit Interpol's Trust Fund and Special Accounts from providing more than 10 percent of Interpol's revenue.** Interpol is not allowed to derive more than 50 percent of its revenue from its Trust Fund and Special Accounts. In practice, this means that statutory contributions from Interpol's member nations will never be sufficient to pay for a substantial majority of its operations. That 50 percent share is far too high. It should be reduced to 10 percent to force Interpol to rely on statutory contributions for the overwhelming majority of its funding—and thus to force Interpol to reduce and focus its operations. All projects that cannot be funded once the Trust Fund and Special Accounts are substantially reduced should either be terminated or be rolled into Interpol's core operations and funded through its Regular Budget.
- **Develop and implement due diligence procedures for donations by governments and intergovernmental organizations.** Interpol avowedly does not undertake any due diligence with respect to any funds received from governments or intergovernmental organizations. But all money comes with strings attached, and that is as true of government and intergovernmental funding as it is of money from the private sector. Interpol should develop and implement due diligence procedures for donations from governments and intergovernmental organizations. These procedures should be guided by Interpol's Constitution, which bans Interpol from any involvement in political activity.

These due diligence procedures should apply to all funding, including statutory contributions, and should bar Interpol from accepting in-kind or statutory contributions from member nations that regularly abuse Interpol's systems. Any member state that is barred from paying statutory contributions or making in-kind contributions should be suspended by Interpol and then by a vote of its Executive Committee through the mechanisms contained in Interpol's *Rules on the Processing of Data*.¹⁷⁹

- **Increase statutory contributions by an additional 50 percent over 2024 levels.** The increase in statutory contributions approved by Interpol’s General Assembly in 2021 is welcome but insufficient. It will probably do no more than hold the line: By 2024, statutory contributions will likely continue to fund between 40 percent and 45 percent of Interpol’s budget. The U.S. should support an additional 50 percent increase in statutory contributions over the 2024 level and seek by 2024 to raise not €82 million in statutory contributions, but €123 million. This would cost the U.S. approximately an additional €8 million annually, or roughly \$9.2 million, but the U.S. would also benefit financially by being able over time to eliminate or at least markedly reduce its contractual payments to Interpol, which currently cost it €7.094 million a year. In other words, the U.S. would come close to breaking even, paying only about an additional €1 million (roughly \$1.15 million) over the level it is already committed to pay in 2024.

Together with cuts in Interpol’s operations, this increase in statutory contributions would allow Interpol to reduce its reliance on contract work very substantially and eliminate its dependence on charitable donations from the UAE, which as of 2020 were its two major financial and ethical vulnerabilities. Interpol’s admission that “the needs of fighting crime today go well beyond the traditional resources that member countries can make available to INTERPOL through their police budgets” is both a warning sign and a summary of what has gone wrong in Interpol.¹⁸⁰ If Interpol’s member states—which collectively are Interpol—want the organization to undertake a mission on their behalf, then they should fund it appropriately together. If Interpol’s member states do not wish to provide funding, then Interpol cannot undertake that mission. No other approach makes sense financially, organizationally, or ethically.

An increase in statutory contributions would give China a larger financial role in Interpol. While not desirable, this increase would be limited, public, and controlled, whereas the current Interpol funding system allows China an even larger, as well as secret and uncontrolled, role as a funder. Increasing statutory contributions is the single best way to ensure the free world’s continued financial predominance in Interpol. The current system poses by far the greater danger of increased Chinese influence.

- **Terminate the Regional Bureaus and cancel all of their associated debts.** Interpol's Regional Bureaus are an experiment that has run its course. With the rise of online meetings, there is no reason for these Bureaus, which exist largely as meeting areas, to remain open.¹⁸¹ The Bureaus are responsible for almost 30 percent of Interpol's unpaid statutory contributions. In general, Interpol should not cancel any of its debts, but in this case, debts related to the Bureaus fall largely on Interpol's poorest members. The concept of the Bureaus, though well-intentioned, was simply a mistake. Interpol should therefore seek the General Assembly's permission to cancel all debts directly related to the Regional Bureaus and to close all of these Bureaus.
- **Reduce Interpol's activities until statutory contributions support 90 percent of its spending.** Interpol clearly needs its member states to pay higher statutory contributions, but no amount of money from those contributions will be sufficient if Interpol continues to do more every year. Interpol's Secretary General, its General Secretariat, its Advisory Group on Financial Matters, its Executive Committee, and ultimately its General Assembly—all of which bear some responsibility for Interpol's operational sprawl—need to decide what activities they can do without instead of trying to figure out how to raise funds everywhere and anywhere for what they would like to do.

Interpol can continue to receive in-kind donations, subject to the operation of its due diligence procedures, but 90 percent of its spending should be funded through statutory contributions, leaving only 10 percent to be paid for by its Trust Fund and Special Accounts. Interpol should cut its budget by:

1. **Closing its Regional Bureaus.** As noted above, these Bureaus do little but generate bad debts.
2. **Reducing consultancy costs.** Interpol paid out almost €3 million to consultants in 2020. It is inevitable that Interpol will have consultancy expenses, but it should seek to reduce the amount it spends on consultants by 50 percent.
3. **Freezing the salaries of its senior management.** Interpol's leadership receives compensation that is in line with prevailing

international norms, but those norms have set pay at too high a level. Beginning in 2023, Interpol should freeze the salaries of its senior management. This freeze should last through 2029, the end of the next Interpol Secretary General's five-year term, after which it should be reexamined.

4. **Closing the Interpol Innovation Centre in Singapore.** The Innovation Centre serves no purpose except to give Interpol a facility in Asia (and remove the constraints of France's labor laws). Many of the costs directly associated with the Centre are paid in kind by Singapore, but even on the basis of in-kind spending alone, the Centre adds €12 million to Interpol's budget annually. The Centre's facilities should be sold, and the funds collected should be rebated (on a percentage basis set by the member nation's share of assessed contributions) to member nations that paid their statutory contributions in full in Interpol's most recent financial year.
5. **Ending all "field operations."** Interpol is supposed to be focused on allowing police around the world to "share and access data on crimes and criminals." It is not an international police force, and it is not supposed to have field operations. But Interpol regularly promotes what it describes as "Interpol operations" and avows that it does have field operations.¹⁸² Interpol has long had to bear the cross of Hollywood movies that portray it as a global police agency.¹⁸³ It needs to step away from anything that tends to turn Hollywood's fiction into reality. It should not be involved in any activity that does not directly relate to enabling the police to "share and access data on crimes and criminals" across national borders.
6. **Not accepting any new permanent Special Account projects.** Interpol increasingly relies on contracts made and executed through its Special Accounts to pay its bills, but this is like a hamster wheel: More contracts mean more money, which means a bigger Interpol, which requires even more contracts to sustain it, and so on. Interpol itself acknowledges that statutory contributions "generally fund the running costs of the General Secretariat and some of the core policing, training and support activities according to our priorities."¹⁸⁴ In other words, Interpol's projects are primarily about funding Interpol's projects—not its notice and diffusion system. These projects add little to Interpol's ability to carry out its core function.

Interpol's principle should be simple: All Interpol member nations must pay a part—no matter how small—of the funding for all permanent Interpol activities, and Interpol should not undertake ongoing contract work for any donor or nation, no matter how desirable that work might be. If an activity cannot be a part of Interpol's Regular Budget, paid for by Interpol's member nations through their statutory contributions, it should not be a part of Interpol's work. All new contract work that Interpol undertakes should be limited to a total of 10 percent of its spending and be for projects that are clearly temporary.

7. **Reducing reliance on seconded officials.** Seconded officials can provide valuable expertise, but allowing so many seconded officials from partly free or not free regimes (only 54 percent of seconded officials are from free states) to work at Interpol poses obvious risks. As Interpol reduces its reliance on contract work and either terminates these projects or transfers them to its Regular Budget, it should naturally reduce its reliance on seconded officials. It should make a particular effort to ensure that it accepts as few seconded officials as possible from partly free or not free regimes.
- **Allocate funding to enhance Interpol's openness to external expertise.** Interpol's rules and regulations are its first line of defense against abuse, both as they exist on paper and as they work in practice. Interpol should therefore allocate funding to support consultation, both through a regular public forum and privately, with external experts who have relevant legal or scholarly experience with the goal of making these rules and regulations, as well as their operation, more robust. It would be a welcome change, for example, if Interpol allowed a defense attorney with experience in cases involving Interpol to address the General Assembly on a regular basis and if it funded an annual conference of modest size to review issues related to its work.
 - **Substantially increase the Notices and Diffusions Task Force's size and funding.** Interpol's Notices and Diffusions Task Force, which supposedly reviews all Red Notices before publication and screens all wanted-person diffusions, is comprised of about 30 staff members in Interpol's General Secretariat.¹⁸⁵ In 2020, Interpol published 11,094 Red Notices and transmitted 21,507 diffusions, 13,618 of which were wanted-person diffusions.¹⁸⁶ This means that each of these 30 staff

members is responsible for reviewing 370 Red Notices a year, or one every day of the year with no allowance for vacations or weekends. Each staff member is also responsible for reviewing 454 wanted-person diffusions a year, or 1.25 every day of the year.

This is excessive. The result is that—in the author’s experience as an expert witness—Interpol regularly publishes Red Notices that, by its rules, it should have rejected.¹⁸⁷ The budget for the Notices and Diffusions Task Force should be substantially increased to allow Interpol to hire enough staff so that no staff member is required to screen more than one Red Notice or wanted-person diffusion per working day, the existing backlog of unscreened Red Notices and wanted-person diffusions can be fully cleared by the end of 2022, and no further backlog is allowed to accumulate.¹⁸⁸

- **Substantially increase funding for the CCF so that it can operate continuously.** The Commission for the Control of Interpol’s Files is in practice Interpol’s appellate body. It is also desperately underfunded. In 2018, the last year of its operations before the COVID-19 pandemic, it met only four times for a week at a time during which, with the aid of a small staff, it had to examine 1,594 new requests for access to or the correction or deletion of data from Interpol’s systems.¹⁸⁹ In 2019–2020, it received 2,740 new requests, an increase of 1,146 from 2018,¹⁹⁰ and there is every reason to expect this growth to continue.¹⁹¹ But in 2022, the CCF’s budget will be €1.241 million, an increase of only €45,000 over 2018.¹⁹²

The CCF needs increased funding so that it can work continuously, be supported by sufficient staff, and create an appeals chamber. This change in the CCF’s operations will require other changes in its rules, procedures, and even the election of its members. In its most recent activity report, the CCF refers to the challenge imposed by the “strained resources” available to it.¹⁹³ With the number of requests it examines rising so fast, the procedures under which the CCF currently works—and its nearly stagnant budget—are clearly insufficient. Interpol’s neglect of the CCF is clear evidence of its lack of commitment to fighting abuse.

- **Reduce the size of Interpol’s financial reserves.** Interpol has good reasons to hold financial reserves, but it should not hold so much

money that it does not need to collect a significant share of its statutory contributions over a single year (much less over several years). The reserves held by Interpol should be reduced to the lowest level that is sufficient to cover all of the organization's obligations to its staff, provide a small emergency reserve, and compensate for a limited failure by a small number of member nations to pay their statutory contributions in full or on time. The Advisory Group on Financial Matters should determine what level of reserves is suitable based on trends in the payment of statutory contributions over the past decade. Any extra reserves should be rebated to member nations that paid their statutory contributions in full in Interpol's most recent financial year with the rebate made on a percentage basis set by the member nation's share of assessed contributions.

- **End Interpol's relations with the Interpol Foundation and ensure the closure of the Foundation.** For the sake of €15 million in unrestricted funds, €3 million of which was paid late, the Foundation has tied Interpol to the UAE, one of its most abusive members, and has allowed the UAE to claim a leading position inside Interpol itself. The U.S. should strongly encourage Interpol to terminate the Foundation's right to use Interpol's name and symbol. In practice, this would close the Foundation. Secretary General Stock should resign from the Foundation's board with immediate effect, and Interpol should never again attempt to raise funds through a mechanism similar to the Foundation.
- **Immediately terminate Interpol's relations with Kaspersky.** Interpol has an ongoing relationship with Kaspersky, the cybersecurity firm headquartered in Moscow and run by a U.K.-based holding company. The U.S. banned Kaspersky from its government IT systems in 2017 because of persistent reports that Kaspersky was connected to Russian security services. Interpol should immediately terminate its relationship with Kaspersky and remove all Kaspersky products from its systems.
- **Terminate Interpol's relations with the International Olympic Committee and the Qatar 2022 Supreme Committee.** Interpol has shown considerable and enduring interest in donations from international and national sporting organizations, and these organizations in turn have been willing funders of Interpol. That could be because of the corruption so often associated with these organizations, which

gives them both a good deal of money to spread around and a desire to improve their reputations by renting Interpol's name. Interpol should sever ties with both the IOC, which contributed €162,000 in 2020, and the Qatar 2022 Supreme Committee, which contributed €586,000 in 2022 and helps to fund Interpol's Sports Security Programme in advance of the 2022 World Cup, to be held in Qatar. What Qatar is doing with the World Cup is not very different from what the UAE is doing with Interpol: seeking to enhance its image by becoming associated with an institution that many people respect or appreciate. The reality behind both the UAE's and Qatar's images is much less attractive.¹⁹⁴ Interpol has nothing to gain from being associated with this reality.

- **Seek to change the composition of the delegations to Interpol's General Assembly.** The national delegations that attend the General Assembly are generally composed of representatives of departments of justice and law enforcement agencies: in other words, cops. Interpol should request—it cannot mandate—that each national delegation include a national representative who is qualified to discuss financial matters and has the authority to agree to increased statutory contributions. The General Assembly is generally consensual, which is not inherently a bad thing, but the perspective of policemen, while obviously important and indeed integral to Interpol, is not the only perspective that would be of value to the General Assembly's debates.

The United States can also take the following steps without consultation with or votes in Interpol:

- **Work with democratic allies to drive the agenda in Interpol's Advisory Group on Financial Matters.** The AGFM is the most important Interpol body about which almost no one knows anything. In practice, the U.S. is not a dominating presence in Interpol's General Assembly. Of course, the U.S.'s voice always matters, but with only one vote in the General Assembly, the U.S. cannot hope to win through voting power alone. The U.S. matters much more in Interpol's Executive Committee, but while the U.S. currently holds a seat on the committee, it will not always be so fortunate. (It is rumored that the U.S. was nervous about the outcome of the elections to the Executive Committee in 2021.) However, the U.S. will always have a seat on the AGFM and will always be the leading voice in the AGFM because it pays more of Interpol's bills than is paid by any other Interpol member

state. The U.S. needs to work with the other leading democratic contributors (Japan, Germany, Canada, the U.K., and France) to drive the agenda of Interpol reform in the AGFM because that is where it will have the most leverage.

- **Give greater clarity to legal expenses borne by the United States on behalf of Interpol.** In civil cases against Interpol, the National Central Bureau (NCB) of the nation in which the case is filed often represents Interpol. Each Interpol member nation, including the U.S., has an NCB to manage communications with Interpol, but every NCB is controlled by, paid by, and staffed by its home nation: An NCB is not a branch of Interpol. The U.S. should explain when and how it represents Interpol in civil cases in the United States, and it should publish the costs—if any—of this representation. It should then either seek the reimbursement of these expenses from Interpol or request that these expenses be rebated against its statutory contributions on the grounds that it is not appropriate for the NCB, which is neither a part of nor paid by Interpol, to bear the costs of Interpol’s legal expenses.
- **Seek the suspension of Iran under Article 52.** Iran is a notoriously abusive Interpol member nation. It is also the largest debtor that is not already under Article 52 sanctions or in a debt-rescheduling program. Article 52 sanctions can be imposed only after a series of technical conditions related to the percentage of dues paid and the timing of those payments have been met. The U.S. should ask Interpol when those conditions will be met in this case. If Iran is already ripe for suspension, the U.S. should press Interpol to act immediately to suspend it under Article 52.
- **Urge the United Kingdom to increase its contribution to Interpol.** In 2020, the U.K. was Interpol’s seventh-largest funder. Approximately 10 percent of the U.K.’s contribution to Interpol—roughly €800,000—was made in 2020 through the European Commission. As a result of Britain’s exit from the European Union, that contribution was not made in 2021. The U.S. should urge the U.K. to ensure that its total national contribution to Interpol remains unchanged after Brexit. The U.K. could do this by increasing its in-kind support for Interpol, by making a voluntary contribution, or through a combination of these measures. Now that it has left the EU, the U.K. relies increasingly on Interpol, not Europol (the EU

equivalent of Interpol). It is therefore very much in the U.K.'s interest to maintain its position as one of Interpol's most important funders.

- **Engage Canada on Interpol.** Canada is Interpol's sixth-largest democratic contributor and the eighth-largest contributor overall. It contributes only slightly less than the U.K. or France. The U.S. needs to work closely with all of its democratic allies in Interpol, but while the U.K. and France are recognized as leading voices in Interpol, Canada is rarely mentioned. It will always be difficult for the U.S. to win elective positions in international organizations, including Interpol, but the barriers facing Canada are much lower. The U.S. therefore has a good deal to gain from closer, though not highly promoted, policy coordination on Interpol with Canada. The fact that the U.S. joined the U.K., Canada, Australia, and New Zealand in urging Interpol to suspend Russia from membership after its invasion of Ukraine in February 2022 is an important milestone in U.S. policy toward Interpol as well as an indication of the importance of the U.S.–Canada relationship and the broader Five Eyes partnership in reforming Interpol.¹⁹⁵

Conclusion

The years from 2011 through 2015 were the crucial period in Interpol's recent financial history. Over those five years—the first four under the leadership of Secretary General Noble and the final year strongly influenced by his legacy—Interpol's budget doubled, and the share of its expenses covered by statutory contributions dropped from 85 percent to 45 percent.

Much of today's Interpol was made in those years: The Singapore Centre opened; the Interpol Foundation was established; and additional funds, first from the private sector and then through contract work for governments, poured into Interpol's budgets. In the six years after 2015, Interpol's budget grew by only €30 million as opposed to the €58 million of growth in the five years after 2010. Noble was about growth, innovation, and expansion. If Interpol had an era of empire-building, it occurred during these five years and was overseen, driven, and embodied by Noble.

By contrast, Secretary General Stock has been a safer pair of hands. He has overseen a substantial improvement in Interpol's transparency—which is not yet good enough but is far better than it was in 2015. He has all but ended Interpol's compromising quest for private-sector funding and, belatedly but commendably, has secured an increase (which is sadly insufficient) in statutory contributions. What he has done he has done well,

but he has not fundamentally challenged the direction that Interpol took under Noble. He has sought to execute better, not to execute differently.

Noble was a transformative figure in Interpol's history, but he did not foresee—and at times appeared to be concerned primarily with denying the existence of—the problems caused by his efforts to transform the organization.¹⁹⁶ He drove the creation of Interpol's I-24/7 system and its move to a modern, web-based platform, a decisively correct move undertaken in the teeth of resistance by Interpol's member states, but he did not anticipate or appear to be concerned about the way autocratic Interpol member states used his new and more efficient system to repress their political opponents more efficiently. He was an energetic fundraiser, but he showed little awareness of the agendas that funders like FIFA carried in their checkbooks. He did not inquire into motives. Unfortunately, in Interpol as in all other organizations like it, everyone has a motive.

Secretary General Stock's second (and, under Interpol's rules, final) term will expire at the end of 2024.¹⁹⁷ Electing his replacement is of decisive importance to Interpol's future. The U.S. and its democratic allies in Interpol need to start laying the groundwork now for that election. Stock's championing of Interpol's relationship with the UAE has been a mistake. Except under the threat of lawsuits, he has placed a low priority on improving Interpol's notice and diffusion system. His belief that preserving Interpol's neutrality requires that it avoid naming and suspending the member states that systemically abuse it is at odds with the concept of neutrality on which Interpol was founded, which requires Interpol to uphold its rules impartially.¹⁹⁸ But in spite of these issues, Stock is a competent German professional.

If Stock were to be replaced by a representative of China, for example, the results for Interpol and for its free member states could well be catastrophic. Commentators today are rightly concerned by the election of the UAE's Ahmed Nasser al-Raisi to Interpol's presidency in 2021, but Interpol's president is in some respects a figurehead. Its Secretary General, on the other hand, has real operational power. It is therefore vital that the U.S. ensure that Stock is replaced by an equally competent professional who hails from a democratic nation and is committed to the necessary reforms of Interpol's operations.

In the end, people are policy. No reforms of Interpol's finances or of Interpol more broadly, no matter how necessary or far-reaching, will be effective if Interpol's leaders are not committed to upholding and advancing them.

Appendix A: Member Nations' Contributions to Interpol in 2020

Appendix Table 1 contains the actual national contribution made by each member nation to Interpol in 2020 and the percentage of Interpol's funding that each member nation provided.

These contributions were calculated by adding statutory contributions; in-kind contributions in staff and property; revenues from reimbursements and recoveries (contractual arrangements between member nations and Interpol); and any Regional Bureau revenues and voluntary contributions, minus any unpaid statutory contributions for the year. These figures were taken from pages 70–74 and 87–88 of Interpol's *Annual Report and Financial Statements 2020*, supplemented by "Interpol Member Country Statutory Contributions 2020."¹⁹⁹ Note that these calculations subtract only 2020 unpaid statutory contributions for 2020, not all debt.

The percentage figures were calculated by dividing the actual national contribution by Interpol's total operating revenue of €135,904,000. This figure includes a small percentage of Interpol's revenue that is not derived from its member states. To find the share that each member state contributed to Interpol's total operating revenue from its member states, the member state's actual national contribution should be divided by €131,934,213.

APPENDIX TABLE 1

Contributions to Interpol, by Member Nation, 2020 (Page 1 of 3)

Grouped by Freedom House 2020 category

Member Nation	Percentage of Category Total	Total Contributions, Euros	Member Nation	Percentage of Category Total	Total Contributions, Euros
FREE NATIONS			St Kitts and Nevis	0.05%	65,828
United States of America	14.90%	20,248,571	Costa Rica	0.04%	51,045
Japan	5.89%	8,003,574	Cyprus	0.04%	50,819
Germany	5.63%	7,650,826	Guyana	0.03%	43,100
Canada	4.23%	5,752,889	Botswana	0.03%	42,829
United Kingdom	4.06%	5,519,777	Mauritius	0.03%	42,242
France	3.83%	5,200,823	Lithuania	0.03%	39,379
Italy	2.56%	3,484,310	Ghana	0.03%	39,005
Norway	2.31%	3,145,895	Cape Verde	0.03%	36,066
South Korea	1.74%	2,364,442	Iceland	0.03%	35,265
Brazil	1.58%	2,153,375	Liechtenstein	0.03%	35,000
Netherlands	1.55%	2,107,241	Seychelles	0.02%	33,131
Spain	1.52%	2,068,995	Latvia	0.02%	30,563
Australia	1.10%	1,496,802	Bulgaria	0.02%	29,388
Argentina	0.92%	1,257,061	Trinidad and Tobago	0.02%	27,037
Belgium	0.78%	1,060,582	Estonia	0.02%	27,037
Switzerland	0.66%	900,373	Panama	0.02%	23,098
Austria	0.58%	790,510	Malta	0.02%	21,159
Sweden	0.56%	758,561	Jamaica	0.01%	19,984
Poland	0.48%	656,266	Andorra	0.01%	19,396
Portugal	0.42%	565,662	Timor-Leste	0.01%	18,808
Czech Republic	0.41%	553,607	Mongolia	0.01%	18,808
Ireland	0.38%	511,377	San Marino	0.01%	18,808
South Africa	0.36%	493,034	Grenada	0.01%	18,220
Israel	0.35%	477,314	Kiribati	0.01%	18,220
Greece	0.32%	432,498	Marshall Islands	0.01%	18,220
Denmark	0.31%	422,005	Solomon Islands	0.01%	18,220
Chile	0.30%	408,691	St Lucia	0.01%	18,220
Finland	0.28%	380,729	St. Vincent & Grenadines	0.01%	18,220
New Zealand	0.18%	250,722	Tonga	0.01%	18,220
Slovakia	0.14%	196,222	Vanuatu	0.01%	18,220
Romania	0.12%	156,492	Tunisia	0.01%	14,686
Slovenia	0.10%	136,859	Antigua and Barbuda	0.00%	2,220
Croatia	0.10%	136,272	Suriname	0.00%	0
Namibia	0.08%	114,544	Dominica	0.00%	0
Monaco	0.07%	99,984	Nauru	0.00%	0
Bahamas	0.07%	98,742	Samoa	0.00%	0
Luxembourg	0.05%	68,179	Uruguay	0.00%	0
Barbados	0.05%	65,828	Belize	0.00%	0

APPENDIX TABLE 1

Contributions to Interpol, by Member Nation (Page 2 of 3)

Member Nation	Percentage of Category Total	Total Contributions, Euros	Member Nation	Percentage of Category Total	Total Contributions, Euros
PARTLY FREE NATIONS			Dominican Republic	0.02%	29,975
Singapore	8.87%	12,054,761	Lebanon	0.02%	28,800
Mexico	0.70%	956,180	Honduras	0.02%	27,229
Kuwait	0.46%	621,765	Serbia	0.02%	25,861
El Salvador	0.42%	568,426	Sri Lanka	0.02%	23,510
Kenya	0.39%	533,864	Bosnia and Herzegovina	0.02%	20,571
Cote d'Ivoire	0.38%	521,835	Paraguay	0.02%	20,571
India	0.35%	479,522	Armenia	0.01%	19,396
Nigeria	0.30%	407,204	Georgia	0.01%	19,396
Ukraine	0.24%	319,982	Moldova	0.01%	18,808
Benin	0.19%	251,874	Bhutan	0.01%	18,220
Colombia	0.17%	231,500	Maldives	0.01%	18,220
Malaysia	0.17%	229,810	Guatemala	0.00%	0
Indonesia	0.14%	195,721	Comoros	0.00%	0
Burkina Faso	0.13%	181,842	Gambia	0.00%	0
Pakistan	0.11%	147,832	Guinea-Bissau	0.00%	0
Albania	0.11%	144,500	Liberia	0.00%	0
Hungary	0.10%	137,534	Togo	0.00%	0
Niger	0.10%	133,098	Haiti	0.00%	0
Guinea	0.09%	128,625	Nepal	0.00%	0
Fiji	0.09%	126,592	NOT FREE NATIONS		
Papua New Guinea	0.09%	120,313	United Arab Emirates	7.48%	10,162,823
North Macedonia	0.09%	116,224	China	2.67%	3,627,060
Mauritania	0.08%	113,402	Russia	0.93%	1,270,128
Zambia	0.08%	112,706	Qatar	0.81%	1,105,349
Philippines	0.08%	107,753	Turkey	0.50%	675,783
Mozambique	0.08%	104,582	Cameroon	0.48%	651,138
Montenegro	0.07%	97,480	Saudi Arabia	0.39%	533,677
Senegal	0.06%	78,326	Ethiopia	0.30%	406,092
Bangladesh	0.05%	65,828	Zimbabwe	0.29%	400,666
Tanzania	0.05%	63,411	Rwanda	0.27%	364,379
Ecuador	0.04%	54,794	Thailand	0.15%	210,516
Bolivia	0.03%	44,864	Congo	0.15%	198,954
Peru	0.03%	43,410	Bahrain	0.14%	185,436
Madagascar	0.03%	41,066	Iran	0.11%	148,133
Lesotho	0.03%	40,478	Vietnam	0.10%	139,231
Malawi	0.03%	40,478	Dem. Rep. Congo	0.10%	130,466
Morocco	0.03%	36,441	Uganda	0.09%	127,047
Sierra Leone	0.03%	35,066	Chad	0.09%	119,026

APPENDIX TABLE 1

Contributions to Interpol, by Member Nation (Page 3 of 3)

Member Nation	Percentage of Category Total	Total Contributions, Euros	Member Nation	Percentage of Category Total	Total Contributions, Euros
Brunei	0.09%	118,478	Azerbaijan	0.02%	31,151
Belarus	0.08%	111,586	Syria	0.02%	23,510
Eswatini	0.08%	103,994	Uzbekistan	0.02%	22,335
Nicaragua	0.07%	98,101	Myanmar	0.01%	19,984
Sudan	0.07%	95,675	Afghanistan	0.01%	19,396
Jordan	0.06%	87,307	Laos	0.01%	18,808
Egypt	0.06%	80,522	Palestine	0.01%	18,220
Djibouti	0.06%	78,803	Cambodia	0.01%	16,808
Algeria	0.06%	78,171	Tajikistan	0.01%	15,808
Libya	0.05%	66,232	Kyrgyzstan	0.01%	9,220
Gabon	0.05%	65,117	Somalia	0.00%	0
Angola	0.05%	61,910	Venezuela	0.00%	0
Oman	0.04%	60,538	Yemen	0.00%	0
Kazakhstan	0.04%	58,775	Turkmenistan	0.00%	0
Central African Republic	0.04%	51,786	South Sudan	0.00%	0
Iraq	0.04%	48,783	N/A FREE NATIONS		
Burundi	0.03%	46,326	Curaçao	0.01%	18,220
Cuba	0.03%	40,555	Vatican City	0.01%	18,220
Equatorial Guinea	0.03%	37,830	Aruba	0.00%	0
Mali	0.03%	36,654	Sint Maarten	0.00%	0
Eritrea	0.02%	33,131	São Tomé and Príncipe	0.00%	0

NOTE: Interpol rounds member state debts to the nearest thousand. It is therefore not possible to determine precisely how much debtor states contributed to Interpol in 2020. The following debtor states are shown in this table as having made no contribution to Interpol in 2020, even though subtracting their debts as reported by Interpol from their nominal contributions leaves either a small positive contribution or a negative one: Suriname, Dominica, Nauru, Samoa, Uruguay, Belize, Guatemala, Comoros, Gambia, Guinea-Bissau, Liberia, Togo, Haiti, Nepal, Venezuela, Yemen, Turkmenistan, South Sudan, Aruba, Sint Maarten, and São Tomé and Príncipe. Elsewhere in this report—i.e., for the purposes of determining the share of contributions from Free, Partly Free, and Not Free nations—these states are credited or debited with the net contribution as calculated from the figures provided by Interpol. As a result, the contributions in this table do not precisely match either those recorded by Interpol or those used elsewhere in this report. The difference between Interpol's total and that reported in this table is €496, which is not material.

SOURCES: Interpol, "Documents: Annual Reports," 2000–2010, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed May 11, 2022), and Freedom House, *Freedom in the World 2020*, https://freedomhouse.org/sites/default/files/2020-02/FIW_2020_REPORT_BOOKLET_Final.pdf (accessed May 11, 2022).

Appendix B: Interpol Red Notice, August 1, 2018

The following is a Red Notice published in 2018, obtained by the author as a result of his work as an expert witness in the U.S. legal system, and reproduced in redacted form with the permission of the individual named in the Notice. It illustrates how Interpol too often publishes Red Notices that do not comply with its own rules and are therefore abusive. It is not possible to know exactly why Interpol publishes these Red Notices in defiance of its own rules, but one plausible reason—though not the only one—is that Interpol’s Notices and Diffusions Task Force has too many Red Notices and wanted-person diffusions to review for it to be able to check all of them adequately.

This Red Notice should not have been published for two primary reasons. First, the Red Notice does not provide adequate judicial data. Article 83(3) (b) of *Interpol’s Rules on the Processing of Data* requires that:

Red notices may be published only when sufficient judicial data has been provided. Sufficient judicial data will be considered to include at least:

(i) summary of facts of the case, which shall provide a succinct and clear description of the criminal activities of the wanted person, including the time and location of the alleged criminal activity....²⁰⁰

The individual is accused in the Red Notice of aggravated burglary and aggravated robbery. In addition, she is accused of “collaborating” in the trafficking of weapons and drugs and of “giving support” to MS-13, though these latter two accusations are included only as part of the “Complementary information about the case,” not as one of the alleged offenses. The Red Notice states that the alleged burglary took place in July 2012 (or perhaps “around the middle of the year 2012”) at a named school (or perhaps schools) and that the alleged robbery took place “on the street” in August 2012.

In the case of the alleged burglary, the Red Notice fails to provide the location or time of the purported crime. It describes a purported “aggravated burglary” at one school and then a second and very similar case of “burglary” that purportedly occurred at what appears to be a different school. It specifies only a month (or a portion of the year). This is not a “succinct and clear” description, and it fails to provide “sufficient” judicial data.

The alleged burglary also does not provide a suitable basis for a Red Notice because under Interpol’s rules, a Red Notice must describe an offense that is of “interest for the purposes of international police cooperation.”²⁰¹

While Interpol does not define this concept, it is not likely that any reasonable person would construe the theft of beans, rice, sugar, and eight bottles of oil from a school as an offense of interest to international police cooperation.

In the case of the alleged robbery (or robberies, as there purportedly was more than one victim), neither a location nor a day is specified. The Red Notice asserts that unnamed individuals threatened an unstated number of unnamed victims with firearms of an indeterminate type in one or more unstated locations on an unstated day or days and deprived them of an indeterminate number of valuables. Again, these assertions do not provide “sufficient” judicial data; in fact, they barely qualify as a description at all, never mind as a “succinct and clear” one. As neither charge is sufficiently supported or described with reasonable clarity, this Red Notice should have been rejected for vagueness.

Interpol’s *Repository of Practice* on the application of Article 3 of its Constitution provides the second reason for rejecting this Red Notice. Section 3.13 (“Coherence between the charges and supporting facts”) states that:

It is therefore essential to verify: first, that the underlying facts match the charges in the particular case; and secondly, that the facts link the individual concerned to the charges. For example, providing general information about the crime and stating that the individual “was involved in this case” is insufficient. Rather, the activities or role of the individual in the crime should be explained....²⁰²

In other words, the “coherence” test is really two tests: one about the relationship between the facts and the charge and the second about the relationship between the facts, the charge, and the individual.

In the case of this Red Notice, the facts do match the charges (that is, the facts sound like a burglary and a robbery, respectively), so the Red Notice meets the first part of the “coherence” test. But it fails the second part by failing to connect the individual to the alleged offenses. In the case of the alleged robbery, the individual is not linked to the charges: She is simply alleged to have been there. The Red Notice does not allege that the individual obtained a firearm, held a firearm, said or did anything threatening, or participated in all, some, or only one of the alleged robberies.

In the case of the alleged burglary, the Red Notice does not allege that the individual drove the truck or broke into the school: It simply cites her “participation.” This is a classic example of a charge that merely provides “general information about the crime and stat[es] that the individual ‘was

involved in this case.” It is hard to imagine a Red Notice that makes less effort either to explain the “activities or role of the individual” or to cite facts that “link the individual concerned to the charges.”

In short, this Red Notice should not have been published both because it is vague and because, by failing to link the individual to the alleged offenses, it fails the second part of the “coherence” test. Either one of these flaws is enough to render the Red Notice invalid.

This is one of many of El Salvador’s abusive Red Notices that appear to be based on allegations of criminal activity but do not clearly connect the individual to any alleged crime. Instead, it appears that the Notice was requested by the Salvadorean authorities in the belief that the individual is a member of a gang. The fact that this Notice accuses the individual of “collaborating” in the trafficking of weapons and drugs and of “giving support” to MS-13 but includes these latter two accusations only as part of the “Complementary information about the case,” not as one of the alleged offenses, demonstrates that the Notice is part of this wider and abusive pattern and casts serious doubt on whether the individual was involved in the offenses alleged in the Notice—and even on whether these offenses occurred at all.

The individual in this case requested the deletion of her Red Notice through the CCF. On March 11, 2022, the CCF “found that the data challenged provided by El Salvador raised questions as to compliance with applicable rules” and “considered that the retention of these data in the INTERPOL Information System was not compliant with INTERPOL’s rules and decided that they should be deleted.” The CCF made this decision on the grounds that the individual had been given asylum in the United States.²⁰³

While this decision was correct on its merits, and while the CCF is well aware of what it describes as the problem of Red Notices that do not contain “a description individualizing criminal involvement,”²⁰⁴ the outcome does not address the wrong that El Salvador committed by requesting the Notice, the wider pattern of its abuse of the Interpol system, or the failure of Interpol’s Notices and Diffusions Task Force to prevent this Red Notice from being published.

LSS T# 602685

NAME OF INDIVIDUAL REDACTED

Control No: REDACTED - CODE INCLUDES MONTH AND YEAR OF PUBLICATION

Requesting Country: El Salvador
File No.: REDACTED - CODE INCLUDES YEAR OF PUBLICATION
Publication date: August 1, 2018
Latest Update: August 1, 2018



RED NOTICE

FUGITIVE SOUGHT FOR CRIMINAL PROSECUTION

WARNING: Armed, Dangerous, Flight Risk, Violent

Distribution to the media (including the internet) of the extract of the notice published in the public access area of the INTERPOL website: Yes

1. IDENTIFICATION DATA

PHOTOGRAPHS OF INDIVIDUAL REDACTED

*Photographed on November 30, 2017
 in SAN FRANCISCO, CALIFORNIA
 (El Salvador)
 Description: PHOTOGRAPH
 TAKEN FROM THE SOLE
 IDENTIFICATION DOCUMENT
 FROM THE NATIONAL CIVIL
 REGISTRY*

Surnames: NAMES REDACTED
Name: NAMES REDACTED
Sex: Female
Date and place of birth: DATE REDACTED - SANTA ROSA DE LIMA, LA UNION - El Salvador
Nationality: El Salvador (verified)
Alias: LA YTYA or LA RONCA
Marital Status: Single
Surname(s) and name of the father: NAMES REDACTED
Maiden Surname(s) and name of the mother: NAMES REDACTED
Occupation: HOUSEKEEPER
Languages spoken: Spanish
Places or countries where she could be traveling: United States, (UNITED STATES OF AMERICA, MEXICO OR CENTRAL AMERICA)

ID Documents

	Citizenship	Type	Number	Issued Date	Expiration Date	Location	Country
1.	El Salvador	National Identification Number	NUMBER REDACTED	November 30, 2017	March 8, 2019	SAN FRANCISCO, CALIFORNIA	El Salvador

Physical Description

Height (cm): 150	Weight (kg): 50	Hair: Black
Eyes: Dark Brown	Complexion: Normal	

Addresses

	Number	Street	City/Locality	Country	Region/State
1.	HOUSE WITHOUT NUMBER	COLONIA SANTA MARIA DOS	SANTA ROSA DE LIMA	El Salvador	LA UNIÓN

2. CASE

Statement of facts

LSS T# 602685

City	Country	Date
LA UNIÓN	El Salvador	2012

Statement of facts

ACCORDING TO THE TESTIMONIAL VERSION, WHERE THE ABOVE-MENTIONED WITH ALIAS OF "LA YIYA OR LA RONCA," GANG MEMBER WHO HOLDS THE STATUS OF "PARO." THE ACTS OCCURRED IN THE YEAR 2012, IN THE MUNICIPALITIES OF EL SAUCE AND SANTA ROSA DE LIMA, DEPARTMENT OF LA UNIÓN; HAS PARTICIPATED IN VARIOUS CRIMES, AMONG THESE WE CAN MENTION AGGRAVATED BURGLARY, WHICH TOOK PLACE AT THE SCHOOL OF THE CASERÍO PAPALAMBRE, CANTÓN TALPETATE, JURISDICTION OF EL SAUCE, DEPARTMENT OF LA UNIÓN. WHERE THE ABOVE-MENTIONED ALONG WITH TWO GANG MEMBERS IN THE MONTH OF JULY OF THE YEAR 2012, USED A PICK UP TRUCK TO COMMIT THE CRIME, WHERE VARIOUS CLASSROOMS IN THE SCHOOL WERE BROKEN INTO, TAKING 7 BAGS OF BASIC GRAINS (BEANS, RICE AND SUGAR), 8 BOTTLES OF OIL AND OTHER ESSENTIAL GOODS, CAUSING A GREAT INDIGNITY TO THE LOCALS, BECAUSE THEY ARE THE SUPPLIES USED TO PREPARE FOOD FOR STUDENTS OF THE PLACE. IN THE CASE OF THE AGGRAVATED ROBBERY IT TOOK PLACE IN THE MONTH OF AUGUST OF 2012, ACT ATTRIBUTED TO [TEXT CUT OFF]

Complementary information about the case:

THE INCHOATE FEMALE INDIVIDUAL ALONG WITH THREE GANG MEMBERS, OCCURRED ON THE STREET OF SANTA ROSA DE LIMA, WHERE THE VICTIMS WERE DEPRIVED OF MONEY IN CASH, CELL PHONES AND VALUABLE ITEMS, HAVING BEEN THREATENED WITH FIRE ARMS. SEPARATELY, WE HAVE THE PARTICIPATION OF THE DEFENDANT ALONG WITH TWO OTHER SUBJECTS IN THE CRIME OF BURGLARY TAKING PLACE IN THE SCHOOL OF THE CANTÓN MOJONES DE SANTA ROSA DE LIMA, OCCURRED AROUND THE MIDDLE OF THE YEAR 2012, WHERE VARIOUS CLASSROOMS WERE BROKEN INTO ALONG WITH THE FACILITIES OF A CAFÉ, TAKING VARIOUS BAGS OF RICE, BEANS, AMONG OTHER SUPPLIES, TRANSPORTING THEM AFTER THE FACT IN A PICK UP TRUCK TOWARDS A HOUSE LOCATED IN THE COLONIA SANTA MARIA UNO OF THE CITY OF SANTA ROSA DE LIMA, LA UNIÓN. THE INCHOATE FEMALE INDIVIDUAL REMAINED IN THE COLONIA SANTA MARIA UNO, OF THE MUNICIPALITY OF SANTA ROSA DE LIMA, COLLABORATING IN THE TRAFFICKING OF WEAPONS AND DRUGS, AND GIVING SUPPORT TO THE CRIMINAL ACTIVITIES OF THE GROUP FULFILLING THE ORDERS OF THEIR BOSSES, CONSIDERING THAT THIS GANG KNOWN AS MARA SALVATRUCHA MS 13 IS ORGANIZED AND STRUCTURED BY BOSSES. "PALABREROS O CORREDORES", FOLLOWED BY THE SOLDIERS AND MEMBERS. ACCORDING TO THE RECORD IN THE JUDICIAL FILE EDA 13-03-18-7 AT THE SAN MIGUEL SPECIALIZED EXAMINING MAGISTRATES' COURT.

FUGITIVE SOUGHT FOR CRIMINAL PROSECUTION**ARREST WARRANT OR EQUIVALENT COURT RULING 1/1**

Classification of the offense: AGGRAVATED BURGLARY, AGGRAVATED ROBBERY

References of the criminal legislation provisions that prohibit the offense:

THE FIRST FORESEEN AND SANCTIONED BY ARTICLES 207 AND 208, PARAGRAPHS 1 AND 6 OF THE PENAL CODE AND THE SECOND FORESEEN AND SANCTIONED BY ARTICLES 212 AND 213 PARAGRAPHS 2 AND 3 OF THE PENAL CODE.

Maximum applicable sentence:

Years: 28
Details: UP TO TWENTY-EIGHT YEARS OF IMPRISONMENT.

Statute of limitations or date by which the arrest warrant expires

No statute of limitation

Arrest warrant or equivalent court ruling

Number	Issuance Date	Issued or Ordered by	Country
OFFICIAL CORRESPONDENCE NOTICE Number 2914	2018 DATE REDACTED	SAN MIGUEL SPECIALIZED EXAMINING MAGISTRATES' COURT	El Salvador

SIGNATORY (name and surname): Geofredo Campos Rosa

Does the General Secretariat have a copy of the arrest warrant in the language of the requesting country? Yes

3. MEASURES TO BE TAKEN IF THIS PERSON IS LOCATED**LOCATE AND DETAIN WITH THE INTENTION OF EXTRADITION:**

Assurance is given that extradition will be requested upon the detention of the person, in accordance with the applicable national legislation and relevant bilateral and multilateral treaties.

PREVENTIVE DETENTION:

This request should be considered as an official request for preventive detention. Please proceed with the preventive detention, in accordance with the applicable national legislation and relevant bilateral and multilateral treaties.

Immediately notify the NCB SAN SALVADOR, El Salvador (NCB reference: INTP-0205-2018-MHAM of April 20, 2018) and the General Secretariat of the OIPC-INTERPOL, in case this individual is located.

Endnotes

1. For a summary of the rise of Interpol abuse, see Matt Apuzzo, “How Strongmen Turned Interpol into Their Personal Weapon,” *The New York Times*, March 22, 2019, <https://www.nytimes.com/2019/03/22/world/europe/interpol-most-wanted-red-notice.html> (accessed April 5, 2022). For Interpol abuse as of 2021, see Ted Bromund, “What Americans Should Know About Interpol Abuse,” *The Daily Signal*, May 17, 2021, <https://www.dailysignal.com/2021/05/17/what-americans-should-know-about-interpol-abuse/>.
2. For a survey of this wider program, see Ted R. Bromund and David Kopel, “Necessary Reforms Can Keep Interpol Working in the U.S. Interest,” Heritage Foundation *Backgrounder* No. 2861, December 11, 2013, <https://www.heritage.org/global-politics/report/necessary-reforms-can-keep-interpol-working-the-us-interest>.
3. Jamie Johnson, “Exclusive: UAE Police Chief Accused of Presiding over Torture of British Academic Running to Be Head of Interpol,” *The Telegraph*, October 1, 2020, <https://www.telegraph.co.uk/news/2020/10/01/exclusiveuae-police-chief-accused-presiding-torture-british/> (accessed April 5, 2022). For a comprehensive assessment of the UAE’s role in Interpol and the unfitness of Ahmed Nasser al-Raisi to serve as Interpol’s Secretary General, see Sir David Calvert-Smith, “Undue Influence: The UAE and Interpol,” https://static1.squarespace.com/static/5e1706a32328de09538395d7/t/617ff6a7dde89f281846a8b2/1635776352236/UNDUE_INFLUENCE_THE_UAE_AND_INTERPOL (accessed April 5, 2022). See also Ben Keith, “The Report, Undue Influence: The UAE and Interpol Now Published,” 5SAH Barristers, April 8, 2022, <https://www.5sah.co.uk/knowledge-hub/news/2021-04-08/the-report-undue-influence-the-uae-and-interpol-now-published> (accessed April 5, 2022); Ted R. Bromund, “The U.S. Must Promote Democratic Leadership in Interpol,” Heritage Foundation *Issue Brief* No. 6025, November 10, 2020, <https://www.heritage.org/global-politics/report/the-us-must-promote-democratic-leadership-interpol>; and Michelle Estlund, “The United Arab Emirates, INTERPOL’s Funding, and Why Ahmed Naser Al-Raisi’s Presidential Candidacy Is a Problem,” *Red Notice Law Journal*, November 24, 2021, <https://www.rednoticelawjournal.com/2021/11/the-united-arab-emirates-interpols-funding-and-why-ahmed-naser-al-raisis-presidential-candidacy-is-a-problem/> (accessed April 5, 2022). For France’s recently announced investigation into al-Raisi, see Agence France-Presse, “France Probes Interpol President for Alleged Torture, Barbarism,” *France24*, March 24, 2022, <https://www.france24.com/en/live-news/20220324-france-probes-interpol-president-for-alleged-torture-barbarism> (accessed April 5, 2022). For a lawsuit in Britain against al-Raisi on similar grounds, see Alex MacDonald, “UAE: British Man Given Approval for Lawsuit Against Emerati Interpol Chief,” *Middle East Eye*, February 9, 2022, <https://www.middleeasteye.net/news/uae-british-man-allowed-lawsuit-against-interpol-chief> (accessed May 3, 2022). For concerns expressed by several non-governmental organizations and members of the European Parliament before al-Raisi’s election, see *Middle East Eye*, “Kuwait: Princess Says Interpol Warrant ‘Politically Targets’ Her and Partner,” March 4, 2022, <https://www.middleeasteye.net/news/kuwait-princess-interpol-warrant-used-politically-target> (accessed May 3, 2022).
4. Interpol, “Documents: Finance,” <https://www.interpol.int/Resources/Documents#Finance> (accessed April 6, 2022), and Interpol, “Documents: Annual Reports,” <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed April 6, 2022). See also Interpol, “Procurement: Awarded Contracts,” <https://www.interpol.int/Who-we-are/Procurement/Awarded-contracts> (accessed April 6, 2022).
5. For Interpol’s 2021 budget, see news release, “INTERPOL General Assembly Approves First Real Increase to Statutory Contributions Since 2009,” Interpol, November 24, 2021, <https://www.interpol.int/en/News-and-Events/News/2021/INTERPOL-General-Assembly-approves-first-real-increase-to-statutory-contributions-since-2009> (accessed April 6, 2022). A leaked Interpol budget for 2022 projects spending of €157 million in 2022, €166 million in 2023, and €179 million in 2024. See “Interpol’s 2022 Budget: A Look Ahead,” *infra*.
6. Information derived from Interpol, *Financial Statements for the Year Ended 31 December 2010*, *Financial Statements for the Year Ended 31 December 2015*, and *Annual Financial Report and Financial Statements 2020*, <https://www.interpol.int/Resources/Documents#Finance> (accessed April 6, 2022). While this report was in draft and after the author had asked Interpol a number of questions about obvious errors in its 2020 financial statement, Interpol published a 90-page revised version of that statement. Both versions are on Interpol’s website. All references in this report are keyed to the first (92-page) version. The errors in this version’s Table B3 have been corrected by referring to Interpol’s list of member country statutory contributions for 2020. See Interpol, “Interpol Member Country Statutory Contributions 2020,” <https://www.interpol.int/Resources/Documents#Finance> (accessed April 6, 2022). The exact total of statutory contributions assessed in 2020 varies from document to document. Interpol’s 2020 financial statement rounds to €58,811,000 for the purposes of calculations but also lists a more precise total of €58,811,453. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 25, 50–52, and 76–78 (€58,811,000) and p. 74 (€58,811,453). Its list of member country statutory contributions for 2020 gives the precise figure of €58,811,441. Interpol, “Interpol Member Country Statutory Contributions 2020.” However, the statutory contributions listed by Interpol in this document add up to €58,811,453.
7. Interpol, General Assembly Resolution No. 14, “New Procedure for and Scale of Distribution of Statutory Contributions for the Period 2020–2022, and Extension of the Scale Applied in the Year 2018 to the Year 2019,” GA-2018-87-RES-14, adopted at General Assembly’s 87th Session, Dubai, United Arab Emirates, November 18 to 21, 2018, <https://www.interpol.int/content/download/6118/file/GA-2018-87-RES-14%20New%20procedure%20for%20and%20scale%20of%20distribution%20of%20Statutory%20Contributions%20for%20the%20period%202020-2022.pdf> (accessed April 6, 2022). The Interpol scale for 2020–2022 is based on the U.N. scale for 2016–2018, not the latest U.N. scale. The Interpol scale differs from the U.N. scale by imposing ceilings and floors on contributions and making allowances for transitions. E-mail from Interpol Press Office to the author, received February 25, 2022. Assessing the Interpol scale is complicated by the fact that the resolution that adopted it refers to a General Assembly report (GA-2018-87-REP-01, “New Procedure for and Scale of Distribution of Statutory Contributions for the Period 2020–2022, and Extension of the Scale Applied in the Year 2018 to the Year 2019”) that—like most such reports—is not publicly available. This makes it difficult to assess, for example, how Interpol has adapted the U.N. scale. See also Interpol, “Our Funding,” <https://www.interpol.int/en/Who-we-are/Our-funding> (accessed April 6, 2022).

8. Interpol, "Constitution of the ICPO-INTERPOL," I/CONS/GA/1956 (2021), Article 38, <https://www.interpol.int/en/content/download/590/file/01%20E%20CONSTITUTION%2011%202021.pdf?inLanguage=eng-GB> (accessed April 6, 2022).
9. Interpol, "Our Funding."
10. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 16.
11. *Ibid.*, p. 11.
12. Interpol, *Financial Statements for the Year Ended 31 December 2010*, p. 6, and *Annual Financial Report and Financial Statements 2020*, p. 16.
13. Interpol, "General Regulations," I/GREG/GA/1956(2021), p. 7, https://www.interpol.int/content/download/591/file/02%20E%20GEN%20REGULATIONS%2011%2012%2019_ok.pdf?inLanguage=eng-GB (accessed April 11, 2022).
14. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 12–13.
15. The 2020 financial statement writes off the €3.749 million owed to Interpol by the Article 52 states as "doubtful debts." These nations are Belize, Comoros, Djibouti, Dominica, Guinea-Bissau, Haiti, Liberia, Nauru, Samoa, São Tomé and Príncipe, South Sudan, Suriname, Turkmenistan, Venezuela, and Yemen. *Ibid.*, pp. 39 and 64.
16. *Ibid.*, p. 13. Interpol's accounts in this regard can be confusing. Interpol does not restate its financial results year on year, and various technical issues relating to the timing of dues payments and to payments made in currencies other than the euro can result in apparent anomalies. But most of the amounts owed are small, and any seeming anomalies do not significantly affect the overall position.
17. *Ibid.*
18. Interpol declined to identify either member state, commenting only that its financial regulations allow member states or international organizations to pay statutory contributions "on behalf of other Members of the Organization. These arrangements are between member countries." E-mail from Interpol Press Office to the author, received March 30, 2022. The "member in long-term payment arrears" was likely either Somalia (which owed €495,000 at the end of 2019 but only €180,000 by the end of 2020) or Zambia (which was reported to have paid its 2018 dues and a portion of its 2019 dues at the end of 2020). Both states were subject to Article 52 sanctions as of the end of 2019; at the end of 2020, both were among the eight countries "under debt-rescheduling agreements." See Interpol, *Annual Financial Report and Financial Statements 2019*, p. 58, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 8, 2022), and *Annual Financial Report and Financial Statements 2020*, p. 65.
19. Interpol, General Regulations, p. 4.
20. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 39. The eight states operating under debt-rescheduling agreements are Burundi, Cape Verde, Cuba, Gambia, Grenada, Iraq, Somalia, and Zambia. *Ibid.*, p. 65.
21. *Ibid.*, pp. 39 and 66.
22. *Ibid.*, pp. 24, 39, and 47.
23. Table, "Status of Contributions to ATT Budgets as at 29 October 2021," Arms Trade Treaty Secretariat, https://thearmstradetreaty.org/hyper-images/file/2021%2010%2029%20-%20ATT_Budgets_ReceivedContributions_Overview/2021%2010%2029%20-%20ATT_Budgets_ReceivedContributions_Overview.pdf (accessed April 12, 2022).
24. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 3.
25. *Ibid.*, pp. 64–66.
26. *Ibid.*, pp. 64–65. For the 2001 debt cancellation, see Interpol, General Assembly Resolution, "New System of Statutory Contributions—Amendment of the Financial Regulations," AG-2001-RES-01, adopted at General Assembly's 70th Session, Budapest, Hungary, September 24 to 28, 2001, <https://www.interpol.int/content/download/6177/file/GA-2001-70-RES-01%20-%20New%20system%20of%20statutory%20contributions%20-%20Amendment%20of%20the%20Financial%20Regulations.pdf> (accessed April 12, 2022).
27. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 70.
28. *Ibid.*, pp. 70–74.
29. In practice, the smallest contributors contribute less than this and have somewhat less voting power because 14 of the 15 states under Article 52 sanctions (the exception being Venezuela) are small contributors. However, even if those 14 states are removed from the equation, the 98 states making the smallest payments control a majority in what is in effect (as of 2020) a 179-member General Assembly.
30. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 12.
31. Interpol, "Member Countries," <https://www.interpol.int/en/Who-we-are/Member-countries> (accessed April 12, 2022).
32. See Freedom House, "Freedom in the World Research Methodology," 2020, https://freedomhouse.org/sites/default/files/2021-02/Freedom_in_the_World_2020_Methodology.pdf (accessed April 12, 2022). Freedom House's rankings can be and are disputed. It should also be noted that some "Free" states—such as South Africa—tend to side with the Partly Free or even the Not Free states. Nevertheless, these rankings are a convenient and consistent way to assess Interpol's membership, and disputes about the ranking of some states do not significantly affect the findings of this paper as they relate to Interpol's funding.

33. In 2020, Freedom House did not rank five Interpol member nations: Aruba, Curacao, São Tomé and Príncipe, Sint Maarten, and the Vatican City State. All of these member nations contribute only the minimum amount of assessed contributions to Interpol. This report therefore excludes these member states unless explicitly stated otherwise.
34. Though Brazil is a weak democracy.
35. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 70–71. For Turkey’s abuse, see Michelle Estlund, “Istanbul, Turkey—Country with Record of Abusive Red Notices Hosts INTERPOL’s 2021 General Assembly,” *Red Notice Law Journal*, November 23, 2021, <https://www.rednoticelawjournal.com/2021/11/istanbul-turkey-country-with-record-of-abusive-red-notices-hosts-interpols-2021-general-assembly/> (accessed April 12, 2022). For Venezuela’s abuse, see Tim Padgett, “Red Alert: Venezuelans Fleeing Their Regime Say Interpol Notices Derail Asylum,” WLRN, Miami, Florida, April 29, 2019, <https://www.wlrn.org/show/latin-america-report/2019-04-29/red-alert-venezuelans-fleeing-their-regime-say-interpol-notices-derail-asylum> (accessed April 12, 2022).
36. Information derived from Interpol, “INTERPOL Member Country Statutory Contributions 2010,” <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 12, 2022), and “INTERPOL Member Country Statutory Contributions 2020,” <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 12, 2022).
37. *Ibid.*
38. It is rumored that several Interpol member states, including Germany and Belgium, lobbied for a revision of the contributions scale that would require them to pay less on the grounds that member states such as the People’s Republic of China, Qatar, and UAE should pay more. Private information.
39. E-mail from Interpol Press Office to the author, received February 25, 2022.
40. News release, “INTERPOL General Assembly Approves First Real Increase to Statutory Contributions Since 2009.”
41. *Ibid.*
42. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 11.
43. *Ibid.*, p. 69.
44. *Ibid.*, p. 68. Interpol cannot actually assess the value of its seconded staff because it does not know how much its member nations pay their staffs. The figures contained in Interpol’s financial statements are an estimate based on paid-staff equivalent. Because seconded staff often receive a housing allowance as well as an educational allowance for their children from their home nations, the value of seconded staff is likely higher than the paid-staff equivalent. Thus, if anything, Interpol’s estimates understate the value it receives from seconded staff. This report accepts Interpol’s estimates because no other data sources are available.
45. Interpol, *Financial Statements for the Year Ended 31 December 2015*, p. 6, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 8, 2022).
46. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 69.
47. *Ibid.*
48. Interpol, *Annual Report 2020*, p. 23, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed April 11, 2022). The 2020 financial statement gives the number of seconded officials as 249. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 68.
49. Interpol, *Financial Statements for the Year Ended 31 December 2010*, p. 6.
50. Interpol, *Financial Statements for the Year Ended 31 December 2015*, p. 6.
51. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 68.
52. *Ibid.*
53. There are persistent rumors that staff seconded to Interpol from democratic states regard seconded officials from several other nations—including, in particular, the People’s Republic of China—as agents working to influence Interpol or to gather data on behalf of their home governments. Private information.
54. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 68.
55. *Ibid.*, p. 31.
56. *Ibid.*, pp. 25, 51–52, 69, and 76–78.
57. *Ibid.*, pp. 25, 52, 69, and 76–78.
58. *Ibid.*, pp. 52 and 69.
59. *Ibid.*, p. 40.
60. *Ibid.*, p. 69.
61. Interpol, *Annual Report 2020*, p. 24. See also news release, “UAE Pledges EUR 50 Million to Support Seven Key INTERPOL Projects,” Interpol, March 27, 2017, <https://www.interpol.int/en/News-and-Events/News/2017/UAE-pledges-EUR-50-million-to-support-seven-key-INTERPOL-projects> (accessed April 12, 2022).

62. Interpol, "INTERPOL Foundation for a Safer World," <https://www.interpol.int/en/Our-partners/INTERPOL-Foundation-for-a-Safer-World> (accessed April 12, 2022).
63. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 54–55.
64. *Ibid.*, p. 40. According to Interpol, the Foundation had paid its 2019 contribution as of March 30, 2022. E-mail from Interpol Press Office to the author, received March 30, 2022.
65. Interpol, General Assembly Resolution No. 8, "Extrabudgetary Resources," AG-2013-RES-08, adopted at General Assembly's 77th Session, Cartagena de Indias, Colombia, October 21 to 24, 2013, <https://www.interpol.int/en/content/download/5932/file/AG-2013-82-RES-08%20-%20Extrabudgetary%20resources.pdf?inLanguage=eng-GB> (accessed April 12, 2022).
66. INTERPOL Foundation for a Safer World, "A Shared Responsibility," https://www.interpolfoundation.org/#who_we_are_section (accessed April 12, 2022).
67. Estlund, "The United Arab Emirates, INTERPOL's Funding, and Why Ahmed Naser Al-Raisi's Presidential Candidacy Is a Problem." Underlining and punctuation as in original.
68. The Foundation is also noted as providing "INTERPOL Organization Support" through the Trust Fund. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 87 and 88. Interpol does not break out the monetary value of this support. Given the fact that the Foundation supported nine programs through the Trust Fund, it is unlikely that the monetary value of this support to Interpol's core operations is significant. Interpol refused to provide any further information on the Foundation's support through the Trust Fund.
69. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 23, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 8, 2022). The statement continues: "[T]he importance of continued funding from such diversified funding sources assumes significance in the discussion in the following section on the principal risks and uncertainties faced by INTERPOL." See also Interpol, *Annual Financial Report and Financial Statements for 2018*, p. 52, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 12, 2022); *Annual Financial Report and Financial Statements 2019*, pp. 51–52; and *Annual Financial Report and Financial Statements 2020*, p. 55.
70. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 39, 63, and 64.
71. *Ibid.*, p. 31.
72. *Ibid.*, pp. 81 and 84.
73. *Ibid.*, pp. 25, 51, and 52.
74. *Ibid.*, pp. 50 and 86.
75. Interpol, *Financial Statements for the Year Ended 31 December 2015*, pp. 6, 20, and 22.
76. Interpol, *Financial Statements for the Year Ended 31 December 2010*, pp. 6, 19, and 21.
77. Figures derived from a comparison of data in Interpol, *Financial Statements for the Year Ended 31 December 2010* and *Annual Financial Report and Financial Statements 2020*.
78. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 63.
79. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 86.
80. INTERPOL Foundation for a Safer World and Interpol, "Cooperation Agreement Between the Interpol Foundation for a Safer World and the International Criminal Police Organization–Interpol," signed in Dubai, United Arab Emirates, November 20, 2018, <https://www.interpol.int/content/download/16674/file/INTERPOL%20Foundation%20for%20a%20Safer%20World%20-%20INTERPOL%20Cooperation%20Agreement%202020%20November%202018%20.pdf?inLanguage=eng-GB> (accessed April 12, 2022).
81. Interpol, General Assembly Resolution No. 15, "Extrabudgetary Resources," AG-2014-RES-15, adopted at General Assembly's 83rd Session, Monaco, November 3 to 7, 2014, <https://www.interpol.int/content/download/5963/file/AG-2014-83-RES-15%20-%20Extrabudgetary%20resources.pdf?inLanguage=eng-GB> (accessed April 12, 2022).
82. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 87.
83. *Ibid.*, pp. 87–88.
84. *Ibid.*, p. 87.
85. E-mail from Interpol Press Office to the author, received February 23, 2022.
86. Interpol, "ID-Art Mobile App: Capture the Art, Capture the Criminals," <https://www.interpol.int/Crimes/Cultural-heritage-crime/ID-Art-mobile-app> (accessed April 12, 2022). For another example of a specified donor activity, see "Germany Supports Our Digital Transformation," Interpol, *Annual Report 2020*, p. 24.
87. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 31.
88. *Ibid.*, p. 28.
89. *Ibid.*, pp. 12, 25, 50–52, and 76–79.

90. Ibid., p. 12.
91. Ibid., p. 63.
92. Ibid.
93. Ibid., p. 79.
94. Interpol, “General Secretariat,” <https://www.interpol.int/en/Who-we-are/General-Secretariat> (accessed April 12, 2022).
95. This information can be found in Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 66, 70–74, and 87–88.
96. As noted previously, Interpol’s estimate of the value of seconded staff likely understates the full cost of these staff. Thus, in practice, the value of U.S. support to Interpol is almost certainly more than €20,248,571. This is equally true for many, if not all, Interpol member states that second staff to Interpol.
97. For the actual national contribution of each member nation to Interpol in 2020 and the percentage of Interpol’s funding that each member nation provided, see Appendix A, *infra*.
98. On a regional basis, the picture is similar: Europe provides 33 percent of total revenue; the Americas, 28 percent; Asia and the South Pacific, 24 percent; Africa, 6 percent; and the Middle East and North Africa, 9 percent. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 12. The Middle East and North Africa share derives significantly from the UAE and Qatar.
99. Interpol, “Contribution Agreements Signed in 2020,” updated September 8, 2020, <https://www.interpol.int/en/content/download/15134/file/NEW%20CONTRIBUTIONS%20AGREEMENTS%20SIGNED%20IN%202020%20AS%20OF%208%20SEPTEMBER%202020.pdf> (accessed April 12, 2022).
100. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 25.
101. Ibid.
102. Ibid., pp. 25, 51, and 53.
103. Ibid., pp. 25, 51, 53, and 86.
104. Ibid., p. 53.
105. Interpol provides information on “Third Party and other costs” as well as those costs for its Regular Budget and its Trust Fund and Special Accounts. It then also provides a “Combination adjustment” that eliminates any overlap between these two sets of costs. See Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 15, 31, 58, 75, and 89. Unfortunately, this “Combination adjustment” makes it impossible to be completely certain what costs belong to the Regular Budget and what costs belong to the Trust Fund and Special Accounts, but it appears that the “Combination adjustment” has been applied entirely to the Regular Budget and that most of the “Third Party and other costs” were therefore borne by the Trust Fund and Special Accounts.
106. Table, “List of Transactions Above 60K Euro in 2020,” Interpol, <https://www.interpol.int/en/content/download/16121/file/List%20of%20transaction%20above%2060K%20EURO%20in%202020.pdf?inLanguage=eng-GB> (accessed April 12, 2022). These payments are likely for the development of an Interpol analytical platform on the model of Europol’s platform, a project that is being funded by the U.S. Whether this platform will be a useful tool, given the limits of Interpol-maintained databases, is an open question. Moreover, even if this project does deliver useful results, Interpol will need to hire many more analysts than it currently employs. This is another example of a project funded through Interpol’s Special Accounts that will create—and is creating—long-term pressure on Interpol’s Regular Budget.
107. See, for example, the chart depicting the allocation of General Secretariat staff in Interpol, *Annual Report 2005*, p. 29, <https://www.interpol.int/en/content/download/4920/file/Annual%20Report%202005-EN.pdf?inLanguage=eng-GB> (accessed April 11, 2022).
108. Interpol, *Annual Report 2020*, p. 23. The 2020 financial statement gives the number of seconded officials as 249. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 68.
109. €22.965 million (total “financial benefit” as cited in Interpol, *Annual Financial Report and Financial Statements 2020*, p. 68) divided by 252 (number of seconded personnel as cited in Interpol, *Annual Report 2020*, p. 23).
110. Interpol, *Annual Report 2020*, p. 23.
111. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 55.
112. “Organizational Information and Leading Data Appendixes,” in World Bank, *Annual Report 2021*, p. 79, <https://openknowledge.worldbank.org/bitstream/handle/10986/36067/211778app.pdf> (accessed April 12, 2022).
113. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 23.
114. Private information. For a brief outline of the new headquarters agreement, see Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 34.
115. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 34.

116. See Fair Trials, “Tools of Transnational Repression—How Autocrats Punish Dissent Overseas,” Briefing Note to the Commission on Security and Cooperation in Europe (Helsinki Commission), September 12, 2019, <https://www.csce.gov/sites/helsinkicommission.house.gov/files/MIN%20Bruno%20-%20Testimony.pdf> (accessed April 12, 2022). This document is also printed as the prepared statement of Bruno Min, Senior Legal and Policy Advisor, Fair Trials, in Hearing, *Tools of Transnational Repression: How Autocrats Punish Dissent Overseas*, Commission on Security and Cooperation in Europe, 116th Cong., 1st Sess., September 12, 2019, pp. 40–50, <https://www.csce.gov/sites/helsinkicommission.house.gov/files/ToolsOfTransnational.pdf> (accessed April 12, 2022).
117. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 34.
118. Emmanuel Jarry, “Former Interpol Chief’s Wife Sues Agency for Complicity,” *The Sydney Morning Herald*, July 8, 2019, <https://www.smh.com.au/world/europe/former-interpol-chief-s-wife-sues-agency-for-complicity-20190708-p5256h.html> (accessed April 12, 2022), and Nick Rummell, “Target of Red Notice Says Interpol Lets Countries Abuse Process,” Courthouse News Service, March 14, 2019, <https://www.courthousenews.com/target-of-red-notice-says-interpol-lets-countries-abuse-process/> (accessed April 12, 2022). It is also likely that Interpol will incur legal costs to defend its President against the case proceeding against him in the United Kingdom and perhaps also as a result of the investigation against him launched by the French authorities. See note 2, *supra*.
119. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 61. These figures exclude combination adjustments and are therefore not directly comparable to other 2020 figures.
120. Interpol, “Additional Funding 2014,” p. 3, <https://www.interpol.int/en/Who-we-are/Our-funding/External-contributions-in-2014> (accessed April 12, 2022), and Jake Wallis Simons, “How Interpol Got in Bed with FIFA,” *Politico*, June 3, 2015, <https://www.politico.eu/article/fifa-funded-interpol-policing/> (accessed April 12, 2022). According to Simons, “Later [in 2012], Interpol was embarrassingly barred from participating in the World Health Organization (WHO) Convention on Tobacco Control because of its financial association with a tobacco company.”
121. Interpol, “Additional Funding 2014,” p. 3.
122. Interpol, “Additional Contributions, 1 January to 31 December 2016,” p. 4, <https://www.interpol.int/en/Resources/Documents#Finance> (accessed April 12, 2022).
123. Interpol, “Additional Funding 2014,” p. 3, and “Additional Funding 2015,” p. 4, <https://www.interpol.int/content/download/602/file/Additional-Contributors-2015.pdf?inLanguage=eng-GB> (accessed April 12, 2022).
124. Interpol, “Additional Contributions, 1 January to 31 December 2018,” p. 4, <https://www.interpol.int/content/download/5645/file/AdditionalContributors.pdf?inLanguage=eng-GB> (accessed April 12, 2022), and Matthew Rosenberg and Ron Nixon, “Kaspersky Lab Antivirus Software Is Ordered off U.S. Government Computers,” *The New York Times*, September 13, 2017, <https://www.nytimes.com/2017/09/13/us/politics/kaspersky-lab-antivirus-federal-government.html> (accessed April 12, 2022).
125. Press release, “Kaspersky Extends Cooperation with INTERPOL in Joint Fight Against Cybercrime,” Kaspersky, July 3, 2019, https://www.kaspersky.com/about/press-releases/2019_kaspersky-extends-cooperation-with-interpol-in-joint-fight-against-cybercrime (accessed April 12, 2022), and e-mail from Interpol Press Office to the author, received March 30, 2022.
126. Interpol, “Additional Contributions, 1 January to 31 December 2020,” p. 3, <https://www.interpol.int/en/Who-we-are/Our-funding/External-contributions-in-2020> (accessed April 12, 2022).
127. Simons, “How Interpol Got in Bed with FIFA.”
128. News release, “International Operation Led by INTERPOL Reveals Scale of Illicit Goods Trafficking,” Interpol, July 17, 2022, <https://www.interpol.int/en/News-and-Events/News/2012/International-operation-led-by-INTERPOL-reveals-scale-of-illicit-goods-trafficking> (accessed April 11, 2022), and Interpol, *Annual Report 2012*, pp. 5 and 43, <https://www.interpol.int/en/Resources/Documents#Annual-Reports> (accessed April 11, 2022).
129. Interpol, *Annual Report 2015*, p. 12.
130. *Ibid.*, p. 47.
131. Interpol, *Annual Report 2016*, p. 43.
132. Interpol, *Annual Financial Report and Financial Statements 2020*, pp. 87–88.
133. See Interpol, “Financial Regulations,” [II.C/FREG/GA/1985(2019)] [II.C/FRUL/EC/2005(2014)], https://www.interpol.int/content/download/592/file/14%20E%20FINANCIAL%20REGULATIONS%2012%2012%2019_ok.pdf (accessed April 11, 2022).
134. Interpol, “Our Funding.”
135. See Interpol, “Due Diligence Guidelines,” adopted by the Executive Committee pursuant to November 2014 General Assembly Resolution AG-2014-RES-15, <https://www.interpol.int/en/Who-we-are/Our-funding> (accessed April 12, 2022), and “Guidelines and Criteria Applying to the Acceptance by INTERPOL of Contributions from the Private Sector,” adopted by the Executive Committee in November 2015, <https://www.interpol.int/en/Who-we-are/Our-funding> (accessed April 12, 2022).
136. Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 33. See also Interpol, *Annual Financial Report and Financial Statements 2020*, p. 16.
137. The current director of the U.S. National Central Bureau, Michael Hughes, notes on LinkedIn that he has been a member of the INTERPOL Advisory Group on Financial Matters since January 2019. LinkedIn, <https://www.linkedin.com/in/michael-hughes-8576886/> (accessed April 12, 2022). See also Interpol, *Annual Financial Report and Financial Statements for 2018*, p. 15.

138. “Data are, a priori, considered to be accurate and relevant when entered by a National Central Bureau, a national entity or an international entity into the INTERPOL Information System and recorded in a police database of the Organization.” Interpol, *INTERPOL’s Rules on the Processing of Data*, III/IRPD/GA/2011 (2019), Article 128(1), https://www.interpol.int/en/content/download/5694/file/24%20E%20RPD%20UPDATE%207%2011%2019_ok.pdf (accessed March 10, 2022).
139. Interpol, “Due Diligence Guidelines,” p. 2.
140. It is rumored that Saudi Arabia recently wanted to give €100 million to the Foundation and that Secretary General Stock was persuaded only with difficulty that this was a bad idea. Private information.
141. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 3.
142. *Ibid.*, p. 8.
143. *Ibid.*, p. 9.
144. Interpol boasts that even after the dues increase that was approved in 2021, “100 of INTERPOL’s 195 member countries will still pay less than EUR 30,000 for their 2022 statutory contribution.” News release, “INTERPOL General Assembly Approves First Real Increase to Statutory Contributions Since 2009.”
145. As Interpol notes, “diversification of funding sources may come with an added cost of governance, particularly since the influence of member countries via their financial support, with both monetary and in-kind contributions, starts to diminish against the increasing weight of external project partners.” Interpol, *Annual Financial Report and Financial Statements for 2017*, p. 33.
146. This use of the term “security” is misleading. NATO is a security organization. Interpol is not. Using the term “security” is an effort to borrow for Interpol a kind of prestige that its actual duties do not merit.
147. For Interpol’s assertion, three crime programs, and “field operations,” see Interpol, “What Is INTERPOL?” <https://www.interpol.int/Who-we-are/What-is-INTERPOL> (accessed April 13, 2022). For the four “Strategic Goals,” see Interpol, “Strategic Framework 2022–2025,” <https://www.interpol.int/Who-we-are/Strategy/Strategic-Framework-2022-2025> (accessed April 13, 2022). For the seven “Global Policing Goals,” see Interpol, “Global Policing Goals,” <https://www.interpol.int/Who-we-are/Strategy/Global-Policing-Goals> (accessed April 13, 2022). For the 17 crimes, see Interpol, “Crimes,” <https://www.interpol.int/> (accessed April 13, 2022). For the eight priority areas, see news release, “INTERPOL General Assembly Approves First Real Increase to Statutory Contributions Since 2009.” For the “architecture,” see Interpol, *Annual Report 2020*, p. 2.
148. Interpol, *Annual Report 2020*, p. 23. A leaked Interpol budget for 2022 proclaims that Interpol will conduct a remarkable 743 “strategic activities” in 2022. See “Interpol’s 2022 Budget: A Look Ahead,” *infra*.
149. For legislation, see S. 1605, National Defense Authorization Act for Fiscal Year 2022, Public Law No. 117-81, 117th Cong., December 27, 2021, Section 6503, “Transnational Repression Accountability and Prevention,” <https://www.congress.gov/bill/117th-congress/senate-bill/1605/text> (accessed April 13, 2022). For congressional hearings, see Hearing, *Tools of Transnational Repression: How Autocrats Punish Dissent Overseas*. For reports, see European Parliament, Policy Department for External Relations, *Misuse of Interpol’s Red Notices and Impact on Human Rights—Recent Developments*, January 2019, [https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU\(2019\)603472](https://www.europarl.europa.eu/thinktank/en/document/EXPO_STU(2019)603472) (accessed May 9, 2022); David Satter, “Russia’s Abuse of Interpol,” Henry Jackson Society, Russia Studies Centre *Policy Paper* No. 6, July 2015, <https://henryjacksonsociety.org/wp-content/uploads/2015/07/Russias-Abuse-of-Interpol.pdf> (accessed April 13, 2022); Conference Report, *Spotlight on a Critical Threat: The Abuse and Exploitation of Red Notices, Interpol and the U.S. Judicial Process by Russia and Other Authoritarian States*, Convened by the Terrorism, Transnational Crime and Corruption Center at the Schar School of Public Policy and Government of George Mason University, November 28, 2018, <https://tracc.schar.gmu.edu/wp-content/uploads/2020/09/Final-Red-Notices-Conference-Report-Bright-Red-1.pdf> (accessed April 13, 2022); and Nate Schenkkan and Isabel Linzer, *Out of Sight, Not Out of Reach: The Global Scale and Scope of Transnational Repression*, Freedom House, February 2021, https://freedomhouse.org/sites/default/files/2021-02/Complete_FH_TransnationalRepressionReport2021_rev020221.pdf (accessed April 13, 2022). For journalism, see, for example, Apuzzo, “How Strongmen Turned Interpol into Their Personal Weapon”; Drew Hinshaw and Bradley Hope, “China Installed Its Top Cop to Steer Interpol. Then He Disappeared,” *The Wall Street Journal*, April 26, 2019, <https://www.wsj.com/articles/china-installed-its-top-cop-to-steer-interpol-then-he-disappeared-11556304500> (accessed April 13, 2022); and Josh Jacobs, “Has Interpol Become the Long Arm of Oppressive Regimes?” *The Guardian*, October 17, 2021, <https://amp-theguardian-com.cdn.ampproject.org/c/s/amp.theguardian.com/global-development/2021/oct/17/has-interpol-become-the-long-arm-of-oppressive-regimes> (accessed April 13, 2022).
150. The figure for the New York City Police Department is for its 2020 fiscal year. See Citizens Budget Commission, “Seven Facts About the NYPD Budget,” City Budget Blog, June 12, 2020, <https://bcny.org/research/seven-facts-about-nypd-budget> (accessed April 13, 2022).
151. Interpol, *Annual Financial Report and Financial Statements 2020*, p. 11.
152. *Ibid.*, p. 63.
153. *Ibid.*, pp. 24, 39, and 47.
154. *Ibid.*, pp. 12 and 30.
155. *Ibid.*, p. 40.
156. *Ibid.*, p. 15.
157. Interpol, “ID-Art Mobile App.”

158. For Raisi's campaign, see Ted R. Bromund, "Key Priorities for the U.S. at the 2021 Meeting of the Interpol General Assembly," Heritage Foundation *Backgrounder* No. 3664, November 1, 2021, <https://www.heritage.org/global-politics/report/key-priorities-the-us-the-2021-meeting-the-interpol-general-assembly>.
159. Interpol, "Our Funding."
160. Interpol, General Assembly Resolution No. 19, "Pursuing Sustainable Funding for a Better World," GA-2017-86-RES-19, adopted at General Assembly's 86th Session, Beijing, China, September 26 to 29, 2017, <https://www.interpol.int/content/download/5739/file/GA-2017-86-RES-19%20-%20Pursuing%20sustainable%20funding%20for%20a%20safer%20world.pdf?inLanguage=eng-GB> (accessed April 13, 2022).
161. National Defense Authorization Act for Fiscal Year 2022, Section 6503.
162. Interpol's statement in response to Russia's invasion of Ukraine reveals that Interpol's leadership, and in particular Secretary General Stock, is committed to an understanding of political neutrality which dictates that preservation of its neutrality requires that Interpol avoid naming and suspending the member states that systemically abuse it. As the statement puts it, "As long as the INTERPOL network can assist in the rescue of one child abuse victim, the prevention of one terrorist attack or the identification of one missing person, it is its duty to ensure that lines of communication remain open." In fact, the concept of neutrality requires Interpol to uphold its rules impartially, not to maintain a neutral attitude toward all of its member states at the expense of ignoring systemic (or even occasional) abuses. See news release, "Ukraine: INTERPOL General Secretariat Statement," Interpol, March 10, 2022, <https://www.interpol.int/en/News-and-Events/News/2022/Ukraine-INTERPOL-General-Secretariat-statement> (accessed April 13, 2022). For the very different decision taken by Europol, see news release, "Decision of Europol's Management Board on the Situation in Ukraine," Europol, March 17, 2022, <https://www.europol.europa.eu/media-press/newsroom/news/decision-of-europol-s-management-board-situation-in-ukraine> (accessed April 13, 2022).
163. For the refugee policy, see Yuriy L. Nemets, "INTERPOL's New Policy on Refugees: Is Everything Settled?" August 26, 2016, https://papers.ssrn.com/sol3/papers.cfm?abstract_id=2843205 (accessed April 13, 2022), and Yuriy Nemets, "Interpol's Policy on Refugees Needs Improvement," *Red Notice Abuse Report*, December 22, 2017, <https://rednoticeabuse.com/interpol-policy-on-refugees/> (accessed April 13, 2022). For excerpts of the text on refugee policy (Interpol has not released the full policy), see Fair Trials, "Interpol Text on Refugee Policy—Excerpts," <https://www.fairtrials.org/app/uploads/2022/01/INTERPOL-TEXT-ON-REFUGEE-POLICY.pdf> (accessed April 13, 2022). See also Interpol's much shorter summary at Interpol, "INTERPOL Refugee Resolution," <https://www.interpol.int/Who-we-are/Legal-framework/INTERPOL-Refugee-Resolution> (accessed April 13, 2022).
164. Owen Bowcott, "Interpol Accused of Failing to Scrutinise Red Notice Requests," *The Guardian*, November 27, 2013, <https://www.theguardian.com/uk-news/2013/nov/27/interpol-accused-red-notice-requests> (accessed April 13, 2022).
165. Note the significance of the reference to the need to provide "an 'effective remedy' as interpreted under international law" in Nina Vajić, Chair of the Commission for the Control of INTERPOL's Files (CCF), speech to Interpol General Assembly, Bali, November 9, 2016, p. 2, <https://www.interpol.int/en/content/download/6943/file/85%20GA%20-%20Speech%20by%20Ms%20Nina%20VAJIC%20CCF%20Chairperson.pdf> (accessed April 13, 2022).
166. For all of these flaws, see Yuriy Nemets, "INTERPOL Rolls Back Individual Right to Access Information in Its Files, Makes It Harder to Fight Abusive Red Notices," *International Enforcement Law Reporter Blog*, December 12, 2018, <https://ielrblog.com/index.php/2018/12/12/interpol-rolls-back-individual-right-to-access-information-in-its-files-makes-it-harder-to-fight-abusive-red-notices/> (accessed April 13, 2022); Yuriy Nemets, "No Appeal as of Right and the Need for Due Process: The Commission for the Control of INTERPOL's Files Steps in Again," *International Enforcement Law Reporter Blog*, December 5, 2020, <https://ielrblog.com/index.php/2020/12/05/no-appeal-as-of-right-and-the-need-for-due-process-the-commission-for-the-control-of-interpol-s-files-steps-in-again/> (accessed April 13, 2022); Yuriy Nemets, "No Right to a Hearing," *Red Notice Abuse Report*, May 14, 2021, <https://rednoticeabuse.com/no-right-to-a-hearing/> (accessed April 13, 2022); and Yuriy L. Nemets, "INTERPOL Claims Immunity, Escapes Judicial Review of Lack of Due Process," *International Enforcement Law Reporter Blog*, June 17, 2021, <https://ielrblog.com/index.php/2021/06/17/interpol-claims-immunity-escapes-judicial-review-of-lack-of-due-process/> (accessed April 13, 2022).
167. See Interpol, "Documents: Decision Excerpts," <https://www.interpol.int/Resources/Documents#Legal>. As of March 15, 2022, the CCF had posted only 45 excerpts, and none had been posted since 2019.
168. For the most important case on Interpol in U.S. law to date, including early arguments about whether Interpol is in fact an international organization, see *Steinberg v. International Criminal Police Organization*, 672 F.2d 927 (D.C. Cir. 1981), <https://casetext.com/case/steinberg-v-intl-criminal-police-org> (accessed April 13, 2022). For an ongoing case, see Nemets, "INTERPOL Claims Immunity, Escapes Judicial Review of Lack of Due Process." For the Supreme Court's decision in *Jam*, see *Jam et al. v. International Finance Corp.*, 586 U.S. ____ (2019), https://www.supremecourt.gov/opinions/18pdf/17-1011_mkhn.pdf (accessed April 13, 2022).
169. Interpol, *Report No. 8—Programme of Activities and Draft Budget for 2022, and Indications for 2023 and 2024*, GA-2021-89-REP-08, submitted to the Interpol General Assembly, 89th Session, Istanbul, Turkey, November 23–25, 2021, pp. 3 and 22.
170. *Ibid.*, p. 6.
171. *Ibid.*, p. 10.
172. *Ibid.*, pp. 28, 35, and 39.
173. *Ibid.*, pp. 42 and 50.
174. For a review of this wider reform agenda, see Ted R. Bromund, "Key Goals for the U.S. at the 2019 Meeting of the Interpol General Assembly," Heritage Foundation *Issue Brief* No. 5002, September 18, 2019, <https://www.heritage.org/global-politics/report/key-goals-the-us-the-2019-meeting-the-interpol-general-assembly>, and Bromund, "The U.S. Must Promote Democratic Leadership in Interpol."

175. National Defense Authorization Act for Fiscal Year 2022, Section 6503.
176. For this wider transparency agenda, see Yuriy Nemets, “CCF Latest Report: Enforcement Loopholes, Political Prosecutions of Businessmen, Lack of Transparency,” *Red Notice Abuse Report*, March 28, 2019, <https://rednoticeabuse.com/ccf-latest-report-enforcement-loopholes-political-prosecutions-of-businessmen-lack-of-transparency/> (accessed April 13, 2022); Fair Trials, “Fair Trials Urges INTERPOL to Be Transparent About Candidates for Next Presidency,” October 13, 2020, <https://www.fairtrials.org/articles/news/fair-trials-urges-interpol-to-be-transparent-about-candidates-for-next-presidency/> (accessed April 13, 2022); Yuriy Nemets, “Will the Expansion of Interpol’s Stolen and Lost Travel Documents Database Lead to an Expansion of Interpol Abuse?” *Red Notice Abuse Report*, February 16, 2021, <https://rednoticeabuse.com/will-the-expansion-of-interpols-stolen-and-lost-travel-documents-database-lead-to-an-expansion-of-interpol-abuse/> (accessed April 13, 2022); and Yuriy Nemets, “INTERPOL Abuse: The 89th General Assembly Meeting in Istanbul This Month Should Finally Open Doors to Reform,” *Ahval*, last updated November 14, 2021, <https://ahval.io/interpol/interpol-abuse-89th-general-assembly-meeting-istanbul-month-should-finally-open-doors> (accessed April 13, 2022).
177. News release, “INTERPOL General Assembly Overwhelmingly Endorses Executive Committee Elections Reform,” Interpol, November 23, 2021, <https://www.interpol.int/en/News-and-Events/News/2021/INTERPOL-General-Assembly-overwhelmingly-endorses-Executive-Committee-elections-reform> (accessed April 13, 2022).
178. In response to a question from the author, Interpol stated that “[a]ll reports which are publicly available are published on the INTERPOL website, however generally the reports referred to in resolutions are for member countries only.” E-mail from Interpol Press Office to the author, received March 30, 2022.
179. For the suspension procedures, see Courtney Grafton and Stephen Bailey, “Does INTERPOL Have a Role to Play in the Conflict in Ukraine?” *EJIL: Talk! Blog*, March 4, 2022, <https://www.ejiltalk.org/does-interpol-have-a-role-to-play-in-the-conflict-in-ukraine/> (accessed April 13, 2022).
180. Interpol, “Our Funding.”
181. For Interpol’s own assertions about the efficacy of its online meeting platform, see Interpol, *Annual Report 2020*, p. 22.
182. Interpol, “Crimes: Human Trafficking: Types of Human Trafficking,” <https://www.interpol.int/Crimes/Human-trafficking/Types-of-human-trafficking> (accessed April 13, 2022).
183. For a recent example, see Netflix’s *Red Notice* (2021) starring Dwayne “The Rock” Johnson, Ryan Reynolds, and Gal Gadot, which reinforces every conceivable myth about Interpol’s nonexistent role as a global police agency. *Red Notice* is supposedly the most watched movie in Netflix’s history with 328 million hours of viewing in its first three weeks of release. See Lucas Shaw, “Netflix Makes the Most Movies in Hollywood. It Wants to Make the Best,” *Bloomberg*, December 5, 2021, <https://www.bloomberg.com/news/newsletters/2021-12-05/-red-notice-is-netflix-s-biggest-movie-ever-critics-don-t-get-why> (accessed April 13, 2022).
184. See Interpol, “Our Funding.”
185. Conference Report, *Spotlight on a Critical Threat: The Abuse and Exploitation of Red Notices, Interpol and the U.S. Judicial Process by Russia and Other Authoritarian States*, pp. 10 and 19. Interpol commented that “[t]he number of task force members fluctuates as member countries sometimes make staff available for fixed periods varying from several months to a year, or longer. The number averages between 30 and 40. Please also note that while the task force is responsible for the actual review of notices and diffusions, officers from specialized units, for example organized and emerging crime or counter-terrorism, also often provide support to the task force.” E-mail from Interpol Press Office to the author, received March 30, 2022.
186. E-mail from Interpol Press Office to the author, received March 30, 2022.
187. For a sample Red Notice that does not conform to Interpol’s rules but was nevertheless published, see Appendix B, *infra*.
188. As discussed above, Interpol has stated that its notice and diffusion system is one of its eight priority areas for investment, but the scale, urgency, and intent of this investment are in fact limited. For the eight priority areas, see news release, “INTERPOL General Assembly Approves First Real Increase to Statutory Contributions Since 2009.”
189. Commission for the Control of INTERPOL’s Files, “Activity Report of the Commission for the Control of Interpol’s Files for 2018,” CCF/110/12/d461, pp. 4, 8, and 13, <https://www.interpol.int/content/download/14760/file/2018%20-%20CCF%20Annual%20activity%20report%20-%20ENG.pdf?inLanguage=eng-GB> (accessed April 13, 2022).
190. Commission for the Control of INTERPOL’s Files, “Activity Report of the Commission for the Control of Interpol’s Files for 2019–2020,” CCF/118/12, p. 14, <https://www.interpol.int/content/download/16993/file/Activity%20Report%20of%20the%20CCF%202019%20%E2%80%93%202020.pdf?inLanguage=eng-GB> (accessed April 13, 2022).
191. From 2010 to 2019–2020, the CCF’s caseload grew from 201 to 2,740—an increase of 1,400 percent. See Commission for the Control of INTERPOL’s Files, “Activity Report of the Commission for the Control of Interpol’s Files for 2018,” p. 13, and “Activity Report of the Commission for the Control of Interpol’s Files for 2019–2020,” p. 14. See also Vitalie Pirlog, Chairman, Commission for the Control of INTERPOL’s Files, speech before 89th Interpol General Assembly Session, Istanbul, Turkey, November 23–25, 2021, https://www.interpol.int/content/download/17071/file/21Y2062%20E%20DiscoursPr%C3%A9sidentCCF_GA89.pdf (accessed April 13, 2022).

192. Interpol, General Assembly Resolution No. 8, “Programme of Activities and Draft Budget for 2022, and Indications for 2023 and 2024,” GA-2021-89-RES-08, adopted at General Assembly’s 89th Session, Istanbul, Turkey, November 23 to 25, 2021, <https://www.interpol.int/content/download/16914/file/GA-2021-89-RES-08%20E%20ProgActivities2022.pdf?inLanguage=eng-GB> (accessed April 12, 2022), and Interpol, General Assembly Resolution No. 15, “Draft Budget for 2018 and Indications for 2019 and 2020,” GA-2017-86-RES-15, adopted at General Assembly’s 86th Session, Beijing, China, September 26 to 29, 2017, <https://www.interpol.int/content/download/5737/file/GA-2017-86-RES-15%20-%20Draft%20Budget%20for%202018%20and%20Indications%20for%202019%20and%202020.pdf?inLanguage=eng-GB> (accessed April 12, 2022).
193. See Commission for the Control of Interpol’s Files, “Activity Report of the Commission for the Control of Interpol’s Files for 2019–2020,” p. 12.
194. NPR, “Report Reveals More Than 6,500 Migrant Workers Have Died in Qatar’s World Cup Prep,” February 27, 2021, <https://www.npr.org/2021/02/27/972056906/report-reveals-more-than-6-500-migrant-workers-have-died-in-qatars-world-cup-pre> (accessed April 11, 2022).
195. Darryl Coote, “Intel Alliance Asks Interpol to Suspend Russia as Kyiv Wants Moscow Isolated,” United Press International, March 7, 2022, https://www.upi.com/Top_News/World-News/2022/03/07/ukraine-Five-Eyes-Interpol-Russia-membership/2571646640660/ (accessed April 11, 2022).
196. For an example of Noble’s tendency to deny the existence of problems, see Kathy Lally, “Fair Trials International Group Urges Reforms for Interpol Arrests,” *The Washington Post*, November 29, 2013, https://www.washingtonpost.com/world/europe/fair-trials-group-urges-interpol-arrest-reforms/2013/11/29/46892a20-590c-11e3-bdbf-097ab2a3dc2b_story.html (accessed April 6, 2022).
197. See Interpol, “Constitution of the ICPO-INTERPOL,” Article 28.
198. See news release, “Ukraine: INTERPOL General Secretariat Statement.” In response to a question from the author, Interpol stated on March 30, 2022, that “INTERPOL’s mandate does not include issuing sanctions or taking punitive measures, nor is there any provision in the Constitution for the suspension or exclusion of a member country. In addition, the decision to implement heightened supervision and monitoring measures in relation to Russia was made by the Secretary General. His decision was endorsed by the Executive Committee.” E-mail from Interpol Press Office to the author, received March 30, 2022. This answer is misleading: the provisions for suspension are in Interpol’s *Rules on the Processing of Data*, not its Constitution. For the original article that prompted Interpol’s reply, see Ted R. Bromund, “Russia Wrongly Escapes Suspension from Interpol,” *The Daily Signal*, March 16, 2022, <https://www.dailysignal.com/2022/03/16/russia-wrongly-escapes-suspension-from-interpol>. See also Grafton and Stephen Bailey, “Does INTERPOL Have a Role to Play in the Conflict in Ukraine?” *EJIL: Talk! Blog*, March 4, 2022, <https://www.ejiltalk.org/does-interpol-have-a-role-to-play-in-the-conflict-in-ukraine/> (accessed April 13, 2022).
199. See note 5, *supra*.
200. Interpol, *INTERPOL’s Rules on the Processing of Data*, Article 83(2)(b).
201. *Ibid.*, Article 83(1)(a)(iii).
202. Interpol, *Repository of Practice: Application of Article 3 of INTERPOL’s Constitution in the Context of the Processing of Information via INTERPOL’s Channels*, Second Edition, February 2013, p. 46, <https://www.interpol.int/content/download/12626/file/article-3-ENG-february-2013.pdf> (accessed April 13, 2022).
203. Commission for the Control of INTERPOL’s Files to Victim’s Attorney, reference CCF/120/R1323.21, March 11, 2022.
204. Commission for the Control of Interpol’s Files, “Activity Report of the Commission for the Control of Interpol’s Files for 2019–2020,” p. 7.



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