

## ARTICLE

## The Internationalization of the Brazilian Public Prosecutor's Office: Anti-Corruption and Corporate Investments in the 2000s<sup>1</sup>

**Fabiano Engelmann<sup>1</sup>**

<https://orcid.org/0000-0002-5720-3832>

**Eduardo de Moura Menuzzi<sup>1</sup>**

<https://orcid.org/0000-0003-3653-8796>

<sup>1</sup>Universidade Federal do Rio Grande do Sul, Post-Graduation Program of Political Science, Porto Alegre/RS, Brazil

The success of different categories of legal professionals in building positions of state power in Brazil since the end of the military regime is in line with the legitimation of models of law and international cooperation. This article focuses on the connections between Brazilian legal actors and the international 'fight against corruption'. By looking at the international connections of Brazil's Public Prosecutor's Office (MPF), we aim to show how the promotion of anti-corruption models of law is the result of corporate cooperation strategies. We cite as evidence overseas travel by MPF agents and their connections with the international field in recent decades. We start by analyzing cooperation documents and then attempt to trace the MPF's pathway towards internationalization during the 2000s.

**Keywords:** Internationalization; judicial elite; public prosecutor's Office; cooperation; anti-corruption.

---

<http://doi/10.1590/1981-3821202000010006>

For data replication, see: <https://doi.org/10.7910/DVN/7XURZ5>

Correspondence: Fabiano Engelman. E-mail: [fabengel@gmail.com](mailto:fabengel@gmail.com)

This publication is registered under a CC-BY Licence.

---

<sup>1</sup>This article results from a Research Project funded by the National Council for Scientific and Technological Development (CNPq).

**R**ule of law formats within countries that moved from military to democratic regimes in the 1980s were influenced by a twofold process. On the one hand, there were the international movements that took part in the resistance to the military and in the reconstruction of the juridical-political order. Among them were pro-human rights NGOs and development cooperation agencies involved in 'exporting democracy' (DEZALAY and GARTH, 2002). On the other hand, the process of reconstruction of the rule of law provided opportunities for reproduction strategies, with new symbolic investments and functions for judicial elites arising as part of transition processes and the drawing up of new constitutions. In the decades following the end of the military regimes, these groups strove to build independent power bases anchored in the courts, public ministries, and the expansion of state bureaucracy that were permeated by models of respect for legal rules (BOURDIEU, 2012; ENGELMANN, 2017).

Brazil is one of the most representative cases in South America of the success of judicial elites in building such power bases in a democratic regime. This article focuses on what we understand to be a second moment in this process of the rise of legal practitioners within the power space, following the construction and accumulation of political and symbolic capital in judicial institutions during the period subsequent to re-democratization.

The scenario involves connections between autonomous institutions, especially the Public Prosecutor's Office, and international movements that drive the anti-corruption agenda. We intend to show that this international connection is a relevant dimension for understanding both the corporate empowerment of attorneys-general and, in general, the conditions of appropriation and legitimation of this agenda in the domestic space. In the corporate sense, anti-corruption movements have helped legitimize the expertise of those engaged in prosecution actions against politicians by reaffirming the independence and institutional and symbolic strength of judicial institutions. Similarly, international factors have influenced the institutional designs, laws and bureaucratic structures that have flourished in Brazil around the anti-corruption agenda, as well as the courses of action taken by the largest anti-

corruption operations of the last decade in which the central actors were agents of the judiciary.

This process involved a second generation of legal specialists recruited for state careers from the 2000s<sup>2</sup> who did not participate in the constitutional debates and corporate battles of the first decade after the military regime. This ‘consolidation’ of the political power of judicial actors in recent decades occurred through their greater autonomy vis-à-vis the political space. Their actions differ greatly from those of the ‘gentleman politicians of law’ (DEZALAY and GARTH, 2002; ENGELMANN, 2006) or the magistrates’ and prosecutors’ associations who took part in the Constituent Assembly (MACIEL and KOERNER, 2014) and were present in political life throughout the 1990s (ARANTES, 2002; ENGELMANN, 2006). Their political and corporate activism sought to promote democracy and social justice through the creation of important relational axes with international human rights movements<sup>3</sup>. Internal movements in the legal field also reinforced this tendency, such as the founding of the Association of Judges for Democracy in 1991 and the alternative law movement (1990 to 1995) which sought to deconstruct the ‘neutrality’ of the law and involve judicial institutions in the political debate and resistance to the neoliberal agenda of the Collor and Cardoso governments (see ENGELMANN, 2006).

In our period, institutions endowed with considerable autonomy and consolidated power established relationships with both internal political movements and the international space. One of the strategies can be found in the anti-corruption movements that occupied the center of the Brazilian political agenda in our period. The discourse of cleaning up politics and the ‘fight against corruption’

---

<sup>2</sup>Although further and more extensive studies are needed, a ‘generation effect’ in the increase of the anti-corruption agenda in the Public Prosecution Service may be postulated from an analysis of the professional and academic pathways of the prosecutors who have led the anti-corruption operation task forces and have been part of institutional internationalization movements over the last decade.

<sup>3</sup>In recent years, the contradiction between the MPF’s political activism and its judicial activism has progressively intensified, resulting in the externalization of a genuine intergenerational conflict. In 2019, the Office of the Federal Prosecutor for Citizen’s Rights, an MPF body composed of public prosecutors who joined the institution in the 1980s and 90s, issued a statement on the leaks of conversations between prosecutors involved in Operation Lava Jato, to the effect that ‘efforts to tackle corruption need to comply with human rights standards’ (MINISTÉRIO PÚBLICO FEDERAL, 2019b (FEDERAL PUBLIC PROSECUTOR’S OFFICE)) and emphasizing the importance of due process and freedom of the press.

has been bandied about frequently in the course of battles between political groups throughout Brazilian history (PINTO, 2011). We should not, however, dismiss such discourse as a mere side-effect of the electoral cycle; it is important to verify the structural factors that fostered the genesis, development and enhancement of this phenomenon. Our hypothesis is that in the Brazil of the 2000s, these elements appear in the expansion of connections between legal elites in the Judiciary, the Public Prosecutor's Office and, to a lesser extent, the bureaucracies of the Executive and the international space of anti-corruption agencies and bodies. This is not to say that the internationalization of the anti-corruption agenda is a causal determinant of the reorientation of the agenda of Brazilian judicial institutions. But rather that due to structural similarities between national arrangements (DEZALAY and GARTH, 2002) there is a clear correspondence between the political and corporate strategies of certain legal elites and the expansion of the international anti-corruption agenda. This agenda penetrates the national power space on different fronts, including during the drafting and passing of anti-corruption laws, increases in related budgets (ARANTES, 2015) and political investment during Lula's two mandates, as described in the book 'The Lula Government and the Fight against Corruption' by Jorge Hage (2010).

The 'fight against corruption' became, during the 2000s, an international cause, propagated by the United States and through standards upheld by the OECD, the UN and the World Bank, all of which induced the proliferation of domestic laws in the national space (TOURINHO, 2018), and the expansion of compliance programs via economic regulations<sup>4</sup>. In general terms, the agenda was legitimized in the national power space with help from the moral and economic doctrines propagated by think tanks, transparency NGOs, investment risk assessment agencies and development banks (ENGELMANN, 2018, 2017). The strength of these prescriptions is evident in the expansion of anti-corruption agencies with varied functions, which are legitimized and inserted into the space of

---

<sup>4</sup>The relationship between these bodies and anti-corruption movements can be seen in a series of institutional documents, such as those of the OECD (2014a; 2014b), the WORLD BANK (2012; 2000) and USAID/US AGENCY FOR INTERNATIONAL DEVELOPMENT (1999).

political struggles (SOUZA, 2010). Institutional and symbolic claims of independence from rulers are fueled by a whole set of international prescriptions and constitute the key element of the success of these endeavors in the national political space.

Within the Brazilian framework, the Judiciary and the Public Prosecutor's Office have become command centers for the dissemination of the anti-corruption catechism in multiple connection profiles. The links that reinforce the positions of those working to advance the anti-corruption agenda within these institutions range from technical legal cooperation related to anti-corruption operations, to cooperation agreements linking judicial institutions with NGOs, OECD working groups and other international bodies. Likewise, the proliferation of spaces dedicated to academic training and the dissemination of ideas around anti-corruption is indicative of the consolidation of this doctrine. It is essential to consider the whole process of import-export of ideas, models of operation and corporate conceptions (ENGELMANN, 2017).

Starting out from this broad framework, this text intends to reveal the basis of these connections in the case of the Federal Public Prosecutor's Office and its international partners. Our hypothesis is that the anti-corruption agenda has had a dislocating effect of Brazilian political-judicial activism. In other words, the penetration of international initiatives acquires symbolic and institutional strength by aligning itself with the corporate investments of judicial institutions and other bureaucracies that have benefited from accumulated institutional and symbolic capital over the last two decades.

### **For a political sociology of anti-corruption**

Expanding as a catechism that appeals to the strength of moral ideas and the technical rationality of global markets, 'anti-corruption' anchors itself in the space of national power through the transformation of the law, the creation of anti-corruption agencies and public transparency. The literature on anti-corruption programs and initiatives points to the experiences of regime transition in Eastern European countries from the 1990s onwards as representative of the expanding phenomenon of agencies promoting this agenda (SCHERRER et al., 2009; SMILOV, 2009; SOUZA, 2010). Several works have demonstrated how these initiatives are

leveraged in the course of domestic political struggles and election campaigns. They also show how certain political forces connect themselves to NGOs and international bodies (DJALILI, 2000; FARAVEL-GARRIGUES, 2009; HEURTAUX, 2009; PUJAS, 2000). Such studies highlight the importance of taking into consideration the import-export logic of these movements and not simply attributing the phenomena to 'external pressure' on the space of domestic power.

The scenarios of mobilization of various actors around a 'policy judgment'<sup>5</sup> result from a combination of factors, whereby legal elites undertake real crusades for the 'moral rectification of politics' anchored in their position in State power structures (BOURDIEU, 2012). In this context, the force of the law is leveraged in a political operation (BOURDIEU, 1981; ENGELMANN, 2018) with the central objective of subjecting elected representatives to criminal punishments. This practice is known in the field of international relations as lawfare<sup>6</sup>. It consists of the manipulated use of legal rules against political opponents, most commonly in the US. Anti-corruption operations run by government-related prosecutors target political opponents. In the Brazilian case, the phenomenon acquires a very specific characteristic. Lawfare actors are a category of agents embedded in state power that have structurally gained a great measure of independence from political pressure.

A key area of research on this phenomenon concerns anti-corruption operations. More specifically, the 'hyper-activism' of judicial agents and control bureaucracies enhanced by the mediatization of political and financial scandals. Studies of the most famous European cases of the 1990s, such as 'Operazione Mani Pulite' in Italy (BRIQUET, 2001; VAUCHEZ, 2004) and the scandals that resulted in the sentencing of politicians in France (ROUSSEL, 2002; VAUCHEZ, 2017) and Spain (PUJAS, 2000) have shown how this works. Their authors discuss the political meanings of these operations and to what extent they fit into the

---

<sup>5</sup>The notion of lawfare is a broad one and is also employed by authors who discuss the social basis of the relationship between morality and politics, such as in research on how voters perceive corruption and politicians who are sentenced in court. See Lascoumes and Nagels (2015).

<sup>6</sup>For more on the concept of lawfare, see Ansah (2010).

framework of structural changes in the position of judicial institutions in the space of power.

Looking at the French case, Roussel (2002) highlights importance of considering the autonomization of judicial institutions in relation to political power, with the weakening of ties of solidarity between judges and politicians and the emergence of an autonomous judiciary. This process favors a new model of professional excellence that includes the intervention of magistrates in the political space from the 'outside' legitimated as 'defense of general interests'. These processes of empowerment and education are bolstered by the penetration of the concept of transparency into both the media and state power. Lascoumes and Nagels (2015) draw attention to a historical pattern of weak penalization of political and financial elites linked to French corruption cases. They emphasize the small number of cases sent to court by the administrative authorities that supervise the crimes of large companies. Among the causes of this phenomenon are disputes over investigative power between the judiciary and the regulators of the bureaucracy as well as a model characterized by relatively smaller autonomy in terms of judicial resources in relation to the political space.

Corroborating the hypotheses of Briquet (2001), Roussel (2002) Lascoumes and Nagels (2015) highlight three key factors that deserve to be considered in order to understand the involvement of judicial agents and civil servants in processes involving financial and political elites. First, adherence to a professional culture of independence strongly associated with legal prerogatives. This is followed by legalism opposed to favoritism for elites. This legalism does not mean 'obedience to the system', but a point from which prosecutors interpret facts and break with the conservative routine of a priori protection for elites. Finally, Lascoumes and Nagels (2015) point out that another potentiating factor of 'anti-corruption' operations is the organization of work and the division of roles that have evolved within the judiciary, police and administrative-financial control bureaucracies.

The spread of the 'anti-corruption' gospel in judicial institutions and state bureaucracies and its overlap with political battles in an importer country of political and legal models (BADIE, 1992) presents a complex challenge. An understanding of the logics surrounding the strategies and tactics of this import-

export movement and their overlap with national power games has become crucial. As Dezalay and Garth (2002) and Engelmann (2017) demonstrate, the dual play of legal elites that attempt to reinforce or rebuild positions in the national power space in South America is an important starting point for understanding what is at stake when State models are imported.

In this light, the anti-corruption fight assumes great centrality in the 'rule of law' and 'good governance' promoted by US think tanks (ABELSON, 2006; ENGELMANN, 2017, 2018; McGANN, 2017; MEDVETZ, 2012; ROCHA, 2015). This movement of ideas is connected to the internationalization of the regulations governing the activities of transnational US corporations by the 1977 Foreign Corrupt Practices Act, which boosted the prescriptions for conformity and the strengthening of anti-corruption authorities (FAVAREL-GARRIGUES, 2009).

In the terms of this general discussion, the research underlying this article starts out with a more systematic understanding of the institutional cooperation networks that link judicial agents with the international anti-corruption space. We started out by looking at international treaties and agreements participated in by the Brazilian government, the Federal Public Prosecutor's Office and the Federal Judiciary. In addition to cooperation documents, we looked at reports on cooperation and the international circulation of the agents leading the process as sources. The goal here was to identify recurring patterns that would allow us to clarify links with the international space. We took an especially probing look at the Federal Public Prosecutor's Office's involvement in international cooperation. One key source were the records of leave for travel abroad taken by public prosecutors between 2008 and 2018. This gave us a broader picture of destination countries as well as the profile of the most frequently recurring anti-corruption-related events.

### **International cooperation and investments by the legal elite**

International anti-corruption cooperation involves building a space for formal and informal prescriptions, networks and agreements between NGOs, international organizations, development agencies and legal and police professionals. At the national end of this space, stand-out features include the

specialization of agents of the Judicial branch and the Public Prosecutor's Office, and the emergence of autonomous transparency and control agencies. The 1977 US Congress approval of the Foreign Corrupt Practices Act (FCPA) represented an important milestone in the internationalization of the 'anti-corruption' catechism<sup>7</sup>. Initially controversial within the OECD due to its scope 'beyond the nation state', this US initiative strongly influenced the subsequent approval of the OECD Anti-Corruption Convention of 1997, which came into force in 1999. The introduction of OECD programs and initiatives is in line with the training and activism work of the NGO Transparency International, founded in 1993 (COEURDRAY, 2004). Other programs deriving from the 2003 UN Convention were subsequently introduced. The UN, through UNODC, has spurred the adoption of national laws contributing to the expansion of 'anti-corruption agencies' by fostering of legal and police expertise garnered from 'anti-drug' programs (Table 05).

In the 1990s, with leadership from the World Bank and the IMF, financial agencies also included anti-corruption prescriptions in 'good governance' models. The proliferation in the 2000s of specific international agreements and programs for technical cooperation and training is another area that deserves attention. These programs are anchored in various entities and penetrate the national space by facilitating agreements in less formalized networks with the agents that increasingly circulate in this space, or even by reproduction of equivalent programs by national agencies.

The conditions for the success of these prescriptions in the national space vary according to the mobilization strategies and political uses to which they are put by groups and agents interested in reinforcing or maintaining positions in the space of power. Even if initiative profiles can be identified, the overlap between internationalized formal and informal networks is an important element. Transparency International, for example, acts in the construction of the

---

<sup>7</sup>This FCPA prohibits payments to foreign government officials, foreign political parties and/or candidates for foreign political office in exchange for commercial or economic advantage. It applies not only to US-based companies or companies otherwise subject to US law, but also to US listed companies and other companies that engage in corruption on US territory.

anti-corruption catechism through the diffusion of publications and the construction of measurement indicators that mobilize the discourse of the 'independence' of NGOs and the scientific field. To reinforce this doctrine, it acts while anchored in the share of state power held by anti-corruption agencies, judiciaries and public ministries in concluding cooperation agreements for consultancy on the use of public resources, as in the case of Brazil's MPF and National Justice Council (CNJ). We can also mention the think tanks that promote the fight against corruption as an instrument for promoting the rule of law (ENGELMANN, 2017). These guide strategies towards members of national agencies, magistrates and prosecutors by conferring awards or distinctions, or by financing lectures and publications in a space of "construction, reproduction and circulation of ideas designed to shape public debate based on the principle of legitimacy" (SVARTAMANN, 2018, p. 131 ).

Another important movement relates to the actions of the United Nations Office on Drugs and Crime (UNODC). In 1997, the UNODC<sup>8</sup> promoted projects in various countries that focused on 'anti-corruption strategies'. In addition to the dissemination of its prescriptions, the UNODC Global Program seeks to 'identify examples and best practices' developed on a national scale that can contribute to an 'international strategy' in terms of anti-corruption. The program serves as a focal point for the various field offices around the world and plays an important role in standardizing police operations methodology. In this sense, it provides models of investigation, interrogation and international legal cooperation and transfers expertise acquired since the 1970s in the fight against organized crime to the sphere of criminalization of corruption (ANDREAS and NADELMAN, 2006).

Within the scope of the UNODC, the Judicial Integrity Group<sup>9</sup>, created after meetings of heads of the judicial branches of government in various countries, has the objective of bringing together judges and disseminating principles of conduct related to anti-corruption prescriptions. Another important front for strengthening cohesion between moral prescriptions, expertise and law is the movement to create training and information-sharing networks between agencies. Encouraged

---

<sup>8</sup>UN Office dedicated to fighting crime and drug trafficking.

<sup>9</sup>See Nações Unidas (2008 (UNITED NATIONS)) and International Transparency (2007).

by OECD and UN conventions, the 'autonomous anti-corruption agency' model forms part of the prescriptions of these international movements. Representative examples include the informal networks created in 2001 within the framework of the European Union, European Partners Against Corruption (EPAC) and the Anti-Corruption Agency Network (ANCORAGE NET) established in 2006.

The European Contact-Point Network Against Corruption (EACN), created by the European Commission, brings together leaders from various agencies anchored in the national power of European countries. In this same dimension we can also mention the European Anti-Fraud Office (OLAF), a specialized financial fraud unit created in 1999, and the Group of States against Corruption (GRECO), linked to the European Council, which brings together representatives from member states. Among academic actions for specific training purposes, we may include the International Anti-Corruption Academy (IACA), which has agreements with the Brazilian Public Prosecution Service for training on techniques and prescriptions. An international initiative created in Beijing in 2003, the International Association of Anti-corruption Authorities (IAACA), is also indicative of the activities of inter-agency networks.

In 2011, the OECD launched the CleanGovBiz program. This initiative focuses on public administration and state institutions and guides the development of instruments to combat corruption. According to the OECD, CleanGovBiz is a strategic priority for the organization and is part of the G20 Anti-Corruption Action Plan, which has set out biennial goals since 2010. It was preceded by the Declaration on Propriety, Integrity and Transparency in the Conduct of International Business and Finance (the PIT Declaration) of 2009. This aims to encourage countries to promote improvements in business environments through cleaner and more efficient markets and more transparent government systems. A set of 'tools', called 'the Toolkit' are provided as part of the plan, and show, among other things, how procurement processes can be improved or how government actors can encourage companies to adopt compliance guidelines and reform national judicial systems to ensure the cooperation of judges in handing down sentences in corruption cases.

In line with international programs, the National Program for the Dissemination of International Legal Cooperation (Grotius Brazil), with a focus on

anti-corruption training of civil servants, was instituted in 2010. It promotes everything from technical training courses to academic publications and university extension programs focused on legal cooperation. It was employed in various regions across Brazil<sup>10</sup>. The Annual Report of the National Secretariat of Justice<sup>11</sup> and the 10th Commemorative Report on the National Strategy for the Fight against Corruption and Money Laundering (ENCCLA)<sup>12</sup>, the National Training and Training Program for the Fight against Corruption and Money Laundering (PNDL) have a record of conducting courses in partnership with several Brazilian institutions and had trained 364 agents by 2012.

### **The international circulation of MPF agents: the Secretariat of International Cooperation and the international exchanges of public prosecutors**

Over the course of the 2000s and 2010s, national cooperation initiatives on anti-corruption<sup>13</sup> saw considerable advances. On the one hand, we find specific laws resulting from international agreements that point to technical cooperation in combating money laundering and asset recovery. On the other hand, there are broader scope laws that have a direct impact on the repositioning of the legal elite that circulate among the public and private sectors (Table 01), such as the Plea-Bargaining Law and the Anti-Corruption Law, both from 2013 (ENGELMANN, 2017).

It is important to analyze the cooperation agreements that link the national space of justice institutions and government bureaucracies to the international anti-corruption space. Such analysis reveals the connections that anchor the prescriptions of international networks, NGOs, programs and organizations in the field of national power. The expansion of these agreements in the 2000s highlights at least two phenomena in the legal field (Table 02). First, it expands the international circulation of Brazilian state

---

<sup>10</sup>See details in the Brazil report (2011).

<sup>11</sup>See details in the Brazil report (2012a).

<sup>12</sup>See Brazil Report (2012b).

<sup>13</sup>For further details on cooperation agreements see the following documents from the Ministério de Relações Exteriores (2015a; 2015b (MINISTRY OF FOREIGN AFFAIRS)), International Anti-Corruption Academy (2016) and Rede Ibero-Americana de Cooperação Internacional (2011 (IBERO-AMERICAN INTERNATIONAL COOPERATION NETWORK)).

functionaries around new doctrinal and technical conceptions of law. This impacts not only on the strategic direction of institutions such as the Public Prosecutor's Office, but also on internal anti-corruption operations through the adoption of penal negotiation models, asset recovery techniques (and recovered asset management) and intensified data sharing, as well as the adoption of an 'international anti-corruption regime' to combat money-laundering in the national space (TOURINHO, 2018).

**Table 01.** Anti-Corruption Laws in the 2000s

2000	Fiscal Responsibility Law	Supplementary Law N <sup>o</sup> 101
2000	Crimes against Public Finances Law	Law N <sup>o</sup> 10,028
2001	Law on the confidentiality of the operations of financial institutions	Supplementary Law N <sup>o</sup> 105
2002	Electronic Notification Law	Law N <sup>o</sup> 10,520 of July
2009	Transparency Law	Supplementary Law N <sup>o</sup> 131
2010	Clean Slate Law	Supplementary Law N <sup>o</sup> 135
2011	Access to Information Law	Law N <sup>o</sup> 12,527
2013	Plea Bargaining Law	Law N <sup>o</sup> 12,850
2013	Anti-corruption Law	Law N <sup>o</sup> 12,846
2016	Anti-terrorism Law	Law N <sup>o</sup> 13,260
2016	State-owned enterprise liability Law	Law N <sup>o</sup> 13,303
2017	Ten measures against corruption	PL 4850/2016 – PLC 27/2017 (in progress)
2019	Anti-crime Package	PL N <sup>o</sup> 881/2019, PL No. 882/2019 and PLP No. 38/2019

Source: Elaborated by the author's based on Diário Oficial (2000-2018).

In a general sense, the most concrete result is that the networks for sharing technical research information were expanded to an international scale. Secondly, the international agreements are in line with the internal corporate movements of different categories of legal professionals. In particular, the categories positioned in spaces at claim autonomy from politicians and leaders, such as the Comptroller General of the Union (CGU), the General Advocacy of the Union (AGU), the Federal Police and the Public Defender of the Union (DPU)<sup>14</sup>. These categories pursue the guarantees prerogatives of independence obtained by the Judiciary and the Public Prosecutor's Office since the end of the military regime (see ARANTES, 2015).

<sup>14</sup>Regarding the controversial attempt by DPU agents to involve the MPF in the fight against corruption, see the public debate between São Paulo State Public Defender Marcos Vinícius Manso Lopes Gomes (2018) and Rio de Janeiro State Public Defender Elisa Cruz (2018).

**Table 02.** International agreements with Brazilian participation in the 2000s

	Date	Summary of agreement (objective, responsible body, results and actions)
Inter-American Convention against Corruption (Caracas Convention) OAS	1996 Promulgated in Brazil by Decree N <sup>o</sup> 4,410, 2002	Promote and strengthen the development by each State Party of the mechanisms necessary to prevent, detect, punish and eradicate corruption. Promote, facilitate, and regulate cooperation among State Parties to ensure the effectiveness of measures and actions taken to prevent, detect, punish, and eradicate corruption in the exercise of public functions, as well as acts of corruption specifically linked to the exercise of public functions. Partner: government of Brazil.
Convention on the Fight against the Corruption of Foreign Public Officials OECD	1997 Promulgated in Brazil by Decree N <sup>o</sup> 3,678 of 11/2000	Take all necessary steps to establish that under its laws it is a criminal offense for any person intentionally to offer, promise or give any improper financial or other advantage, either directly or through intermediaries, from a foreign public official, to the official in question or to third parties. Partner: government of Brazil.
Cooperation agreement Financial Action Task Force of Latin America (GAFILAT)	2000	GAFILAT is a regional group that belongs to the international network of agencies dedicated to preventing and combating money laundering and terrorist financing. The core of this network is the OECD-based FATF, located in Paris, which issues the 40 Recommendations - the international standards - that all its member countries are required to implement in their national laws. Partner: government of Brazil. The MPF became an official member of the network in 2014.
UN Convention against Corruption, in International Commercial Transactions UN	2003 Promulgated in Brazil by Decree N <sup>o</sup> 5,687 of 2006	01. Promote and strengthen measures to prevent and combat corruption more effectively and efficiently; 02. Promote, facilitate and support international cooperation and technical assistance in preventing and combating corruption, including asset recovery; 03. Promote integrity, accountability and proper management of public affairs and property. Partner: government of Brazil.
The Ibero-American Public Prosecutor Training Network (RECAMPI) and the Ibero-American Network for International Legal Cooperation (IberRede)	Signed in Madrid 2010	01. The purpose of this Framework Agreement is to lay down the general basis for collaboration between the Parties involved in areas of common interest. 02. To facilitate this collaboration, the Parties undertake to inform each other about the lines of action identified as priorities in each period, and the activities that will develop them. 03. The Parties agree to develop an annual Action Plan with this Framework Agreement and the priorities identified by each of them for that period as the general basis for collaboration, in which they shall set out the most appropriate form for said collaboration as well as the specific activities they are to perform. Partner: Federal Public Prosecutor's Office.

	Date	Summary of agreement (objective, responsible body, results and actions)
Multilateral Convention on Mutual Administrative Assistance in Tax Matters OECD	2011 Promulgated in Brazil by Decree N <sup>o</sup> 8,842 08/2016	The Parties shall provide each other with administrative assistance in tax matters. This assistance shall cover, where applicable, measures taken by judicial bodies. Said administrative assistance includes 01.the exchange of information, including simultaneous tax audits and participation in tax audits carried out abroad; 02. the collection of tax credits, including precautionary measures; and 03. the notification of documents.
Cooperation agreement International Anti-Corruption Academy (IACA)	2013 CGU 2016 CNMP	The cooperation takes place between agencies with the voluntary exchange of information from a non-exclusive database. Forms of cooperation include creation of and support for mutual anti-corruption projects; meetings to evaluate strategies; exchange of information and results, especially in regard to activities of common interest; commitment to promote training; and mutual assistance. Partner: National Council of the Public Prosecutor's Office (CNMP) and General Comptroller of the Union (CGU).
Cooperation agreement Transparency International and MPF	2014	Share knowledge on areas of corruption prevention and public transparency. Transparency International offered to provide assistance free of charge in the J&F case. Partner: Federal Public Prosecutor's Office.
MPF and World Bank Memorandum of Understanding CNJ and Transparency International Cooperation Agreement	2015 2017	Facilitate information and data exchange in the fight against fraud and corruption in World Bank funded projects. Focus on promoting anti-corruption practices within the judiciary. The institutions envisage presenting a work plan detailing activities ranging from training judges on topics such as anti-corruption to protecting victims and witnesses. The partnership involves the exchange of experiences between the international entity and the Brazilian body. Partner: National Justice Council (CNJ).
Transparency International and MPF Cooperation Agreement	December 2017	Establish a work schedule and guidelines for investing part of the company's leniency fines into social anti-corruption projects. Partner: Federal Public Prosecutor's Office.

Source: Elaborated by the author's based on Engelmann (2018).

The establishment of internationalization channels for these institutions and agencies in the space opened by anti-corruption activism, forges a corporate path that goes far beyond the original prerogatives set forth in the laws of the 1988 Constitution. The reinforcement of prerogatives of investigation and supervision of the political field comes from 'interpretation', proposed laws and technical specialization in these institutions and agencies throughout the 2000s. In addition, it benefits from increased resources, as the 'national anti-corruption camp' mediates international prescriptions that acquire the force of law (ARANTES,

2015), a program that unites the media, moral entrepreneurs, business associations, international NGOs and their local reproducers (ENGELMANN, 2017, 2018). In this regard, it is interesting to note the comparative data from studies on the 'scandalization' of politics, which reveal the unequal treatment of the Executive, Legislative and Judiciary powers and the Public Prosecutor's Office, and empirical evidence on the complex effects of the association between the mainstream media and the justice system in Brazil's democracy (FERES JÚNIOR, MELO, and BARBABELA, 2018; FERES JÚNIOR, BARBABELA, and BACHINI, 2018).

According to Saraiva (2016), the increasing investment of MPF staff in convention-related meetings intensified the exchange of information between them and their international counterparts, as well as among public servants from related bodies in other countries, police, tax authorities and administrative control bodies.

Closer contacts, in this sense, are central to the improvement of cooperation channels independent of the Brazilian government<sup>15</sup> (Table 03). In addition to participating in working groups linked to international conventions and agencies, the MPF expanded its relationship with Transparency International by participating in the production of its annual reports. Likewise, another way in which the MPF participates in international fora is through collaboration in studies conducted by different bodies aimed at improving public and private mechanisms in this area.

The participation, especially of the MPF, in cooperation programs highlights the internationalization of methods that involve operating profiles derived in many cases from counter-trafficking models. Apart from technical cooperation, some of these agreements relate directly to the creation of 'anti-corruption laws' in the national space during the 2000s. The MPF is a representative case due to its central importance. It began its more systematic anti-corruption activity with the creation, in 2005, of the Center for International Legal Cooperation (CCJ). From the end of 2009, the MPF began

---

<sup>15</sup>In 2015, the headquarters of the Secretariat for International Cooperation established a group to set up a legal liaison office with the French government. The resulting office included the only liaison magistrate in Brazil able to expedite requests for mutual assistance between the MPF and the French judiciary (MINISTÉRIO PÚBLICO FEDERAL, 2015).

strategically monitoring compliance with international conventions, as highlighted by Saraiva (2016), by conducting international insertion assessment that indicates the autonomy of initiatives in relation to the Executive:

Therefore, the MPF had been occasionally invited to attend meetings of international bodies on the subject, usually when some branch of the Executive (especially the Ministry of Foreign Affairs, the CGU or the Ministry of Justice) considered its presence relevant. Starting from 2009, Gurgel Santos (General Prosecutor at the time) began increasing the frequency with which representatives were appointed to OECD, UN and OAS meetings that dealt with anti-corruption conventions. In July 2010, a working group was set up specifically for MPF representation at these bodies, which was to complement the work of the ASCJI. With General Prosecutor Rodrigo Janot taking office in September 2013, the International Legal Cooperation Secretariat (SCI) was created, and placed under the responsibility of a member with exclusive dedication to legal cooperation (...). Subsequently, an Executive Group was set up in view of the need for frequent conventions and other international events (SARAIVA, 2016, p. 207).

In the 2010s, two cooperation agreements were made with the NGO Transparency International. The first, more generic, agreement, signed in 2014 related to 'knowledge sharing'. In 2017, the second agreement, which aimed at conducting anti-corruption campaigns with the use of part of the assets recovered in the operations. In particular, the amounts obtained from the fines imposed on companies found guilty of corruption practices. Thus, one can observe that in addition to the circulation of prescriptions from the international space and the establishment of autonomous relationships, funds were also set up to leverage cooperation with international bodies. This connection reveals the MPF's role as formulator and executor of public policy in the distribution of these funds<sup>16</sup>.

These initiatives were accompanied by the creation of nationally anchored actions. In September 2015, the National Council of the Public Prosecution Service (CNPMP) created the National Anti-Corruption Forum (FNCC)<sup>17</sup>. This constitutes a

---

<sup>16</sup>On which subject, it is interesting to note the announcement from the Federal Public Prosecutor's Office (2019c) that it had created a foundation responsible for defining the criteria for allocating these funds, and that those coming from its agreement with Petrobras would soon be available.

<sup>17</sup>The detailed documents and evaluations of the MPF's cooperation agreements with Transparency International, as well as the initiatives of the National Corruption Forum may be consulted on the institutional website of the National Council of the Public Prosecution Service.

'political' action on the part of the MPF and appears as a centralizing space for discourse circulation. It involves initiatives that transcend the organization's sphere of action and engage with the space of anti-corruption activism. According to its founding document, its objective is "to foment debate and the construction of prevention and repression initiatives within the Brazilian Federal Public Prosecution Service in ten different axes of action" (CONSELHO NACIONAL DO MINISTÉRIO PÚBLICO, 2015). These initiatives include: Transparency and the Law on Access to Information, internal control and the professionalization of the public administration, educational campaigns, training for social control, legislative measures and educational projects.

**Table 03.** Profiles of links established in international agreements

Connections	Commitments
- between the Brazilian government and foreign governments	- commitment to implementing 'measures' to control and combat corruption
- between the Brazilian government and international bodies (OECD, UN and OAS)	- commitment to criminalizing corruption in the public sector (transforming it into a criminal matter)
- between judicial or control institutions (CGU/MPF/Revenue) and counterpart organizations or institutions	- commitment to sharing fiscal and tax data, etc
- between the Federal Public Prosecutor's Office and National Justice Council and Transparency International	- commitment to combating money laundering and the sharing of information on this theme
	- commitment to 'anti-corruption' training
	- training of judges, prosecutors, civil servants, advisory service on the recovery of assets recovered during anti-corruption operations

Source: Elaborated by the author's based on Ministry of Foreign Affairs (2015a; 2015b; 2018) and Brazilian Public Prosecutor's Office (2015; 2016; 2018).

In its condition as an intermediate elite entity (BADIE, 1992), the success of the MPF reinforces its role as sponsor of the recommendations of international agencies in national political processes. In 2015, the President of the Financial Action Task Force (FATF), Roger Wikins, visited General Prosecutor Rodrigo Janot, and alerted him to the fact that the absence of effective measures to criminalize terrorist organizations could lead to the imposition of economic sanctions on Brazil. As a result of the meeting, the PGR forwarded letters to the Office of the President, the Chamber of Deputies, the Ministry of Justice and the Federal Senate recommending that an Anti-Terrorism Law be put in place as a matter of urgency. To close the international circuit in that year, the measures adopted by the MPF at the domestic level were presented at a meeting of the FATF in Austria (MINISTÉRIO PÚBLICO FEDERAL, 2015). In 2016, Law Nº 13,260

defined the concept of terrorism and a terrorist organization and established investigative and procedural provisions.

The international community lavished rewards on the MPF. On the one hand, international recognition of its privileged status as an evaluator in the anti-corruption system: in 2015, public prosecutors participated in the evaluation mechanisms of the international anti-corruption systems of Suriname (MESISIC/OAS), Antigua, Barbuda (IRG/UNCAC), Sweden, Spain (WGB/OECD), and Canada (FATF) (MINISTÉRIO PÚBLICO FEDERAL, 2015). On the other, international awards and foreign media appearances, widely reproduced in the 'field of scandals' (GRÜN, 2018) in Brazil. In 2015, General Prosecutor Rodrigo Janot is listed among 100 global thinkers by Foreign Policy, a magazine specializing in international politics. In 2017, the prosecutors Deltan Dallagnol, Carlos Fernando do Santos Lima and Roberson Pozzobon represented Operation Lava Jato at the annual award ceremony of the Global Investigations Review (GIR), an agency that specializes in international investigations. In 2018, Lava Jato prosecutors in Paraná, Rio de Janeiro and Brasilia received the Special Achievement Award of the International Association of Prosecutors (AFFONSO, 2017; BRANDT and AFFONSO, 2018; COUTINHO, 2015; MINISTÉRIO PÚBLICO FEDERAL, 2018c, 2017f).

At the domestic level, the MPF's strategy of primacy in the fight against corruption has facilitated recognition of its central position in the Brazilian anti-corruption system, and has carved it out a role as the central authority for international cooperation requests in respect of criminal matters pursuant to the Convention on Judicial Assistance between Member States of the Community of Portuguese Speaking Countries in Criminal Matters. This involves all requests from the Brazilian prosecutor to Angola, Cape Verde, Guinea-Bissau, Equatorial Guinea, Mozambique, São Tome and Principe and East Timor (BRASIL, 2016; MINISTÉRIO PÚBLICO FEDERAL, 2016).

The analysis of the professional and academic pathways and data of the 22 federal prosecutors belonging to the Support Group of the MPF Secretariat for International Cooperation created in 2013, which represents the continuity of the 2005 initiatives, makes important inferences possible. The Secretariat's trajectory corroborates the hypothesis of a cumulative specialization over the last fifteen years towards a model of legal cooperation in which the MPF acts independently of

government institutions. Most of the members of this group graduated with law degrees during the 1990s, half of them between 1998 and 2001. Entry into the MPF occurred for the most part between the second half of the 1990s and the early 2000s, nearly a decade after the promulgation of the new Constitution.

This was a generation of prosecutors who had not participated in the formation of the MPF in the decade subsequent to the democratic transition. This means that they had not participated in the internal discussions about the MPF's 'role in democracy' during the 1990s, which was very much a continuation of constitutional debate (ARANTES, 2002; ENGELMANN, 2007; MACIEL and KOERNER, 2014). Most of the members of the group can boast a master's degree or a PhD, half of which were obtained abroad, in Spain or the United States. Those with the highest academic qualifications are also part of the regional MPF training schools and, in some cases, are university professors. This, in addition to their various books and articles on legal issues, indicates some degree of investment in the theoretical debate and the training of experts on themes linked to the MPF's activities. Even though their publications deal with various aspects of law, the theme of criminal legal cooperation is clearly predominant among the books, dissertations and doctoral theses. The main topics include compliance and specific issues related to 'fighting corruption'.

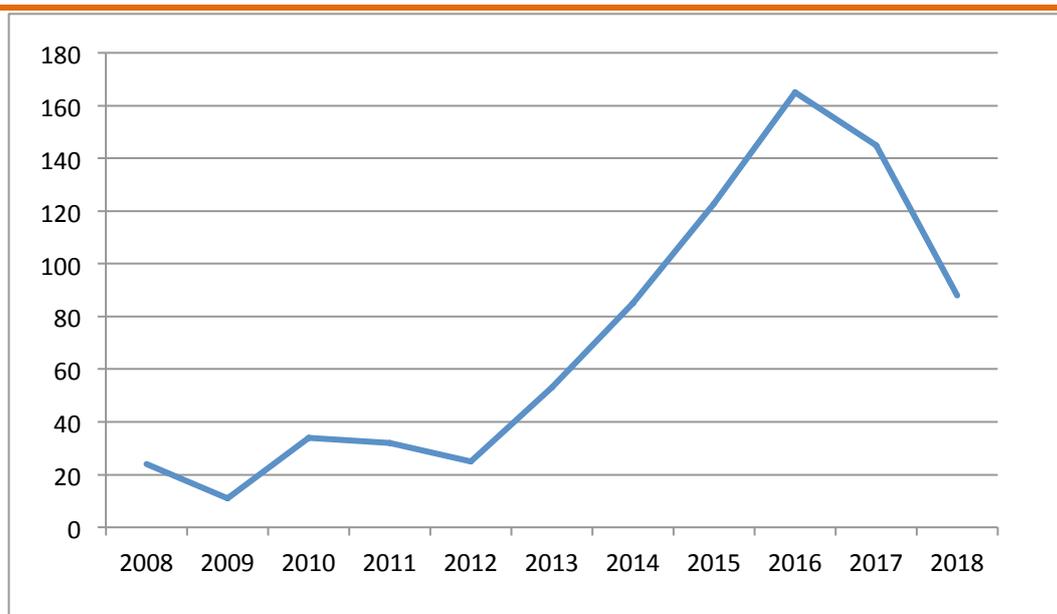
### **Connections and insertion into the international 'anti-corruption' space**

Foreign trips undertaken by prosecutors provide another prism through which to observe the intensification of the autonomous international eddies flowing around the MPF in the 2000s. Travel profiles provide important clues that corroborate the connections between internationally circulating institutional strategies and the prosecutors' investments in expertise and networks of exchange. In order to obtain a representative overview of the international circulation of state prosecutors, we built a database of information covering the period 2008-2018, extracted by consulting all the editions of the Official Gazette, in which 878 authorizations for attendance at overseas events were published. We selected trips related to institutional cooperation in the prosecution of crime and themes falling within the scope of 'anti-corruption'. We excluded exchange trips deriving directly

from the status of prosecutor, such as the completion of postgraduate courses abroad, from this study (Graph 01).

The information available in the official records contains the name of the prosecutor, his or her destination and the period of the trip. Staffing levels and roles were also cataloged, allowing us to create a profile of prosecutors who travel internationally. Analysis of travel records in our period allowed us to observe a clear trend of increased travel from 2015, coinciding with Operation Lava Jato. The data confirm that the most frequent travelers come from the group of prosecutors who occupy prominent positions in the Secretariat of International Cooperation. Our database also showed that this trend is also present in inter-state trips within Brazil, which is indicative of the proliferation of anti-corruption-linked events.

**Graph 01.** Number of trips/year (2008 -2018)



Source: Elaborated by the author's based on Diários Oficiais (2000-2018).  
Elaborated by the author's based on Diários Oficiais (2000-2018).

Over the period 2008-2018 seven countries stand out among destinations for prosecutors: The United States, France, Argentina, Italy, Portugal, Austria and Peru (Table 04) (Graph 02).

The first feature is that the predominant connections are with the United States and European countries. France and Portugal appear as preferred destinations for postgraduate law teachers in the 2000s (ENGELMANN, 2009;

WOHNRATH, 2018). The United States is likewise the preferred destination for partners in the largest law firms (ENGELMANN, 2011). The second feature is the strong presence of cooperation between South American countries. Paraguay, Uruguay and Colombia appear shortly after the most frequent destination countries (USA, France, Argentina, Italy, Portugal, Austria and Peru), and this indicates the importance of taking into consideration the size of South American networks, in terms both associative (between public ministries) and technical<sup>18</sup>. Mozambique is the African country that appears most frequently.

**Table 04.** Most frequent destinations for Prosecutors (2008-2018)

País	2008	2009	2010	2011	2012	2013	2014	2015	2016	2017	2018	TOTAL
USA		02	02	03	01	02	09	26	18	23	06	90
France			01	03	04	08	12	10	17	11	07	72
Argentina	04		10	01	01	03	05	03	03	16	04	50
Italy				01	01	02	09	17	10	09		49
Portugal	01		02	05	04	07	03	03	08	02	03	38
Austria	01			01	01	01	05	09	09	06	03	35
Peru						03	03	08	04	08	07	33
Total	06	02	15	13	13	25	39	68	76	76	39	

Source: Elaborated by the author's based on Diários Oficiais (2000-2018).

It is worth mentioning the efforts to expand formal and informal associative networks between public ministries across South America. In 2014, the MPF formally joined the Asset Recovery Network of the Latin American Financial Action Task Force (RRAG/GAFILAT) and appointed the Secretary of International Cooperation, Vladimir Aras, to act as a point of contact (MINISTÉRIO PÚBLICO FEDERAL, 2015).

In 2016, the Secretariat for International Cooperation and the MPF Higher School held a roundtable discussion in Brasília with Jaime Arellano Quintana, Executive Director of the Justice Studies Center of the Americas (JSCA)<sup>19</sup>, on

<sup>18</sup>Geliski (2018) demonstrates the importance of associative cooperation networks in the consolidation of public defender models.

<sup>19</sup>The Justice Studies Center of the Americas is an international body under the inter-American system (OAS). It promotes technical assistance from governments and judicial institutions in reforming the justice system in the region. The career of Jaime Arellano Quintana provides a clear illustration of the way legal elites in the anti-corruption system circulate internationally. He is a Chilean lawyer and holds a degree from the Pontifical Catholic University of Chile (1984-1988) and a master's degree in Public Administration and Public Policy (1995-1996) from the American University (Washington, USA) paid for by a Fulbright scholarship and the Presidency of the Republic of Chile scholarship. During his stay in the USA, he was an advisor to the Chilean Embassy.

'Procedural Reform and Public Prosecution Models in Latin America'. From the formal perspective, the commitment made by the representatives of the Public Ministries of Ibero-American countries in 2018 to create Joint Investigation Teams (ECI) is evidence that the institutions have increased their transnational information exchange channels (MINISTÉRIO PÚBLICO FEDERAL, 2018a; TOURINHO, 2018). From the informal perspective, the political efforts by the Brazilian MPF to protect the position of members of the 'Lava Jato' task force in Peru highlight strategies for strengthening the relationships between agents and their positions in the national fields (MINISTÉRIO PÚBLICO FEDERAL, 2019a, 2018b).

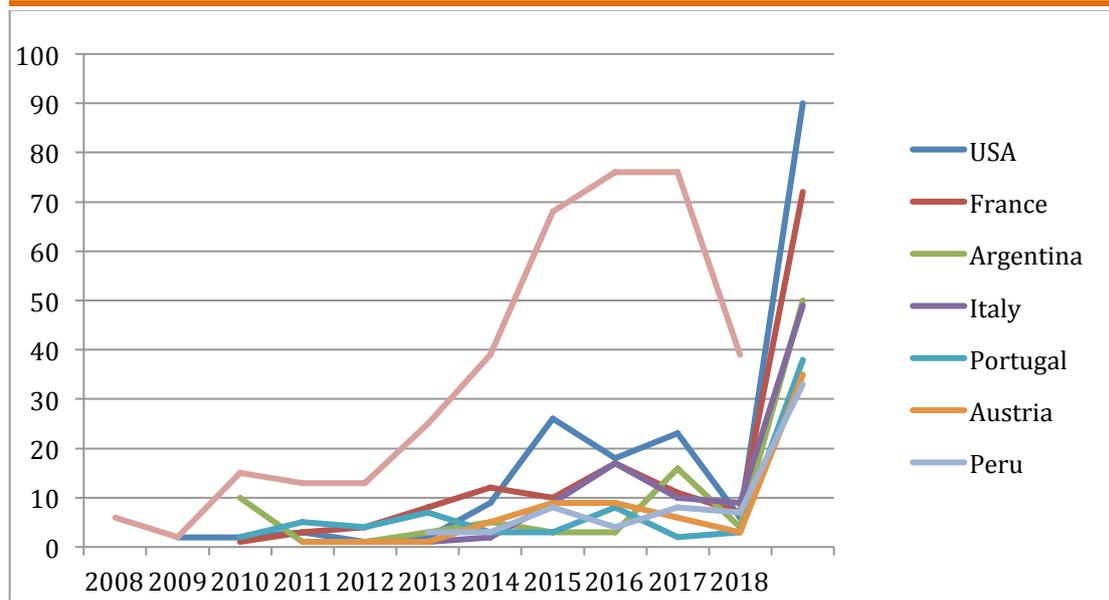
Regarding international cooperation between South American countries, it is interesting to note the existence of empirical evidence showing that US foreign policy bodies contributed financially to the international travel of Brazilian prosecutors. This was done by financing participation in events that promoted the sharing not only of anti-corruption lessons learned during Operation Lava Jato, but also the internationalization of such investigations. The fact that the United States Embassy paid the accommodation and meal expenses of Brazilian representatives is recorded in US approvals for such disbursements<sup>20</sup>.

Analysis of the data on participation in events abroad indicates two major international insertion profiles in respect of prosecutors. One is that of participation in thematic and institutional associative networks linking Latin American agents. In most cases, events are repeated annually and are stable over the time series. The second profile is that of participation in more specific anti-corruption events in the countries of the northern hemisphere. Technical cooperation and training of experts were predominant activities.

---

Returning to Chile between 1996 and 2006, "he built a varied public career in legislative advice, design and implementation of public policies in the justice sector, and the modernization and management of public institutions" (CENTRO DE ESTUDIOS DE JUSTICIA DE LAS AMÉRICAS, 2019, p 94). Between 2006 and 2010, he was legal manager of the Chilean Economic Development Agency. In 2010, he became a senior partner of the traditional firm Jara and Marin Abogados (1976), acting in the area of public law and representing the private sector before regulatory bodies and the Comptroller General of the Republic. He has been Executive Director of JSCA since 2014.

<sup>20</sup>See PGR Ordinances N<sup>o</sup>s 392 to 396 of May 10, 2017, published in the Official Gazette of May 18, 2017, p. 94 (MINISTÉRIO PÚBLICO FEDERAL, 2017a, 2017b, 2017c, 2017d, 2017e).

**Graph 02.** Evolution country/year most frequent destinations

Source: Elaborated by the author's based on Diários Oficiais (2000-2018).

There is a significant volume of travel to various UN, UNODC and OECD events. They include the OECD Anti-Corruption Working Group and the Conference of the Parties to the United Nations Convention against Corruption, which holds regular meetings related to the implementation of the UN Anti-Corruption Convention. Also noteworthy are the meetings of the International Association of Anti-Corruption Authorities (IAACA) and the Financial Action Task Force on Money Laundering (GAFI/FATF), as well as ongoing training and cooperation events with the US Department of Justice.

### Final considerations

The increase in the international circulation of MPF staff – beyond the group of participants in the international prosecutor cooperation core – shows how the institution has invested in internationalization as a national power strategy. The data show higher circulation than is indicated by the MPF's own documents on cooperation, which corroborates the hypothesis of an international cooperation model that does not pass through the recorded channels of the Ministry of Foreign Affairs or other regular government channels.

As international studies that propose a political sociology of ‘anti-corruption’ movements have shown, it is necessary to consider both national and international priorities to fully grasp the nature of the phenomenon. The diversification of international initiatives is connected with the different political logics that condition their importation into the national power space. These connections are led by agencies, NGOs and technocracies where legal elites play a key role. In some cases, the role of large internationalized law firms interested in changing internal competition rules is greater than that of state agencies – this is more common in the case of the European Union.

Conversely, the Brazilian case represents an example of the appropriation and reworking of these norms by autonomous bureaucracies. In particular, the Federal Public Prosecutor’s Office stands out in that its agents have succeeded in asserting their corporate and political independence since the end of the military regime. The legitimacy of the MPF as a ‘corruption fighter’ benefits from the large volume of resources secured throughout the 2000s and the symbolic capital accumulated since the drafting of the Constitution.

Bureaucratic specialization in the Brazilian state surrounding the fight against corruption is directly related to the proliferation of laws resulting from the international conventions with the OECD, UN, OAS that were ratified by Brazil in the early 2000s. Prosecutors’ corporate investments levered this framework to strengthen the institution’s autonomy in relation to the government and the political space. In the context of anti-corruption operations, we can see a second corporate moment following the battles in the 1986 Constituent Assembly, one aimed at the criminalization of political agents.

The capacity of the Brazilian MPF to become the central protagonist in this network of anti-corruption agencies constituting nuclei of autonomous international cooperation in relation to governmental channels reveals a complex phenomenon in which legal elites anchor themselves in the internationalized law space. This process transcends the conjuncture effects and successive police operations that have placed judicial institutions at the center of political debate and are linked to the global growth of independent authorities and control bodies. This phenomenon is evident in the expanding international circulation of prosecutors during the 2010s and the continued proliferation of less formal

networks around associations, training seminar events and lectures. Likewise, in expanding formal cooperation with public prosecutors in other countries, the US State Department, and international organizations. The effects of this process deserve a continuous deepening of studies considering the wider legal space and the other agencies connected to anti-corruption. In regard, in particular, the autonomy and institutional and symbolic strength acquired by these legal elites and their institutionalization as a regulatory agency capable of acting against certain political elites.

Translated by Robinson Fraser  
Submitted on March 04, 2019  
Accepted on October 16, 2019

## References

- ABELSON, Donald E. (2006), *A capitol idea: think tanks and US foreign policy*. Montreal: McGill- Queen's University Press. 392 pp..
- AFFONSO, Julia (2017), Procuradoria ganha prêmio internacional por combate à corrupção na Lava Jato. Estadão de São Paulo. Available at <<https://politica.estadao.com.br/blogs/fausto-macedo/procuradoria-ganha-premio-internacional-por-combate-a-corrupcao-na-lava-jato/>>. Accessed on July, 18, 2019.
- ANDREAS, Peter and NADELMAN, Ethan (2006), *Policing the globe: criminalization and crime control in international relations*. Oxford: Oxford University Press. 348 pp..
- ANSAH, Tawia (2010), Lawfare: a rhetorical analysis. *Journal of International Law*. Vol 43, Nº 01, pp. 87-119.
- ARANTES, Rogério Bastos (2015), Rendición de cuentas y pluralismo estatal en Brasil: Ministério Público y Policía Federal. *Desacatos*. Vol. 49, pp. 28-47.
- ARANTES, Rogério Bastos (2002), *Ministério Público e política no Brasil*. São Paulo: EDUC and Ed. Sumaré. 327 pp..
- ASSOCIAÇÃO NACIONAL DOS PROCURADORES DA REPÚBLICA (2012), PEC da Impunidade: Associações lançam campanha nacional, 11-12-2012. Available at <<http://anpr.org.br/noticia/2533>>. Accessed on July, 17, 2019.
- BADIE, Bertrand (1992), *L'État importé: L'occidentalisation de l'ordre politique*. Paris: Fayard. 334 pp..

- BAPTISTA, Rodrigo (2019), CCJ aprova projeto com medidas contra a corrupção e abuso de autoridade. Available at <<https://www12.senado.leg.br/noticias/materias/2019/06/26/ccj-aprova-projeto-com-medidas-contra-a-corrupcao-e-abuso-de-autoridade>>. Accessed on July, 17, 2019.
- BOURDIEU, Pierre (2012) *Sur l'État*: cours au Collège de France (1989-1992). Paris: Ed Raisons d'agir/ Ed. du Seuil. 672 pp..
- BOURDIEU, Pierre (1981), La représentation politique : Éléments pour une théorie du champ politique. *Actes de la Recherche en Sciences Sociales*. Nº36/37, pp. 03-24.
- BRASIL (2016), *Decreto 8.861, de 28 de setembro de 2016*. Dispõe sobre a designação das autoridades centrais brasileiras no âmbito da Convenção de Auxílio Judiciário em Matéria Penal entre os Estados Membros da Comunidade dos Países de Língua Portuguesa. Presidência da República. Diário Oficial. September, 29, 2016. IDOU. p. 04.
- BRASIL (2012a), *Prestação de contas ordinária anual: Relatório de Gestão do Exercício de 2011*. Brasília: Secretaria Nacional de Justiça. 763 pp..
- BRASIL (2012b), *Estratégia nacional de combate à corrupção e à lavagem de dinheiro: 10 anos de organização do estado brasileiro contra o crime organizado*. Brasília: Ministério da Justiça/ Secretaria Nacional de Justiça/ Departamento de Recuperação de Ativos e Cooperação Jurídica Internacional. 101 pp..
- BRASIL (2011), *Relatório de gestão do Exército*. Brasília: Secretaria Nacional de Justiça/ Departamento de Recuperação de Ativos e Cooperação Jurídica Internacional. 79 pp..
- BRANDT, Ricardo; AFFONSO, Julia. (2018), 47 procuradores da Lava Jato ganham premiação internacional na África do Sul. Estadão de São Paulo. Available at <<https://politica.estadao.com.br/blogs/fausto-macedo/47-procuradores-da-lava-jato-ganham-premiacao-internacional-na-africa-do-sul/>>. Accessed on July, 18, 2019.
- BRIQUET, Jean Louis (2001), La 'guerre des justes'. La magistrature antimafia dans la crise italienne In: *Juger la politique*. Edited by BRIQUET, Jean-Louis and GARRAUD, Philippe. Rennes: Presses Universitaire de Rennes. pp. 103-121.
- CENTRO DE ESTUDIOS DE JUSTICIA LAS AMÉRICAS (2019), Director Ejecutivo. Jaime Arellano Quintana. Available at <<http://www.cejamericas.org/acerca-de-ceja/consejo-directivo?catid=0&id=95>>. Accessed on July, 18, 2019.
- COEURDRAY, Murielle (2004), Le double jeu de l'import-export symbolique. *Actes de la Recherche en Sciences Sociales*. Vol. 01/02, Nº 151-152, pp. 80-90.

- CONSELHO NACIONAL DO MINISTÉRIO PÚBLICO (2015), Available at <[http://www.cnmp.mp.br/portal/images/Comissoes/DireitosFundamentais/Arquivos/1\\_dez\\_eixos\\_de\\_atuacao.pdf](http://www.cnmp.mp.br/portal/images/Comissoes/DireitosFundamentais/Arquivos/1_dez_eixos_de_atuacao.pdf)>. Accessed on January, 08, 2019.
- COUTINHO, Mateus (2015), Janot é incluído em lista de 'cem pensadores globais' da revista Foreign Policy. Estadão de São Paulo. Available at <<https://politica.estadao.com.br/blogs/fausto-macedo/janot-e-incluido-em-lista-de-cem-pensadores-globais-da-revista-foreign-policy/>>. Accessed on July, 18, 2019.
- CRUZ, Elisa (2018), Qual deve ser o papel da Defensoria Pública no combate à corrupção? Available at <[https://www.conjur.com.br/2018-jul-15/elisa-cruz-qual-papel-defensoria-combate-corrupcao#\\_ftn1](https://www.conjur.com.br/2018-jul-15/elisa-cruz-qual-papel-defensoria-combate-corrupcao#_ftn1)>. Accessed on February, 19, 2019.
- DALLAGNOL, Deltan and POZZOBON, Roberson (2019), Ações e reações no esforço contra a corrupção no Brasil. In: *Corrupção: Lava Jato e Mãos Limpas*. Edited by PINOTTI, Maria Cristina. São Paulo: Portfolio-Penguin. pp. 129-183.
- DEZALAY, Yves and GARTH, Bryant G. (2002), *The internationalization of palace wars: lawyers, economists and the contest for Latin American States*. Chicago: University of Chicago Press. 352 pp..
- DJALILI, Mohammad-Reza (2000), Mondialisation de la corruption et de la criminalité. In: *Monnayer les pouvoirs: espaces, mécanismes et représentations de la corruption*. Edited by BLUNDO, Giorgio. Genève: Graduate Institute Publications. pp. 87-98.
- ENGELMANN, Fabiano (2018), O campo jurídico e a força do direito na política brasileira. In: *Justiça no Brasil: às margens da democracia*. Edited by MARONA, Marjorie Corrêa and DEL RÍO, Andrés. Belo Horizonte: Arraes Editores. pp. 200-222.
- ENGELMANN, Fabiano (2017) La lutte anti corruption dans le Brésil des années 2000 : entre l'activisme politique-judiciaire et les vertus du marché international. Conference Paper. Centre Européen de Sociologie et de Science Politique, Ehess- Paris.
- ENGELMANN, Fabiano (2011), Abogados de negocio y la rule of Law in Brazil. *Revista Política*. Vol. 49, Nº 01, pp. 21-41.
- ENGELMANN, Fabiano (2009) Les études à l'étranger des juristes brésiliens : effets en retour d'un passage obligé. *Cahiers de la Recherche sur L'Éducation et les Savoirs*. Vol. 02, pp. 183-201.

- ENGELMANN, Fabiano (2007), Tradition and diversification in the uses and definitions of the Law: a proposed analysis. *Brasilian Political Science Review*. Vol. 01, N° 01, pp. 53-70.
- ENGELMANN, Fabiano (2006), *Sociologia do campo jurídico: juristas e usos do direito*. Porto Alegre: SAFE. 214 pp..
- FAVAREL-GARRIGUES, Gilles (2009), La lutte anticorruption, de l'unanimisme international aux priorités intérieures. *Droit et société*. Vol. 72, N° 02, pp. 273-284.
- FERES JÚNIOR, João; MELO, Patrícia Bandeira de, and BARBABELA, Eduardo (2018), Justiça, opinião pública e mídia. In: *Justiça no Brasil: às margens da democracia*. Edited by MARONA, Marjorie Corrêa and DEL RÍO, Andrés. Belo Horizonte: Arraes Editores. pp. 175-199.
- FERES JÚNIOR, João; BARBABELA, Eduardo, and BACHINI, Natasha (2018), A Lava Jato e a mídia. In: *Operação Lava Jato e a democracia brasileira*. Edited by KERCHE, Fábio and FERES JÚNIOR, João. São Paulo: Contracorrente. pp. 199-228.
- GELISKI, Leonardo (2018), Rede de atores, ideias e agendas: o papel das associações de defensores e de defensorias em seu processo de fortalecimento institucional na América Latina. *Master's dissertation*. Programa de Pós-Graduação em Políticas Públicas. Universidade Federal do Rio Grande do Sul.
- GRÜN, Roberto (2018), *Da pizza ao impeachment: uma sociologia dos escândalos no Brasil contemporâneo*. São Paulo: Alameda. 282 pp..
- GOMES, Marcos Vinícius Manso Lopes (2018), Combate à corrupção deve ser prioridade institucional da Defensoria Pública. Available at <<https://www.conjur.com.br/2018-jul-03/tribuna-defensoria-combate-corrupcao-prioridade-institucional-defensoria>>. Accessed on February, 19, 2019.
- HAGE, Jorge (2010), *O governo Lula e o combate à corrupção*. São Paulo: Ed. Perseu Abramo. 80 pp..
- HEURTAUX, Jérôme (2009), Les effets politiques de la lutte anticorruption en Pologne. *Droit et société*. Vol. 72, N° 02, pp. 323-338.
- INTERNATIONAL ANTI-CORRUPTION ACADEMY (2016), MACS programme comes to Brazil. Available at <<http://www.iaca.int/645-macs-programme-comes-to-brazil.html>>. Accessed on December, 12, 2018.
- INTERNATIONAL TRANSPARENCY (2007), Global corruption report 2007: corruption in judicial systems. Available at <[http://files.transparency.org/content/download/173/695/file/2007\\_GCR\\_EN.pdf](http://files.transparency.org/content/download/173/695/file/2007_GCR_EN.pdf)>. Accessed on December, 12, 2018.

- LASCOUMES, Pierre and NAGELS, Carla (2015), *Sociologie des élites délinquantes: de la criminalité en col blanc à la corruption politique*. Paris: Armand Colin ed. 304 pp..
- MACIEL, Débora Alves and KOERNER, Andrei (2014), O processo de reconstrução do Ministério Público na transição política (1974-1985). *Revista Debates*. Vol. 08, Nº 03, pp. 97-117.
- MEDVETZ, Thomas (2012), *Think tanks in America*. Chicago: Chicago University Press. 344 pp..
- McGANN, James G. (2017), *2016 Global go to think tank Index Report*. Philadelphia: Think Tanks and Civil Societies Program University of Pennsylvania. 170 pp..
- MINISTÉRIO DAS RELAÇÕES EXTERIORES (2015a), Acordo marco de cooperação com a OECD. Available at <<http://www.itamaraty.gov.br/pt-BR/notas-a-imprensa/8697-acordo-marco-de-cooperacao-com-a-ocde>>. Accessed on December, 12, 2018.
- MINISTÉRIO DAS RELAÇÕES EXTERIORES (2015b), Brasil aprova na ONU resolução de combate à corrupção. Available at <<http://www.itamaraty.gov.br/pt-BR/notas-a-imprensa/12264-brasil-aprova-na-onu-resolucao-de-combate-a-corrupcao>>. Accessed on February, 16, 2017.
- MINISTÉRIO PÚBLICO FEDERAL (2019a), Força tarefa Lava Jato no MPF/PR manifesta preocupação com a destituição de promotores da Lava Jato peruana. Available at <<http://www.mpf.mp.br/pr/sala-de-imprensa/noticias-pr/forca-tarefa-lava-jato-no-mpf-pr-manifesta-preocupacao-com-a-destituicao-de-promotores-da-lava-jato-peruana>>. Accessed on February, 19, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2019b), Nota Pública PGR-00329724/2019, 16-07-2019. Available at <<http://pfdc.pgr.mpf.mp.br/institucional/nota-publica-3-2019>>. Accessed on July, 16, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2018a), Associação Ibero-Americana de MPs aprova critérios para formação de equipes conjuntas de investigação. Informe Cooperação Internacional do MPF 03-09-2018 a 17-09-2018. Available at <<http://www.mpf.mp.br/atuacao-tematica/sci/noticias/informe-cooperacao-internacional-do-mpf/edicao-19-2013-3-a-17-setembro-2018>>. Accessed on February, 19, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2018b), Força-tarefa Lava Jato emite nota de apoio às investigações do Ministério Público do Peru. Available at <<http://www.mpf.mp.br/pr/sala-de-imprensa/noticias-pr/forca-tarefa-lava-jato-emite-nota-de-apoio-as-investigacoes-do-ministerio-publico-do-peru>>. Accessed on February, 19, 2019.

- MINISTÉRIO PÚBLICO FEDERAL (2018c), Lava Jato recebe premiação internacional na África do Sul. Available at <http://www.mpf.mp.br/pr/sala-de-imprensa/noticias-pr/lava-jato-recebe-premiacao-internacional-na-africa-do-sul>>. Accessed on July, 18, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2017a), Portaria PGF nº 392, de 10 de maio de 2017. Autorização de afastamento para o exterior de Procurador da República. Diário Oficial da União. 18 maio 2017; Seção 02, pp. 94.
- MINISTÉRIO PÚBLICO FEDERAL (2017b), Portaria PGF nº 393, de 10 de maio de 2017. Autorização de afastamento para o exterior de Procurador da República. Diário Oficial da União. 18 maio 2017; Seção 02, pp. 94.
- MINISTÉRIO PÚBLICO FEDERAL (2017c), Portaria PGF nº 394, de 10 de maio de 2017. Autorização de afastamento para o exterior de Procurador da República. Diário Oficial da União. 18 maio 2017; Seção 02, pp. 94.
- MINISTÉRIO PÚBLICO FEDERAL (2017d), Portaria PGF nº 395, de 10 de maio de 2017. Autorização de afastamento para o exterior de Procurador da República. Diário Oficial da União. 18 maio 2017; Seção 02, pp. 94.
- MINISTÉRIO PÚBLICO FEDERAL (2017e), Portaria PGF nº 396, de 10 de maio de 2017. Autorização de afastamento para o exterior de Procurador da República. Diário Oficial da União. 18 maio 2017; Seção 02, pp. 94.
- MINISTÉRIO PÚBLICO FEDERAL (2017f), Relatório de Gestão. Secretaria de Cooperação Internacional. Setembro 2013 - Setembro 2017. Versão condensada. Available at <https://www.mpf.mp.br/atuacao-tematica/sci/dados-da-atuacao/relatorio-de-gestao/docs/relatorio-de-gestao-sci-2013-2017-versao-condensada>>. Accessed on July, 15, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2016), PGR passa a ser autoridade central para cooperação internacional com países de língua portuguesa. Available at <http://www.mpf.mp.br/pgr/noticias-pgr/pgr-passa-a-ser-autoridade-central-para-cooperacao-internacional-com-paises-de-lingua-portuguesa>>. Accessed on February, 19, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2015), Anexo notícia da Secretaria de Cooperação Internacional. Available at <http://www.mpf.mp.br/atuacao-tematica/sci/dados-da-atuacao/relatorio-de-gestao/docs/anexo-noticias-da-secretaria-de-cooperacao-internacional-1.pdf>>. Accessed on July, 16, 2019.
- MINISTÉRIO PÚBLICO FEDERAL (2013), O Brasil ganha, a democracia ganha com a rejeição da PEC 37, 25-06-2013. Available at <http://www.mpf.mp.br/pgr/noticias-pgr/brasil-ganha-a-democracia-ganha-com-rejeicao-da-pe-37>>. Accessed on July, 17, 2019.

- NAÇÕES UNIDAS (ONU)- Escritório Contra Drogas e Crime (UNODC) (2008), *Comentários aos Princípios de Bangalore de Conduta Judicial*. Brasília: Conselho da Justiça Federal. 179 pp..
- OECD (2014a), Foreign bribery report: an analysis of crime of bribery of foreign public officials. OECD Publishing. Available at <<http://www.oecd.org/corruption/oecd-foreign-bribery-report-9789264226616-en.htm>>. Accessed on December, 12, 2018.
- OECD (2014b), Phase 03 report on implementing the OECD anti- bribery convention in Brazil. OECD Publishing. Available at <<http://www.oecd.org/daf/anti-bribery/Brazil-Phase-3-Report-EN.pdf>>. Accessed on December, 12, 2018.
- PINTO, Céli Regina Jardim (2011), *A banalidade da corrupção: uma forma de governar o Brasil*. Belo Horizonte: Editora UFMG. 178 pp..
- PUJAS, Véronique (2000), Les pouvoirs judiciaires dans la lutte contre la corruption politique en Espagne, en France et Italie. *Droit et Societé*. N° 44/45, pp. 41-60.
- REDE IBERO-AMERICANA DE COOPERAÇÃO INTERNACIONAL (2011), Acordo de quadro de colaboração entre Escola Superior do Ministério Público da União e a Rede Ibero-Americana de cooperação jurídica internacional. Available at <[https://iberred.org/sites/default/files/acuerdo\\_iberred\\_esmpu\\_brasil.pdf](https://iberred.org/sites/default/files/acuerdo_iberred_esmpu_brasil.pdf)>. Accessed on December, 12, 2018.
- ROCHA, Camila (2015), Direita em rede: think tanks de direita na América latina. In: *Direita, volver! O retorno da direita e o ciclo político brasileiro*. Edited by CRUZ, Sebastião C. Velasco e; KAYSEL, André, and CODAS, Gustavo. São Paulo: Ed. Perseu Abramo. pp. 261-278.
- ROUSSEL, Violaine (2002), *Affaires de juges: les magistrats dans les scandales politiques en France*. Paris: La Découverte. 312 pp..
- SARAIVA, Wellington Cabral (2016), Atuação do Ministério Público Federal nas convenções internacionais contra corrupção. In: *Temas de cooperação internacional*. Edited by Ministério Público Federal. Brasília : Ministério Público Federal. pp. 201-210.
- SCHERRER, Amandine; MÉGIE, Antoine, and MISTSILEGAS, Valsamis (2009), La stratégie de l'Union européenne contre la criminalité organisée : entre lacunes et inquiétudes. *Cultures and Conflits*. N° 74, pp. 91-110.
- SMILOV, Daniel (2009), Anticorruption agencies: expressive, constructivist and strategic uses. *Crime, Law and Social Change*. Vol. 53, N° 01, pp. 67-77.

- SOUZA, Luis de (2010), Anti-corruption agencies: between empowerment and irrelevance. *Crime Law Social Change*. Vol. 53, pp. 05–22.
- SVARTMANN, Eduardo Munhoz (2018), Argentina e Brasil na visão dos think tanks dos Estados Unidos. *Revista Carta Internacional*. Vol. 13, Nº 01, pp. 127-147.
- TOURINHO, Marcos (2018), Brazil in the global anticorruption regime. *Revista Brasileira de Política Internacional*. Vol. 61, Nº 01, pp. 01-18.
- USAID/US AGENCY FOR INTERNATIONAL DEVELOPMENT (1999), A handbook on fighting corruption. Center for democracy and governance. Available at <[http://www.au.af.mil/au/awc/awcgate/usaidd/fighting\\_corruption.pdf](http://www.au.af.mil/au/awc/awcgate/usaidd/fighting_corruption.pdf)>. Accessed on October, 22, 2018.
- VAUCHEZ, Antoine (2017), O poder judiciário um objeto central da ciência política. In: *Sociologia política das instituições judiciais*. Edited by ENGELMANN, Fabiano. Porto Alegre: Ed UFRGS. pp. 39-56.
- VAUCHEZ, Antoine (2004), *L' institution judiciaire remotivée: le processus d'institutionnalisation d'une 'nouvelle justice' en Italie (1960-2000)*. Paris: LGDJ. 268 pp..
- WOHNRATH, Vinicius (2018), Espaços de formação doutoral no exterior para docentes de pós-graduação em Direito no Brasil. *Revista Debates*. Vol 12, Nº 03, pp. 53-86.
- WORLD BANK (2012), New directions in justice reform: a companion piece to the updated strategy and implementation plan on strengthening governance, tackling corruption. Available at <[http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2012/09/06/000386194\\_20120906024506/Rendered/PDF/706400REPLACEMENT0Justice0Reform0Final.pdf](http://www-wds.worldbank.org/external/default/WDSContentServer/WDSP/IB/2012/09/06/000386194_20120906024506/Rendered/PDF/706400REPLACEMENT0Justice0Reform0Final.pdf)>. Accessed on October, 22, 2018.
- WORLD BANK (2000), Helping countries combat corruption: the role of the World Bank. Available at <<http://www1.worldbank.org/publicsector/anticorrupt/corruptn/corrptn.pdf>>. Accessed on October, 22, 2018.

## Annex

**Table 05.** Synopsis of main international anti-corruption actions (conventions, organizations, networks, programs and international agencies specialized in anti-corruption)

Action	Origin	Year	Objective
Foreign Corrupt Practices Act (FCPA)	EUA	1977	US federal law to combat transnational corruption by certain US-related persons or entities. The FCPA has two main provisions, accounting provisions and anti-bribery provisions. The first deal with accounting transparency requirements and the second make it illegal to pay bribes to foreign civil servants for the purpose of obtaining or maintaining business.
Transparency International	Germany	1993	Created by former World Bank director Peter Heigen, the agency promotes anti-corruption actions, publications, rankings and cooperation programs. Since 1995, it has published an annual Corruption Perception Index with country rankings
GROTIUS Program	European Union	1996	Promotes international legal cooperation through the training of different categories of justice professionals, and supports initiatives by public institutions or private bodies
OECD Anti-Corruption Convention	OECD	1997	Convention on the Fight against the Corruption of Foreign Public Officials in International Business Transactions. Encourages the creation of independent national agencies.
World Bank	Washington	1999	From the early 2000s on, corruption control has been incorporated into the notion of good governance. The World Bank supports opinion polls on the topic
The Group of States against Corruption (GRECO)	European Union (Council)	1999	The objective of is to improve the capacity of its members to fight corruption by monitoring compliance with the Council of Europe's anti-corruption standards through a dynamic process of mutual evaluation and peer pressure.
European Anti-Fraud Office (OLAF)	European Union (Commission)	1999	Strengthen the scope and effectiveness of the fight against fraud and all other illegal behavior against the financial interests of the European Union. OLAF's mission is not only to protect the EU's financial interests, but also to combat fraud, corruption or irregularities within the European institutions whenever they may have financial consequences.
Judicial Integrity Group	UN/ UNODC	2000	Association of magistrates and judges that develops rules and policies to strengthen the integrity and capacity of the judiciary. In 2002, the Judicial Integrity Group approved the Bangalore Principles of Judicial Conduct, the implementation of which is supported by the UNODC. The Global Judicial Integrity Network was launched in 2018

Action	Origin	Year	Objective
European Partners against Corruption (EPAC)	European Union	2001	Informal and independent network of over 60 anti-corruption authorities and police oversight bodies from Council of Europe member states.
UNODC Global Program against Corruption	UN	2003	As guardian of the 2003 UN Convention against Corruption, UNODC maintains a comprehensive program to assist Member States, especially developing countries, to implement the provisions of the Convention. To this end, it promotes technical assistance directed to both the public and private sectors.
International Association of Anti-corruption authorities (IAACA)	Beijing	2003	The main objective of the organization is to promote the effective implementation of the United Nations Convention against Corruption, adopted by the United Nations General Assembly on December 30, 2003, and to assist anti-corruption authorities worldwide in the fight against corruption.
Anti-corruption agency network (ANCORAGE-NET)	Portugal	2006	An anti-corruption agency (ACA) online research network whose primary purpose is to provide comprehensive and easily accessible information on the format, operation and activities of such bodies to practitioners and analysts in the field of corruption control.
European contact-point network against corruption EACN	European Union	2008	Formal cooperation network comprising around 50 anti-corruption authorities from EU Member States. The European Anti-Fraud Office (OLAF) is also a member. The EACN was formally established by a European Council decision in 2008, building on the existing structures of the European Anti-Corruption Partners (EPAC).
Anti-corruption Working Group (ACWG)	G20	2010	It provides for bi-annual action plans related to the implementation of anti-corruption cooperation and transparency programs.
International Anti-Corruption Academy IACA	UN/UNDOC, OLAF, Austria	2011	The organization was established on the basis of a multilateral treaty – the Agreement on Establishing the International Anti-Corruption Academy as an International Organization. It is focused on anti-corruption training. It offers a master's degree on this subject at its headquarters in Vienna
Clean Gov Biz	OECD	2011	CleanGovBiz is an initiative of the Organization for Economic Cooperation and Development (OECD) that focuses on public administration, state institutions and governments. It assists and guides the design or reform of instruments to combat corruption.

Source: Elaborated by the author's based on Engelmann (2018).