Law & Social Inquiry (2025), **50**, 406–437
doi:10.1017/lsi.2025.1

Law& Social Inquiry

ARTICLE

A Translocal Compromise: Adoption of Anti-corruption Reforms in East Timor

Sapna Reheem Shaila

Lecturer, Kent Law School, University of Kent, UK
Email: sr918@kent.ac.uk

(Received 26 April 2023; revised 18 May 2024; accepted 04 October 2024; first published online 21 February 2025)

Abstract

This article examines what happens when plural normative ideas and arrangements to address an issue reach local settings through transnational networks. Using anti-corruption reforms in East Timor as the lens, I show the diverse normative aspirations of international and local actors involved in transferring and receiving new regulatory arrangements. By proposing compromise as another possible outcome of transnational legal transfers, the study examines how compromises shape the scope and limits of adopted regulations. The anti-corruption reforms case study from East Timor allows us to identify when and how translocal compromises occur, who is part of such compromises, and how they influence the legal transfer and adoption process. Drawing on insights from comparative law, law and society, and regulation studies scholarship, the article provides a bottom-up perspective of transnational legal reforms, illustrating the entanglements of these initiatives with the local politics, conflicts, and power struggles. The findings underscore the need for more qualitative studies on legal transfers where multiple international and local actors are involved, capturing how their power struggles shape the scope and limits of regulatory arrangements that are ultimately adopted. By illustrating the interactions between local, national, and international actors, the article contributes to understanding the complexities, possibilities, and limits of transnational legal reform initiatives in specific contexts.

Keywords: anti-corruption reforms; transnational legal pluralism; legal transfers; compromise; rule-of-law promotion; East Timor/Timor Leste

Introduction

Travelling through the main crossroads in East Timor's capital city, Dili, one could barely escape the many billboards, posters, and graffiti condemning corruption and highlighting its potential adverse effects on the young nation. At one major crossroad, a billboard sponsored by Misereor,[1] the Timorese Anti-Corruption Commission, and

[1] A German Catholic Bishops Organisation for Development Cooperation (see Interpeace 2013).

the United Nations Office on Drugs and Crime (UNODC) loomed over the busy traffic with an image of Timorese school children holding placards declaring "*Kastigu korruptor*"[2] and "*Labele estragon ami nia futura.*"[3] In schools, multiyear partnerships supported by Misereor, Interpeace, the Australian embassy, and the Centre for Peace and Development (a Timorese non-governmental organization [NGO]) aimed at developing civic awareness among young children have introduced illustrated storybooks (*Bano no Binoi*) and anti-corruption songs that explain the phenomenon of corruption, collusion, and nepotism. Beyond the billboards, training manuals, songs, and television series, local-international partnerships to address corruption have also extended to state institutions through legal and technical assistance arrangements at the National Parliament, Timorese Office of the Public Prosecutor, local courts, and the Anti-Corruption Commission. Inside the Office of the Public Prosecutor and the Anti-Corruption Commission, international actors were appointed as advisers, strategists, and mentors to assist Timorese officials to fight corruption. The Timorese anti-corruption agency was even staffed with a government official, who was exclusively assigned to develop partnerships with international partners.

I examine these international-local engagements that enabled the adoption of regulatory arrangements to address corruption in the newly independent state of East Timor. My argument is that, when actors with diverse normative and regulatory aspirations over addressing a globally identified problem encounter a local setting, they have the option of either walking away or entering into a compromise on what aspects of the identified problem will be addressed and how it will be tackled. While compromises allow for the introduction of new regulatory arrangements to address the identified problem, they also influence the limits and possibilities of the adopted regulatory arrangements. In the Timorese context, there were different groups of international and local stakeholders who were invested in shaping the anti-corruption initiatives in the country, and I argue that these diverse groups of international and local stakeholders who were at the forefront in the transfer, adoption, and implementation of the new legal and institutional arrangements to address corruption navigated their differences by entering into compromises and eventually shaped the adopted regulatory space to tackle the issue of corruption in the country.

The involvement of international actors in transferring legal solutions to address transnationally identified global problems in local contexts is well documented (Dezalay and Garth 2002; Goodale and Merry 2007; Merry 2009; Berger 2017). Within this theme, different scholars have examined the motivations of such initiatives (Mattei and Nader 2008; Pahuja 2011), the resulting power dynamics (Desai and Woolcock 2015; Kennedy 2018), and the implications that it has on the local social setting (Tamanaha 2011; Eslava 2015; Berger 2017). However, there have been limited attempts to disentangle the resulting regulatory frameworks that develop from such interactions. Comparative law scholars have engaged with this issue (to a certain extent) through the optics of legal transfers[4] (Watson 1993, 1995; Cairns 2012). Using

[2] "Let us fight the corrupt."

[3] "Let us build a strong future for us."

[4] I use "legal transfers" instead of "legal transplants." Although scholars rely on legal transplants to describe the movement of law from one society to the other, the metaphor suggests a planned and neat

legal transfers as their lens, they describe how new laws and institutional arrangements reach local contexts, what factors enable the movement of certain standards to reach a recipient society, and how the transferred laws are harmonized and adopted in that society. The main concern of comparative scholars has been the movement and adoption of law between a dominant transferor and a recipient society that is targeted for reforms or is seeking reforms (Nelken and Feest 2001; Gillespie and Nicholson 2012; Siems 2014) and their successes in transferring new regulatory forms to recipient societies (Snyder 1982; Nelken 2001; Peerenboom 2013). But contemporary legal transfer projects involve (often simultaneously) a range of international and local actors in the process of the transfer, adoption, and implementation of new regulatory arrangements in a local setting.

Transnational law scholars have documented the construction (Halliday and Shaffer 2015; Shaffer and Aaronson 2020) and movement (Dezalay and Garth 2002; Carruthers and Halliday 2009; Halliday and Shaffer 2015; Garcia 2016; Shaffer and Aaronson 2020) of regulatory models from core international sites of norm creation to the peripheral national and local sites where such arrangements are meant to be adopted and implemented to address globally identified social problems. Within this line of inquiry, scholars have mapped the role of elite expert groups in identifying global problems (Dezalay and Garth 2002; Halliday and Shaffer 2015; Shaffer and Aaronson 2020), designing legal and regulatory solutions to address them (Dezalay and Garth 2002; Lloyd and Simmons 2015), and transferring these solutions to local sites where they are adopted and implemented as part of the national laws and institutional arrangements (Hammerslev 2011; Vecchioli 2011; Berger 2017; Simion 2021). Since the line of preliminary inquiry in transnational law scholarship is concerned with the construction of global norms and how they have or have not established order and stability in the local setting, authors in this field have taken mostly a "top-down" approach. As a result, they examine the diffusion of global governance structures and how global institutions (and the actors within those institutions) transfer regulatory norms and arrangements to the local context. Consequently, this strand of scholarship also largely overlooks the process of adoption and implementation of new regulatory arrangements at the local level.

As Toby Goldbach (2019, 584) observes, examinations of the cross-border movement of law, legal institutions, or legal systems have been mostly anaemic (with a few exceptions) in investigating the politics of power implicit in law reform work or analyzing the social (individual and group) factors, forces, and processes involved in the movement of law.[5] To remedy the gap, Goldbach argues that we need to undertake a different approach in examining the movement of law and how it

movement of laws from one society to another, where the transferred laws and institutions are transplanted into the recipient society either successfully or unsuccessfully. Since this article aims to draw attention to the dynamic processes that underlie the movement, adoption, and implementation of law, and the unexpected ways in which regulatory arrangements reach societies and settle there, I use "legal transfers" to describe the phenomenon. As I will demonstrate, the process of legal transfers is messy and dynamic unlike what the "transplant" metaphor suggests. David Nelken (2001, 15–21) also calls for a more reflective use of metaphors while explaining and describing legal transfers.

[5] Some of the scholars who have examined the diffusion of law across nation-states beyond the conventional frames are John Gillespie and Penelope Nicholson (2012), who use interpretative analysis to map how local actors influence legal transplants and their adoption, and Bruce Carruthers and Terence

influences legal change in a setting by: (1) studying the people involved in the movement of law; (2) paying attention to the power and politics of people who are involved; and (3) building empirically grounded, detailed accounts of how legal change occurs (594). Goldbach's interventions highlight the importance of unpacking the process of legal transfers and the role of actors involved in the process. Thus, relying on Goldbach's (2019) approach, I examine actors who have been involved in the transfer, adoption, and implementation of anti-corruption reforms in East Timor and how their interests and politics have shaped the regulatory arrangements that were eventually adopted in the country.

By focusing on the agents of legal change, my approach differs from traditional analyses by comparative law scholars who examine the "differences" and "similarities" between the rules and institutional arrangements of different societies and how to carry out legal reforms successfully (Siems 2022). Instead, I emphasize the importance of studying what happens during the process of legal transfers across national borders by closely studying the experiences of the different actors who are involved, both internationally and locally, and who facilitate the adoption, implementation, and enforcement of new standards locally (for authors who take a similar approach, see also Dezalay and Garth 2002; Carruthers and Halliday 2009; Berger 2017; Simion 2021). I examine what interests these different actors bring to the table, how their interests are pursued through the project of legal reforms, and how they influence the eventual regulatory arrangements adopted to address a social problem locally. The approach allows for the capture of what happens at the local sites where multiple international and local actors are involved in the process of legal transfer and where there is no uniform understanding of the ideal regulatory arrangements to address a global problem. Rather, what exists is "open-ended, contingent and fragile legalities that enable new complex terrains of political struggle" (Canfield, Dehm, and Fassi 2021).

Transnational legal reform initiatives involve a wide range of international and local actors who are part of the transfer and implementation of new laws and institutional arrangements to address the issue in a local setting. For instance, the adoption of the UNODC's Convention against Corruption (UNCAC) has facilitated the involvement of multilateral and bilateral organizations and, through these organizations, the participation of development practitioners, lawyers, and judges as part of legal reform projects.[6] At the local sites, politicians, lawyers, judges, and civil society members play a significant role as "first-level" actors involved in adopting and implementing transferred regulatory arrangements. This first level of local actors includes those who have opportunities to negotiate and navigate the varied politics of transnational legal reforms and pave the way for the adoption of new laws and institutional arrangements. Depending on the sites where the transnational legal reform initiatives occur, the profiles and characteristics of these first-level local and international actors vary.

In East Timor, the involvement of the United Nations (UN) in the referendum processes in 1999 enabled different bilateral and multilateral partners to engage with

Halliday (2009), who also demonstrate the role of local intermediaries in shaping the outcomes of legal transfers.

[6] United Nations Convention against Corruption, 2003, 2349 UNTS 41.

the process of justice reforms locally. Timorese leaders, who led the resistance, also welcomed international partnerships and assistance as they strove for legitimacy for the young state and sought financial assistance to rebuild the nation. As for the international partners, multilateral organizations such as the European Union (EU), the UN, and the World Bank were involved; alongside them, bilateral partners from the United States, Australia, Norway, South Korea, Japan, Portugal, Brazil, and Cape Verde were also prominent in the justice sector. I examine the role of international development practitioners, international and Timorese legal professionals, Timorese political figures, and civil society members who were at the forefront in shaping what laws and institutional arrangements were adopted as part of anti-corruption reforms, and I focus on the outcomes that emerged from the involvement of multiple parties with differing viewpoints. Even though the methodological intervention proposed here may not be original, by using qualitative data, I demonstrate the plural approaches among the different actors who were involved in anti-corruption reforms in East Timor and how they entered a compromise to address the issue locally. Thus, using qualitative data, I show another possibility of the reception of transnationally led legal reform initiatives where multiple parties are involved.

To describe the encounter between different sets of international and local actors, I have relied on the term "translocal."[7] My use of the term "translocal" builds on the conceptualization by Matthew Canfield, Julia Dehm, and Marisa Fassi (2021), where translocality is a frame to understand "the mobility, peoples' embeddedness while being mobile, and how mobile and immobile actors (re-)produce connectedness and thereby reshape places" (340, quoting Porst and Sakdapolrak 2017, 112). I use "translocal" to describe the international-local encounters for a variety of reasons. First, "translocal" captures the diversity of actors—local and international—and their expertise, resources, and aspirations that are funnelled to a local site as part of the broad transnational initiatives. Second, it captures the plurality of the normative attitudes and regulatory approaches in transnational engagements. Third, "translocal" reveals, as Canfield, Dehm, and Fassi (2021) argue, how encounters between different legal actors, discourses, and practices produce not a uniform field of law but, rather, multiple normative orders and rival authorities across multiple scales. Thus, by focusing on the grounded locations that the mediating international and local actors encounter, I study how their everyday practices, discourses, subjectivities, and politics shape the transfer and adoption of new regulatory arrangements to address a social problem that has been identified at the global level.

Advancing these arguments, I aim to show first that, contrary to the findings that highlight the homogenization of regulatory arrangements due to transnational networks (Slaughter 1999; Boyle and Meyer 2002; Kingsbury, Krisch and Stewart 2005; Roht-Arriaza 2005), East Timor's experience of adopting anti-corruption reforms demonstrates the existence of plural legalities that are reflected in the adopted

[7] The use of "translocal" in this article is different from how Subhabrata Banerjee (2011) uses the concept to demonstrate the creation of a new political space that consists of plural local voices that resist, or how Boaventura de Sousa Santos (2006, 398) refers to translocalism to signify counter-hegemonic struggles, where the oppressed group aspires to organize their resistance at the same scale and through same type of coalitions used by the oppressors who victimized them. Instead, the use of translocal in this article is closer to how Matthew Canfield, Julia Dehm, and Marisa Fassi (2021) use the term to illuminate plural legalities, shifting forms of operation and exercises of power.

compromised regulatory arrangements to address the issue. Second, transnational reform processes are often described as "imposing" initiatives where international actors transfer laws and institutional arrangements without accommodating local interests (Tamanaha 1995, 2011). I argue that, in certain contexts, local actors can also be very much involved in the adoption of new regulatory arrangements in the country (see also Carruthers and Halliday 2009; Dezalay and Garth 2019). In East Timor, different groups of international actors worked closely with powerful local elites, who were crucial to enabling legal reforms locally. Furthermore, the findings on transnational legal reform initiatives in East Timor can illuminate what happens when multiple international partners are involved in a legal reform project and where there are powerful local actors. The case study allows us to capture when translocal compromises occur, who is part of such compromises, and how such concessions and settlements among different parties influence the limits of the regulatory arrangements that are eventually adopted.

To further my arguments, I rely on insights from regulation scholars who have mapped the dynamics among the people involved in the process of legal change and its adoption to understand the possibilities and limits of transnational engagements (Braithwaite and Drahos 2000; Alter and Meunier 2006; Carruthers and Halliday 2009; Block-Lieb and Halliday 2017). Unpacking the dynamics between different actors shows how all transferred regulatory arrangements or aspirations may not be adopted outright or are rejected because they are foreign and new. Rather, another possibility can emerge when international-local actors with differing approaches to addressing a social problem meet at the local level. By pursuing this line of inquiry and situating my focus on the local sites where transnational legal reform initiatives are taken, this article advances calls by Mark Goodale and Sally Engle Merry (2007), Bruce Carruthers and Terence Halliday (2009), and Gregory Shaffer and Ely Aaronson (2020) for more locally situated accounts of transnational legal transfers.

The arguments pursued also add to the scholarship on justice sector reforms in East (Strohmeyer 2001; Grenfell 2013; Nixon 2013; Kent 2018). I demonstrate the compromises between the international and local partners in the legal reform process. By doing so, my findings depart from those of scholars who have examined international engagements in East Timor during the initial phase of state building (Grenfell 2013; Nixon 2013; Nicholson and Hinderling 2018). For instance, Pip Nicholson and Samantha Hinderling (2018) and Laura Grenfell (2013) argue that international partners who were involved in justice sector reform initiatives took a "top-down" approach to appointing international judges to hear domestic cases; they overlooked traditional norms and regulatory practices by imposing rational bureaucratic notions of law and processes in the country. These authors focus on legal reforms that were taken immediately after the re-declaration of independence in the country when the UN transitional administration was in charge. However, once the Timorese leaders undertook their political positions, they were able to influence the reforms introduced in the country.

Subsequent qualitative research on the involvement of international donor engagements in the country throws light on the collaborative engagements between international and local partners (Reheem Shaila 2019, 2023; Swenson 2022) and shows how cross negotiations and settlements were part of the process of transnational legal

reforms in the country.[8] Such a shift in the local-international interactions seems to have been the result of two political events: civil unrest in 2006, for which international partners' policies were blamed (Engel 2020), and the 2014 impasse between the Portuguese judges and the elite resistance leaders, which led to the National Parliament terminating the work visas of the international advisers in the judiciary (JSMP 2014; Reheem Shaila 2023). The arguments pursued in this article further the findings of such collaborative engagements between international and local actors in pursuing legal change in the country.

The article develops in the following way: the second section describes compromise as another possible outcome of legal transfers and adds to the existing typologies on the adoption of legal transfers. This section distinguishes compromised adoption from other possibilities, such as full adoption, selective/partial adoption, and rejection of the legal transfers. The third section describes the methods used for data collection, and the fourth section delves into the plural approaches to tackling corruption supported by different groups of international and local stakeholders in East Timor. The fifth section describes the anti-corruption reforms adopted in the country and explains the limits and possibilities of the newly adopted anti-corruption framework. The sixth section concludes.

Compromises and legal transfers

The scholarship on legal transfers provides us with abundant typologies to understand what happens when internationals take new regulatory arrangements to the local level. Scholars have theorized why societies adopt new laws and institutions (Merryman 1981; Zimmermann 1994; Ajani 1995, 2007), the different ways in which transferred laws are adopted (Potter 1994, 2004; Antons 2003, 2007; Harding, Antons, and Gessner 2007; Carruthers and Halliday 2009; Glenn 2014), and how external factors influence the trajectory of adoption and adaptation (Merryman 1981; Nelken and Feest 2001). Focusing on the "reception" of transferred laws and institutional arrangements, comparative law scholars identify three main outcomes resulting from transnational legal transfer initiatives: full adoption (Watson 1974, 1993; Ajani 1995; Berkowitz, Pistor, and Richard 2003), selective adoption (Potter 2004, 2009; Wang 2013; Kien, Ho Pham and Lu Nguyen 2019), and rejection (Glenn 2014). These typologies emerge from observing the "similarities" and "differences" between legal and institutional arrangements that are transferred and adopted locally. Consequently, they do not assist in understanding how people at the "first level" influence the outcomes of legal transfers.

Carruthers and Halliday (2009) remedy this gap by focusing on the interactions between the actors who are part of transnational legal transfers and adoption, and,

[8] An example of this is the Justice Sector Strategic Plan that maps the roles and responsibilities of both international and local actors. The document emphasizes collaboration and cooperation as fundamental to the legal reform process in the country. In 2010, the Ministry of Justice, along with the Council of Coordination for Justice—an advisory body, comprising the minister of justice, the president of the Court of Appeal, and the prosecutor general—developed the Justice Sector Strategic Plan for the short-, medium- and long-term development of the Timorese justice sector (Ministry of Justice Timor Leste 2010). The initiative was the first Timorese-led activity set up to address the weaknesses of the justice system.

since their approach is closer to what I propose here, their typology is also the most valuable for my argument. Carruthers and Halliday observe that the diffusion of specific regulatory arrangements from global to local contexts is a negotiated process. At the adoption stage, the authors identify four possible outcomes that can emerge depending on the interactions between the international transferors and the local recipient intermediaries: (1) acceptance, where a transferred script is adopted fully without reservations; (2) adaptation as replication, when a global script is translated into a local form without a fundamental change in the primary goals or mission; (3) adaptation as hybridization where there is a merger of global frames, goals, and mission, with local forms but in ways that cannot be reduced either to the global or the local; and (4) rejection where the intermediaries fail to convince either of the parties in the global/local encounter to pursue or not pursue a reform (302).

In Halliday and Carruthers's study, the International Monetary Fund and the World Bank emerge as the dominant partners with their technical and economic capital. They also had the upper hand in deciding the outcomes of legal transfers in the domestic context. However, the landscape of contemporary transnational legal transfers is much more diverse. Various bilateral and multilateral organizations, international NGOs, and even faith organizations are involved in legal transfer initiatives. Depending on the issue area, they can bring varying regulatory approaches to address a transnational issue at the local level (Zumbansen 2010; Heupel 2012; Schimmelfennig 2012; Darian-Smith 2013; Ivory 2020). For example, while multilateral institutions such as the UN and the EU approach corruption as mostly a public governance issue, Transparency International, which is one of the core international NGOs working on anti-corruption, takes a broader normative approach by identifying the mismanagement of money both in the private and public sphere as corruption. In areas where transnational regulatory approaches remain flexible or unsettled, the chances of plural regulatory strategies to address the issue are higher (Merry 2009; Halliday and Shaffer 2015).[9] Thus, as part of transnational legal transfers, different normative perspectives on how an issue is understood and addressed can reach local settings.

All of this means that gaining consensus at the local level over plural normative approaches and how to address an issue remains challenging. As more international actors are involved in legal reform initiatives, local stakeholders have much more scope for bargaining, negotiating with different groups, and choosing from a range of regulatory arrangements (Short 2016). Unlike settings where international partners can dictate reforms externally (Miller 2003) and have more authority (Boyle, Songora, and Foss 2001), translocal compromises occur in places where the power and authority of the international partners are weak. They also occur in settings where the first level of local stakeholders holds considerable authority locally and can influence the legal field. As for local stakeholders, despite their reservations over the proposed reforms and their content, they may enter into compromises with international partners to gain broader international legitimacy or financial support

[9] Kathryn Sikkink (2002) and Sophia O'Brien (2019) provide examples of the diverse approaches to anti-impunity laws and transitional justice measures; Sally Engle Merry (2009) gives examples of women's rights; and, more recently, Frank Schimmelfennig (2012) and Sapna Reheem Shaila (2019) write about the rule of law reforms.

or signal to the international community their alignment with certain international aspirations.

Where translocal compromises occur, the adopted regulatory measures are more likely to reflect the elements of plural approaches supported by the different parties. By choosing to compromise, the parties involved largely agree to find a middle ground in order to bring any form of regulatory change to address a transnational problem locally. Consequently, the resulting regulatory framework will not fully reflect the regulatory arrangements as they were initially envisioned by the international or local partners. Instead, it will be a combination of different legal and institutional arrangements that emerges from the negotiations among the first-level actors. Such compromises between the parties could potentially also restrict institutional mandates and the reach of law, and all these aspects will have to be evaluated empirically.

Research design and methods used for data collection

To understand the role of first-level actors and their involvement in shaping anti-corruption initiatives, I spent five months in East Timor in 2018. I collected data through field observations, semi-structured interviews with Timorese anti-corruption commissioners (four interviews), officials at the Ombudsman office (three individuals), civil society members working on anti-corruption (nine individuals), and lawyers (five individuals). International advisers who were involved in the justice sector reforms (six individuals) or used to be part of such initiatives (four individuals) also provided data for the research. Informal conversations with staff of the US Agency for International Development (USAID) (two individuals), who were the primary financial supporters of the Anti-Corruption Commission, also gave background information to situate the reforms. The data was collected as part of a broader project examining international-local efforts in rebuilding and strengthening the justice sector in the country.

Regarding the local actors, those who were prominent in shaping the legal field were the resistance leaders who had become political leaders in the new state (the "old generation") and the Timorese graduates who grew up under the Indonesian regime in the country (the "in-between generation") who had taken up senior roles within the government, judiciary, and the bureaucracy.[10] It was explained to me that the "old generation" included those people who were young when East Timor gained independence from Portugal. They grew up resisting the Indonesian military. Some left for Portugal and other Portuguese colonies (Mozambique and Angola) to support the resistance movement from abroad. Some stayed behind and joined forces with Xanana as guerrilla fighters (see Nygaard-Christensen 2012; Bexley 2017). Thus, the "old generation" comprised resistance fighters from the guerrilla front known as the

[10] In 2018, when the data was collected, there was another group of stakeholders who felt that they had only limited opportunities to influence policies in the country. This group was aged eighteen to thirty-two and referred to themselves as the "new generation," who were completing their university degrees and hoping to join the state administration. Therefore, in contrast to Anghie Bexley (2017), I use "in-between" to represent the generation who took official roles in the state institutions immediately after the redeclaration of independence in 2002.

"resistance front" and the "diplomatic front" (Nygaard-Christensen 2012).[11] They spoke Portuguese fluently, which was also used as the language of resistance, and had close ties with Portugal. They also insisted that Portuguese should be recognized alongside Tetum as a national language. The adoption of Portuguese as a national language allowed foreign lawyers, judges, and prosecutors who were proficient in the language to take up senior mentor and advisory roles in the National Parliament, courts, Office of the Public Prosecutor, and the Anti-Corruption Commission. As for the "in-between generation," the group constituted of individuals who grew up under the Indonesian occupation and who went to universities in Jakarta. As students in Indonesian universities at the time, they supported the independence movement clandestinely (Bexley 2017). After the referendum, many who were associated with NGOs in Indonesia were recruited into the state institutions. They were given their roles as advisors, mentors, and senior officials to assist the "in-between generation" of Timorese counterparts who had a minimal grasp of the language and little work experience (Strohmeyer 2001).

Many international partners were involved in legal reform initiatives in East Timor. The main groups involved in justice sector reforms were the Portuguese legal advisers through their bilateral assistance, the United Nations Development Program (UNDP), USAID, and the European Commission. Other donors, such as the Japan International Cooperation Agency and the Korea International Cooperation Agency (KOICA),[12] also funded and supported different aspects of corruption reforms. Among the different international partners, Portugal had the most substantial influence on the reforms in the core justice institutions. This was because, with the adoption of Portuguese as one of the national languages, all technical and formal correspondences were drafted in Portuguese since Tetum, the other official language, was not considered to be advanced enough (Taylor-Leech 2008, 2013; Reheem Shaila 2023). Since most of the "in-between generation" were not proficient in the Tetum language, they relied on Portuguese advisers and mentors at the law department of the National University and the Legal Training Centre for training as well as on senior technical advisers and mentors at the courts, in the National Parliament, and at the Office of the Public Prosecutor for assisting with the everyday operation and application of law. Consequently, as a result, Portuguese legal trainers, judges, prosecutors, and lawyers

[11] Two groups emerged from the Revolutionary Front for an Independent East Timor (FRETILIN) following occupation. The FRETILIN members who fled the country during the civil war formed a "diplomatic front" under the leadership of Jose Ramos Horta, who later went on to win the Nobel Peace Prize for his efforts to reinstate East Timor's independence. Ramos Horta was the foreign affairs minister under the FRETILIN party and living in exile in Mozambique when Indonesian troops occupied the nation in 1975. In the international sphere, Ramos Horta soon became the voice for the Timorese independence movement. Other prominent diplomatic front leaders included Mari Alkatiri and Ana Pessoa, who mobilized support in Mozambique, Angola, and Portugal. Inside the country, a guerrilla front, widely known as the "resistance front," emerged under the leadership of Xanana Gusmao. Gusmao named the resistance front the National Council of Maubere Resistance (CNRM) in 1988 and set out a distinctive path from the old FRETILIN to create a legitimate armed force of national resistance for Timorese independence. These efforts of the resistance and the diplomatic front led the international community to back the United Nations (UN) supported referendum on self-determination in the country in 1999.

[12] The Korea International Cooperation Agency's support is more recent in this area, and the agency funded and supported the UN Development Programme's (UNDP) initiatives in drafting a separate legislation on corruption (UNDP 2018, 2019).

played a significant role as transnational legal transferors in East Timor.[13] But, for the purposes of this article, I focus on the two main donors in the area: USAID and Portugal.

During the interviews, participants were asked about their role in the adoption of anti-corruption reforms, the challenges they faced while introducing new laws and institutional arrangements, and the operational and institutional difficulties they faced while applying the newly adopted regulatory framework. To examine the limits of the adopted anti-corruption institutions and laws in the country, I studied a controversial corruption case that involved a senior minister who was described as having close alliances with the "old generation" to contextualize the continuing influence of resistance leaders on corruption cases and anti-corruption institutions. I also analyzed secondary research from the Judicial System Monitoring Programme (JSMP), a Timorese NGO focusing on judicial developments in the country, to understand the politics of using parliamentary immunity laws by the leaders to shield individuals from prosecution on corruption charges.

Plural approaches to tackling corruption in East Timor

At the international level, the UNCAC is the core international document that recognizes corruption as a global problem demanding a global response. As of 18 November 2021, 189 countries had ratified the UNCAC, and the signatories had pledged to address corruption within and beyond their national borders. Even though there has been a global consensus in recognizing corruption as a social problem that affects societies globally, there is little agreement on defining what acts are considered corrupt and the best ways to regulate the issue locally. The UNCAC urges member states to adopt measures to prevent corruption (Chapter II), criminalize corruption (Chapter III), and support other member states in their fight against corruption (Chapter IV).

The UNCAC does not provide precise definitions of what constitutes corruption or how the problem can be regulated. Instead, the drafters recognize that corruption plays out in unique and distinct ways and that its elements, consequences, and contributing factors must be unpacked empirically (UNODC 2003, 23). Accordingly, the UNCAC states that "[t]he purpose is not necessarily to propose that specific elements be criminalised, although this may often be the conclusion of governments, but to identify acts which fall within the range of conduct described as 'corrupt,' and which are intrinsically harmful to individuals or societies to the extent that efforts to prevent, combat or control them using criminal justice policies or other measures may be called for" (23). Thus, instead of defining corruption, the UNCAC identifies some of the ways in which the phenomenon manifests in a society: grand and petty corruption; active and passive corruption; bribery, embezzlement, theft, and fraud;

[13] The involvement and practice of non-dominant international partners such as Portugal in legal transfers is minimally documented within law and development, comparative law, and transnational law scholarship. In recent years, a few authors have attempted to bridge the gap by describing the initiatives and activities of non-dominant actors other than the US Agency for International Development (USAID), the World Bank, and International Monetary Fund in transnational legal transfers (Chin and Qadir 2012; Zumbrägel 2020; Erie 2021), and in particular within East Timor's context (see Almeida 2017; Jerónimo 2017; Reheem Shaila 2019, 2023).

extortion, abuse of discretion, favoritism, nepotism, and clientelism; conduct creating or exploiting conflicting interests; and improper political contributions (to list a few examples). As for transnational efforts to address corruption, the UNCAC defers to national governments to determine what works within their context, and it encourages international actors to work alongside local governments in assisting other countries to address the problem. It is also this ambiguity that has enabled the adoption of the UNCAC at the international level and has allowed for a wide scope of engagement by international actors on anti-corruption reforms locally (Johnston 2012).

While no coherent approach exists among the different international actors involved in anti-corruption reforms, we can observe some broad patterns of the regulatory frameworks they have supported as part of anti-corruption missions (Delaney 2006; Chêne 2008; Zaum Taxell, and Johnsøn 2012; Johnsøn 2016a, 2016c). As Jakob Svensson (2005) notes, internationally led anti-corruption reforms have mainly focused on government corruption in the public sphere. The emphasis has been on public officials and how they carry out their official roles.[14] Regarding regulatory models to address corruption, there is far less coherence in the projects supported by international donors (Chêne 2008). Their approaches to regulating corruption can be broadly categorized as interventions with a focus on punishment, prevention, and inculcating values (Chêne 2008). Depending on the extent of donor commitment, some donors contribute support across the different areas listed. Bilateral donors may also draw on the expertise of their staff and promote laws and institutional arrangements that mirror regulatory arrangements in the donor nation. As a result, anti-corruption reforms by international actors take different forms and focuses. For instance, the EU and the European Commission have a long legacy of supporting the Office of Ombudsman in post-Soviet states (Carl 2018), whereas USAID, a bilateral donor, follows a different format to address corruption. USAID initiatives have focused on engineering institutional arrangements that allow for independent investigation and enforcement of corruption issues (USAID 2022, 2024). USAID also emphasizes societal reform to change societal and political attitudes toward corruption (Hutchinson 2005, 8; USAID 2024).

At the local sites where anti-corruption reforms are taken, the challenges are different. Normative positions on what constitutes corruption and tolerance to the issue vary from one society to another (for Senegal, see Blundo 2006; for Bolivia, see Goldstein 2003; for Albania, see Dalakoglou 2010; for South Africa, see Hoag 2010; for China, see Hsu 2001; for Taiwan, see Simon 2010; see Pardo 2004; Torsello 2016). For example, corruption by public officials may not even be labelled an illegal act in some societies as such transgressions may be seen as a necessary transaction for getting things done (De Sardan 1999; Torsello 2016). Corruption may also serve different purposes based on the type of society (Flanary, Moran, and Williams 2000; Theobald

[14] For instance, the World Bank and the Organisation for Economic Co-operation and Development (OECD) continue to focus on corrupt practices in the public sphere where an official misuses their government role for public gain. Other broader approaches to corruption also exist. See Anand, Ashforth and Joshi (2004, 40) who identify corruption as "misuse of organisational position or authority for personal gain or organisational (or sub-unit) gain, where misuse in turn refers to departure from accepted societal norms." Transparency International uses this same broad definition. See "What Is Corruption," *Transparency International*, https://www.transparency.org/en/what-is-corruption.

and Williams 2000). In countries emerging from conflict, corruption may be instrumental in buying peace with potential spoilers and maintaining stability (Cheng and Zaum 2012). This could involve giving senior positions of power to old combatants, favoring them over other eligible competitors during public procurement tender processes or diverting public money in the form of government schemes, or giving away senior political positions so they too can benefit from the spoils of the war (Zaum and Cheng 2011; Hersant 2017).

In East Timor, the divergences in approaches between first-level international and "local"[15] actors can be mapped in relation to normative understandings of what constitutes corruption and how it must be regulated. The issue of what constitutes a corrupt act can be understood through examples identified by the interviewees, surveys conducted by NGOs such as the Asia Foundation and USAID, and reports from Transparency International. In the USAID initial assessment document on corruption, the authors highlight the issue as "poor grasp of anticorruption concepts" by key actors (USAID 2009, vii). While petty corruption was not a systemic issue in the country, there were unsubstantiated grand acts of abuse of power by those in political roles in the government that were of critical concern. Common examples that were highlighted to describe the issue included the misallocation of budgets (Transparency International 2015),[16] followed by issuing procurement contracts and tenders to close family members (Transparency International 2015, 5), and the excessive purchase of vehicles by senior members of the National Parliament.[17]

Transparency International (2015, 4) also includes in this list the issue of government increases to budget limits without giving substantiated or transparent explanations. For instance, in 2012, the state budget was increased by 245 percent compared to 2006. The increased budget is often marked as "special funds" in which the executive has the discretion to move money for infrastructure projects and other projects not identified in the official budget documents (Global Integrity 2013; Transparency International 2015, 5). Transparency International adds that, even though the period coincided with a general decrease in global prices for oil (East Timor's main source of income is oil reserves), the government in power at the time failed to provide information on its expenditures for individual programs, actual spending and revenues for the year prior to the budget year, extra budgetary funds, transfers to public corporations, quasi-fiscal activities, earmarked revenues, financial and non-financial assets, and the percentage of the budget devoted to secret items (Transparency International 2015, 4). All such instances where a public official exercises their discretionary power to benefit themselves or those close to them fall within the ambit of the corruption problem, as identified by the UNCAC.

[15] When I refer to "local" stakeholders, I mean the individuals and groups who were collaborating with bilateral and multilateral organizations to bring anti-corruption reforms in the country. These local actors do not constitute a homogenous group. Instead, the group includes local officials, politicians, and civil society members who have been involved in anti-corruption reforms.

[16] An issue that was also highlighted by the judges in their 2014 decision on the national budget that led to the revocation of visas of Portuguese senior judges in the judiciary (see Reheem Shaila 2023).

[17] Fieldnotes by the author, 9 November 2018 (on Movimentu Universitario Timor-Leste (MUTL) demonstration in front of Dili's Parliamentary Palace over Parliament's decision to buy new cars for the forty-eight newly elected members of Parliament (MPs), while selling off old Toyota Prados to departing MPs at low prices). More details on the protests can be found at *Fundasaun Mahein* (2018).

During interviews with Timorese lawyers, anti-corruption officials, and judicial trainees, they pointed out that budget misallocation happens for two reasons. First, a senior public official spends the allocated money for public purposes but may allocate the funds in ways that are not approved.[18] The second instance, which is much more broadly reported,[19] involves senior officials offering public tenders to resistance fighters and their families. With regard to tenders provided to those who were part of the resistance movement and their families, one lawyer contextualized the issue in the following way:

> I have an example of this—the electrification project. If you look at who has gotten the contracts, it is mainly veterans owning different streets as part of the electrification project. This way, everyone got a piece of the pie, and they shared the benefits. Those benefitting from such opportunities think it is their right to benefit from their position as veterans for their efforts during the resistance struggle.[20]

The preference given to resistance fighters, in particular, can be understood as a "selling peace" policy to maintain peace and stability (Cheng and Zaum 2012). This is because, once the country regained its independence and began internationally led state-building initiatives, those who fought during the conflict were given no opportunities to be part of the new state machinery. The resistance fighters were excluded because of their lack of professional degrees and experience to take positions within the state institutions. Compared to the resistance fighters, those who had been in exile and were from the "in-between generation" who grew up under Indonesian rule benefited greatly from the new opportunities. Timorese citizens who were living in exile during the Indonesian occupation had continued their professional careers in Portugal, Angola, and Mozambique. Once the country regained independence, they returned to take key positions in the new state.[21] Those from the "in-between generation" had opportunities to pursue higher education in Indonesian colleges as part of the Indonesian government's scholarship programs, and when the UN transitional administration undertook its mass recruitment drive immediately following independence, they were appointed as government officials,

[18] Also identified by Transparency International in their summary report (Transparency International 2015, 4–5).

[19] See reports from *Tempo Semanal* 2012; Global Integrity 2013; La'o Hamutuk 2013b, 2014. In their report, La'o Hamutuk, a Timorese non-governmental organization (NGO), observes that, in 2013, out of the 3,019 of the 4,117 tenders posted on the eProcurement portal, the details of the contract award were not available to the public (La'o Hamutuk 2013b; see also Transparency International 2015, 5).

[20] Interview with local lawyer, Dili, 12 April 2018. A local newspaper also reported instances of a former member of the Armed Forces for the National Liberation of East Timor (FALINTIL) who was convicted for his involvement in the February 2008 attacks on the president and recommended by the Commission of Inquiry for investigation into his role in the 2006 crisis to have won several contracts in Manufahi. Another instance reported involved an individual who was convicted for his involvement in the 2006 crisis and was given a contract to manage electricity in Liquiçá (Crisis Group Asia Briefing 2011; *Suara Timor Lorosae* 2011).

[21] An example was the appointment of Judge Claudio Ximenes, a Timorese expat and junior judge in Portugal, to the most senior judicial position in East Timor. Ximenes was recruited by the UNDP to mentor the newly recruited local judges from 2002.

prosecutors, public defenders, and judges. Thus, this latter set of actors was better positioned to reap the peacetime dividends.

To maintain peace and recognize the efforts of individuals who had contributed significantly to the independence struggle, the old generation of resistance leaders allowed (informally mostly) preferential treatment for those who had fought during the resistance struggle. Such digressions manifested in the form of preferential treatment for resistance fighters and their families over other candidates during tendering processes (*Tempo Semanal* 2012; Benner 2013; La'o Hamutuk 2013b, 2014) and special benefit programs targeting former combatants (Crisis Group Asia Briefing 2011; Roll 2018a, 2018b). Under the UNCAC, such instances fall within the deviated use of public office. However, they were not perceived as illegal by the key resistance leaders but, rather, as a necessity "for creating unity and cohesion, and promoting reconciliation in the country" (Gusmao 2009, 4).[22] Instead, they defended their positions, pointing out the distinct contributions and sacrifices that the resistance fighters had made to win Timorese independence. As a result, if the resistance fighters gained from being favorably treated during a public tender process or targeted for specific government benefit programs, it was argued to be inevitable and an obligation of the Timorese people to the fighters who had fought for their independence.[23]

In terms of regulating corruption in the country, international partners were involved in introducing three institutional avenues: the Office of the Public Prosecutor, the Ombudsman for Human Rights and Justice (Ombudsman Office), and the Anti-Corruption Commission. Each of these avenues had the support of different international partners. Following the survey carried out by the Asia Foundation, USAID proposed separate pieces of anti-corruption legislation and a commission to investigate and prosecute corruption allegations. The proposal was to develop the capacity of the government officials to "deter, detect and sanction corruption" (USAID, n.d.b).[24] However, the proposal was initially met with resistance from the Timorese leaders and the Portuguese technical advisers as they had influenced the Timorese parliamentarians into adopting similar laws,[25] and institutional arrangements between the executive, legislature, and judiciary, as in Portugal. While the Timorese leaders were skeptical about a separate institution focused solely on

[22] See generally Xanana Gusmao's approach in circumventing the law for the pursuit of maintaining peace internally and externally for national interests (Gusmao 2009, 10–11). See Gusmao's speech to the National Parliament in response to a no confidence motion tabled by the opposition FRETILIN party for releasing Maternus Bere, a commander of the pro-Indonesian Lakasaur miltia group. In this particular instance, Gusmao highlights the significance of maintaining friendly relations with the neighboring state of Indonesia and why compromising on the law is necessary for East Timor's political ambitions and geopolitical stability. For more details on the Bere case, see *East Timor Law and Justice Bulletin* 2009. See also writings on a leaked document from the UN in early 2011 (Nygaard-Christensen 2017).

[23] For an explanation on such narrativized ordeals in East Timor evoking cultural codes of reciprocity in which whoever suffers must be repaid, see Traube 2007. See also Gusmao's letter supporting Emilia Pires, a senior minister, when she was convicted for corruption (*Observador* 2017).

[24] The collaborative initiative was called the Threshold Program for Anti-Corruption and was a thirty-six-month long support program rolled out by the US government (USAID n.d.b).

[25] Examples are the Penal Code, Law no. 19/2009, 7 June 2009; the Citizenship Law, Law no. 9/2002, 5 November 2002; the Statute of Judicial Magistrates, Law no. 8/2002, 20 September 2002, which have the same or similar provisions to the corresponding legislation in Portugal.

corruption and specialized legislation targeting the same, the Portuguese partners resisted the proposal because it misaligned with the broader institutional structure and division of powers among the justice institutions initially designed following 2002.[26]

For example, the division of power between different judicial authorities followed a similar structure to that of the Portuguese judiciary. Following the Portuguese institutional model,[27] the Office of the Public Prosecutor had the central role in initiating investigations and filing cases on crime to the relevant court. The newly adopted Penal Code also copied the Portuguese Penal Code and included provisions that addressed corruption.[28] The code identified crimes committed during the performance of public functions (Articles 292–302), passive corruption (Articles 292 and 293), active corruption (Article 294), embezzlement and the misuse of public material resources and facilities (Article 295), and the abuse of power and financial participation in public affairs (Article 299). In addition to the above, the Penal Code also identifies the mismanagement of public funds (Article 319). Thus, for the Portuguese technical advisers in Parliament, having an independent anti-corruption commission that was separate from the Office of the Public Prosecutor threatened the latter office as it was designed to have the primary role in initiating, investigating, and prosecuting criminal charges such as corruption cases.[29] The technical advisors were also against separate legislation on anti-corruption as they saw it as overlapping with the provisions of the newly adopted Penal Code.

The proposal for an independent anti-corruption commission also overlapped with the Office of the Provedor for Human Rights and Justice, which was instituted according to Article 27 of the Constitution. The Office of the Provedor was established with the support of multiple international partners in 2005 (Nicolau 2007).[30] Some interviewees reported that experts from the European Commission supporting the initiative had a significant role in promoting the work of the Ombudsman Office, although no official records exist of this activity.[31] Initially, the Ombudsman Office

[26] Interview with ex-international adviser to the National Parliament, Dili, 13 May 2018.

[27] In 2022, Portugal adopted amendments to its local laws to institute a specialized agency for addressing corruption in the country. Portugal has adopted several reforms in response to recommendations from the European Union (EU) and OECD. One example is Aprova medidas previstas na Estratégia Nacional Anticorrupção, alterando o Código Penal, o Código de Processo Penal e leis conexas, Law no. 94/2021, 21 December 2021. Under the Portuguese legal system, the Polícia Judiciária has a unit that works toward detection and prevention of corruption. If there are any suspicions, the case is then referred to the Office of the Public Prosecutor's Department of Investigation and Prosecution and the Central Department for Criminal Investigation and Action.

[28] Penal Code.

[29] Interview with ex-Portuguese adviser to National Parliament, Dili, 13 May 2018.

[30] An example is the EU Aid database, which provides a summary of the different bilateral donors supporting the EU to assist the European Commission in their activities in East Timor, but, in terms of area/sector, no data is available. USAID supported the Ombudsman Office in 2013, but the support was mainly for awareness programs.

[31] Scoping interview with ex-European External Action Service program manager, London, 6 December 2017; interview with an Ombudsman Office official, Dili, 17 April 2018. The EU and East Timor signed the Cotonou Agreement in 2005, which is a partnership agreement that includes members of the African, Caribbean, and Pacific Group of states, including Timor Leste and the EU member states. Partnership Agreement between the Members of the African, Caribbean and Pacific Group of States of the One Part, and the European Community and Its Member States, of the Other Part, Doc. ACP/CE/en123, 23 June 2000.

was established to promote and protect human rights in the country, with a mandate to generate awareness among the citizens and improve public authorities' compliance with human rights obligations. Soon, monitoring and regulating maladministration in public offices was also included within the office's mandate, based on the advice of a working group including experts, jurists, UN personnel, donor officials, and local and international NGOs. Accordingly, the Ombudsman Office was given the powers to deal with complaints of corrupt activities by investigating and providing necessary guidance to government departments. Thus, the Ombudsman Office was conceptualized as an oversight institution that would monitor and bring government officials to account when there was a violation of human rights or a breach of good governance practices (Nicolau 2007).

These institutional arrangements, which were promoted and supported by various international partners, were distinct and overlapped in how they aimed to regulate corruption. The structure and mandate of the Office of the Provedor and the proposed Anti-Corruption Commission were similar. They were expected to work independently and separately from other core justice institutions. They also had a mandate to generate public awareness about corruption and provide opportunities for citizens to initiate complaints of their own accord. But the initial USAID proposal for the Anti-Corruption Commission was that it would also function as an independent body with investigatory and prosecutorial powers. The Office of the Public Prosecutor was also envisaged as an independent body from the judiciary and executive but with the highest power in pursuing criminal justice. Thus, all three institutional arrangements for regulating corruption were conceptualized to be independent of executive and judicial influence. However, the scope of their mandates varied. Perhaps, the Office of the Public Prosecutor had the strictest and most limited role in prosecuting and investigating corruption charges. The Ombudsman Office took an oversight and awareness-generating role, and the Anti-Corruption Commission had investigatory, prosecutorial, and awareness-generating roles. The proposed Anti-Corruption Commission and the Office of the Public Prosecutor aimed to address the issues by criminalizing corruption, which meant that, once an official was convicted, they either had to undergo imprisonment or pay fines depending on the gravity of their crime. The Ombudsman Office was meant to address the issue through a softer approach by sending reports to specific public authorities guiding them on good governance practices and how to avoid future violations.[32]

Thus, in East Timor, differences in normative and regulatory approaches to addressing corruption played out at different levels. While the international actors involved in the anti-corruption reforms were aligned on the liberal regulatory model of addressing the problem, whereby the regulators and their political superiors were accountable and their actions were limited by rational legal rules, the local political elite leaned toward a regulatory model based on tradition (Weitzman 1974; Vincent 2008; Van Camp 2014) and reverence (McCormick 1990; Jayasuriya 2003). The old generation leaders were drawn to a system of governance that recognized their

The partnership focuses on three main areas, which are political cooperation, development cooperation, and economic and trade cooperation (see European External Action Service 2021).

[32] Interview with official at Ombudsman Office, Dili, 13 May 2018.

sacrifices for the country and granted them immunity.[33] Despite their consensus on their liberal regulatory approach to address corruption in the country, the international partners diverged in their positions on how the issue of corruption ought to be tackled locally. However, they have successfully managed to collaborate and engage with local stakeholders, enabling an environment for continuous engagements.[34] In the following section, I examine how the international and local actors navigated these plural approaches and compromised on the adopted regulatory arrangements to address corruption in the country. I also show that these translocal compromises influenced the legal and institutional arrangements adopted in the country and how they were used to tackle corruption locally.

A compromised regulation of corruption in East Timor

In 2009, when the proposal for an Anti-Corruption Commission and separate legislation on anti-corruption was tabled in the National Parliament, the motion was mainly met with resistance.[35] The Anti-Corruption Commission was designed to be an independent body that would investigate corruption charges *suo motu* (action taken of its own accord) and monitor anti-corruption initiatives locally. But the Portuguese technical advisers in the National Parliament and the Office of the Public Prosecutor rejected the proposal as it was perceived to diverge from the institutional arrangements introduced in the country following independence.[36] One of the interviewees (an ex-international adviser in the Timorese Parliament) observed that the conflict between the Portuguese camp and what was perceived as the adversarial model of the Anglo-American camp translated into dismissals of amendment requests to the statute of the Anti-Corruption Commission. Consequently, a compromise was reached whereby the commissioners in the Anti-Corruption Commission could initiate investigations only after receiving a referral from the Office of the Public Prosecutor, which, according to the interviewee, "left the commission with no teeth."[37]

Once the statute for the Anti-Corruption Commission was adopted in Parliament, it became apparent that the commission's mandate overlapped with the Ombudsman Office in ensuring good governance practices and tackling corruption in the public sector. The statute that was passed identified the commission's mandate as "an independent and specialised criminal body to investigate" corruption as well as with the powers to undertake preventive action and criminal investigation when there is

[33] Pitman Potter (2021, 68) observes similar dynamics in China. He argues that China's official regulatory culture follows patrimonial sovereignty where those in power draw on traditional norms of Confucianism and combine them with the ideals of revolutionary transformation drawn from Marxism-Leninism and Maoism. Thus, Potter argues that the regulatory culture in China tends to emphasize governance by political authority that remains largely immune to challenge.

[34] Compared to traditional donor practises, the reflexive engagement enabling collaboration and compromises by international partners working on anti-corruption reforms seem to align with recent interventions by scholars for more flexible engagement in fragile contexts (Desai, Isser, and Woolcock 2012).

[35] Interview with ex-international adviser to the Parliament, Dili, 13 April 2018.

[36] Interview with ex-international adviser to the Parliament, Dili, 13 April 2018; interview with Timorese official at the Anti-Corruption Commission, Dili, fieldnotes 2018.

[37] Interview with ex-international adviser to the Parliament, Dili, 24 April 2018.

passive or active corruption, abuse of power, embezzlement, misuse of public material or resources, or financial participation in public affairs.[38] The latter's mandate especially overlapped with the Ombudsman Office's mandate. For example, if the Ombudsman Office received any complaints, an ombudsman could investigate the issue further. If there was any cause for concern, the ombudsman made a report and a guidance document for further action by the authorities. But the overlap between the Ombudsman Office and the Anti-Corruption Commission resulted in confusion as to the roles the different institutions held and when they were to intervene to prevent abuse. One of the public officials in the Ombudsman Office explained that the provision was not thoroughly examined during the enactment as the focus was on ensuring a clear division of powers between the Office of the Public Prosecutor and the proposed Anti-Corruption Commission.[39] Further, the absence of international partners who initially backed the Ombudsman Office in the National Parliament during the institution of the Anti-Corruption Commission contributed to the error.[40] In 2009, an amendment process was initiated, and the powers of the ombudsman were restricted to monitoring roles, while the anti-corruption commissioners were given investigatory roles.

Regarding the "old generation" leaders, even though they were not directly involved in deciding the different institutional arrangements, they were able to influence its scope and limitations. In the National Parliament, they dragged their feet on the adoption of separate legislation that would tighten measures on the investigation, prosecution, and enforcement of corruption cases (La'o Hamutuk 2011). Having Portuguese advisors on their side, albeit for different reasons, further led the Timorese leaders to stall the enactment of legislation on anti-corruption. They also ensured that the National Parliament had the authority to choose senior officials in the Anti-Corruption Commission (Government of Timor Leste 2010). The Prosecutor General was already a political appointment.[41] These measures ensured that the institutions that were proposed to be independent of the executive initially now had channels through which the "old generation" leaders could exert their influence through overt and covert ways.

In addition, in 2009, when the Anti-Corruption Commission was instituted, the National Parliament drafted the new Rules of Procedure for its members (Democratic Republic of East Timor 2009). Under Article 8 of the Rules of Procedure, the Parliament drafted new rules on immunity, whereby the members of the Parliament are allowed immunity in the event of criminal proceedings, provided that the National Parliament decides not to suspend the members for crimes punishable by imprisonment exceeding five years (Article 8.3). The new immunity rules contradicted Article 113 (on criminal liability of the members of government) and Article 114 of the Timorese Constitution (on immunities for members of government), which

[38] Law on the Anticorruption Commission, Law no. 8/2009, July 2009.

[39] Interviews with officials at the Ombudsman Office, Fieldnotes, Dili, 17 April 2018, 18 April 2018, 23 April 2018.

[40] Interview with UNDP staff 1, Dili, 9 March 2018; interview with official at Ombudsman office, Dili, 17 April 2018.

[41] Statute of Public Prosecutors' Office, Law no. 14/2005, 16 September 2005, art. 12; Juridical Regime of the Employees of Justice and the Services of the General Offices of the Tribunals, the Prosecutor General and Public Defender, Decree Law no. 27/2009, 24 August 2009.

sets out that immunity privileges should not extend to members who are charged with criminal offences punishable with a sentence for imprisonment of more than two years.[42] Despite the inconsistency in 2009, the government in charge adopted the immunity rules, allowing for the possible protection of members from criminal charges punishable with a sentence for more than two years. One could observe that the new rules on immunity were passed as a way to circumvent the potential prosecution of ministers for their corruption. The Penal Code sets the punishment for corruption between three to fifteen years, and the new immunity rule allowed the National Parliament to step in whenever a member is accused of corruption and the Parliament wanted to provide them immunity. Even though no official records indicate the international partners' knowledge or acceptance of the new immunity rule, it is unlikely that such legislation would have gone unnoticed by the international technical advisers appointed to the National Parliament at the time. In terms of enforcement, these compromised regulatory arrangements limited the cases that were investigated, prosecuted, and eventually enforced in the country.

For investigations, following the compromised mandate of the Anti-Corruption Commission, the commission cannot initiate investigations on its own; rather, it must wait for a referral from the Office of the Public Prosecutor. One of the deputy commissioners at the commission explained this limitation in the following way. To strike a balance without encroaching too much on the Office of the Public Prosecutor's mandate, the statute on the institution of the Anti-Corruption Commission allows it to tackle corruption cases in only two ways:

1. it can wait for the Office of the Public Prosecutor to send a request for investigation to the commission (identified by the statute) or
2. the Anti-Corruption Commission can gather and analyze information if someone has filed a complaint directly with the commissioner.[43]

In the first instance, the Anti-Corruption Commission helps the Office of the Public Prosecutor to prepare essential documents and evidence to help build a strong case for the prosecution. In the second instance, when a complaint is directly lodged with the Anti-Corruption Commission, the commissioners can conduct an initial analysis (without using wiretapping on suspects or examining bank accounts or tax records) to establish if there are grounds to believe a complaint is genuine. The commissioners can further send the complaint to the Office of the Public Prosecutor to initiate charges. If the prosecutors agree with the commissioners that the case has grounds, the Office of the Public Prosecutor can dispatch an order to the commissioners to initiate official investigations. As a result, when and how the anti-corruption commissioners can intervene in corruption cases is tied to those instances that pass the threshold set by the Office of the Public Prosecutor.[44] But this all depends on

[42] In instances where a member is charged with a crime punishable for two years, then the National Parliament must decide whether they can continue. In terms of detainment and imprisonment, Article 114 states that no member of the government can be detained or imprisoned without the permission of the National Parliament unless the crime is a felonious one.

[43] Law no 8/2009, art. 5.

[44] Official reports from the Office of the Public Prosecutor for 2013–16 indicate that the Anti-Corruption Commission and the Office of the Public Prosecutor worked together to initiate 286

whether the senior prosecutor in charge, who is a political appointee, would even want to initiate an investigation.[45]

Then, there are issues concerning the gathering of evidence for the cases. One of the interview participants observed that allowing senior political figures to decide who can take the senior positions in key anti-corruption institutions has influenced which allegations on corruption are investigated and prosecuted. The participant added that most of the staff members who are part of the three institutions are either party supporters of the Revolutionary Front for an Independent East Timor (FRETILIN) (Mari Alkatiri's party) or the National Congress for Timorese Reconstruction (CNRT) (Kay Rala Xanana Gusmao's party) and are appointed through political affiliations.[46] According to the official, this translates into difficulties finding evidence when a high-profile case involves someone closer to the resistance leaders or a veteran.[47] Some Timorese government officials referred to this as the "missing file, apologetic staff" conundrum, which was contextualized by an anti-corruption commissioner who observed that the excuse of "missing files" was the most common excuse heard by investigating officials.

The deputy commissioners at the Anti-Corruption Commission observed that staff in the government offices often gave a range of excuses during the investigation—from not finding essential files to admitting that they were inexperienced.[48] One of the ex-Timorese anti-corruption officials pointed out that the patronage system remains a channel for many Timorese to get a government job, and many also have close political affiliations that fall either within the CNRT or the FRETILIN camp. This means that, sometimes when a case against a senior member of a political party arises, it is hard to trace the files. The commissioner pointed out that, sometimes when a senior government official is transferred, all the files are taken with him, or it could be genuine that files cannot be traced "as the culture of file-keeping" is weak in the country.[49] If the cases are investigated, then the next potential challenge arises at the adjudication level (JSMP 2012).

If the Anti-Corruption Commission is successful at investigating a corruption charge, the prosecution can build a viable case that leads to a successful conviction, but even if there has been no parliamentary immunity given to the accused, it is still

corruption cases, of which 165 resulted in formal charges (Office of the Prosecutor General Financial Report, 2017, quoted in JSMP 2017).

[45] Interview with anti-corruption commissioner, Dili, 24 April 2018.

[46] Both the parties are led by "old generation" resistance leaders, with Mari Alkatiri leading the FRETILIN party, and Xanana Gusmao leading the National Congress for Timorese Reconstruction (CNRT). FRETILIN is one of the oldest political parties in the country, with its roots in Nicolau Lobato's and his comrades' initial independence struggle for Timorese independence from Portuguese colonial administration. Gusmao's CNRT was formed as a guerrilla front initially during the resistance phase against Indonesian occupation. Xanana named the resistance front the CNRM in 1988 and set out a distinctive path from the old FRETILIN to create a legitimate armed force of national resistance for Timorese independence. For a detailed discussion, see Hoadley 1976.

[47] Interview with anonymized Timorese official 2, Dili, 27 April 2018; interview with Ombudsman Office official 1, Dili, 17 April 2018.

[48] Interviews with Anti-Corruption Commission senior officials 1, 2, and 3, Dili, 12 April 2018, 24 April 2018, 3 May 2018; interview with ombudsman Office official 1, Dili, 17 April 2018; interview with lawyer 3, Dili, 18 April 2018.

[49] Interview with Timorese official, Dili, 17 April 2018.

possible that they may escape punishment. One of the high-profile cases involving a minister from the "old generation," Emilia Pires, is helpful for observing how the old generation leaders can influence the enforcement of judicial decisions. Pires was an ex-finance minister, who had close relations with the old generation of leaders, especially Gusmao. When Pires was convicted for corruption, Gusmao immediately retaliated against her conviction and published an open letter addressed to Pires (*Observador* 2017). Using his flair for poetic language and criticizing the court for its decision, Gusmao accused the president of the Court of Appeal and the prosecutor general of financial irregularities in their offices. He criticized them for convicting Pires, who, despite her ill health, returned from Portugal to rebuild the Timorese state following the referendum. In the letter, Gusmao recalled his friendship with Pires, which began when he was detained in Jakarta's Salemba prison house and how she had assisted him during that time. Gusmao suggested that he found the court decision against Pires "deplorable" for causing her stress at a time when she was suffering from a severe illness. Gusmao added that, in her role as the minister of finance, Pires had transformed the public administration and finance departments by modernizing the institutions and introducing a public finance system. According to him, "[t]he State of Timor-Leste owes a lot to [Pires] . . . you, who with unusual honesty, worked towards strengthening its institutions and law . . . therefore, I cannot accept that you have committed a crime of corruption that has harmed the State (*Observador* 2017; translated from Portuguese with the assistance of a research assistant).

The final judgment against Pires was never enforced as she was issued a pardon by the president (Jose Ramos Horta) and prime minister (Gusmao) at the time (Agência Noticiosa de Timor-Leste 2023). The prosecution of Pires, in particular, was an anomaly compared to other high-profile instances. The case against her was initiated at a time when international advisers in their roles were proactive in restricting executive power. However, such actions were soon met with retaliation by Gusmao's government, which was then in power. An example is the termination of work visas of international advisers in key judicial institutions by the National Parliament after the justices wrote a judgment challenging the legality of the national budget in 2014.[50]

The application of regulatory measures to address corruption in East Timor remains narrow. International actors also have recognized this; however, they emphasize why they need to compromise to have access for continued engagement in the justice sector.[51] In East Timor, the choice to compromise among the parties may not have occurred organically but, rather, out of necessity. Without the support of the local elite leaders, it was impossible for the international partners to have a channel for engagement. However, with time, as more young people from the new generation are taking government positions, the influence of the elite leaders is waning. In a political environment where the influence of different actors is in flux, compromise is the only way forward for constructive engagement. International actors have

[50] In 2014 when the National Parliament under Gusmao 's administration revoked the work visas of senior international technical advisers in the judiciary (Resolution no. 11/2014, 24 October 2014; Resolution no. 32/2014, 31 October 2014). In Resolution no. 32, the government identified eight named international judicial officers (five judges, two prosecutors, and one investigator appointed at the Anti-Corruption Commission).

[51] Fieldnotes by the author, 2018.

observed that unofficial compromises as a strategy is necessary, especially for a state that is fragile and emerging from conflict, in order to allow them to buy time to collaborate with those from the "in-between generation" and to develop a broad awareness of the corruption among public and government officials.[52]

Consequently, instead of focusing on transferring "ideal" regulatory measures that align with the normative attitudes and regulatory approaches of the donors, the international partners have started collaborating with like-minded Timorese officials at the Anti-Corruption Commission on softer measures such as public awareness campaigns and developing training manuals for junior government staff. One of the commissioners at the Anti-Corruption Commission pointed out that such initiatives have been crucial for training and equipping junior-level staff to spot corrupt practices from senior levels at earlier stages and stop them. Awareness campaigns are targeted mainly at students so that the next generation of Timorese citizens are aware of corrupt practices, and they too can anonymously act as whistleblowers, sending complaints to the commission, a service that was rarely used by the public when the data was collected in 2018. This would allow the Anti-Corruption Commission to bypass the Office of the Prosecutor General and initiate investigations. Thus, even though translocal compromises have led to the adoption of a compromised regulatory framework for addressing corruption in the country, they have facilitated further opportunities for international and local actors to build alliances and engage in broader initiatives to tackle corruption. In 2020, after many years of NGO lobbying and increased calls from the public, an anti-corruption law was adopted in the country—Measures to Prevent and Combat Corruption[53]—and, according to a public survey conducted by the Asia Foundation (2022), public perceptions of corruption in the public sphere are going down even though high-profile cases are still considered a problem.

A finding from the case study is that, in settings where intermediaries are compromising, local actors can take proactive roles even before the implementation stage. This finding adds to the scholarship that captures the "politics of implementation" by local actors (Carruthers and Halliday 2009; Gillespie and Nicholson 2012). Scholars have mainly pinpointed the agency of local actors in shaping the outcomes of legal transfers at the implementation stage as they exert more influence and control over how newly adopted laws are implemented and enforced. This is because, in conventional legal transfer initiatives, international partners have more influence at the adoption stage with the "top-down" imposition of new regulatory arrangements to a recipient society as part of aid or trade-related conditionalities. In East Timor, during the initial state-building phase, international actors played prominent roles in setting the limits of the legal system (Grenfell 2013; Nicholson and Hinderling 2018). However, this dynamic shifted after the 2006 crisis. The involvement of local actors at the adoption stage means that they can exert their influence even at the initial phase by choosing which international actors to partner with and putting forward their normative perspectives either overtly (in the case of

[52] Interview with ex-National Parliament adviser, Dili, 4 May 2018; interview with international technical advisor to the judiciary, Dili, 13 April 2018; interview with international technical advisor to the Public Defenders' Office, Dili, 26 March 2018.

[53] Measures to Prevent and Combat Corruption, Law 7/2020, 26 August 2020.

proposing legislation on parliamentary immunity) or altering regulatory arrangements introduced by international partners through covert ways (in the case of appointing senior officials at the Anti-Corruption Commission).

Conclusion

This article has examined what happens during transnational legal transfers when multiple parties are involved in the transfer, adoption, and implementation of new legal rules and institutional arrangements in a local setting. I have demonstrated how transnational legal transfers involve the interaction of diverse interest groups that bring their plural approaches to addressing an issue. Such an encounter of plural legalities has implications on the eventual regulatory arrangements that are adopted in a society. At local settings where translocal normativities diverge and collide, I have argued that first-level actors can engage in cooperative ways to find a middle ground for further engagements. Such compromises that are made as part of these transnational legal transfers influence the possibilities and limits of regulatory arrangements adopted in a society. The findings from the Timorese case study show how, despite the varying normative attitudes and regulatory approaches, international and local actors worked toward adopting a new regulatory framework for addressing corruption in the country. Compromises made among the first-level actors resulted in the adoption of a regulatory framework that combined different regulatory models supported by the parties.

In East Timor, although the adopted regulatory framework compromised the investigation, prosecution, and enforcement of corruption cases in the country, it has enabled further engagements between international and local partners who are invested in tackling corruption locally to undertake innovative initiatives to address the problem, thus setting a path for the settling of anti-corruption norms in the country. Even though entering into compromises meant that the international partners had to make concessions from their intended regulatory arrangements, it was only because of such compromises that they could engage in innovative ways to strengthen the regulatory arrangements and tackle corruption locally. Thus, the transnational anti-corruption reform initiatives in East Timor show that the transfer and adoption of global norms to local settings is rarely a linear process. In settings where plural approaches to addressing a transnational issue exist, finding a middle ground and adopting regulatory arrangements that still allow for tackling a globally identified social problem is possible. However, whether entering such compromises facilitates the regulation of an identified problem is context specific and needs to be empirically assessed.

The Timorese case study provides a valuable lens to understand what happens in other transitional settings and contexts where multiple actors are involved in legal reform initiatives to address a transnational problem. It highlights that, beyond the possibility of adoption, selective adoption, and rejection, recipients can also enter into compromises with international partners. The case study also reveals why first-level actors involved in transnational legal transfers may need to compromise. Unlike instances of legal transfers where an international partner emerges as the dominant actor, transnational legal transfers bring a wide range of actors who can mobilize their social, cultural, and economic capital in varied ways to gain influence locally. In

such instances, international partners may choose to cooperate and compromise so that they can continue their engagement with local partners. As for local actors, they may enter into compromises for financial aid and international support or for elevating their status in the international community by adopting reforms in a specific area. This underscores the significant role of local actors in shaping the outcomes of legal transfers, even at the adoption stage.

Finally, a consideration of the possibility of compromises as part of transnational legal transfers also has implications for understanding the successes and failures of legal transfers. While a compromised regulatory framework may not align with the intended "ideal" framework proposed by international partners to address a problem in a society, it might still be effective in tackling the issues that do not fall within the sphere of compromise. In East Timor, the newly adopted institutional arrangements were limited in addressing corruption charges involving allies of the old guard leaders. However, the compromised regulatory institutions were good enough to pursue and prosecute other cases (often successfully as seen in the instance of Lucia Lobato's case). This underscores the need for more empirical studies to map what compromises were made, who was involved in making such compromises, and how they shaped the outcomes in terms of what laws and institutional arrangements were adopted and how they were used. The findings presented in this article are crucial for policy makers, legal scholars, and researchers working on transnational collaborative initiatives as they highlight the importance of considering the conflicts, competition, and compromises unfolding in local settings during legal reform initiatives.

Acknowledgments. My sincerest gratitude goes to the many readers of previous drafts of this article for their constructive feedback and encouragement. Professor David Nelken, Dr. Deval Desai, Professor Mathias Siems, Professor Naomi Creutzfeldt, Professor Mark Fathi Massoud, Professor Lynnette Chua, Dr. Nafay Choudhury, Dr. Laura Burke, Dr. Sara Ten Brinke, and the four anonymous reviewers at *Law & Social Inquiry*, your insights and critiques have significantly shaped and refined my arguments and ideas. I would also like to thank the Dickson Poon School of Law at King's College London for the generous funding to carry out the empirical research in East Timor in 2018 and the European University Institute Max Weber Program for the editorial support and additional research funds during the final stages of this article in 2023. Finally, I am grateful for all the assistance provided by Bertanizo Ghurro, who helped me organize meetings with Timorese officials and translated documents and interviews in Portuguese and Tetum and whose support was crucial for completing my fieldwork in 2018.

References

Agência Noticiosa de Timor-Leste. 2023. "Gov't Proposed New Leaders for CAC and Institutions That Manage Oil and Minerals." 14 September. https://en.tatoli.tl/2023/09/14/govt-proposed-new-leaders-for-cac-and-institutions-that-manage-oil-and-minerals/01/.

Ajani, Gianmaria. 1995. "By Chance and Prestige: Legal Transplants in Russia and Eastern Europe." *American Journal of Comparative Law* 43, no. 1: 93–117.

——. 2007. "Transplants, Legal Borrowings and Reception." In *Encyclopedia of Law and Society*, edited by David S. Clark, 248–61. Vol. 3. London: Sage Publications.

Almeida, Bernardo. 2017. "The Main Characteristics of the Timorese Legal System- A Practical Guide." *Law and Politics in Africa, Asia and Latin America* 50, no. 2: 175–87.

Alter, Karen J., and Sophie Meunier. 2006. "Nested and Overlapping Regimes in the Transatlantic Banana Trade Dispute." *Journal of European Public Policy* 13, no. 3: 362–82.

Anand V., B. E. Ashforth, and M. Joshi Joshi. 2004. "Business as Usual: The Acceptance and Perpetuation of Corruption in Organizations." *Academy of Management Executive* 18, no. 2: 39–53.

Asia Foundation. 2022. "Public Perception Survey." https://asiafoundation.org/wp-content/uploads/2024/08/Initial-Findings-of-Timor-Leste-Tatoli-Public-Perception-Survey-2022.pdf.

Antons, Christoph. 2003. *Law and Development in East and South-East Asia*. New York: Taylor & Francis.

——. 2007. "Law Reform in the 'Developmental States' of East and Southeast Asia: From the Asian Crisis to September 11, 2001 and Beyond." In Antons and Gessner, 81–104.

Antons, Christoph, and Volkmar Gessner. 2007. *Globalisation and Resistance: Law Reform in Asia since the Crisis*. Onati, Spain: Bloomsbury.

Banerjee, Subhabrata Bobby. 2011. "Voices of the Governed: Towards a Theory of the Translocal." *Organization* 18, no. 3: 323–44.

Benner, Tom. 2013. "East Timor Mismanagement." *Al Jazeera*, 19 October. https://www.aljazeera.com/features/2013/10/19/mismanagement-highlighted-in-east-timor.

Berger, Tobias. 2017. *Global Norms and Local Courts: Translating the Rule of Law in Bangladesh*. Oxford: Oxford University Press.

Berkowitz, Daniel, Katharina Pistor, and Jean-Francois Richard. 2003. "The Transplant Effect." *American Journal of Comparative Law* 51: 163204.

Bexley, A. 2017. "The Geracao Foun and Indonesia: Exclusion, Belonging and the Nation-State." In *Fieldwork in Timor-Leste: Understanding Social Change through Practice*, edited by M. Nygaard-Christensen and A. Bexley, 99–125. Oxford: Nordic Institute of Asian Studies Press.

Block-Lieb, Susan, and Terence C. Halliday. 2017. *Global Lawmakers: International Organizations in the Crafting of World Markets*. Cambridge, UK: Cambridge University Press.

Blundo, Giorgio. 2006. "Dealing with the Local State: The Informal Privatization of Street-level Bureaucracies in Senegal." *Development and Change* 37, no. 4: 799–819.

Boyle, Elizabeth Heger, and John W. Meyer. 2002. "Modern Law as a Secularized and Global Model: Implications for the Sociology of Law." *In Dezalay and Garth* 2002, 65–96.

Boyle, Elizabeth Heger, Fortunata Songora, and Gail Foss. 2001. "International Discourse and Local Politics: Anti-Female-Genital-Cutting Laws in Egypt, Tanzania, and the United States." *Social Problems* 48, no. 4: 524–44.

Braithwaite, John, and Peter Drahos. 2000. *Global Business Regulation*. Cambridge, UK: Cambridge University Press.

Cairns, John W. 2012. "Watson, Walton, and the History of Legal Transplants." *Georgia Journal of International and Comparative Law* 41: 637–96.

Canfield, Matthew C., Julia Dehm, and Marisa Fassi. 2021. "Translocal Legalities: Local Encounters with Transnational Law." *Transnational Legal Theory* 12, no. 3: 335–59.

Carl, Sabine. 2018. "The History and Evolution of the Ombudsman Mode." In *Research Handbook on the Ombudsman*, edited by M. Hertogh and R. Kirkham, 17–33. Cheltenham, UK: Edward Elgar.

Carruthers, Bruce G., and Terence C. Halliday. 2009. *Bankrupt: Global Lawmaking and Systemic Financial Crisis*. Stanford, CA: Stanford University Press.

Chêne, Marie. 2008. "Donor Responses to Corruption in Deteriorating Governance Environments." *U4 Anti-corruption Resource Centre*, 25 April. https://www.u4.no/publications/donor-responses-to-corruption-in-deteriorating-governance-environments.pdf.

Cheng, Christine S., and Dominik Zaum, 2012. "Selling the Peace?: Corruption and Post-Conflict Peacebuilding." In *Corruption and Post-Conflict Peacebuilding*, edited by Dominik Zaum and Christine Cheng, 1–25. Abingdon, UK: Routledge.

Chin, Gregory and Fahimul Qadir. 2012. "Rising States, Rising Donors and the Global Aid Regime." *Cambridge Review of International Affairs* 25, no. 4: 493–506.

Crisis Group Asia Briefing. 2011. "Timor Leste's Veterans: An Unfinished Struggle?" *Crisis Group Asia*, 18 November. https://www.crisisgroup.org/sites/default/files/b129-timor-leste-s-veterans-an-unfinished-struggle.pdf.

Dalakoglou, Dimitris. 2010. "Migrating-remitting – 'Building' – Dwelling: House-making as 'Proxy' Presence in Postsocialist Albania." *Journal of the Royal Anthropological Institute* 16, no. 4: 761–77.

Darian-Smith, Eve, 2013. *Laws and Societies in Global Contexts: Contemporary Approaches*. Cambridge, UK: Cambridge University Press.

De Sardan, J. P. Olivier. 1999. "A Moral Economy of Corruption in Africa?" *Journal of Modern African Studies* 37, no. 1: 25–52.

De Sousa Santos, Boaventura. 2006. "Globalizations." *Theory, Culture & Society* 23, no. 2–3: 393–99.

Delaney, Patrick X. 2006. "Transnational Corruption: Regulation Across Borders." *Virginia Journal of International Law* 47: 413–43.

Democratic Republic of East Timor. 2009. *Rules of Procedure of the National Parliament of the Democratic Republic of Timor-Leste*. Series I, No. 40, 11 November. https://mj.gov.tl/jornal/lawsTL/RDTL-Law/RDTL-Resolutions/Rules%20of%20Procedure%20of%20the%20National%20Parliament%20of%20RDTL.pdf.

Desai, Deval, and Michael Woolcock. 2015. "The Politics—and Process—of Rule of Law Systems in Developmental States." In *The Politics of Inclusive Development: Interrogating the Evidence*, edited by Sam Hickey, Kunal Sen, and Badru Bukenya, 174–96. Oxford: Oxford University Press.

Desai, Deval, Deborah Isser, and Michael Woolcock. 2012. "Rethinking Justice Reform in Fragile and Conflict-Affected States: Lessons for Enhancing the Capacity of Development Agencies." *Hague Journal on the Rule of Law* 4, no. 1: 54–75.

Dezalay, Yves, and Bryant Garth, eds. 2002. *Global Prescriptions: The Production, Exportation, and Importation of a New Legal Orthodoxy*. Ann Arbor: University of Michigan Press.

—— and Bryant Garth, eds. 2011. *Lawyers and the Rule of Law in an Era of Globalization*. Abingdon, UK: Routledge.

Dezalay, Yves, and Bryant Garth. 2019. *Asian Legal Revivals: Lawyers in the Shadow of Empire*. Chicago: University of Chicago Press.

European External Action Service. 2021. "Timor-Leste and the European Union Commit to a Further Strengthening of Their Partnership." 29 January. https://www.eeas.europa.eu/delegations/timor-leste/timor-leste-and-european-union-commit-further-strengthening-their-partnership_und?s=254.

East Timor Law and Justice Bulletin. 2015. "Issue of Immunity Hampers Trial of the East Timor Secretary of State for Arts and Culture on Charges of Mismanagement, Embezzlement and Abuse of Power." 16 December. https://www.easttimorlawandjusticebulletin.com/2015/12/issue-of-immunity-hampers-trial-of-east.html.

Engel, Rebecca E. 2020. *The 2006 Crisis in East Timor: Lessons for Contemporary Peacebuilding*. Abingdon, UK: Routledge.

Erie, Matthew. 2021. "Law and Development Minus Legal Transplants: The Example of China in Vietnam." *Asian Journal of Law and Society* 8, no. 2: 372–401.

Eslava, Luis. 2015. *Local Space, Global Life*. Cambridge, UK: Cambridge University Press.

Flanary, Rachel, Jonathan Moran, and Robert Williams. 2000. *Corruption in the Developed World*. Cheltenham, UK: Edward Elgar.

Fundasaun Mahein. 2018. "FM's Take on the Prado Demonstrations and Police Response." 15 November. https://www.fundasaunmahein.org/2018/11/15/fms-take-on-the-prado-demonstrations-and-police-response/.

Garcia, Gabriel. 2016. "The Rise of the Global South, the IMF and the Future of Law and Development." *Third World Quarterly* 37, no. 2: 191–208.

Gillespie, John, and Penelope Nicholson. 2012. *Law and Development and the Global Discourses of Legal Transfers*. Cambridge, UK: Cambridge University Press.

Glenn, H. Patrick. 2014. *Legal Traditions of the World: Sustainable Diversity in Law*. Oxford: Oxford University Press.

Global Integrity. 2013. *Global Integrity Report: Timor Leste 2013*. https://www.globalintegrity.org/resource/gir2013_report_timorleste/.

Goldbach, Toby S. 2019. "Why Legal Transplants?" *Annual Review of Law and Social Science* 15: 583–601.

Goldstein, Daniel M. 2003. "In Our Own Hands: Lynching, Justice, and the Law in Bolivia." *American Ethnologist* 30, no. 1: 22–43.

Goodale, Mark, and Sally Engle Merry, eds, 2007. *The Practice of Human Rights: Tracking Law between the Global and the Local*. Cambridge, UK: Cambridge University Press.

Government of Timor Leste. 2010. "Statement by the Spokesperson of the IV Constitutional Government." 2 February. http://timor-leste.gov.tl/?p=2085&lang=en.

Grenfell, Laura, 2013. *Promoting the Rule of Law in Post-Conflict States*. Cambridge, UK: Cambridge University Press.

Gusmao, Xanana. 2009. "Intervention: Response by His Excellency the Prime Minister Kay Rala Xanana Gusmao on the Occasion of the Motion of No Confidence." Plenary Session of the National Parliament. 12 November. https://laohamutuk.org/Justice/99/bere/Censura/PM12Oct09En.pdf.

Halliday, Terence C., and Gregory C. Shaffer. 2015. *Transnational Legal Orders*. Cambridge, UK: Cambridge University Press.

Hammerslev, Ole. 2011. "The European Union and the United States in Eastern Europe: Two Ways of Exporting Law, Expertise and State Power." *In Dezalay and Garth* 2011, 142–63.

Harding, Andrew, C. Antons, and V. Gessmer. 2007. "South East Asia 1997–2006: Two Case Studies on the Politics of Law and Development." In Antons and Gessner, 133–57.

Hersant, Jeanne. 2017. "Patronage and Rationalization: Reform to Criminal Procedure and the Lower Courts in Chile." *Law & Social Inquiry* 42, no. 2: 423–49.

Heupel, Monika. 2012. "Rule of Law Promotion through International Organization and NGO." In *Rule of Law Dynamics: In an Era of International and Transnational Governance*, edited by Micharl Zurn, Andre Nollkaemper, and Randy Peerenboom, 133–52. Cambridge, UK: Cambridge University Press.

Hoadley, S. 1976. "East Timor: Civil War: Causes and Consequences." *Southeast Asian Affairs* 1976: 411–19.

Hoag, Colin. 2010. "The Magic of the Populace: An Ethnography of Illegibility in the South African Immigration Bureaucracy." *PoLAR: Political and Legal Anthropology Review* 33, no. 1: 6–25.

Hsu, Carolyn L. 2001. "Political Narratives and the Production of Legitimacy: The Case of Corruption in Post-Mao China." *Qualitative Sociology* 24, no. 1: 25–54.

Hutchinson, Francis. 2005. "A Review of Donor Agency Approaches to Anti-Corruption." *Research Gate.* https://www.researchgate.net/profile/FrancisHutchinson/publication/282652099_A_Review_of_Donor_Agency_Approaches_to_Anti-Corruption/links/5616015608ae983c1b42410a/A-Review-of-Donor-Agency-Approaches-to-Anti-Corruption.pdf.

Interpeace. 2013. "Timor-Leste: Peace Houses Used to Raise Awareness about Corruption." *Interpeace*. 9 December. ~https://www.interpeace.org/2013/12/timor-leste-2/#:~:text=The%20Peace%20Houses%2C%20founded%20on,can%20access%20anti%2Dcorruption%20materials.

Ivory, Radha. 2020. "Transnational Criminal Law or the Transnational Legal Ordering of Corruption?: Theorizing Australian Corporate Foreign Bribery Reforms." In *Transnational Legal Ordering of Criminal Justice*, edited by Gregory Shaffer and Ely Aaronson, 84–119. Cambridge, UK: Cambridge University Press.

Jayasuriya, Kanishka. 2003. "Authoritarian Liberalism, Governance and the Emergence of the Regulatory State in Post-Crisis East Asia." In *Politics and Markets in the Wake of the Asian Crisis*, edited by Mark Beeson, Kanishka Jayasuriya, Hyuk-Rae Kim, and Richard Robison, 330–45. Abingdon, UK: Routledge.

Jerónimo, Patricia. 2017. *Report on Citizenship Law:East Timor*. Florence: Robert Schuman Centre for Advanced Studies. https://cadmus.eui.eu/bitstream/handle/1814/45931/GLOBALCIT_CR_2017_07.pdf?sequence=1&isAllowed=y.

Johnsøn, Jesper. 2016a. "Aid Agencies' Anti-Corruption Strategies: Comparing the World Bank, the EU and UNDP." In Johnsøn 2016b, 70–174.

———. 2016b. *Anti-Corruption Strategies in Fragile States*. Cheltenham, UK: Edward Elgar.

———. 2016c. "How to Reduce Corruption in Fragile States: The Theory." In Johnsøn 2016b, 39–69.

Johnston, Michael. 2012. "Building a Social Movement against Corruption." *Brown Journal of World Affairs* 18, no. 2: 57–74.

JSMP (Judicial System Monitoring Programme). 2012. *Parliamentary Privilege and Immunity in Timor Leste: How to Ensure Equality Before the Law*. June. https://jsmp.tl/wp-content/uploads/2012/05/Parliamentary-privilege-and-immunity-June-2012-FINAL.pdf.

———. 2014. *Dismissal of International Officials and Advisors in the Timor-Leste Judicial Sector an Analysis of the Constitutionality, Legality and Impact of Parliamentary Resolution No. 11/2014 and Government Resolutions No. 29/2014 and 32/2014*. 16 December. https://www.laohamutuk.org/Justice/2014/JSMPRept16Dec2014en.pdf.

———. 2017. *Justice Update: Challenges in Preventing and Combatting Corruption as Well as Good Governance and the Importance of the Law against Corruption.* http://jsmp.tl/wp-content/uploads/2012/06/1-JU_Korrupsaun-12-Dec-2017-ENGLISH-2.pdf.

Kennedy, David. 2018. *A World of Struggle: How Power, Law, and Expertise Shape Global Political Economy*. Princeton, NJ: Princeton University Press.

Kent, Lia. 2018. *The Dynamics of Transitional Justice: International Models and Local Realities in East Timor*. Abingdon, UK: Routledge.

Kingsbury, Benedict, Nico Krisch, and Richard B. Stewart. 2005. "The Emergence of Global Administrative Law." *Law and Contemporary Problems* 68, no. 3–4: 15–61.

La'o Hamutuk. 2011. "Anti-Corruption Law under Discussion." https://www.laohamutuk.org/econ/corruption/11AnticorruptionLaw.htm.
——. 2013a. "General State Budget for 2014." http://www.laohamutuk.org/econ/OGE14/13OGE14.htm#process.
——. 2013b. "Interesting Items on Timor-Leste's Procurement Portal." https://www.laohamutuk.org/econ/portal/ProcIndex.htm.
——. 2014. "Handing out the Cash." http://laohamutuk.blogspot.com/2014/01/handing-out-cash.html.
Lloyd, Paulette, and Beth A. Simmons. 2015. "Framing for a New Transnational Legal Order: The Case of Human Trafficking." In Halliday and Shaffer, 400–38.
Mattei, Ugo, and Laura Nader. 2008. *Plunder: When the Rule of Law Is Illegal*. Hoboken, NJ: Wiley & Sons.
McCormick, Barrett L. 1990. *Political Reform in Post-Mao China: Democracy and Bureaucracy in a Leninist State*. Berkeley: University of California Press.
Merry, Sally Engle. 2009. *Human Rights and Gender Violence: Translating International Law into Local Justice*. Chicago: University of Chicago Press.
Merryman, John Henry. 1981. "On the Convergence (and Divergence) of the Civil Law and the Common Law." *Stanford Journal of International Law* 17: 357–88.
Miller, Jonathan M. 2003. "A Typology of Legal Transplants: Using Sociology, Legal History and Argentine Examples to Explain the Transplant Process." *American Journal of Comparative Law* 51, no. 4: 839–86.
Ministry of Justice Timor Leste. 2010. "Justice Sector Strategy Plan." https://www.mj.gov.tl/files/JSSP_ENGLISH.pdf.
Nelken, David. 2001. 'The Meaning of Success in Transnational Legal Transfers." *Windsor Year Book of Access to Justice* 19: 349–66
Nelken, David, and Johannes Feest. 2001. *Adapting Legal Cultures*. New York: Bloomsbury.
Nicholson, Pip, and Samantha Hinderling, 2018. "Court Development in Timor-Leste: Handover and Its Long Shadow." In *Handbook on the Rule of Law*, edited by Christopher May and Adam Winchester, 509–30. Cheltenham, UK: Edward Elgar.
Nicolau, Guteriano. 2007. "Ombudsman for Human Rights: The Case of Timor-Leste." *Hurights Osaka* 47: n.p. https://www.hurights.or.jp/archives/focus/section2/2007/03/ombudsman-for-human-rights-the-case-of-timor-leste.html.
Nixon, Rod. 2013. *Justice and Governance in East Timor: Indigenous Approaches and the New Subsistence State*. Abingdon, UK: Routledge.
Nygaard-Christensen, Maj. 2012. "The Rebel and the Diplomat: Revolutionary Spirits, Sacred Legitimation and Democracy in Timor-Leste." In *Varieties of Secularism in Asia*, edited by Nils Ole Bubandt and Martijn Van Beek, 209–30. Abingdon, UK: Routledge.
——. 2017. "The UN Document Leak." In *Fieldwork in Timor-Leste*, edited by Maj Nygaard-Christensen and Angie Bexley, 191–208. Copenhagen: Nordic Institute of Asian Studies Press.
O'Brien, Sophia. 2019. "Global Norms, Local Resistance: Addresing Impunity in Japan and Beyond." In *Legal Transplants in East Asia and Oceania*, edited by Vito Breda, 256–96. Cambridge, UK: Cambridge University Press.
Observador. 2017. "Xanana Gusmão Defende Ex-Ministra Timorense Condenada e Critica Justiça." 26 January. https://observador.pt/2017/01/26/xanana-gusmao-defende-ex-ministra-timorense-condenada-e-critica-justica/.
Pahuja, Sundhya. 2011. *Decolonising International Law: Development, Economic Growth and the Politics of Universality*. Cambridge, UK: Cambridge University Press.
Pardo, Italo. 2004. *Between Morality and the Law: Corruption, Anthropology and Comparative Society*. Aldershot, UK: Ashgate.
Peerenboom, Randall. 2013. "Toward a Methodology for Successful Legal Transplants." *Chinese Journal of Comparative Law* 1, no. 1: 4–20.
Porst, Luise, and Patrick Sakdapolrak. 2017. "How Scale Matters in Translocality: Uses and Potentials of Scale in Translocal Research." *Erdkunde* 71, no. 2: 111–26.
Potter, Pitman B. 1994. *Domestic Law Reforms in Post-Mao China*. Abingdon, UK: Routledge.
—— 2004. "Legal Reform in China: Institutions, Culture, and Selective Adaptation." *Law & Social Inquiry* 29, no. 2: 465–95.

—— 2009. "Selective Adoption and Institutional Capacity Building: Methods of Applying International Rules under the Impacts of Globalisation." In *The Hypothesis of Selective Application and China's Legal Practice*, edited by Pitman Potter and G. Xiaorong. Shanghai: Shanghai Academy of Social Sciences Press.

—— 2021. *Exporting Virtue?: China's International Human Rights Activism in the Age of Xi Jinping*. Vancouver: UBC Press.

Reheem Shaila, Sapna. 2019. "Shifting the Legal Borderlands of Rule of Law Programs: Brazilian Cooperation Agency (ABC) and the Public Defenders' Office in East Timor." *Revista Estudos Institucionais* (*Journal of Institutional Studies*) 5, no. 2: 747–76.

——. 2023. "A Judiciary 'Suspended' in Transition? A Case Study of Portuguese Judges in East Timor." In *The Cambridge Handbook of Foreign Judges on Domestic Courts*, *Cambridge Law Handbooks*, edited by A. Dziedzic and S. N. M. Young, 124–39. Cambridge, UK: Cambridge University Press.

Roht-Arriaza, Naomi. 2005. *The Pinochet Effect: Transnational Justice in the Age of Human Rights*. Pittsburgh: University of Pennsylvania Press.

Roll, Kate. 2018a. *Reconsidering Reintegration: Veterans' Benefits as State-Building*. Canberra: Australian National University Press.

——. 2018b. "Street Level Bureaucrats and Post-Conflict Policy-Making: Corruption, Correctives, and the Rise of Veterans' Pensions in Timor-Leste." *Civil Wars* 20, no. 2: 262–85.

Schimmelfennig, Frank. 2012. "A Comparison of the Rule of Law Promotion Policies of Major Western Powers." In *Rule of Law Dynamics: In an Era of International and Transnational Governance*, edited by Michael Zurn, Andre Nollkaemper, and Randy Peerenboom, 111–32. Cambridge, UK: Cambridge University Press.

Shaffer, Gregory, and Ely Aaronson, eds. 2020. *Transnational Legal Ordering of Criminal Justice*. Cambridge, UK: Cambridge University Press.

Short, Jodi L. 2016. "Transplanting Law in a Globalized World: Private Transnational Regulation and the Legal Transplant Paradigm." In *Comparative Law and Regulation*, edited by Francesca Bignami and David Zaring, 430–44. Cheltenham, UK: Edward Elgar.

Siems, Mathias M. 2014. "Bringing in Foreign Ideas: The Quest for Better Law in Implicit Comparative Law." *Journal of Comparative Law* 9: 119–36.

—— 2022. *Comparative Law*. Cambridge, UK: Cambridge University Press.

Sikkink, Kathryn, 2002. "Transnational Advocacy Networks and the Social Construction of Legal Rules." *In Dezalay and Garth* 2002, 37–64.

Simion, Kristina. 2021. *Rule of Law Intermediaries: Brokering Influence in Myanmar*. Cambridge, UK: Cambridge University Press.

Simon, Scott. 2010. "Negotiating Power: Elections and the Constitution of Indigenous Taiwan." *American Ethnologist* 37, no. 4: 726–40.

Slaughter, Anne-Marie. 1999. "Judicial Globalization." *Vanderbilt Journal of International Law* 40: 1103–24.

Snyder, Francis G. 1982. "Review of Legal Imperialism: American Lawyers and Foreign Aid in Latin America by James Gardner." *Wisconsin Law Review* 80, no. 4: 373–96.

Strohmeyer, Hansjorg. 2001. "Collapse and Reconstruction of a Judicial System: The United Nations Mission in Kosovo and East Timor." *American Journal of International Law* 95, no. 1: 46–63.

Suara Timor Lorosae. 2011. "Projecto EDTL prioirdade ba veteranus" [Priority for veterans in EDTL project]. 31 March.

Svensson, Jakob. 2005. "Eight Questions About Corruption." *Journal of Economic Perspectives* 19, no. 3: 19–42.

Swenson, Geoffrey. 2022. *Contending Orders: Legal Pluralism and the Rule of Law*. Oxford: Oxford University Press.

Tamanaha, Brian Z. 1995. "The Lessons of Law-and-Development Studies." *American Journal of International Law* 89, no. 2: 470–86.

—— 2011. "The Primacy of Society and the Failures of Law and Development." *Cornell International Law Journal* 44: 209–47.

Taylor-Leech. 2008. "Language and Identity in East Timor: The Discourses of Nation Building." *Language Problems and Language Planning* 32, no. 2: 153–80.

——. 2013. "The Language Situation in Timor-Leste." In *Language Planning in the Asia Pacific*, edited by Robert Kaplan and Richard Baldauf, 92–159. Abingdon, UK: Routledge.

Tempo Semanal. 2012. "Minister of Finance Emilia Pires Approves Budget for Her Husband." http://temposemanaltimor.blogspot.com/2012/11/minister-of-finance-emilia-pires.html.

Theobald, Robin, and Robert Williams. 2000. *Corruption in the Developing World*. Cheltenham, UK: Edward Elgar.

Torsello, Davide. 2016. *Corruption in Public Administration: An Ethnographic Approach*. Northampton, UK: Edward Elgar.

Tran Kien, Nam Ho Pham, and Quynh-Anh Lu Nguyen. 2019. "Negotiating Legal Reform through Reception of Law: The Missing Role of Mixed Legal Transplants." *Asian Journal of Comparative Law* 14, no. 2: 175–209.

Traube, Elizabeth. 2007. "Unpaid Wages: Local Narratives and the Imagination of the Nation." *Asian Journal of Anthropology* 8, no. 1: 9–25.

Transparency International. 2015. *Timor-Leste: Overview of Corruption and Anti-Corruption*. Berlin: Transparency International. https://knowledgehub.transparency.org/assets/uploads/helpdesk/Country_profile_Timor_Leste_2015.pdf.

UNDP (United Nations Development Programme). 2018. "UNDP and CAC Form New Partnership to Strengthen Transparency and Accountability in Timor-Leste." https://www.un.org.tl/en/media-center/news-releases/undp-and-cac-form-new-partnership-to-strengthen-transparency-and-accountability-in-timor-leste.

——. 2019. "New UNDP & KOICA Partnership to Support Anti-Corruption and Integrity." 9 December. https://www.undp.org/arab-states/events/new-undp-koica-partnership-support-anti-corruption-and-integrity.

UNODC (United Nations Office on Drugs and Crime). 2003. *UN Guide for Anti-Corruption Policies*. November. https://www.unodc.org/pdf/crime/corruption/UN_Guide.pdf.

US Agency for International Development (USAID). N.d.a. "Completed Projects Timor-Leste." https://www.usaid.gov/timor-leste/basic-page/completed-projects.

——. N.d.b. "Timor-Leste Threshold Program." *USAID Millennium Challenge Corporation*. https://www.mcc.gov/where-we-work/program/timor-leste-threshold-program/.

——. 2009. *Corruption Assessment: Timor Leste*. 15 September. https://pdf.usaid.gov/pdf_docs/Pnadq697.pdf.

——. 2022. "Countering Transnational Corruption State of Innovation Analysis." November. https://www.usaid.gov/sites/default/files/2023-01/Countering%20Transnational%20Corruption%20State%20of%20Innovation%20Analysis.pdf.

——. 2024. "USAID Information Brief: USAID's Expanded Approach to Anticorruption." 16 February. https://oig.usaid.gov/sites/default/files/2024-03/5-000-24-001-A-rev_0.pdf.

Van Camp, Katie R. 2014. "The Pardoning Power: Where Does Tradition End and Legal Regulation Begin." *Mississippi Law Journal* 83: 1271–1318.

Vecchioli, Virginia. 2011. "Human Rights and the Rule of Law in Argentina: Transnational Advocacy Networks and the Transformation of the National Legal Field." In Dezalay and Garth 2011, 93–112.

Vincent, Louise. 2008. "Cutting Tradition: The Political Regulation of Traditional Circumcision Rites in South Africa's Liberal Democratic Order." *Journal of Southern African Studies* 34, no. 1: 77–91.

Wang, Chenguang. 2013. "Legal Transplantation and Legal Development in Transitional China." *World Bank Legal Review* 4: 161–79.

Watson, Alan. 1974. *Law Making in the Later Roman Republic*. Oxford: Oxford University Press.

——. 1993. *Legal Transplants: An Approach to Comparative Law*. Athens: University of Georgia Press.

——. 1995. "From Legal Transplants to Legal Formants." *American Journal of Comparative Law* 43: 469–76.

Weitzman, Lenore. 1974. "Legal Regulation of Marriage: Tradition and Change, A Proposal for Individual Contracts and Contracts in Lieu of Marriage." *California Law Review* 62: 1169–1288.

Zaum, Dominik, and Christine Cheng, 2011. *Corruption and Post-Conflict Peacebuilding: Selling the Peace?* Abingdon, UK: Routledge.

Zaum, Dominik, Nils Taxell, and Jesper Johnson. 2012. "Mapping Evidence Gaps in Anti-Corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption." *CHR Michelsen Institute* 7 (October): 1–58. https://assets.publishing.service.gov.uk/media/57a08a9ae5274a27b2000699/U4Issue-2012-07-mapping-evidence-web.pdf.

Zimmermann, Reinhard. 1994. "Civil Code and Civil Law-The 'Europeanization' of Private Law within the European Community and the Re-Emergence of a European Legal Science." *Columbia Journal of European Law* 1: 63–106.
Zumbansen, Peer. 2010. "Transnational Legal Pluralism." *Transnational Legal Theory* 1, no. 2: 141–89.
Zumbrägel, Tobias. 2020. "Kingdom of Gravity:Autocratic Promotion and Diffusion in Saudi Arabia." In *Authoritarian Gravity Centers: A Cross-Regional Study of Authoritarian Promotion and Diffusion*, edited by Marianne Kneuer and Thomas Demmelhuber, 55–88. Abingdon, UK: Routledge.

Dr. Sapna Reheem Shaila is a Lecturer in Law at Kent Law School, University of Kent. The article is based on Sapna's doctoral research, which was completed at Dickson Poon School of Law, King's College London in 2022. Prior to joining Kent Law School, Sapna was a Max Weber Fellow in Law at the European University Institute. The author can be contacted at sr918@kent.ac.uk.

Cite this article: Reheem Shaila, S. (2025). 'A Translocal Compromise: Adoption of Anti-corruption Reforms in East Timor'. *Law & Social Inquiry* **50**, 406–437. https://doi.org/10.1017/lsi.2025.1