

Presentation contents



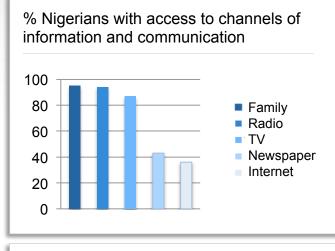
- 1. Background
- 2. Public opinion on governance and conflict
- 3. Nigerian Financial Intelligence Unit reform
- 4. Final Takeaways

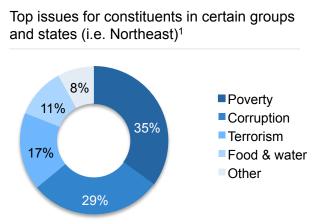


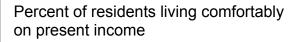
Third party pollsters track media usage, demographics, and state-by-state public opinion, compiled in Book 1













Percent of residents finding is very difficult to live on present income



- Recent surveys
 provide valuable
 information about
 demographics,
 policy approval
 ratings, and top
 issues on a state by-state basis
- This information is static and cannot be analyzed over time or in relation to drivers like violence

- 1. ACLED and Global Terrorism Database
- Internal Displacement Monitoring Centre



PeaceTech and its clients require analyses with broader scope and ability to evaluate drivers of opinion



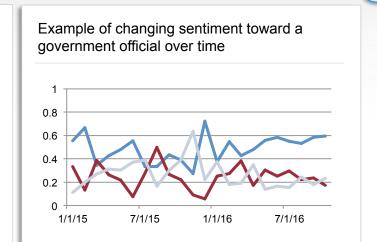
Numerous questions from governors and NGOs remain unanswered

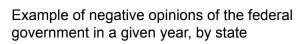
How does public opinion about the federal government, military, and state governors change over time?

How does violence change public perceptions of governors and good governance?

How do military interventions change public opinion about state and federal officials?

To what extent do citizens associate different kinds violence with the government—positively or negatively?







- Existing literature
 on public opinion
 is insufficient to
 answer key
 questions for
 governors or NGOs
 like PeaceTech
- We need innovative techniques to aggregate and analyze public sentiments

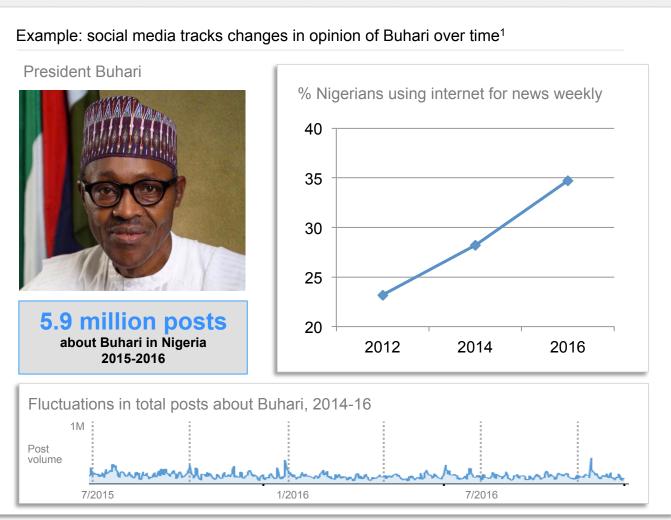
- 1. ACLED and Global Terrorism Database
- 2. Internal Displacement Monitoring Centre



Social media can augment third party assessments of public opinion on violence, issues, actors, and events



- Public opinion analysis normally requires SMS, inperson, or paper surveys
- Social media can collect millions of opinions and can be filtered by date and topic based on lexicons built with expert input and media analysis
- Although the demographics of social media users is not perfectly representative, as media penetration improves, so does representativeness²



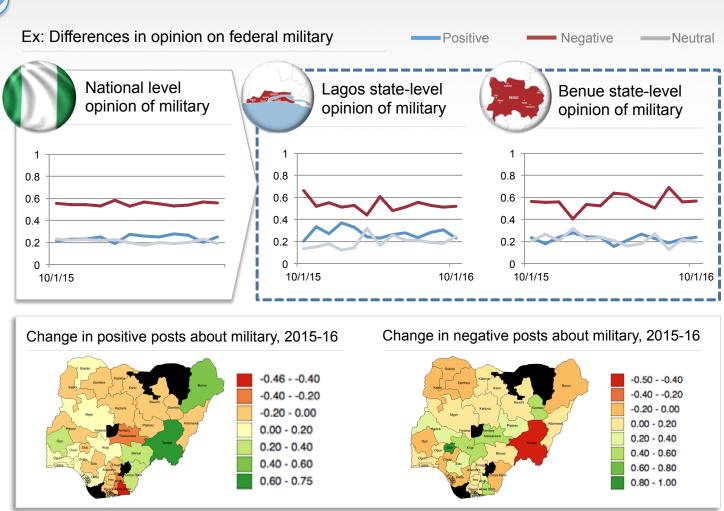
- Crimson Hexagon social media post aggregator
- 2. Regression analysis of BBG/Gallup data shows small but significant differences in education, income, and urbanicity of social media users



Preliminary social media analysis illuminates shifts in sentiment related to federal government, military, governors



- Comparing sentiments from local and federal levels illuminates significant differences in opinion, trends, and spikes among constituent groups
- Posts can be classified as positive, negative, and neutral based on tested, scientific algorithms²

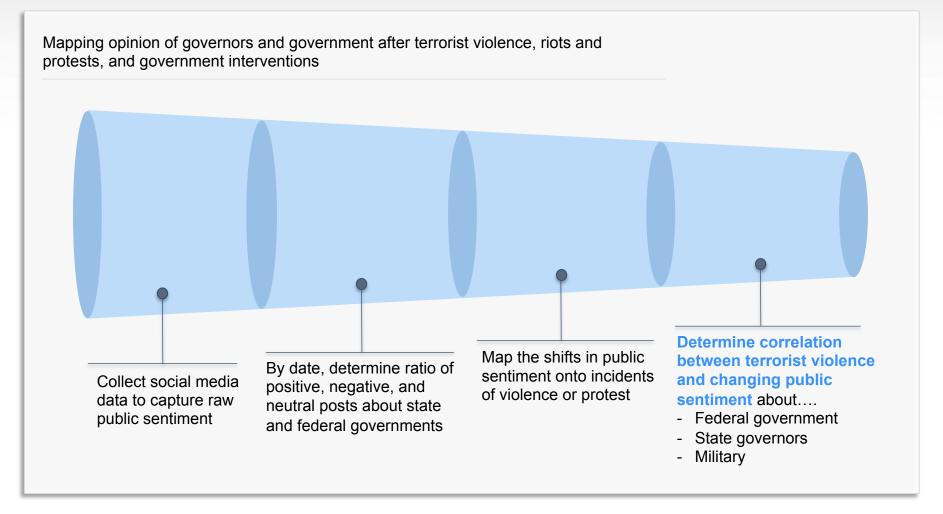


- 1. Crimson Hexagon social media post aggregator
- 2. Based on the National Research Council Word-Emotion Association Lexicon, 2011



Can sentiment analysis of social media correlate changes in opinion about government or military with terrorist, riot/protest, and state violence?





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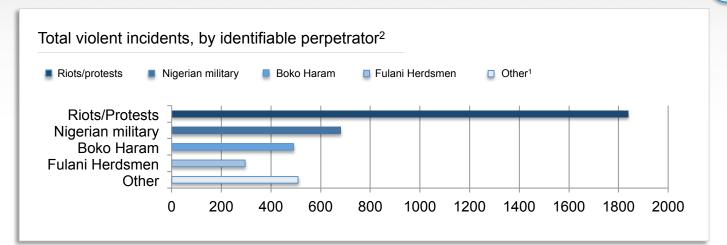


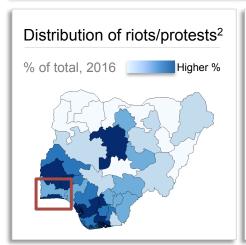
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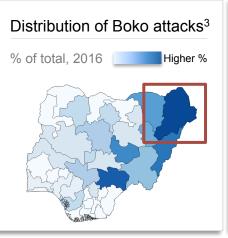


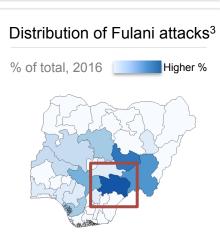
Violence is primarily linked to four actors and concentrated in specific states, providing clear case study examples











- Four actors account for the majority of incidents, and a handful of states bear the brunt of this violence
- Boko Haram is concentrated in the Northeast states, particularly Borno
- Fulani Herdsmen are prevalent in the Middle Belt states, especially Benue
- Riots and protests concentrate in urban centers like Lagos

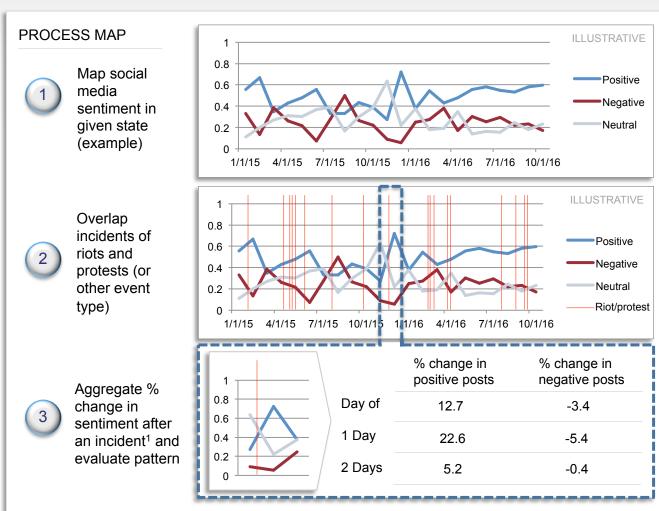
- 1. 380 observations by 80 different actors, 129 observations by police forces
- 2. ACLED, 2015-2016
- 3. Global Terrorism Database



Social media analysis can determine significance of shifts in opinion after incidents of violence



- Sentiment analysis classifies each social media post as positive, negative, or neutral
- Analyze shifts in opinion relative to incidents or violence and regress to identify significant trends
- A significant result could indicate that citizens blame state or federal government for lack of security or have little faith in governance



1. Using an OLS regression



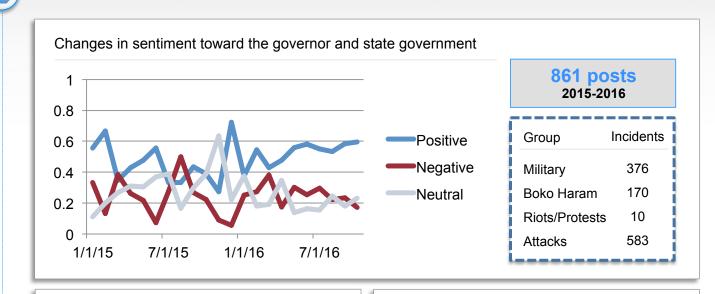
Borno does not exhibit significant changes in sentiment toward the state government following any violent incidents





Borno Take-aways

- Violence has no statistically significant impact on public opinion about the state governor or federal government
- Violence by non-state actors leads to a spike in negativity about the military



% increa	% increase of positive posts about the governor				
		sig	nificant at p	0<0.05 =	
	MIL ¹	ВН	R/P	ATT	
Day of	-2.5	-9.0	15.8	-5.3	
1 Day	-8.2	-1.1	27.1	-5.7	
2 Days	4.4	-0.8	0.0	3.4	

% increase of negative posts about the governor					
	significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT	
Day of	3.5	5.5	-9.3	7.8	
1 Day	7.7	6.1	-18.2	6.8	
2 Days	-6.3	8.0	2.6	-2.2	

^{1.} MIL = military intervention, BH = Boko Haram attack, R/P = riot or protest, ATT = attack



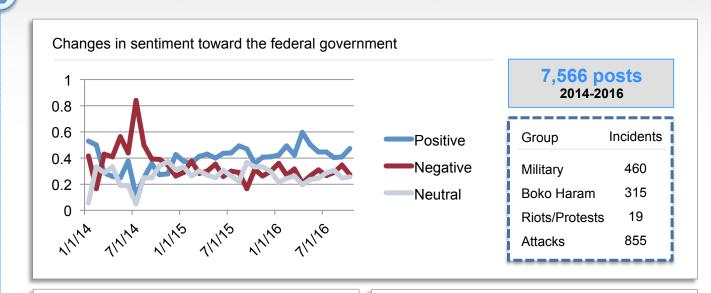
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% increase of positive posts about the rederal gov					
		Sig	gnificant at	p<0.05 =	
	MIL ¹	ВН	R/P	ATT	
Day of	2.8	0.7	-4.0	1.2	
1 Day	3.2	1.1	-9.4	1.0	
2 Days	0.5	-1.4	4.9	-1.2	

% increase of positive posts about the federal gov

% increase of negative posts about the federal gov					
		si	gnificant at	p<0.05 =	
	MIL ¹	ВН	R/P	ATT	
Day of	-3.5	0.5	4.3	-2.0	
1 Day	-1.6	0.4	10.4	1.4	
2 Days	-1.4	1.0	4.0	0.8	

^{1.} MIL = military intervention, BH = Boko Haram attack, R/P = riot or protest, ATT = attack



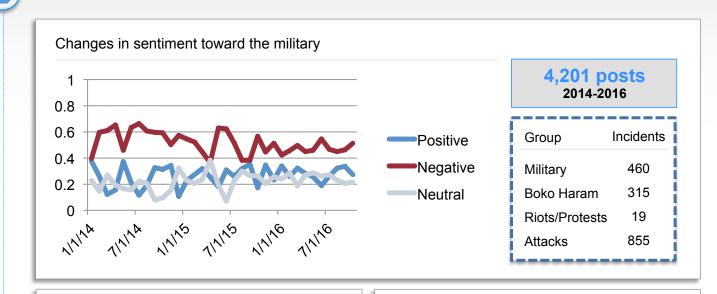
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% IIICIea	se of positive posts about the military significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT	
Day of	-3.5	-1.8	1.0	-3.3	
1 Day	-0.3	-0.2	5.3	-0.1	
2 Days	-6.6	-2.8	-6.1	-5.4	

% increase of nocitive nocts about the military

% increase of negative posts about the military				
		sig	nificant at	p<0.05 =
	MIL ¹	ВН	R/P	ATT
Day of	2.3	-4.8	-6.5	-0.8
1 Day	3.1	2.9	-7.2	3.6
2 Days	7.6	4.4	6.2	6.7

1. MIL = military intervention, BH = Boko Haram attack, R/P = riot or protest, ATT = attack



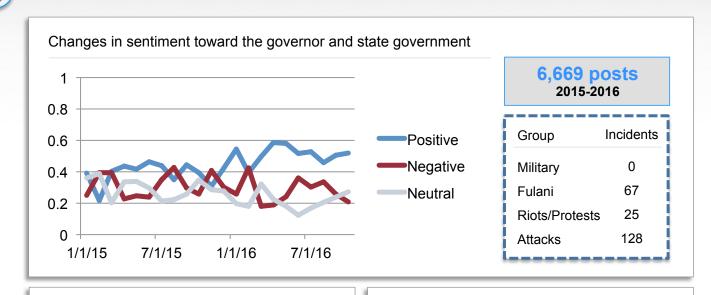
Benue demonstrates significant negative changes in opinion toward the governor following violence attacks





Benue Take-aways

Any kind of incident negatively shift sentiments about state governor, but does not change in views of the military or federal government



% increase of positive posts about the governor				
		significant at p<0.05 =		
	FH ¹	R/P	ATT	
Day of	-0.5	3.0	-1.9	
1 Day	-2.6	-4.4	-3.2	
2 Days	-9.9	1.3	-5.5	

% increase of negative posts about the governor					
		signific	ant at p<0.05 =		
	FH	R/P	ATT		
Day of	8.4	-2.0	8.0		
1 Day	9.2	0.9	8.0		
2 Days	8.2	-4.7	6.3		

^{1.} MIL = military intervention, FH = Boko Haram attack, R/P = riot or protest, ATT = attack



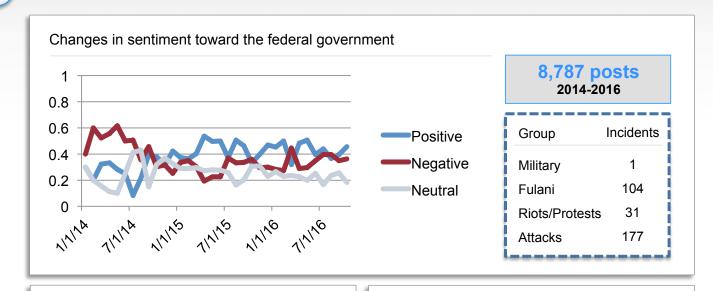
Benue does not exhibit significant changes in sentiment toward the federal government following violence attacks





Benue Take-aways

Any kind of incident negatively shift sentiments about state governor, but does not change in views of the military or federal government



% increase of positive posts about the federal gov't					
	significant at p<0.05 =				
	FH ¹	R/P	ATT		
Day of	3.1	1.6	1.2		
1 Day	2.1	7.1	2.0		
2 Days	-0.4	4.8	2.2		

% increase of negative posts about the federal gov't					
	significant at p<0.05 =				
	FH	R/P	ATT		
Day of	-3.7	-5.1	-2.0		
1 Day	2.6	-0.9	1.9		
2 Days	1.6	-3.2	-2.5		

^{1.} MIL = military intervention, FH = Boko Haram attack, R/P = riot or protest, ATT = attack



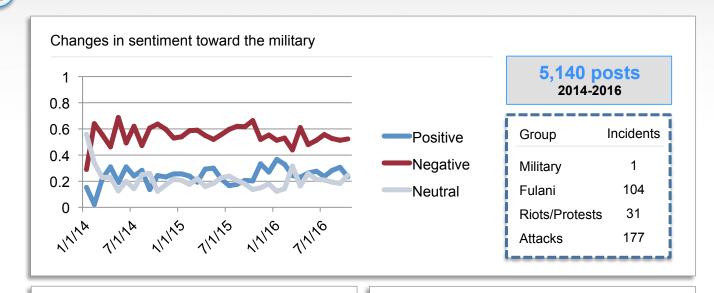
Benue demonstrates significant negative changes in opinion toward the military following violence attacks





Benue Take-aways

Any kind of incident negatively shift sentiments about state governor, but does not change in views of the military or federal government



% increase or	significant at p<0.05 =			
	FH ¹	R/P	ATT	
Day of	-4.3	-6.1	-3.7	
1 Day	0.1	-3.0	1.5	
2 Days	1.1	-0.8	-2.2	

% increase of nocitive nocts about the military

% increase of negative posts about the military					
	significant at p<0.05 =			5 =	
	FH	R/P	ATT		
Day of	1.8	6.6	3.7		
1 Day	2.2	0.3	-1.5		
2 Days	1.8	0.4	3.8		

1. MIL = military intervention, FH = Boko Haram attack, R/P = riot or protest, ATT = attack



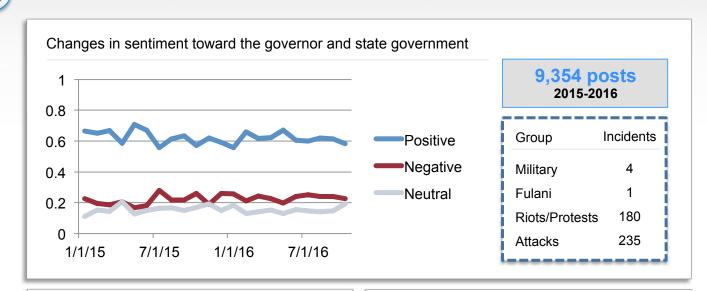
Lagos also shows no significant change in public opinion toward the state government after most types of violence





Lagos Take-aways

- Riots and protests have little impact on public opinion
- Non-state actor events negatively impact perception of the state governor
- Military intervention leads to increase in negative sentiment about the military



% increase of positive posts about the governor					
	significant at p<0.05 =				
	MIL ¹	FH	R/P	ATT	
Day of	-10.7	-60.8	-0.3	0.8	
1 Day	0.6	-14.5	-0.7	-0.6	
2 Days	-2.4	-6.1	-0.1	0.5	

% increase of negative posts about the governor					
		significant at p<0.05 =			
	MIL ¹	FH	R/P	ATT	
Day of	12.7	77.4	-0.3	-1.1	
1 Day	-1.2	23.3	0.1	-0.7	
2 Days	4.7	4.4	0.4	-0.1	

^{1.} MIL = military intervention, FH = Fulani Herdsmen attack, R/P = riot or protest, ATT = attack



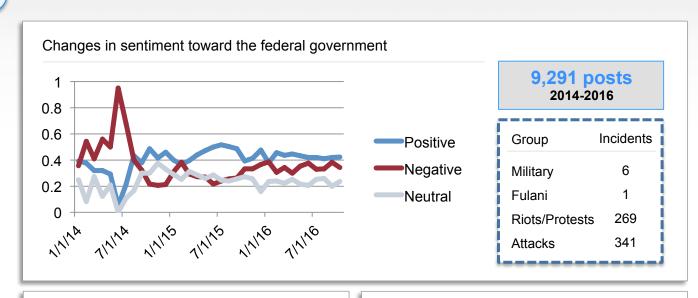
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% increase of positive posts about the federal gov't					
	significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT	
Day of	-7.9	-38.8	-1.4	-2.1	
1 Day	-7.8	-38.5	0.0	-0.1	
2 Days	8.7		1.9	1.5	

% increase of negative posts about the federal gov't					
	significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT	
Day of	4.4	66.4	0.2	0.8	
1 Day	9.4	63.2	0.2	-0.1	
2 Days	4.3		0.2	0.2	

^{1.} MIL = military intervention, FH = Fulani Herdsmen attack, R/P = riot or protest, ATT = attack



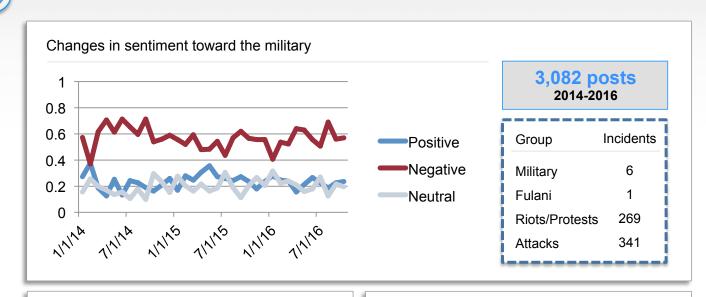
Lagos also shows no significant change in public opinion toward the military after most types of violence





Lagos Take-aways

- Riots and protests have little impact on public opinion
- Non-state actor events negatively impact perception of the state governor
- Military intervention leads to increase in negative sentiment about the military



% increase of positive posts about the military				
	significant at p<0.05 =			
	MIL ¹	FH	R/P	ATT
Day of	-23.4	-23.8	-1.7	-3.0
1 Day	-6.7	-7.0	2.5	-1.2
2 Days	-14.9	-23.7	1.9	0.3

% increase of negative posts about the military					
		significant at p<0.05 =			
	MIL ¹	FH	R/P	ATT	
Day of	28.3	45.7	-1.4	-0.3	
1 Day	24.1	29.1	-2.9	1.0	
2 Days	2.0	45.8	-1.6	0.1	

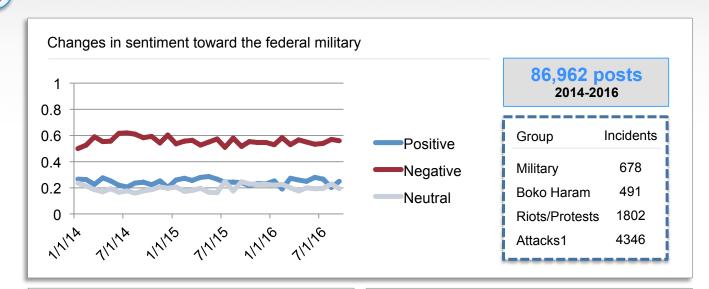
^{1.} MIL = military intervention, FH = Fulani Herdsmen attack, R/P = riot or protest, ATT = attack



Opinions of the federal military show significant negative changes following military interventions



- At a national level, the Nigerian military appears to be consistently unpopular and high casualty attacks are deeply unpopular
- Following high casualty attacks by non-state actors or riots, citizens exhibit a significant negative shift in opinion toward the military
- Across the board, citizens blame the military for lack of a security but find fault in current efforts to intervene



% increase of positive posts about the military					
	significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT ²	
Day of	-1.5	-0.8	-2.0	-1.2	
1 Day	-0.7	-1.5	-0.3	-0.3	
2 Days	-0.2	-1.6	-1.1	-0.4	

% increase of negative posts about the military					
		significant at p<0.05 =			
	MIL ¹	ВН	R/P	ATT ²	
Day of	2.5	1.2	2.9	2.0	
1 Day	2.3	2.9	1.6	1.5	
2 Days	0.9	2.4	2.6	1.6	
2 Days	0.9	2.4	2.6	1.6	

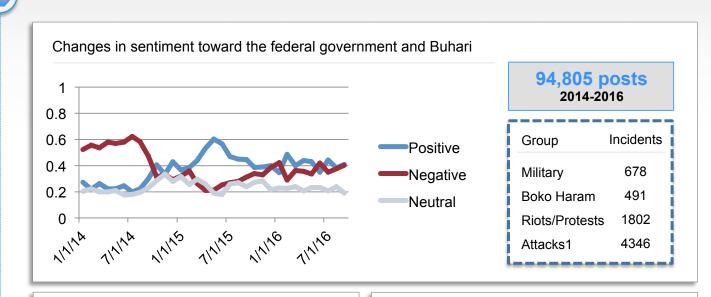
- 1. MIL = military intervention, BH = Boko Haram attack, R/P = riot or protest, ATT = attack
- Including attacks causing 50+ fatalities



Opinions of the federal government show positive changes after military interventions and riots/protests



- Sentiment about the federal government shift dramatically in 2015, following the election of Buhari
- Following riots and protests, citizens exhibit a significant positive shift in opinion toward the federal government
- Following other types of violence there is no significant relationship
- Citizens focus blame on the military not the federal government for violence



% increase of positive posts about federal gov					
	significant at p<0.05 =				
	MIL ¹	ВН	R/P	ATT	
Day of	-0.2	-0.1	2.6	0.8	
1 Day	1.4	-2.6	2.6	-1.4	
2 Days	1.1	-1.7	2.2	-0.7	

% increase of negative posts about federal gov					
	significant at p<0.05 =				
	MIL ¹	BH R/P ATT			
Day of	0.7	-0.1	-2.2	-0.2	
1 Day	-2.1	3.1	-1.8	1.3	
2 Days	-1.7	2.3	-2.0	-1.0	

^{1.} MIL = military intervention, BH = Boko Haram attack, R/P = riot or protest, ATT = attack



Final take aways: Our findings suggest that...



Takeaways

- Study confirms that citizens link violence to opinion of government, and Nigerians blame government (on some level) for lack of security against different violent actors
- Nigerians primarily blame the military for lack of security against terrorist violence but view military interventions unfavorably
- Whichever level of government is perceived as responsible for combatting Fulani Herdsmen (state) versus Boko Haram (federal) bears the negative shift post violence
- Nigerians view the federal government more favorably in the wake of riots and protests

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In their recent meeting with USIP, Nigerian governors cited FDI as their main priority.





Oct. 19th USIP Meeting with Nigerian Governors



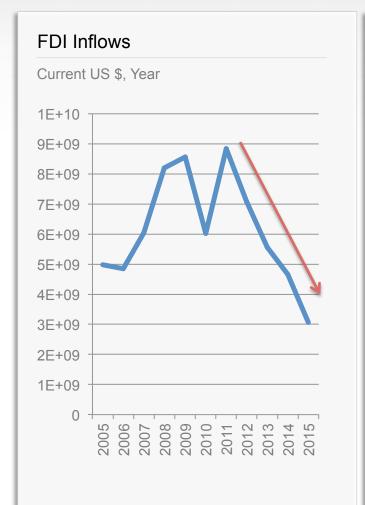
#1 Priority

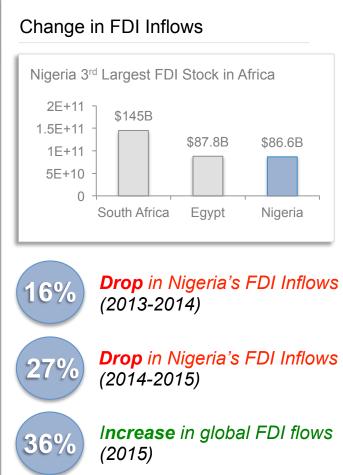
Increasing FDI

FOREIGN DIRECT INVESTMENT



Nigeria's 65% FDI drop since 2011 has been linked to falling oil prices, rising corruption and political instability.







Oil Prices

Corruption

Instability



Corruption and political stability can be controlled by governors.

This section will therefore focus on those aspects.

FOREIGN DIRECT INVESTMENT



Recent events highlight the importance of AML and corruption control to increase FDI.







- HSBC processes drug-trafficking proceeds through Mexico
- Funds transmitted from sanctioned countries like Iran
- Ties to KSA bank linked to terrorist financing
- Fined \$1.9 Billion

J.P. Morgan Out of Nigeria (2015)

J.P.Morgan

- HSBC scandal leads to more caution amongst big banks
- JP Morgan removed Nigeria from Emerging Market Bond Indexes
- Cites fluctuating Naira and lack of transparency

Investors who track the GBI-EM series continue to face challenges and uncertainty while transacting with the naira due to the lack of a fully functional two-way FX market and limited transparency.

– JP Morgan Statement

Corruption & money laundering are main concerns for foreign investors

- 1. Bloomberg
- 2. The Guardian
- 3. Financial Times



De-risking can have severe consequences on Nigeria's economy if left unchecked

CONSEQUENCES



- Correspondent banking relationships (CBRs) enable domestic & crossborder transactions
- De-risking is the process through which financial institutions reduce or eliminate ties to avoid, rather than manage risk
- Driven by fears over being sanctioned as a result of regulations associated with AML or CFT
- > 50% of banks in Sub-Saharan Africa have seen declines in CBRs ¹

Limited or no ties to financial institutions, which are costly to reestablish.

Decreased ability to import, export, or send remittances

Increase in informal methods of conducting financial transactions

Small local financial institutions harmed disproportionately, indirectly affecting society's poorest

"Nigeria and other emerging markets are increasingly at risk of financial shocks because of the withdrawal of correspondent banking relationships." – *ELOMBAH*

"The withdrawal of commercial banking relationships has reached a critical level in some affected countries [and could] disrupt financing services and cross border flows, including trade finances and remittances, potentially undermining financial stability, inclusion, growth and development goals." – IMF head, Christine Lagarde

- 1. SWIFT Data
- 2. World Bank



Recent trends in de-risking pose a huge risk on Nigerian FDI and economy which FIUs can help mitigate



De-Risking

The trend has been to completely cut ties with high risk countries, and institutions

This leads to huge drops in FDI in Nigeria, further straining its economy

Anti-Money Laundering

AML efforts would improve's Nigeria's status and limit derisking

This would ultimately put investors at ease and increase FDI

Financial Intelligence Unit

NFIU reforms amongst **Buhari's** main promises

Very high potential

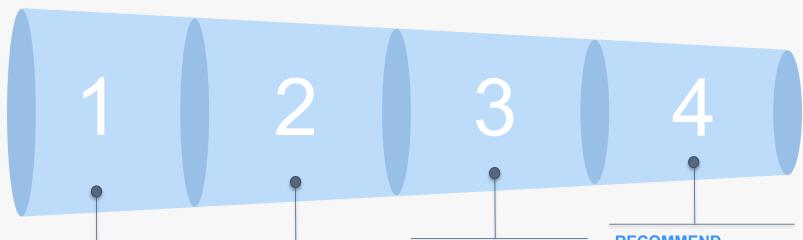
Could have **huge impact** on investor
trust and FDI



How effective are FIUs and anti-corruption efforts in increasing FDI inflows and promoting political stability?



Using classic regressions, as well as sentiment analysis, to showcase the importance of anti-money laundering and FIU reforms in Nigeria.



COLLECT data on countries similar to Nigeria, regress, and find trends between corruption, FDI, and political stability.

MAP SHIFTS in public sentiment onto major events relating to corruption and financial systems in Nigeria, and determine correlation.

ASSESS current Nigerian FIU using:

- Best practices
- Benchmarks
- FATF and GIABA Mutual Evaluations and reports

RECOMMEND

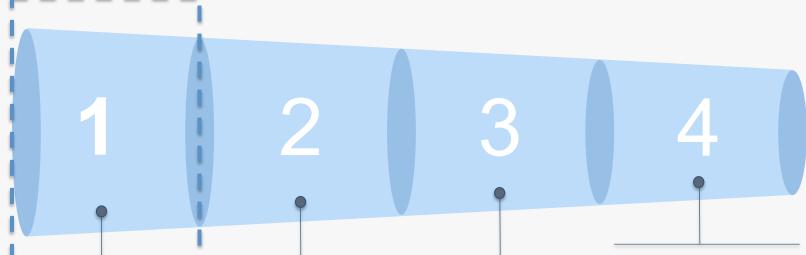
improvements to Nigeria's FIU and anti-money laundering efforts, and identify potential challenges.



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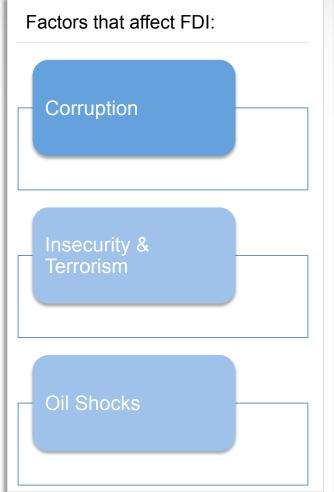
RECOMMEND

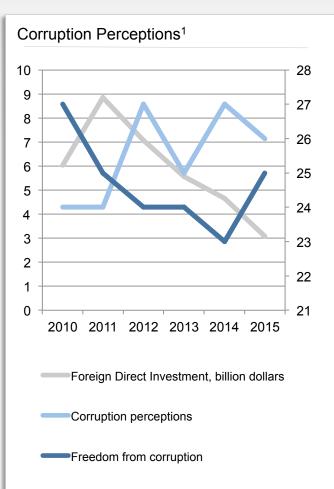
improvements to Nigeria's FIU and anti-money laundering efforts, and identify potential challenges.

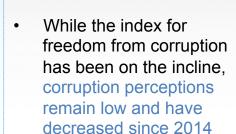
FOREIGN DIRECT INVESTMENT



Common factors affecting FDI: Corruption, Insecurity & Terrorism, and Adverse Shocks







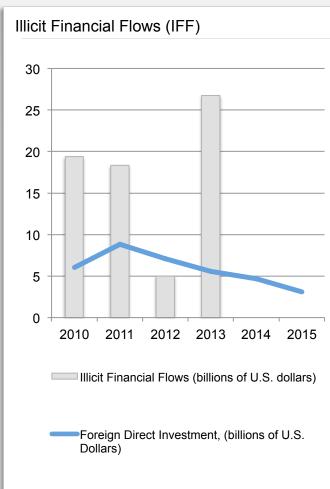
- Incidents such as the issuing of a presidential pardon to the former Governor of Bayelsa State, charged with money laundering in 2007, have called Nigeria's anti-corruption efforts into question ²
- Inefficiencies in the judicial system resulting from rampant corruption and low funding have also discouraged FDI

- The Global Economy
- Adejugbe, 2013



Common factors affecting FDI include: Corruption, Insecurity & Terrorism, and Adverse Shocks



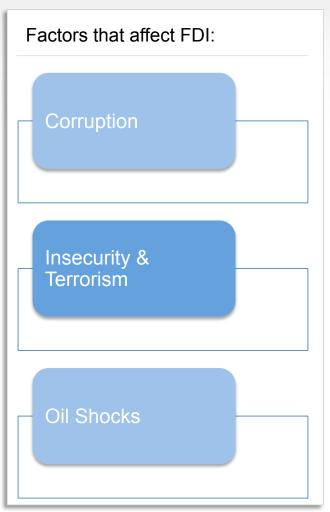


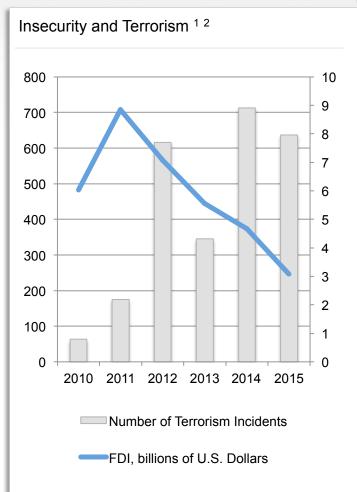
- In 2012, Africa lost \$69 billion from illicit financial flows
- On average, \$17.3 billion of illicit finances flow from Nigeria
- According to Global Financial Integrity, Nigeria ranks highest in Africa in its cumulative illicit flows
- Panel and UN have highlighted how eliminating IFF is necessary to encourage FDI



Common factors affecting FDI: Corruption, Insecurity & Terrorism, and Adverse Shocks







- Studies show that political stability is key to encouraging FDI
- The increasing sense of instability and security in Nigeria has contributed to a decline in foreign direct investments
- Insecurity and terrorism is not only responsible for generating fear and uncertainty, but the destruction of infrastructure that has adversely affected the oil sector, leading to further declines in FDI

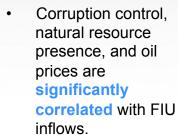
- 1. The Global Economy
- 2. Global Terrorism Database

REGRESSIONS



For countries similar to Nigeria, higher corruption control has significantly led to increase in FDI.



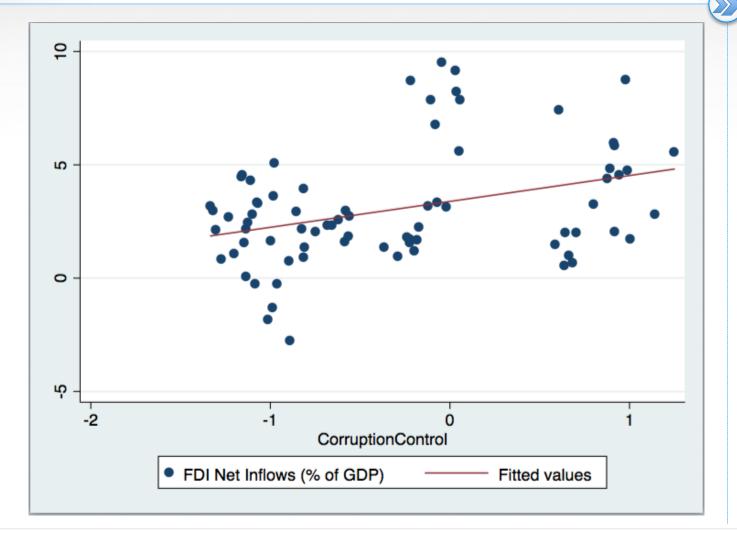


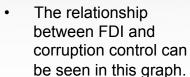
- Political stability, though not significantly correlated in this model, has a relatively low 11.1% P-value. It is still important.
- A high R2 value of 91.47%, and adjusted R2 of 88.84% demonstrate the strength of this model.

REGRESSIONS



The positive correlation between corruption control and FDI is seen in this graph.



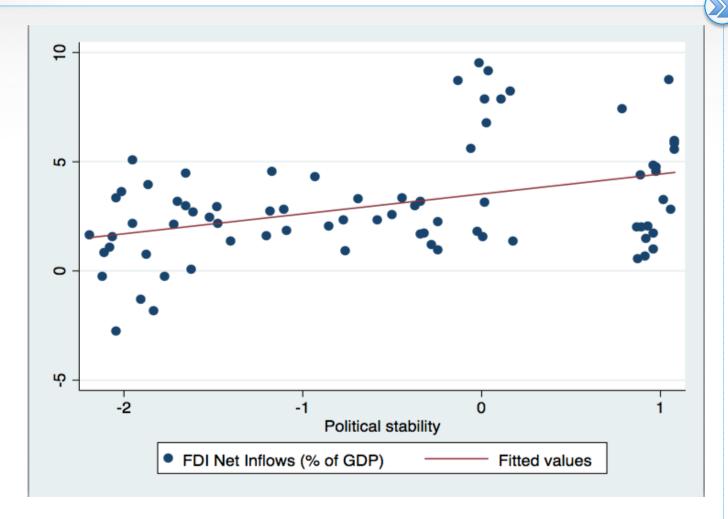


- One way to improve corruption control is by fighting money laundering and improving financial intelligence.
- This includes derisking and financial intelligence unit improvements.

REGRESSIONS



There is a positive trend between political stability and FDI inflows.

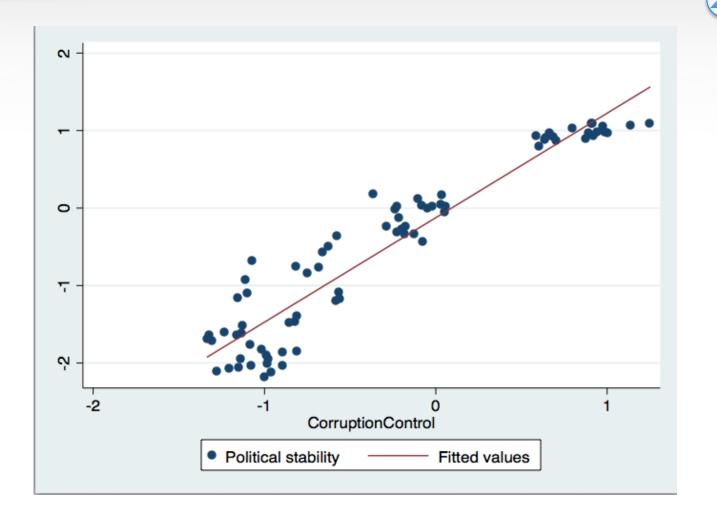




- According to a UNCTAD report, investors, both foreign and domestic, did cite terrorism fears as a main reason for their decreased investment.
- Political stability is therefore also something to keep in mind when courting foreign investors.



Corruption control is also associated with improvements in political stability.

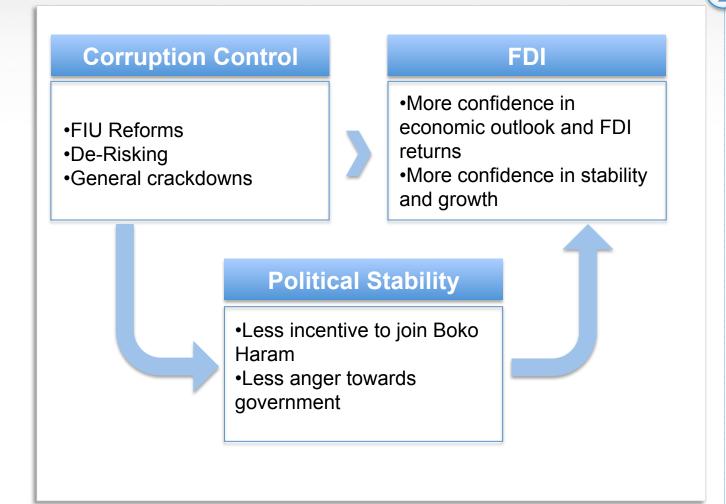


- Corruption control is highly correlated with political stability.
- Interviews with Boko
 Haram defectors and
 almost-recruits have
 also shown corruption
 to be a main driver
 behind joining the
 terrorist organization.
- This indicates that steps to control corruption and money laundering would only help with the governors' goal to increase investment, but also their fight against Boko Haram.

- 1. World Bank Data
- 2. Mercy Corps



Corruption control and political stability both lead to increase in FDI.



Areas to Explore:

Anti-Money Laundering

De-Risking



Financial Intelligence **Units**



President Obasanjo launched the Nigerian Financial Intelligence Unit (NFIU) in 2004



NFIU

- Analyze suspicious transactions and cross-border movements of currency
- Maintain a transparent financial intelligence database
- Advise government authorities on policies to prevent financial crimes

The Economic and Financial Crimes Commission (EFCC)

- NFIU operationally autonomous from the EFCC
- NFIU is housed within EFCC and derives its budget from EFCC's budgetary allocation
- NFIU central authority with the mandate to receive, analyze and disseminate information on Suspicious Transaction Reports (STRs)

Anti Money Laundering (AML) Act

2004

Economic and Financial Crimes Act

2004

Money Laundering Prohibition Act

2011

Money Laundering Prohibition Act

2011

Terrorism Prevention Act

2015

Nigerian Financial Intelligence Center Bill

^{1.} Mutual Evaluation of the Federal Republic of Nigeria (2008)



GIABA Mutual Evaluation of the Federal Republic of Nigeria (2008).



MUTUAL EVALUATION REPORT

Published May 7, 2008

Since then, there have been seven yearly updates

Financial Action
Task Force (FATF)

Mandate: Set standards and to promote effective implementation of legal, regulatory and operational measures for combating ML/TF and other related threats to the integrity of the international financial system.

R.26: Partially Compliant

- Operational autonomy of the FIU.
- Power of NFIU Director
- Protection of information
- FIU statistics on STRs and CTRs inconsistency/inaccuracy
- Deficiencies in public reports issued by the FIU



GIABA Mutual Evaluation of the Federal Republic of Nigeria Yearly Updates.



2015 Update:

Still only Partially Compliant on R.26

- Indicate timelines for enacting the NFIU Bill
- Improvements to management structure of the NFIU
- Protection and dissemination of information
- Provide specific number of analysts/staff deployed to the Monitoring & Analysis department of the NFIU; further training

Improvements since 2008:

Maintenance of STR and CTR statistics

Issuance of public and annual reports

Increased interagency cooperation

NFIU management structure streamlined

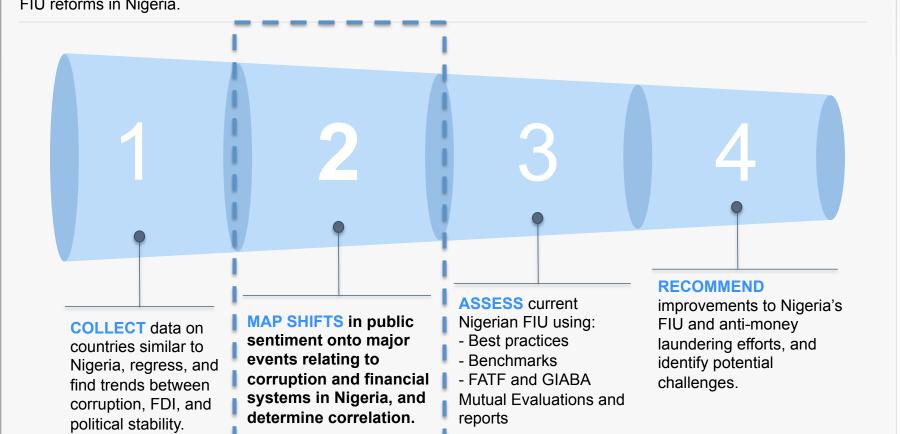
^{1.} Mutual Evaluation of the Federal Republic of Nigeria (2009-2015)



How effective are FIUs and anti-corruption efforts in increasing FDI inflows and promoting political stability?



Using classic regressions, as well as sentiment analysis, to showcase the importance of anti-money laundering and FIU reforms in Nigeria.

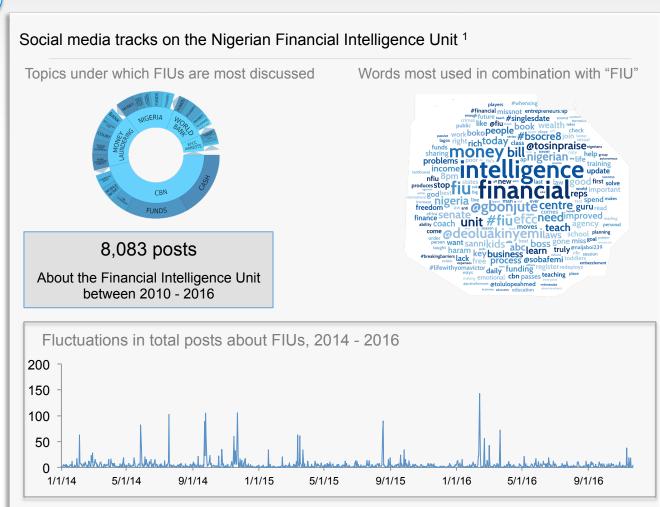




Capturing public sentiment on Nigeria's Financial Intelligence Capabilities using social media analytics



- Can social media analytics be used to capture public sentiment on the NFIU?
- Does there exist a strong public discourse surrounding the NFIU?
- Does there exist a strong discourse surrounding financial corruption issues that FIUs seek to remedy?
- To what extent do Nigerians associate financial corruption issues with the state? To what extent do they associate it with the federal government?



1. Crimson Hexagon social media post aggregator



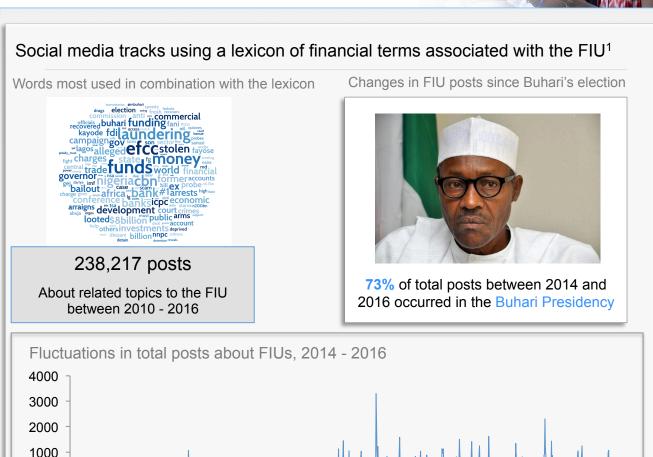
Capturing public sentiment on Nigeria's Financial Intelligence Capabilities using social media analytics

1/1/14

5/1/14



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5/1/15

9/1/15

1/1/16

9/1/14

1/1/15

1. Crimson Hexagon social media post aggregator

5/1/16

9/1/16



By scraping Nigerian news sites and blogs, we developed a 'financial lexicon' encompassing words associated with financial regulation

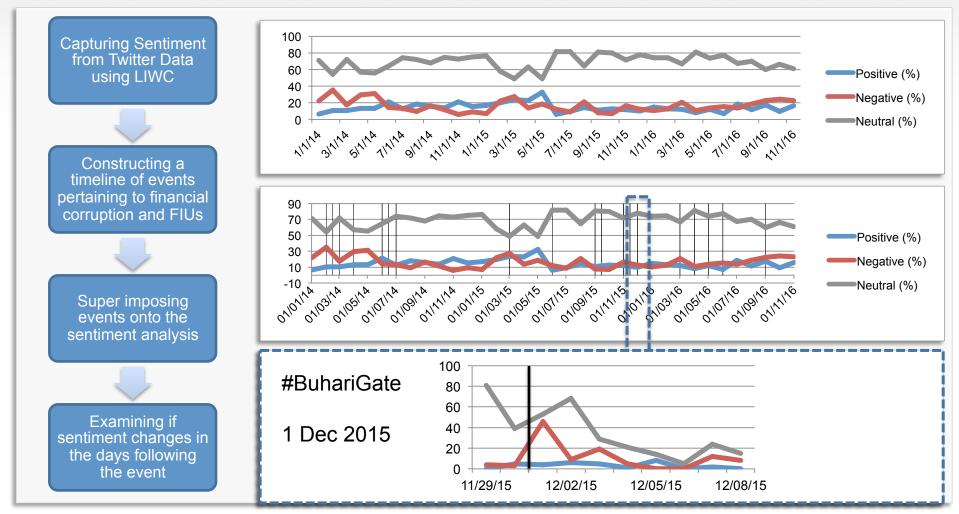


("Financial Intelligence" OR FIU OR "Financial Intelligence Unit" OR NFIU OR "Nigerian Financial Intelligence Unit" OR EFCC OR "Economic and Financial Crimes Commission" OR "Nigeria Drug Law Enforcement Agency "OR "Special Control Unit against Money Laundering" OR "Central Bank of Nigeria" OR CBN OR "Economics and Financial Crimes Commission Establishment Act" OR HURIWA OR "Human" Rights Writers Association of Nigeria" OR "Integrity Group" OR ICPC OR "Independent Corrupt Practices Commission" OR NAICOM OR "National Insurance Commissions" OR "National Treasury" OR NBA OR "Nigerian Bar Association" OR "National Judicial Court" OR "Egmont Group of Financial Intelligence Units" OR Egmont OR FATF OR "Financial Action Task Force" OR "Financial Action Task Force" Recommendation" OR GIABA OR "Intergovernmental Action Group Against Money Laundering in West Africa" OR "International Money Laundering Information Network" OR "Eastern and Southern African Anti-Money Laundering Group" OR UN OR "United Nations" OR IMF OR "World Bank" OR "United Nations" Convention Against Corruption" OR MPLA OR "Money Laundering Prohibition Act" OR TPA OR "Terrorism Prevention Act" OR AML OR "Anti Money Laundering" OR CFT OR "Combating Financing of Terrorism" OR "Countering Financing of Terrorism" OR "Currency Transaction Reports") AND (FDI OR "Foreign Direct Investment" OR "Foreign Investment" OR "Financial institutions" OR "Commercial Banks" OR "Financial Stability" OR "Financial illiteracy" OR "Illicit Funds Flow" OR "Derisking" OR "Legislation" OR "Money" OR "Cash" OR "Poverty" OR "Financial Autonomy" OR "Financial Fraud" OR "Financial Flows" OR "Cash Flows" OR "Nigeria Factor" OR "Terrorist Financing" OR "Money Laundering" OR "Organised crime" OR Funding OR Funds OR "Campaign Funding")



Social media analytics show that events pertaining to financial corruption cause shifts in discourse

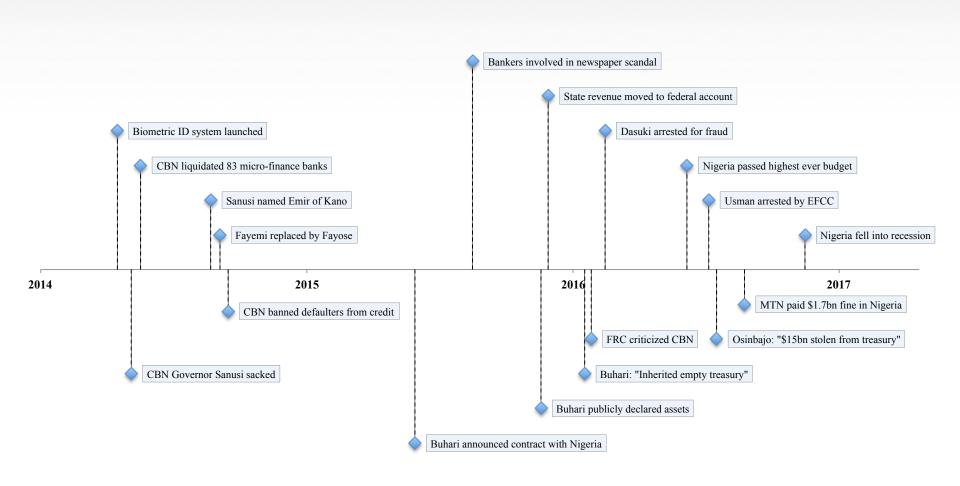






Timeline of financial regulatory events







Happenings relating to the financial system are followed by significant changes in general sentiment



Change in sentiment following general event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	-0.05	-0.04	0.09	
2 Days	-0.03	0.06	-0.04	
7 Days	0.03	0.13	-0.15	

Change in sentiment following positive event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	0.03	0.01	-0.04	
2 Days	-0.09	-0.03	0.12	
7 Days	0.02	0.16	-0.18	

Change in sentiment following negative event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	-0.11	-0.06	0.17	
2 Days	0.02	0.08	-0.10	
7 Days	0.06	0.09	-0.16	

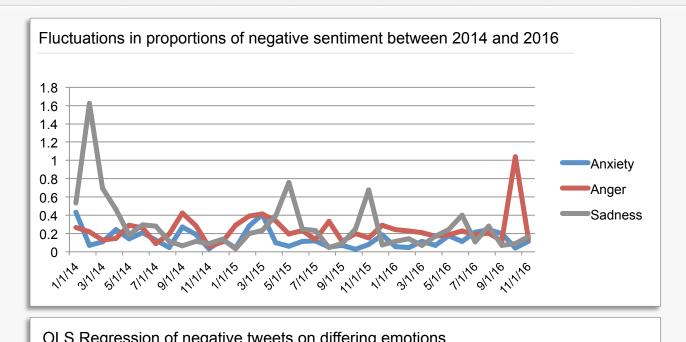
Change in sentiment proportions depending on number of events per month				
significant at p<0.05 =				
Positive	Negat	tive	Neutral	
-0.4	-0.02	0.4		
-0.7	-0.2	0.9		
-0.3	0.0)6	0.3	
	Positive -0.4 -0.7	Positive Negat -0.4 -0.02 -0.7 -0.2	significant a Negative -0.4	

- Lack of positive reactions, even when events are positive, indicate general skepticism towards anti-corruption efforts.
- significant changes in neutral sentiment can be explained by the social media demographic. People are reporting events rather than reacting to them because they're not affected by them.
- The fact that so many people are reacting, however, shows that the population is attentive to financial news.



Social media analytics can be disentangled beyond binary emotions



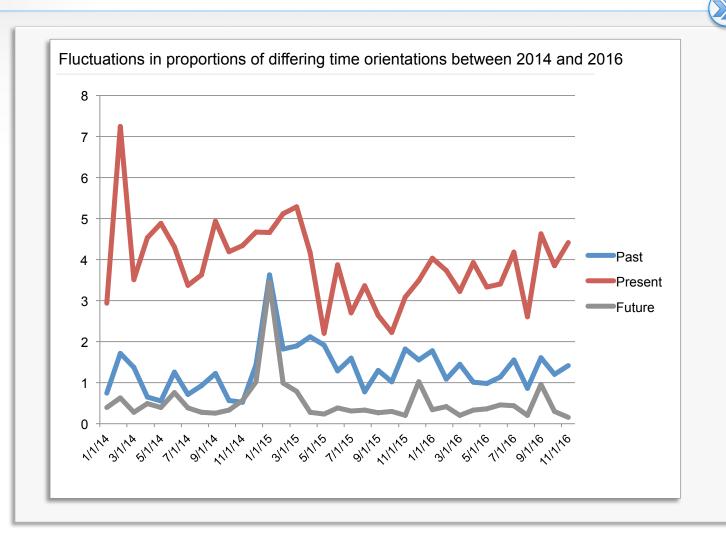


	. cegaare meete	on amoning officiality		
	Anger	Sadness	Anxiety	
Coefficient	0.135	0.128	0.099	

- Anger and sadness appear to be most associated with negative tweets
- Understanding the specific emotions behind negative sentiment could sway policy
- While emotions such as sadness and anxiety could be remedied through assurance on part of Nigerian leaders, anger could indicate future spikes in violence levels



Social media analytics can provide insight on the time orientation of Nigerians



- Sentiment analysis shows that Nigerians tend to speak of regulatory financial terms with respect to the present
- Thus, we can see
 that Nigerians are
 focused on the
 immediate present
 issues and less
 concerned with
 future or past
 issues pertaining to
 financial corruption



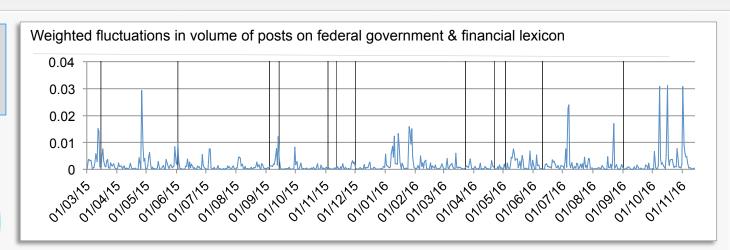
Sentiment on the federal government with regards to financial intelligence fluctuates over time

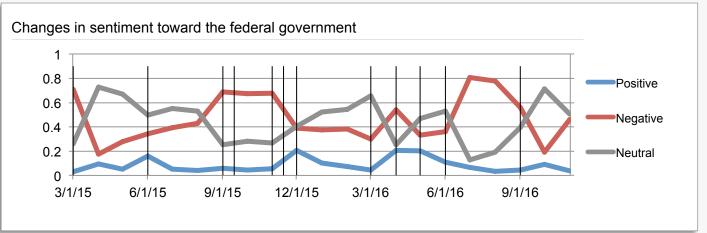


28,764 postsMarch 2015 – Present

Federal Financial Lexicon

To what extent do Nigerians associate financial corruption issues with the federal government?



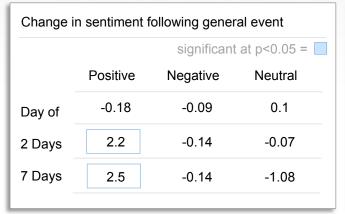


1. Crimson Hexagon social media post aggregator

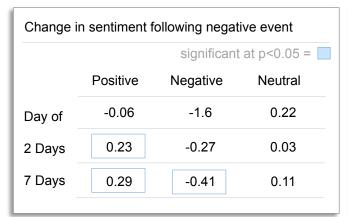


Events associated with the financial regulatory regime tend to result in more favorable views of the federal government





Change in sentiment following positive event				
significant at p<0.05 =				
Positive	Negative	Neutral		
0.04	0.06	-0.1		
0.21	0.13	-0.07		
0.22	0.12	-0.11		
	Positive 0.04 0.21	Positive Negative 0.04 0.06 0.21 0.13		



Change in total tweets following an event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	1.6	1.6	1.6	
2 Days	1.9	2.0	1.9	
7 Days	3.8	3.8	3.8	

- Positive significant changes in positive sentiment following a general event and a negative event, indicate that Nigerians look favorably on the federal government's efforts in tackling anticorruption.
- A significant decline in negative tweets following negative events further indicate that Nigerians do not blame the federal government with negative events pertaining to financial corruption.



State and financial intelligence analysis yields twice more posts than federal government

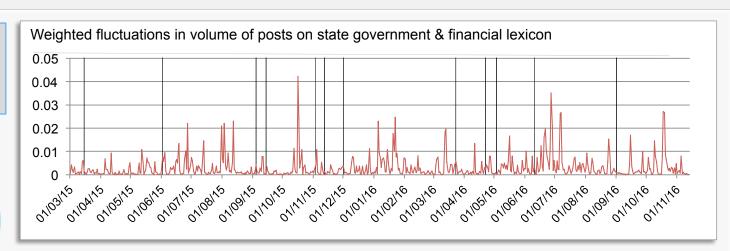


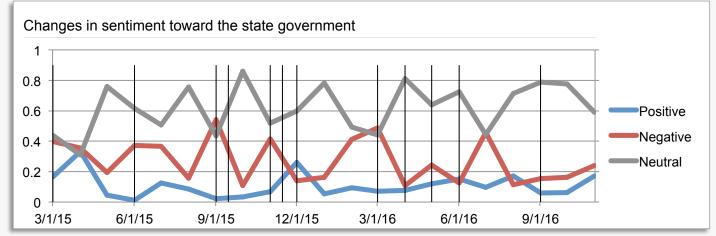
53,954 posts

March 2015 – Presen

Governors / State Financial Lexicon

To what extent do Nigerians associate financial corruption issues with the state?



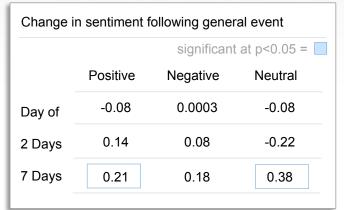


1. Crimson Hexagon social media post aggregator



Changes in sentiment following events indicate a skepticism towards the role the state plays in financial intelligence





Change in sentiment following positive event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	0.33	-0.02	-0.31	
2 Days	-0.07	0.49	-0.41	
7 Days	-0.08	0.72	-0.65	

Change in sentiment following negative event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	0.03	0.002	-0.03	
2 Days	0.1	0.14	-0.24	
7 Days	0.21	0.1	-0.31	
_				

Change in total tweets following an event				
	significant at p<0.05 =			
	Positive	Negative	Neutral	
Day of	0.08	0.08	0.08	
2 Days	0.17	0.17	0.17	
7 Days	0.59	0.59	0.58	

- Statistically
 significant increase
 in negative sentiment
 and a decline in the
 proportion of neutral
 tweets following
 positive events,
 indicate a general
 skepticism towards
 anti-corruption
 efforts as pursued at
 the state level.
- Comparing these results with that from the federal government could indicate that Nigerians associate blame or praise pertaining to financial corruption with the state level rather than the federal government



Key takeaways from social media analytics highlight the need for an autonomous FIU that works to remedy corruption in Nigeria

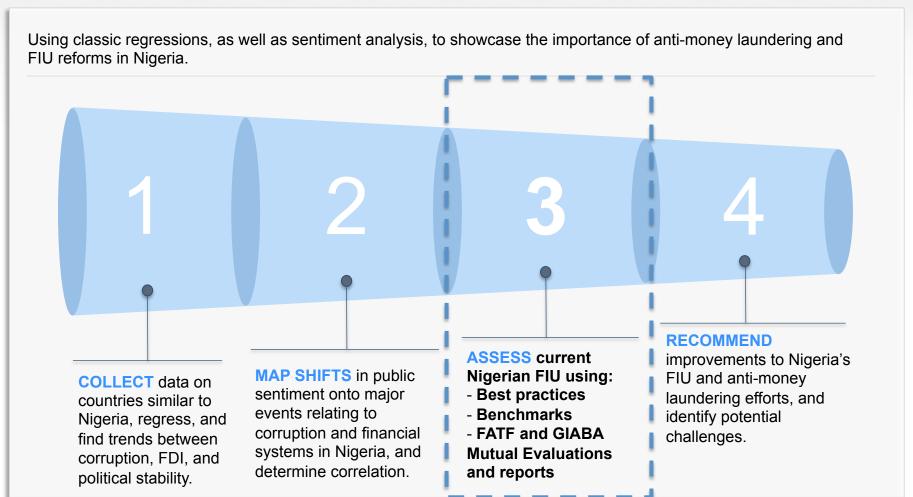


- Issues pertaining to financial regulation are not only present in the public discourse but have the ability to shift public sentiment, which appears to be more negative and skeptical towards positive efforts of anti-corruption control
- Upon segmenting negative emotions into different types we see that anger appears to have the highest proportion
- Nigerians are more concerned with present regulatory issues as opposed to ones of the past or future
- Despite corruption control being an issue at the federal level, sentiment analysis shows that Nigerians tend to associate financial regulatory issues more strongly at the state government level rather than the federal level
- Given the effect corruption control has on perceptions of governors, this could be leveraged to lobby the federal government for a stronger, more autonomous Financial Intelligence Unit



How effective are FIUs and anti-corruption efforts in increasing FDI inflows and promoting political stability?



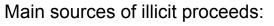




Anti-Money Laundering (AML) in Nigeria



Nigeria is a major drug transshipment point and a significant center for criminal financial activity.¹



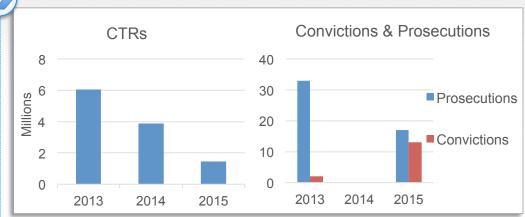
Oil bunkering Bribery & embezzlement

Smuggling Bank robberies

Financial crime

\$12.7 billion

Losses to financial fraud in West Africa



Challenges:

Quantity and quality of CTRs / STRs

Prosecutions & convictions

Cash-based economy

NFIC Bill yet to be signed into law

1. 2013 to 2015 International Narcotics Control Strategy Report (INCSR)



Countering Terrorist Financing (CFT) in Nigeria



Multiple agencies involved in CTF but little cooperation.¹

Department of State Security (DSS) Economic and Financial Crimes Commission (EFCC)

Other ministries

The DSS is the primary investigating agency for terrorism cases, but...does not have the capacity to investigate terrorism financing...and does not share information with other agencies...¹

The EFCC...which houses the financial investigative expertise is often excluded from participating...and thus unable to fully contribute.

Challenges:

Strongly dependent on **Boko Haram's financing structure**

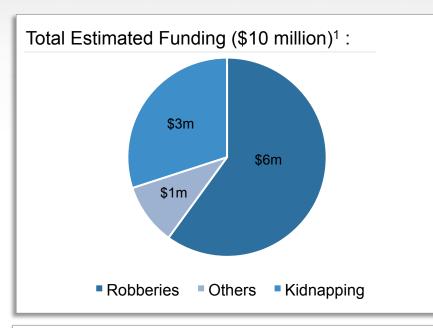
Multinational Joint Task Force (MNJTF) in 2012 had **initial success**

But Boko Haram adjusted their operations to asymmetric attacks



Boko Haram's Financing Structure





Nigerian authorities have reported an increase in cattle rustling activities...that is directly connected to BH.²

\$12 million

Est. value of cattle stolen by BH in 3 instances from 2014-16

Challenges:

Boko Haram operations are not costly

• E.g. Weapons are stolen instead of bought

Links to foreign terrorist groups, domestic organized crime, and AML

- Less territory today
- Look to crime to ensure sufficient funding
- Need to create better links between FIUs, law enforcement and intelligence communities

Corruption

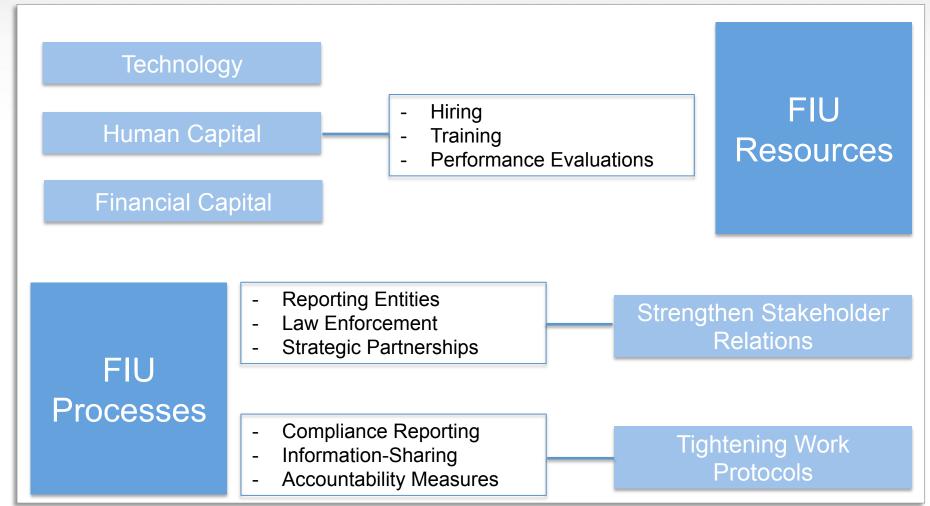
Politicians and border security

- 1. US House of Representatives Committee on Financial Services
- 2. Terrorist Financing in West and Central Africa. October 2016. FATF.



What makes a good Financial Intelligence Unit?



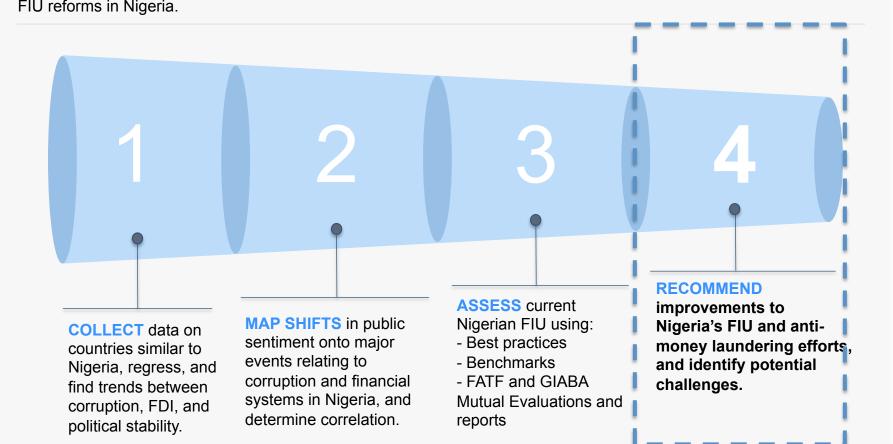




How effective are FIUs and anti-corruption efforts in increasing FDI inflows and promoting political stability?



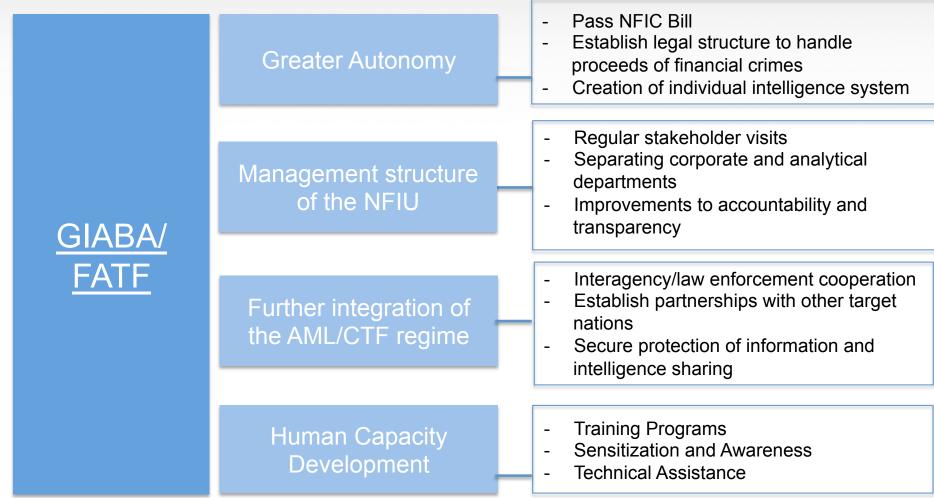
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Recommendations

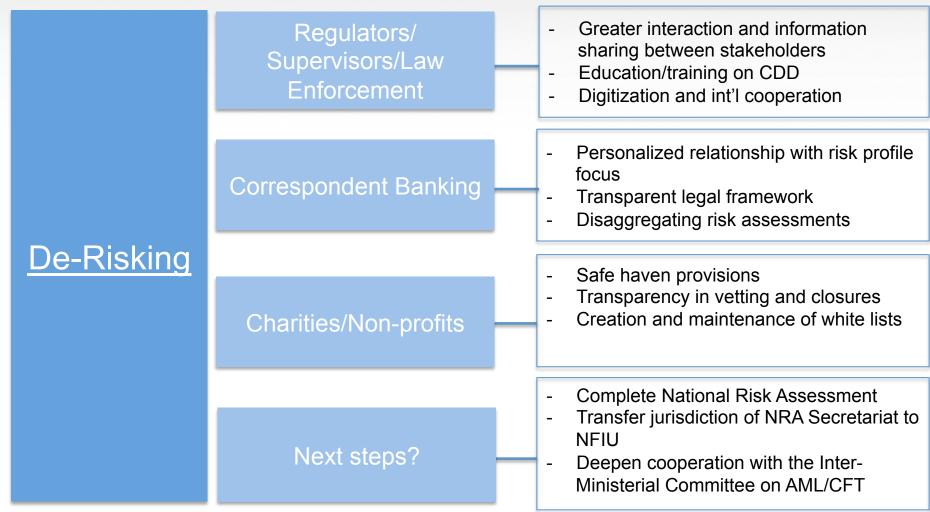






Recommendations







How effective are FIUs and anti-corruption efforts in increasing FDI inflows and promoting political stability?



1

2

3

Parties

USIP
Peace Tech Lab
Nigerian Governors

Goals

Increase FDI
Mitigate political instability

Methods

Regression
Sentiment analysis
NFIU Evaluations
Global best practices

Findings

Corruption & FDI
correlation
Public discourse on AML
Blame directed towards
governors

Recommendations

Governor lobbying for:

- Greater FIU autonomy
- Passing of NFIC bill
- •Improved management structure of FIU
 - Human capacity development
- Integration of AML/CTF regime

Presentation contents



- 1. Background
- 2. Public opinion on governance and conflict
- 3. Nigerian Financial Intelligence Unit reform
- 4. Final Takeaways



Final take aways: Our findings suggest that...



Social media can illuminate public opinion in ways that traditional surveys could not previously

Nigerians link violence to their opinions of state and federal government, although the specific impact depends on event type FIU is statistically linked to foreign direct investment, and Nigeria has concrete steps to increase transparency at the state and federal levels