



Sârra-Tilila Bounfour

Integrity Specialist

Details

Email

sarratilila@stbintegrity.com

Nationality

French-Moroccan

Skills

Internal & external investigations

Witness & subject interviews

Investigative report drafting

Disciplinary & sanctions processes

International administrative & arbitral proceedings

Anti-fraud & anti-corruption legal frameworks

Policy review & drafting

Training & coaching

Languages

English



French



Italian



Spanish



Links

[My LinkedIn profile](#)

[STB Integrity LinkedIn page](#)

[STB Integrity website](#)

Profile

Sârra-Tilila Bounfour brings 15 years of international legal & investigative experience in Paris, Rome, and Washington DC. Dedicated to the promotion of integrity and the global fight against corruption, Sârra-Tilila's practice is at the crossroads of investigations, dispute resolution, and international development, with a focus on the African continent.

Prior to founding her consulting firm, STB Integrity, she spent 10+ years in law firms and multilateral organizations tackling integrity issues, from the policy, training, investigative, and litigation angles.

Sârra-Tilila has conducted dozens of investigations for multilateral organizations, national development agencies, and governments. She has a proven track-record of successful investigations into allegations of fraud, corruption, collusion, embezzlement and other prohibited practices.

She has also acted in integrity-related litigation. Her expertise includes administrative sanctioning bodies such as the World Bank Sanctions Board, international administrative tribunals like the International Labor Organization Administrative Tribunal (ILOAT), and international arbitral tribunals constituted under the major rules (UNCITRAL, ICC, ICSID, OHADA).

Sârra-Tilila is the co-founder of the MIPA network and the creator of the Integrity Career Institute newsletter, both dedicated to integrity professionals in international development and humanitarian sectors. She regularly speaks at conferences and lectures on topics such as anti-corruption, investigations, and administrative sanctions and debarment systems.

A dually qualified lawyer in New York State and in Paris (currently inactive), she speaks English & French fluently, is conversant in Italian and Spanish.

Experience

STB Integrity , Founder & Executive Director

Oct 2022 – Present Global

I help international organizations, national development agencies, and other development & humanitarian sector entities achieve their integrity goals

- Leading internal and external investigations into breaches of ethics & integrity standards
- Performing quality assurance checks on investigative work products to ensure legally compliant investigative processes and outcomes
- Supporting clients with the resolution of post-investigation disputes: especially administrative integrity sanctions proceedings against internal and external parties, contract-based arbitration against third parties involved in misconduct, referrals to national authorities
- Building clients' integrity capacity up: internal justice system assessments, policy review & drafting, practical skills training for staff & other stakeholders

Clients include UNICEF's Ethics Office, WFP's OIGI, Islamic Relief Worldwide's Counter-Fraud Unit


International Climate Initiative, Independent Complaint Mechanism (IKI ICM), Integrity Expert Panel Member

Jan 2023 – Present  Global

The Independent Complaint Mechanism of Germany's International Climate Initiative is intended to enable people who suffer (potential) negative social and/or environmental consequences from IKI projects, or who wish to report the improper use of funds, to voice their complaints and seek redress.


- Investigating complaints by whistle-blowers reporting allegations of fraud, corruption and other improper uses of funds
- Developing standard operating procedures for integrity compliance reviews and investigations
- Issuing recommendations for remedial action in substantiated cases
- Participating in outreach efforts to raise awareness of the mechanism across implementing partners

World Food Programme (WFP) , Legal Officer

Apr 2021 – Sep 2022  Rome


- Advised investigators and HR officers on legal aspects of staff misconduct: investigative procedures, disciplinary proceedings, referrals to national authorities
- Advised WFP senior management on employee appeals against administrative decisions relating to investigations and disciplinary sanctions
- Represented WFP in litigation before the FAO Appeals Committee and the ILOAT
- Drafted integrity prevention policies; designed knowledge management materials on investigations & discipline; developed a searchable jurisprudence database on abusive conduct cases
- Advised on privileges & immunities of WFP personnel

World Bank, Integrity Vice Presidency (INT) , Investigator & Litigator

Sep 2018 – Mar 2021  Washington, D.C.

- Completed 4 complex investigations in English & French into dozens of allegations of fraud, corruption, collusion, coercion and obstruction in World Bank-funded projects in Africa, from inception to final investigation report
- Assisted the intake team with the preliminary assessment of a fast-rising number of Francophone complaints
- Successfully represented INT in 6 post-investigation settlement negotiations & sanctions litigation proceedings under the World Bank's sanctions procedures
- Issued referrals of substantiated allegations of sanctionable practices to relevant national authorities as needed, in coordination with the Legal department

DLA Piper, Investigations, Litigation & Arbitration , Senior Associate

Jan 2013 – Aug 2018  Paris

- Conducted independent investigations and led multi-professional teams of lawyers, forensic accountants, digital forensic specialists & other experts
- Advised public sector clients on white-collar crime matters, including mutual legal assistance procedures as well as criminal law & criminal procedure reforms
- Represented clients in international investment & commercial arbitrations under the major rules (ICSID, ICC, OHADA, UNCITRAL etc.) and post-award litigation
- Advised public sector clients on integrity risk mitigation in the structuring of major development projects, especially in the infrastructure & mining sectors

Hector Farina Avocats , Associate

Oct 2012 – Dec 2013  Paris

- Advised IFIs & governments on projects in infrastructure, natural resources & energy sectors: project structuring, procurement processes, contract drafting, negotiations

Public International Law & Policy Group (PILPG) , Legal Consultant

May 2010 – Jul 2012  Washington, D.C. / Abidjan

- Advised 7 post-conflict governments in MENA, sub-Saharan Africa & Asia on international law aspects of peace processes and democratic transition, with a focus on constitutional & legislative anti-corruption reforms
- Led a team of 6 experts to assess Ivory Coast's transitional justice strategy, and drafted a 100+ page report in English & French for the President & Prime Minister
- Managed the Francophone Practice Group and a project team of 8 research associates & research associates

Selected Engagements

Investigations

- Investigating allegations of misappropriation of funds from a grant by the German International Climate Initiative (IKI) through extortion (IKI ICM Case [2023-002](#))
- Investigating allegations of submission of fraudulent contracts and financial documentation under a grant by the German International Climate Initiative (IKI), together with allegations of retaliation following reporting (IKI ICM Case [2022-001](#))
- Investigated allegations of widespread fraud, collusion, and corruption in the procurement of works to combat soil erosion under a half-billion dollar World Bank-financed project for climate change mitigation & adaptation in Africa, resulting in sanctions against half dozen companies & individuals and the adoption of strengthened preventive measures for the project
- Investigated allegations of fraud, collusion and corruption in the procurement and execution of several contracts under a World Bank-financed public sector management project in Liberia, resulting in the debarment of 2 companies, 1 individual, and the removal of 2 high-level officials from the project management team
- Investigated a dozen allegations of fraud, collusion and corruption in the procurement and implementation of several IT services and equipment contracts under a World Bank-financed social protection project in Liberia, resulting in findings of aggravated collusion
- Investigated allegations of corruption in the emergency procurement of works for the rehabilitation of a water supply system in the DRC under a multi donor-funded health sector project, resulting in the removal of a senior project official and a subsequent debarment sanction
- Investigated allegations of fraud, misappropriation and embezzlement of Dutch aid for a water sector project in Benin, resulting in the resignation of a minister, official state apologies and the adoption of anti-fraud preventive measures ([more information](#))
- Assisted the Republic of Guinea with its investigation into allegations of corruption around the award of mining rights over one of the largest iron ore deposits in the world and mutual legal assistance procedures with half a dozen countries, resulting in the [withdrawal](#) of the rights from the corrupting companies and [criminal sanctions](#) against the individuals involved in Switzerland

Dispute resolution & litigation

International administrative tribunals

- Represented INT before the World Bank's Suspension & Debarment Officer in sanctions proceedings against a company for corrupt practices in the procurement and execution of a works contract under a climate change mitigation & adaptation in Nigeria, resulting in a 5 year debarment (Sanctions Case No. 675)
- Represented INT in sanctions proceedings against a senior project consultant under a World-Bank financed contract for corrupt practices in the procurement of emergency equipment and works in the DRC (Sanctions Case No. 763)
- Represented INT in sanctions proceedings against a senior project official for collusion and corruption in the procurement of several contracts under a World Bank-financed public sector management project in Liberia, and against a company that made corrupt payments to that official, resulting in debarment and conditional non-debarment sanctions (Sanctions Board Decisions No. 138 and 139)
- Represented INT in post-investigation settlement negotiations with an international group of IT service companies that led to its debarment for fraudulent and collusive practices (press release)
- Represented WFP before the ILOAT in an appeal by a former employee challenging a disciplinary decision of dismissal for conflict of interests arising from outside political activities (pending)
- Represented WFP before the ILOAT in an appeal by a former employee against a disciplinary decision of summary dismissal for serious misconduct, including fraud and gross negligence in the performance of their duties (pending)
- Advised WFP on multiple administrative proceedings regarding disciplinary measures for employee misconduct and proceedings initiated by employees regarding the treatment of their claims of harassment, sexual harassment, abuse of authority and other workplace misconduct

International arbitral tribunals

- Sitting as sole arbitrator in a French language, *ad hoc* arbitration under the UNCITRAL rules, governed by the general principles of international commercial law, relating to a construction contract between an international organization and a private company (pending)
- Represented the Republic of Guinea in multi-billion dollar, French & English language, ICSID arbitrations brought by the investor alleging expropriation of a mining concession and related rights to one of the world's most important iron ore deposits, which the government had withdrawn following an investigation and findings of corruption (BSG Resources Limited, BSG Resources (Guinea) Limited and BSG Resources (Guinea) SÀRL v. Republic of Guinea (ICSID Case No. ARB/14/22)) (award rendered in May 2022 confirming the findings of corruption and awarding the State over 5 million USD in costs)
- Represented a State in a USD 40 million, Paris seated, French language, French law ICC arbitration and subsequent annulment proceedings relating to the procurement of military equipment, and involving allegations of fraud in the procurement as well as in the execution of the contract
- Represented a state in a Paris seated, French language, ICC arbitration relating to the validity of agreements for the sale of an aircraft and involving allegations of fraud as well as allegations of violation of an international sanction regime and military embargo

Policy & capacity-building

- Designing trainings for an INGO on fraud & corruption prevention and investigations
- Revised 12+ investigation reports on financial & workplace misconduct for international organizations in 2023
- Advised on the revision of the WFP anti-fraud & anti-corruption policy, the anti-harassment & sexual harassment policy and related guidance for staff
- Advised on the development of SOPs for WFP referrals to national authorities
- Assisted an African government on the creation of a national anti-corruption authority and the revision of the penal & criminal procedure codes

Thought Leadership

Integrity Career Institute, Founder

Oct 2023 – Present

- Launched the first newsletter for integrity professionals in international organizations
- Offering weekly selections of jobs and learning resources for career development

MDB Integrity Professionals Association (MIPA), Co-Founder & Co-Chair

Nov 2020 – Present

- Co-created the first professional network dedicated to integrity investigation and litigation in international organizations, now counting 1,600+ participants
- Organized global events including expert debates, round-table discussions, and training workshops; curated a job board on LinkedIn

Speaking & Teaching Engagements

- Keynote speech at the 6th IFRC Annual Conference on Preventing Corruption in Humanitarian Operations (2022)
- Lecture on “The World Bank Sanctions System” at the University of Ottawa (2022)
- Presentation on the interplay of international aid & investments, corruption, and dispute resolution at Duke University School of Law (2020)
- FIAA/MIDS 2-day workshop on “Cross-Examination of Fact Witnesses” at the Graduate Institute of International and Development Studies in Geneva (2018)
- Seminars for law students & legal professionals on legal research & drafting and on witness questioning (2014-2018)

Qualifications

Bar memberships: New York State, USA and Paris, France (inactive)

Quantic School of Business & Technology, Master of Business Administration (M.B.A.)

Université Paris Nanterre, Master 2 (L.L.M.) in French & Common Law

American University Washington College of Law, Juris Doctor (J.D.)