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# Mobilizing Action Against Corruption (MAAC) Activity

Contract N° 111-C-00-07-00030-00

Advocacy and Assistance Centers (AACs)  
Second Activity Report  
August 2010 - January 2011

April 2011

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## Advocacy and Assistance Centers (AACs) Second Activity Report August 2010 - January 2011

**Submitted to:** RA Anti-Corruption Strategy Monitoring Commission &  
USAID/Armenia  
by Casals & Associates, a DynCorp International Company

April 2011



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### **DISCLAIMER**

The authors' views expressed in this report do not necessarily reflect the views of the United States Agency for International Development (USAID) or the United States Government.

## Introduction

Advocacy and Assistance Centers (AACs) serve as corruption complaint offices that conduct three key functions:

- 1) Provide free legal assistance and support to victims of corruption on a walk-in or call-in basis;
- 2) Advocate for the adoption of reforms addressing roots causes of corruption; and
- 3) Conduct public education and awareness activities.

They are run by Non-Governmental Organizations (NGOs) in 13 locations throughout Armenia (see AACs Directory page 3) under grants provided by the USAID Mobilizing Action Against Corruption (MAAC) Activity ([www.maac.am](http://www.maac.am)).

The present report summarizes the activities and accomplishments of the network of AACs from their inception through January 2011, and provides detailed information for the six-month period 1 August 2010 - 31 January 2011.<sup>1</sup>

In analyzing the AACs' work during the referred period, the information provided in this report is structured in three sections:

- 1) AACs' caseload and operational indicators.
- 2) List of institutional, legislative or procedural corruption vulnerabilities.
- 3) List of preventive anti-corruption reforms achieved at the instigation of AACs.

From December 2008, when the first centers opened their doors to the public, through January 2011, the AACs network has reached a number of important milestones. These consist of serving more than **9,500 complainants** and handling over **1,500 corruption-related cases** in a number of sectors, including healthcare, property rights, labor pensions, traffic and general public services.

Drawing from their caseload, AACs have also identified in excess of **150 institutional inefficiencies** that facilitate the occurrence of corruption and advocated for the adoption of preventive measures, in coordination with government and civil society. This has resulted in the enactment of 16 procedural reforms to reduce corruption risks (Table 14).

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<sup>1</sup> A previous report, available at [www.maac.am/documents.htm](http://www.maac.am/documents.htm), covers the AACs' activities from the establishment of the first centers in December 2008 through July 2010.

## Section 1 - AACs Caseload and Operational Indicators

Following a process to re-compete the grants for the management of the all AACs, the AACs' network experienced significant structural changes as of August 2010. These changes consist of the conversion of four AACs (Ararat, Gyumri, Ijevan and Yeghegnadzor) into Reception Centers; the closing of the three Reception Centers in Syunik Marz, and a reduction in the number of AAC grantees, from five to three.<sup>2</sup>

Table 1 presents the individual Advocacy and Assistance Centers and the organizations selected by MAAC to establish and operate them from 1 August 2010 through 30 June 2011. During the reporting period, AACs were present and fully operational in 13 locations throughout Armenia. These consisted of seven AACs located in Yerevan, Aragatsotn, Armavir, Gegharkunik, Kotayk, Lori and Syunik, plus reception centers in Ararat, Shirak, Tavush and Vayots Dzor, and two smaller Reception Centers in Aparan and Talin under the coordination of the Aragatsotn AAC. These 13 facilities were operated by three MAAC grantees: the Armenian Young Lawyers Association (AYLA), which operated nine of them; Gegharkunik Chamber of Commerce and Industry (GCCCI), responsible for the AAC in Gavar and Armavir Development Center (ADC), which managed the AAC in Armavir.

Table 1. AAC Directory					
Marz	City	Address	Hotline	Operating Grantee	Reception Center
1. Aragatsotn AAC	Ashtarak	V. Petrosyan 51/2	08000 11 22	Armenian Young Lawyers Association	1) Aparan: 2) Talin:
2. Ararat RC	Ararat	Charents 2/4	08000 11 17	Armenian Young Lawyers Association	
3. Armavir AAC	Armavir	Shahumyan 68a	08000 11 18	Armavir Development Center	
4. Gegharkunik AAC	Gavar	Boshnaghyan 1/1	08000 11 16	Gegharkunik Chamber of Commerce and Industry	
5. Kotayk AAC	Hrazdan	23 Ogestos, 60	08000 11 19	Armenian Young Lawyers Association	
6. Lori AAC	Vanadzor	82 Vardanants #1	08000 11 12	Armenian Young Lawyers Association	
7. Shirak RC	Gyumri	Tigran Mets 1 # 2	08000 11 21	Armenian Young Lawyers Association	
8. Syunik AAC	Kapan	A. Manukyan 1 #72	08000 11 14	Armenian Young Lawyers Association	
9. Tavush RC	Ijevan	Ankakhutyan 4/14	08000 11 13	Armenian Young Lawyers Association	
10. Vayots Dzor RC	Yeghegnadzor	Narekatsi 18a	08000 11 20	Armenian Young Lawyers Association	
11. Yerevan AAC	Yerevan	Nalbandyan 7 # 2	08000 11 10	Armenian Young Lawyers' Association	

<sup>2</sup> MAAC awarded on 19 August 2010 separate grants to Armavir Development Center (ADC) and the Gegharkunik Chamber of Commerce and Industry (GCCCI) to run, respectively, the AACs in Armavir and Gegharkunik marz. On 15 September 2010, MAAC awarded a grant to the Armenian Young Lawyers Association (AYLA) to manage the AACs in Yerevan, Vanadzor, Kapan, Hrazdan and Ashtarak and the AAC Reception Centers in Gyumri, Ijevan, Yeghegnadzor, Ararat, Aparan and Talin.

Tables 2 through 6 showcase the main indicators utilized by MAAC to assess the operational results of the reconfigured network from August 2010 to January 2011. They also present the cumulative indicator results for each center prior to the August 2010 network reconfiguration.

In spite of the referred network reconfiguration, which implied a two-month inoperative AAC in Lori and a usual reduction in workload levels in December and January, AACs achieved significant progress in all their key performance indicators during the reporting period.

<b>Table 2. Number of Citizens Complainants Reporting to AACs</b>									
	<b>Dec 2008<sup>3</sup> – July 2010</b>	<b>2010</b>					<b>2011</b>	<b>Aug. 2010 – Jan 2011</b>	<b>Dec 2008 - Jan 2011</b>
<b>Marz</b>	<b>Sub-Total*</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Six Month Sub-Total</b>	<b>Total</b>
Aragatsotn	803	68	78	104	170	127	92	639	1,442
Ararat	478	24	41	41	52	54	39	251	729
Armavir	310	27	26	27	26	21	19	146	456
Gegharkunik	317	21	36	20	28	19	27	151	468
Kotayk	753	72	101	111	88	89	59	520	1,273
Lori**	497	N/A	N/A	25	72	59	40	196	693
Shirak**	349	38	38	71	72	83	71	373	722
Syunik	461	36	50	60	70	66	62	344	805
Tavush	640	45	57	40	53	27	23	245	885
Vayots Dzor	475	63	63	65	68	71	47	377	852
Yerevan**	624	55	115	174	122	99	136	701	1,325
<b>Total</b>	<b>5,707</b>	<b>449</b>	<b>605</b>	<b>738</b>	<b>821</b>	<b>715</b>	<b>615</b>	<b>3,943</b>	<b>9,650</b>

\*Cumulative total from each of the center's inception through July 2010.

\*\* These centers were operated through July 2010 by a different grantee. The Lori AAC was inoperative in August and September 2010.

Table 2 above presents the number of citizen complainants who visited the AACs to request legal information and/or assistance. Despite the usual downward trend during the holiday months of December and January and during the transition to new operators in three centers, the total number of visitors grew significantly over the preceding six months (February – July 2010).

During the reporting period, AACs served 3,943 complainants, with an average of 657 visits per month compared to 2,905 visits during the preceding six-month period. This represented a 36% increase. The increase in the number of visitors is largely the result of a wide array of public awareness activities conducted by AACs in 2010 which raised the centers' visibility nationwide, such as seminars, rallies, community meetings, media appearances, all of which MAAC supported with the design and dissemination of TV and radio spots, outdoor billboards, promotional material, newsletters and yellow pages ads. The findings of the 2010 Corruption

<sup>3</sup> Only four centers were opened to the public in December 2008 (Lori, Shirak, Syunik and Tavush). A fifth center, the Yerevan AAC, launched activities in March 2009 and the remaining six (Aragatsotn, Ararat, Armavir, Gegharkunik, Kotayk, Syunik and Vayots Dzor) became operational by May 2009.

Survey of Households administered in November 2010 ([www.maac.am/documents.htm](http://www.maac.am/documents.htm)) showed a 40% increase in citizen awareness of Advocacy and Assistance Centers, from 10% in 2009 to 14% in 2010.

Tables 3 and 4 show the breakdown of the complainants by gender and age. Table 3 shows that considerably more women than men have reported instances of corruption to AACs. Out of 2,889 complaints received from October 2010 through January 2011, 58% were by women.

In terms of age distribution, most complaints come from the citizens in the 31 to 50 years age group. From October 2010 through January 2011, their complaints (1,304) accounted for 45% of the total number of AAC visitors.

<b>Table 3. Complainants by gender</b>				
<b>Month</b>	<b>Male</b>	<b>Female</b>	<b>Unspecified</b>	<b>Total</b>
<b>Oct-10</b>	309	426	3	<b>738</b>
<b>Nov-10</b>	331	490	0	<b>821</b>
<b>Dec-10</b>	293	417	5	<b>715</b>
<b>Jan-11</b>	256	359	0	<b>615</b>
	<b>1,189</b>	<b>1,692</b>	<b>8</b>	<b>2,889</b>

<b>Table 4. Complainants by age group</b>					
<b>Month</b>	<b>18-30</b>	<b>31-50</b>	<b>51 and older</b>	<b>Unspecified</b>	<b>Total</b>
<b>Oct-10</b>	195	358	182	3	<b>738</b>
<b>Nov-10</b>	257	351	211	2	<b>821</b>
<b>Dec-10</b>	181	311	218	5	<b>715</b>
<b>Jan-11</b>	152	284	179	-	<b>615</b>
	<b>785</b>	<b>1,304</b>	<b>790</b>	<b>10</b>	<b>2,889</b>

These figures would suggest that the younger cohort (ages 18 to 30), which represent 27% of the entire universe of complainants, are less inclined to report acts of corruption. To draw the attention of youths to use the AACs, public awareness activities should be designed around simple and concise anti-corruption messages that are simultaneously appealing and discernible to students, university graduates and young professionals.

It should be noted, however, that age information is not always provided by complainants. In a number of cases, the AAC staff makes a best estimate of this information for complaint registration purposes. Similarly, gender information was not gathered in a number of instances in which the complaint was presented via hotline and the complainant's gender could not be determined.

Table 5 shows the number of cases presented by citizens to AACs that constitute actual pursuable corruption cases, in or out of court.

From August 2010 through January 2011, the 383 pursuable cases (on average 64 per month) constituted 9.7% of the total number of complaints received (3,943). This 1:10 ratio weakened slightly in comparison with the preceding six months (February – July 2010) when 16% of complaints resulted in pursuable cases. This is the result on an increasing number of requests for legal assistance that were not always linked to corruption - “the abuse of entrusted power for private gain”.

<b>Table 5. Number of Pursuable Cases Submitted by Citizens to AACs</b>									
	<b>Dec 2008 – July 2010</b>	<b>2010</b>					<b>2011</b>	<b>Aug-2010 – Jan 2011</b>	<b>Dec 2008 - Jan 2011</b>
<b>Marz</b>	<b>Cumulative*</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Six Month Sub Total</b>	<b>Total</b>
Aragatsotn	122	4	5	6	6	1	3	25	147
Ararat	103	2	4	6	10	11	21	54	157
Armavir	111	6	4	4	4	3	2	23	134
Gegharkunik	55	2	4	1	1	2	4	14	69
Kotayk	103	8	14	12	11	10	4	59	162
Lori	272	N/A	N/A	1	4	1	2	8	280
Shirak	31	5	6	7	10	5	5	38	69
Syunik	140	4	4	5	6	2	2	23	163
Tavush	51	2	1	2	0	1	1	7	58
Vayots Dzor	48	6	6	6	4	4	3	29	77
Yerevan	129	10	23	32	13	17	8	103	232
<b>Total</b>	<b>1,165</b>	<b>49</b>	<b>71</b>	<b>82</b>	<b>69</b>	<b>57</b>	<b>55</b>	<b>383</b>	<b>1,548</b>

\*Cumulative figure since each of the center's inception through July 2010.

Table 6 below presents **corruption cases** by sector. It shows most complaints of alleged corruption concern condominium administrators, law enforcement entities, the judicial system and welfare agencies. These statistics are not meant to rank sectors or government services in terms of corruption. They simply identify the sectors for which citizens come to get assistance at the AACs. For example, traffic police, which MAAC corruption surveys of households rank among the government bodies perceived as most corrupt, only makes up 4% of the cases brought to the attention of the AACs. (MAAC has since taken steps to increase the AACs' ability to assist citizens in traffic police related cases and promote their services in this area).

<b>Table 6. Pursuable Cases Received from October 2010 through January 2011 Broken Down by Sector</b>		
<b>Sector</b>	<b>Frequency</b>	<b>Percentage</b>
Condominium administrators	40 <sup>4</sup>	15.21%
Law Enforcement Agencies	27	10.27%
Welfare	26	9.89%
Judicial system	26	9.89%
Utilities	21	7.98%
Central Government Agencies	17	6.46%
Local Self Government Bodies	14	5.32%
Labor Rights	11	4.18%
Private sector	11	4.18%
Property Rights	10	3.80%
Notary Public	9	3.42%
Healthcare	7	2.66%
Education	4	1.52%
Traffic Police	4	1.52%
Other	36	13.69%
<b>Total</b>	<b>263</b>	

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<sup>4</sup> All 40 complaints against condominium administrators were filed against the same entity.

Table 7 shows the number of corrective actions to reinstate the infringed rights of corruption victims taken by institutions as a result of AAC interventions.

Since August 2010, the network of AACs has successfully processed 73 cases, an average of 12 cases per month. During the same period, 20% of all pursuable cases resulted in corrective action.

To resolve expeditiously a case, a request for corrective action is first addressed via basic administrative channels: the AAC will write a letter, telephone or have a face-to-face conversation with the identified “suspected” person(s) concerned or organization. The processing of pursuable cases referred to the judiciary is lengthier, and in fact a majority of those cases are still with the courts.

<b>Table 7. Number of cases resulting in corrective action</b>									
	<b>Dec 2008 - July 2010</b>	<b>2010</b>					<b>2011</b>	<b>Aug 2010 – Jan 2011</b>	<b>Dec 2008 - Jan 2011</b>
<b>Marz</b>	<b>Cumulative*</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Six Month Sub -Total</b>	<b>Total</b>
Aragatsotn	34	0	2	1	0	1	1	5	39
Ararat	7	0	0	2	0	0	1	3	10
Armavir	21	1	2	1	2	4	2	12	33
Gegharkunik	19	0	2	1	0	0	2	5	24
Kotayk	27	1	3	5	1	1	0	11	38
Lori	19	N/A	N/A	0	0	0	0	0	19
Shirak	9	1	1	0	0	2	1	5	14
Syunik	17	1	0	0	0	0	0	1	18
Tavush	14	0	0	0	2	3	1	6	20
Vayots Dzor	12	6	3	4	4	2	1	20	32
Yerevan	15	0	2	0	0	3	0	5	20
<b>Total</b>	194	10	15	14	9	16	9	73	267

\*Cumulative total from each of the center's inception through July 2010.

Table 8 presents the number of cases referred directly to prosecution, whereby the ACC lawyer accompanies the assumed corruption victim or advises and explains to him/her how to denounce violations of the Armenian Criminal Code before the Prosecutor General's Office, the Special Investigative Service Bureau, the Police and/or other investigative/law enforcement agencies.

From August 2010 to January 2011, AACs referred, directly or indirectly, 26 cases to prosecution or about 7% of all pursuable cases received.

Fourteen of these 26 cases were referred by the Kotayk and Shirak AACs. If other AACs have been less active in terms of referring cases to prosecution, the main reason given is complainants' reluctance to initiate criminal actions against alleged corrupt officials. By and large, complainants are satisfied in obtaining resolution of their cases and are unwilling to take extra steps in order to have offending parties or individual sanctioned. This reluctance is particularly prevalent in smaller communities.

Table 8. Number of cases referred to prosecution									
	Dec 2008 July 2010	2010					2011	Aug-2010 – Jan 2011	Dec 2008 – Jan 2011
Marz	Cumulative*	Aug	Sep	Oct	Nov	Dec	Jan	Six Month Sub Total	Total
Aragatsotn	5	0	0	0	0	0	0	0	5
Ararat	5	1	0	0	0	2	0	3	8
Armavir	5	0	1	1	0	0	0	2	7
Gegharkunik	2	0	0	0	0	0	0	0	2
Kotayk	5	2	0	2	0	3	0	7	12
Lori	23	N/A	N/A	0	0	0	0	0	23
Shirak	16	1	2	3	1	0	0	7	23
Syunik	7	0	0	1	1	0	0	2	9
Tavush	14	0	0	2	0	0	0	2	16
Vayots Dzor	0	0	0	0	0	0	0	0	0
Yerevan	33	0	0	1	0	2	0	3	36
<b>Total</b>	115**	4	3	10	2	7	0	26	141

\*Cumulative total from each of the center's inception through July 2010.

\*\* Total was adjusted from 116, as previously reported, to reflect the corrected number.

In 17 out of the 26 cases referred to prosecution this period, the AACs represented the complainant directly before law enforcement agencies. In the remaining nine instances, the AACs advised the complainant on how to present their cases to prosecution.

Table 9 shows the number of cases that have been referred to Armenian courts. From August 2010 through January 2011, AACs referred 60 corruption-related cases to court, an average of 10 cases per month. This is considerably more than during the same period one year earlier (August 2009 – January 2010), when AACs submitted 46 cases to Court. .

As of 31 January 2011, none of the cases referred by AACs to prosecutors nor to courts had resulted in a conviction. AACs are simultaneously pursuing administrative channels to secure sanctions, such as dismissals, leave without pay and/or monetary fines against alleged corrupt officials.

Table 9. Number of cases referred to courts									
	Dec 2008 – July 2010	2010					2011	Aug. 2010 – Jan 2011	Dec 2008 - Jan 2011
Marz	Cumulative*	Aug	Sep	Oct	Nov	Dec	Jan	Six Month Sub Total	Total
Aragatsotn	8	0	0	3	0	0	2	5	13
Ararat	36	0	0	1	1	1	0	3	39
Armavir	17	3	2	1	1	1	2	10	27
Gegharkunik	8	1	0	0	0	0	1	2	10
Kotayk	2	0	1	0	2	0	2	5	7
Lori	28	N/A	N/A	0	0	0	0	0	28
Shirak	13	1	2	2	6	6	3	20	33
Syunik	18	0	0	1	1	0	0	2	20
Tavush	10	3	0	1	0	0	0	4	14
Vayots Dzor	3	0	2	0	0	0	1	3	6
Yerevan	45	2	0	0	0	4	0	6	51
<b>Total</b>	<b>188</b>	<b>10</b>	<b>7</b>	<b>9</b>	<b>11</b>	<b>12</b>	<b>11</b>	<b>60</b>	<b>248</b>

\*Cumulative total from each of the center's inception through July 2010.

In 20 out the 60 cases referred to Court this period, the AACs represented the complainant in Court. In the remaining 40 instances, the AACs advised the complainant on how to present their cases to Court.

## Section 2 - Institutional and Procedural Inefficiencies That Make Corruption Possible

Table 10 shows the number of inefficient institutional mechanisms, either procedural or systems-level, identified by the AACs.

Drawing from their caseload of 1,548 pursuable cases, AACs have identified 153 inefficient institutional mechanisms at the central and local levels that are vulnerable to corruption. These included the 42 inefficiencies identified from August 2010 to January 2011 listed in Table 13.

Beyond assisting individual victims of corruption, AACs are directly involved in addressing and correcting procedural or institutional inefficiencies leading to corruption. AACs use their caseload to identify areas most prone to corruption, draft preventive regulatory reforms and promote their adoption in coordination with government. Reforms expand the impact of the AACs' work.

Table 10. Inefficient systems-level or procedural mechanisms identified									
	Dec 2008 – July 2010	2010					2011	Aug 2010 – Jan 2011	Dec 2008 – Jan 2011
Marz	Cumulative*	Aug	Sep	Oct	Nov	Dec	Jan	Six Month Sub Total	Total
Aragatsotn	12	0	0	3	1	0	0	4	16
Ararat	8	0	0	2	0	0	0	2	10
Armavir	2	0	0	0	0	0	0	0	2
Gegharkunik	11	1	1	1	1	2	1	7	18
Kotayk	18	0	3	1	0	0	0	4	22
Lori	3	N/A	N/A	4	0	0	0	4	7
Shirak	4	0	0	5	1	1	0	7	11
Syunik	1	0	0	4	0	0	0	4	5
Tavush	21	0	0	1	0	0	0	1	22
Vayots Dzor	9	0	0	4	0	0	0	4	13
Yerevan	10	1	0	3	1	0	0	5	15
<b>Total</b>	111**	2	4	28	4	3	1	42	153

\* Cumulative total from each of the center's inception through July 2010

\*\* This figure includes 12 inefficiencies jointly identified by all AACs as part of their June 2009 retreat.

Table 11 shows the number of roundtable discussions or working meetings that have been set up by the AACs to debate identified inefficient institutional mechanisms in order to produce corrective reforms.

During the reporting period, AACs held 40 working meetings with government officials (at the central and local levels) and civil society organizations to promote the adoption of anti-corruption reforms in Yerevan and seven marzes, namely Aragatsotn, Ararat, Armavir, Gegharkunik, Kotayk, Lori and Shirak. These working groups often were the first in a series of significant steps aimed at advocating for the enactment of the proposed reforms and leading to the preparation and remittance of written communications to government authorities with concrete recommendations addressing areas prone to corruption.

<b>Table 11. Working groups with NGOs, experts, government officials to debate identified problems</b>									
	<b>Dec 2008 – July 2010</b>	<b>2010</b>					<b>2011</b>	<b>Aug 2010 – Jan 2011</b>	<b>Dec 008 – Jan 2011</b>
<b>Marz</b>	<b>Cumulative*</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Six Month Sub Total</b>	<b>Total</b>
Aragatsotn	13	1	1	0	0	1	0	3	16
Ararat	13	0	0	1	0	0	1	2	15
Armavir	10	1	1	2	0	1	1	6	16
Gegharkunik	11	0	4	2	1	2	1	10	21
Kotayk	16	0	3	2	6	3	1	15	31
Lori	1	N/A	N/A	1	0	0	0	1	2
Shirak	1	0	0	0	0	0	1	1	2
Syunik	0	0	0	0	0	0	0	0	0
Tavush	9	0	0	0	0	0	0	0	9
Vayots Dzor	14	0	0	0	0	0	0	0	14
Yerevan	5	2	0	0	0	0	0	2	7
<b>Total</b>	<b>101**</b>	<b>4</b>	<b>9</b>	<b>8</b>	<b>7</b>	<b>7</b>	<b>5</b>	<b>40</b>	<b>141</b>

\* Cumulative total from each of the center's inception through July 2010.

\*\* The total includes eight meetings organized jointly by two or more AACs. The total was adjusted from 109 cases listed in the first "AACs' Activity Report" to reflect the actual number.

Table 12 presents the number of “procedural” reforms implemented by government authorities at the instigation of the AACs.

From their inception through January 2011, AACs had successfully promoted the adoption of 16 procedural reforms or mechanisms aimed at preventing corruption in six marzes (see Table 11 for the complete list). During the reporting period, the six achieved reforms were the first ever promoted by the AACs in Kotayk, Tavush and Yerevan.

<b>Table 12. Number of procedural changes implemented</b>									
	<b>Dec 2008 - July 2010</b>	<b>2010</b>					<b>2011</b>	<b>Aug 2010 – Jan 2011</b>	<b>Dec 2008 – Jan 2011</b>
<b>Marz</b>	<b>Cumulative*</b>	<b>Aug</b>	<b>Sep</b>	<b>Oct</b>	<b>Nov</b>	<b>Dec</b>	<b>Jan</b>	<b>Six Month Sub Total</b>	<b>Total</b>
Aragatsotn	1	0	0	0	0	0	0	0	1
Ararat	0	0	0	0	0	0	0	0	0
Armavir	1	0	0	0	0	0	0	0	1
Gegharkunik	7	0	0	0	0	0	0	0	7
Kotayk	1	0	0	0	1	3	0	4	5
Lori	0	N/A	N/A	0	0	0	0	0	0
Shirak	0	0	0	0	0	0	0	0	0
Syunik	0	0	0	0	0	0	0	0	0
Tavush	0	0	1	0	0	0	0	1	1
Vayots Dzor	0	0	0	0	0	0	0	0	0
Yerevan	0	1	0	0	0	0	0	1	1
<b>Total</b>	<b>10</b>	<b>1</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>3</b>	<b>0</b>	<b>6</b>	<b>16</b>

\*Cumulative total from each of the center's inception through July 2010

Table 13 presents the list of inefficient institutional mechanisms, both procedural and systems-level, that are vulnerable to corruption at central and local levels, drawn from the complaints received by the AACs. Except for the first year when AACs were being established, information is presented by quarter.

<b>Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs</b>	
<b>December 2008 – September 2009</b>	
1	Yerevan (Second Quarterly Retreat): Revision of article 352 of RA Criminal Code to broaden rights of judges.
2	Yerevan (Second Quarterly Retreat): Appropriation, waste or incorrect use of the budget.
3	Yerevan (Second Quarterly Retreat): Use of new evidence in a court case.
4	Yerevan (Second Quarterly Retreat): Revision of judicial acts when newly revealed circumstances arise ( <i>Non loquendum est sub est gubernandum</i> principle).
5	Yerevan (Second Quarterly Retreat): Revision of Administrative Code article #20 to address corruption risks.
6	Yerevan (Second Quarterly Retreat): Require notaries to check submitted data according to the continental legal system.
7	Yerevan (Second Quarterly Retreat): Promote the use of recording devices in notary offices.
8	Yerevan (Second Quarterly Retreat): Adopt the practice of responding to complaints to prosecutor and informing on status of complaint.
9	Yerevan (Second Quarterly Retreat): Recommendations to improve the Postal Service's performance and to fulfill its mandate as prescribed by law.
10	Shirak: Lack of enforcement of controls on the distribution of prescription drugs.
11	Shirak: Illegal practices between policlinics and drugstores.
12	Shirak: Revise law on inheritance to reduce corruption risks.
13	All AACs at June 2009 retreat: Indefinite and ungrounded delays in the registration of real estate property at the Cadastre Office with the alleged expectation of a bribe.
14	All AACs at June 2009 retreat: Lack of clear criteria on how car tax import duties are determined.
15	All AACs at June 2009 retreat: Overly complex process to register wills in which citizens are referred from one entity to another until they pay a bribe to complete the process.
16	All AACs at June 2009 retreat: Lack of transparency in the decision-making process at Community Councils (governance body at the municipal level) which do not allow to monitor for discretionary behavior and abuses.
17	All AACs at June 2009 retreat: Loose requirements in the organization of public auctions by municipalities (e.g. obscurely publicized notices) which may lead to rigged processes.
18	All AACs at June 2009 retreat: Lack of publicity in connection with the execution of the budget by Community Councils.
19	All AACs at June 2009 retreat: Contradictory or mutually exclusive decisions by cadastre and municipal authorities on transfer of property.
20	All AACs at June 2009 retreat: Vague operational standards by regional cadastre offices which lead to discretionary decisions regarding land registrations.
21	All AACs at June 2009 retreat: Inaccurate and discretionary calculation of labor records by the Social Security Administration to push citizens to offer a bribe.

<b>Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs</b>	
22	All AACs at June 2009 retreat: Social security benefits provided based on vague standards which allows for discretion on who receives them.
23	All AACs at June 2009 retreat: Obscure processes organized by the Ministry of Justice for the selection of public notaries (competition process are not properly publicized).
24	All AACs at June 2009 retreat: Lack of transparency in community spending causing irresponsible/discretionary expenditures.
25	Lori: Abuse in the authority of law enforcement agencies to restrict freedom of movement to citizens for political gain (e.g. blocking attendance to political rallies).
26	Lori: Manipulation of regulations regarding the exploitation of natural resources which result in the sale of publicly-owned real estate property under its real market value.
27	Lori: Lack of a clear process (involving the Ministry of Foreign Affairs, Offices of Vital Records and the President's Office) to surrender the Armenian nationality when becoming a citizen of another country, leaving citizens exposed to extortions.
28	Armavir: Lack of observance of real estate property rights by municipal authorities for private gain.
29	AYLA Managed Centers: Vague regulations to determine beneficiaries of social welfare (e.g. key concepts, such as "family" are not clearly defined), hence leaving ample room for arbitrary decisions by government officials from the Social Security Administration.
30	Gegharkunik: Absence of road signs in key highway intersections leads to abuse and extortions to car drivers by traffic police.
31	Gegharkunik: "Multiple window" processes at the Cadastre's Office held behind doors which leave users exposed to extortion or abuse by government officials.
32	Gegharkunik: Lack of financial control on services provided by emergency doctors (they are not obliged to present invoices) generates opportunities for bribe-demanding behavior.
33	Gegharkunik: Limited or no information on the steps to conduct transactions and their respective fees at the Offices of Vital Records, Notary Publics and Public Archives Offices.
34	Shirak: Lack of observance by local government authorities of all pre-required steps (e.g., obtaining permit approvals by the Ministry of Nature Protection and its Water Resources Management Agency) in the process of awarding construction permits in this marz.
35	All AACs in September 2009 Retreat: Information on the cost of services provided by Offices of Vital Records nationwide are not well identified and documented, which leads to arbitrary charges and extortions.
36	All AACs in September 2009 Retreat: Excessive discretion by law enforcement agencies to conduct criminal investigation procedures.
<b>October – December 2009</b>	
37	Aragatsotn: Obscure decision process by the Governor' Office in the concession of transportation services in the city of Ashtarak, which limits the availability of these services to citizens.
38	Aragatsotn: Offices if Vital Records in the marz do not provide citizens with information on their rights and services.
39	Armavir: The Pension Office acts arbitrarily in calculating the labor record of retirees.
40	Gegharkunik: The local Registry Office acts arbitrarily and overcharges small businesses for registering.
41	Kotayk: Lack of transparency in the decision making process linked to the allocation of public funds at the community level.

<b>Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs</b>	
42	Syunik: Lack of information on the benefits that citizens are entitled to from the local Social Benefits Office (linked to the Ministry of Labor and Social Affairs), which leaves ample room for discretionary decisions and extortions.
<b>January – March 2010</b>	
43-66	Limited information and lack of citizen oversight on the activities and services offered by government authorities in: <b>Aragatsotn (4):</b> 1) Governor's Office, 2)Ashtarak, 3)Talin, 4)Aparan <b>Ararat (2):</b> 1) Governor's Office, 2)Ararat city. <b>Kotayk (8):</b> 1) Governor's Office, 2)Hrazdan, 3)Abovyan, 4)Tsakhkadzor,5) Nor Hachn, 6)Yeghvard, 7)Charentsavan, 8) Byureghavan. <b>Tavush (8):</b> 1)Governors' Office, 2) ljevan, 3)Dilijan, 4)Noyemberyan, 5)Berd, 6)Ayrum, 7)Tavush (village), 8) Bagratashen. <b>Vayots Dzor (2):</b> 1) Governor's Office, 2)Yeghegnadzor.
67-90	Absence of mechanisms to regulate conflicts of interest in: <b>Aragatsotn (4):</b> 1) Governor's Office, 2)Ashtarak, 3)Talin, 4)Aparan. <b>Ararat (2):</b> 1) Governor's Office, 2)Ararat city. <b>Kotayk (8):</b> 1) Governor's Office, 2)Hrazdan, 3)Abovyan, 4)Tsakhkadzor,5) Nor Hachn, 6)Yeghvard, 7)Charentsavan, 8)Byureghavan. <b>Tavush (8):</b> 1)Governors' Office, 2) ljevan, 3)Dilijan, 4)Noyemberyan, 5)Berd, 6)Ayrum, 7)Tavush (village), 8) Bagratashen. <b>Vayots Dzor (2):</b> 1) Governor's Office, 2)Yeghegnadzor.
91	<b>Gegharkunik:</b> Limited information and understanding of the new tax regime for business owners which creates opportunities for extortions by Tax Inspectors.
92	<b>Kotayk:</b> Lack of oversight of traffic police's work, which spurs wide-spread abuses and extortions.
<b>April – June 2010</b>	
93-96	Limited information and lack of citizen oversight on the activities and services offered by government authorities in: <b>Tavush (2):</b> 1) Haghartsin (village), 2) Aygahovit (village). <b>Vayots Dzor (2):</b> 1) Vayk (village), 2) Jermuk.
97-100	Absence of mechanisms to regulate conflicts of interest in: <b>Tavush (2):</b> 1) Haghartsin (village), 2) Aygahovit (village). <b>Vayots Dzor (2):</b> 1) Vayk (village), 2) Jermuk.
101	<b>Gegharkunik:</b> The lack of information on the procedures to file requests, queries and complaints before local government bodies leads to abuses by public servants.
102	<b>Gegharkunik:</b> The lack of awareness of property registration procedures and the process to pay property taxes and for other administrative services at local government bodies which leads to corruption.
103	<b>Gegharkunik:</b> Vague regulations in the "Administrative Violations Act" allow for discretionary behavior in the imposition of fines by the Office of Statistics. A long list of entities and individuals in Armenia (e.g. legal entities, individual entrepreneurs, state offices, non-governmental organizations, etc) are required to present periodical reports to the Office of Statistics with information on labor and economic indicators, such as number of employees, employees' salaries, production volumes, revenues, etc. The Office of Statistics may impose economic fines if they find the reports to be "ambiguous". Ironically, this term is not clearly defined by the law and the Office of Statistics may decide arbitrarily when a report is ambiguous or not, which could lead to extortions against the entities responsible for presenting them.

<b>Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs</b>	
104	<b>Aragatsotn:</b> Traffic tickets do not indicate the procedure to paying them, which leads to manipulation and abuses by Traffic Police.
105-106	Limited information and lack of citizen oversight on the activities and services offered by government authorities in: <b>Ararat (2):</b> 1) Masis, 2) Vedi.
107-108	Absence of mechanisms to regulate conflicts of interest in: <b>Ararat (2):</b> 1) Masis, 2) Vedi.
109	<b>Tavush:</b> Lack of speed signs delineating the start and end of urban areas in the Ijevan highway lead to traffic police extortions.
110	<b>Vayots Dzor:</b> Overcharges by State Registration Office in light of limited information of state dues.
<b>July – September 2010</b>	
111	<b>Gegharkunik:</b> Wrongful calculation of pensions at local social security offices to pressure citizens into offering a bribe to make the required adjustments.
112	<b>Gegharkunik:</b> Lack of information on the cost, sources of funding (e.g. central and/or local budget), construction periods, and the contractor(s) responsible for public works (by and large, public works' sites do not feature signs with all of this information for the public, hence increasing the risks for abuses and limiting their accountability).
113	<b>Gegharkunik:</b> Lack of acquaintance by citizens on how to conduct inheritance procedures following the death of a relative. If citizens miss a six month deadline to initiate the process before a Notary Public, they need to refer their application to the Court system, where they are often subject of extortions to validate the inheritance.
114	<b>Kotayk:</b> Lack of information on the periodical payments that condominium residents need to make by law to their management boards for maintenance and administration services. This creates opportunities for discretionary behavior, unjustified charges and/or the misappropriation of funds.
115	<b>Kotayk:</b> Lack of information on the procedure and timeline for submitting citizen applications to the Governor's Office. This may result in unjustified delays or a lack of a response to citizens' petitions, which may generate opportunities for corruption.
116	<b>Kotayk:</b> The municipality of Hrazdan does not make public all of their decisions, nor it informs citizens on how to file requests before the municipality.
117	<b>Yerevan:</b> Lack of transparency in the admission process to post-graduate degrees at the European Academy (a private University). Applicants may be subject to bribe extortions to secure their admission.
<b>October – December 2010</b>	
118	<b>Aragatsotn:</b> Condominiums in the Marz do not disclose information on their services and their cost, which often leads to overcharges and other abuses. (October 2010)
119	<b>Aragatsotn:</b> Tax officers fail to notify small businesses of legal changes to tax regulations, which may lead to abuses and extortions in connection with tax inspections. (October 2010)
120	<b>Aragatsotn:</b> Avagani (Community Councils) decisions are not publicized as required by law (LSGB Law, article 30, parts 3 and five), which may lead to corruption in the decision-making process. (October 2010)
121	<b>Aragatsotn:</b> Tax authorities do not provide the required legal notices to small businesses before imposing fines, which creates an environment conducive to corruption. (December 2010)
122	<b>Ararat:</b> The procedure to applying for social benefits is not widely known, and ill-informed citizens are exposed to corruption. (October 2010)
123	<b>Ararat:</b> Motorists are not well aware of their rights and may fall victims of corrupt traffic police officers, who frequently stop cars unjustifiably. (October 2010)
124	<b>Gegharkunik:</b> In accordance with Armenia's "State Duties Act", citizens are obliged to pay 5,000 AMD to the Civil Registry if they need to make corrections to their vital records information, even if the errors are not attributable to them, but to the staff of the Civil Registry itself. This may lead to extortions and abuses. (October 2010)

**Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs**

125	<b>Gegharkunik:</b> "Country of Origin" certificates (required to export agricultural products) are issued only in Yerevan through a somehow complicated process. In requesting these documents, farmers from the marzes need to interact with government officials that at times try to extort a toll for their "services". Farmers have expressed their interest in having local organizations, which are seemingly less likely to commit abuses against them, such as Gegharkunik's Chamber of Commerce and Industry, issuing the subject certificates on behalf of the Customs Office. (November 2010)
126	<b>Gegharkunik:</b> There is limited information on the scope, timeline and budget of approved public works projects in the marz, such as the re-construction of the Sevan-Arpa tunnel (which diverts water from the Arpa river to Lake Sevan). In addition to creating corruption risks, the lack of transparency generates a lot of uncertainty and potential economic losses to the businesses located near the Lake Sevan shoreline. (December 2010)
127	<b>Gegharkunik:</b> Annual car inspections are carried out without clear established rules and regulations. Drivers are pressured into paying more money than required by law to obtain the required inspection approvals. Furthermore, this process seems to be mainly a simulation to generate a profit for their operators as cars are rarely inspected. (December 2010)
128	<b>Kotayk:</b> Lack of solutions to traffic chaos in Hrazdan induces frustrated drivers to break traffic regulations while police officers are allegedly readily available to stalk and extort them. (October 2010)
129	<b>Lori:</b> In a number of state-run kindergartens, parents are allegedly forced to bribe the administration in exchange for enrolling their children. (October 2010)
130	<b>Lori:</b> Parents are asked to co-fund classroom expenses, but the intended use of their contributions is not fully disclosed or visible. (October 2010)
131	<b>Lori:</b> Doctors in State-run hospitals are prone to demanding unlawful payments in exchange of their services for expecting women. (October 2010)
132	<b>Lori:</b> The admission process to Vanadzor's Pedagogic University lacks transparency. This may induce conditions favorable for offering or extorting bribes. (October 2010)
133	<b>Shirak:</b> Weak enforcement of anti-smoking regulations in Gyumri. In spite of complaints, local authorities fail to enforce anti-smoking laws in the public transportation system. The Municipality is reluctant to sanction bus drivers, who are Municipal employees, even if they violate anti-smoking laws blatantly and repeatedly. (October 2010)
134	<b>Shirak:</b> Lack of Civil Registration and Notary Offices in villages creates opportunities for corruption (public servants at said offices tend to demand money for serving citizens in remote areas). (October 2010)
135	<b>Shirak:</b> The lack of information on how to process social benefits creates ripe opportunities for corruption at Social Benefits Offices. (October 2010)
136	<b>Shirak:</b> The lack of transparency in the procurement of public works, where bribes are allegedly offered by prospective contractors, leads to deficient constructions. (October 2010)
137	<b>Shirak:</b> The budget is not executed in a transparent manner. It is not unknown, for instance, how the municipality is using the funds allegedly allocated to refurbish underground pedestrian passages in Gyumri, which are in dire conditions. (October 2010)
138	<b>Shirak:</b> The lack of an effective monitoring body over the Court Enforcement Agency (Court Bailiff) leads to recurrent abuses by the staff of this agency. (November 2010)
139	<b>Shirak:</b> Deficient awareness on the process and cost of services provided by the Office of Civil Registrations leaves citizens vulnerable to manipulation and abuses. Some services which must be provided within three days may take longer in an attempt to extort money from uninformed citizens. (December 2010)
140	<b>Syunik:</b> Mentally challenged citizens are sent to Yerevan for medical examinations in connection with their request of social benefits. Health authorities in Kapan refer them to Yerevan knowing well that a vast majority of claimants cannot afford the trip. This is allegedly done to extort a bribe in exchange of directly approving the benefits in Kapan or to simply dismiss claims. (October 2010)
141	<b>Syunik:</b> Notary Offices would not respond to questions nor provide services to residents of remote areas in Syunik marz, unless allegedly offered unjustified payments. (October 2010)

<b>Table 13 - Inefficient procedural and systems-level mechanisms identified by AACs</b>	
142	<b>Syunik:</b> Local Self Governance Bodies often fail to provide the information requested by citizens, which leads to bribe opportunities. (October 2010)
143	<b>Syunik:</b> Government authorities seemed to have simulated the organization of public hearings (required by law), prior to allowing the commercial exploitation of uranium mines in the Marz by a foreign corporation. This prevented local residents from expressing their concerns about the risks to the ecology and their lives. (October 2010)
144	<b>Tavush:</b> Distribution of court cases in Tavush is often conducted in contradiction to regulations (Court Council Decision Number 10). Frequently, cases are referred to courts located in remote areas. This creates incentives for citizens to offer bribes to channel their cases to courts based in the main population areas.
145	<b>Vayots Dzor:</b> Avagani (Community Councils) decisions are not publicized as required by law, which may lead to corruption in the decision-making process. (October 2010)
146	<b>Vayots Dzor:</b> Written notices/posters on their services and their cost are not always clearly visible at public hospitals, Cadastre and Civil Registration Offices. (October 2010)
147	<b>Vayots Dzor:</b> The Yerevan–Yeghegnadzor highway lacks speed signs in a number of places, which exposes unaware drivers to police abuses. (October 2010)
148	<b>Vayots Dzor:</b> School books, which should be free of charge, are allegedly sold to parents in most schools in the marz (this is seemingly a nationwide practice). (October 2010)
149	<b>Yerevan:</b> Local authorities allow or fail to halt the individuals that demand money from drivers for the use of publicly available parking spaces. (October 2010)
150	<b>Yerevan:</b> In light of legal flaws and loopholes, the Court's Bailiffs (the public servants responsible for enforcing Court rulings and decisions) often delay the enforcement of judicial rulings unless they are "paid" for their services. (October 2010)
151	<b>Yerevan:</b> The lack of an early graduation mechanism at the University level (in the case of students who pass all their courses and exams in an expeditious manner) may lead to corruption risks as they are allegedly forced to make illegal payments to complete their graduation paperwork. (October 2010)
152	<b>Yerevan:</b> The lack of a road sign on a key traffic intersection (Nalbandyan 9), indicating circular traffic (circular movement) and chaotic parking lot at Sakharov square in Yerevan leads to conflicts with traffic police and corruption risks. (November 2010)
<b>January 2011</b>	
153	<b>Gegharkunik:</b> Citing budget constraints, Local Self Government Bodies (LSGBs) fail to plow streets and sidewalks properly, which then become very dangerous or impassable for cars and pedestrians in winter time. This is mostly the result of an obscure budget design and execution process as LSGBs are free to determine the allocation of funds and it is not always known how the entire budget is spent. (January 2011)

## Section 3 – Procedural reforms addressing corruption risks successfully promoted

Table 14 presents the list of procedural corruption prevention measures successfully promoted by AACs in coordination with government authorities.

<b>Table 14 - Procedural changes implemented</b>	
<b>October 2008 – December 2009</b>	
1	<b>Gegharkunik:</b> In July 2009, the local AAC sent communications to the Governor of the Marz, the Ministry of Transportation and Communications, the Human Rights Defender and the President's Public Council (an entity composed of representatives of political and non-governmental organizations) to request, among other things, the installation of traffic signs on the Yerevan-Sevan road as a measure to prevent recurring police extortions. The signs were placed by the Ministry of Transportation and Communications three weeks following the presentation of the AAC's request. (July 2009).
2	<b>Gegharkunik:</b> In October 2009, the AAC was also successful in working with the Offices of Vital Records in their marz to post the list of prices for their services, hence reducing the risks of arbitrary decisions and abuses by their clerks. (October 2009).
3	<b>Aragatsotn:</b> In December 2009 the AAC cooperated with the Offices of Vital Records Offices in the cities of Aparan and Talin to post the list of prices for their services, hence reducing the risks of arbitrary decisions and abuses by their clerks. (December 2009).
<b>January – March 2010</b>	
4	<b>Kotayk:</b> The center worked with the Municipality of Hrazdan in posting the decisions of its Community Council for the citizens' review and scrutiny (March 2010). Pictures
5	<b>Gegharkunik:</b> As a result of the AAC's intervention, the Regional Tax Office agreed to train local business owners on the latest tax reforms as a measure to prevent recurring abuses and extortions by tax inspectors, while simultaneously increasing tax collections in the community (March 2010).
<b>April – June 2010</b>	
6	<b>Armavir:</b> At the recommendation of the Armavir AAC, the local Pensions Office placed in its offices a bulletin board informing citizens on the procedure to calculate their pensions. This would reduce the arbitrary review of labor records, linked to the calculation of pension payments, with the purpose of extorting retirees (April 2010).
7	<b>Gegharkunik:</b> At the instigation of the Gegharkunik AAC, the village of Gandzak placed an information bulletin in their offices outlining property registration procedures and the municipality's functions to reduce the opportunities for corruption (June 2010).
<b>July – September 2010</b>	
8-10	<b>Gegharkunik:</b> With support from the Gegharkunik AAC, the villages of Tsak-Kar, Tzovazard and Zovaber posted information bulletins in their offices describing property registration procedures and their municipalities' functions to reduce the opportunities for corruption (July 2010).

<b>Table 14 - Procedural changes implemented</b>	
11	<b>Yerevan:</b> Following working meetings with the AAC's staff, the European Academy posted on-line all the information relative to its admission process ( <a href="http://www.eriicta.am">www.eriicta.am</a> ). This is expected to reduce extortions risks against students seeking to gain access to said university based on their academic merits. (August 2010).
12	<b>Tavush:</b> As a result of the AAC's intervention, the Traffic Police issued Directive Number 17/3-5634 to relocate urban boundary signs in the cities of Ijevan and Dilijan. Previously, the signs were mistakenly placed in highways, significantly outside of urban areas, hence exposing unsuspecting drivers against extortions by Traffic Police for allegedly speeding in so-called "urban areas". (September 2010).
<b>October – December 2010</b>	
13	<b>Kotayk:</b> Traffic chaos in downtown Hrazdan induced frustrated drivers to break traffic regulations to the delight of police officers who were readily available to stalk and extort them. Following a working meeting with AAC staff, local police officers (in Districts 2 and 3) agreed to intervene more efficiently in conducting downtown traffic, which reduced traffic jams significantly and seemingly decreased extortions against drivers. (October 2010).
14	<b>Kotayk:</b> Condominium authorities at Kentron-A2 District posted notices informing citizens on the requirements and costs of their services, hence reducing potential abuses against condominium residents. This is particularly a prevalent problem in connection with the issuance of certificates of residence, a document required to process a passport and to conduct property-registration procedures. (December 2010).
15	<b>Kotayk:</b> The Governor's Office in Kotayk and Hrazdan's town hall posted information notices on their premises informing citizens about their services, prices and complaint channels to decrease the likelihood of abuses and extortions by government officials. (December 2010).
16	<b>Kotayk:</b> The Governor's Office in Kotayk and Hrazdan's town hall posted information notices on their premises informing citizens on how to file "Freedom of Information" requests based on the law in the subject matter. This is expected to increase the scrutiny of their actions and diminish opportunities for corruption. (December 2010).