

Real Estate and Money Laundering in Cameroon: A Legal Appraisal

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Abstract

The regulation of the real estate sector to combat money laundering in Cameroon is critical due to its susceptibility to illicit financial activities. Real estate refers to property consisting of land, buildings, and natural resources attached to or within the land. It includes both the physical structures such as residential homes, commercial buildings, and industrial facilities and the land on which they are situated. The real estate sector refers to the industry involved in buying, selling, leasing, and developing land, buildings, and properties. It encompasses various activities and stakeholders related to both residential and commercial real estate. This study provides a legal appraisal of the current regulatory framework governing real estate transactions in Cameroon, with a focus on its effectiveness in mitigating money laundering risks. The analysis explores the regulatory mechanisms in place, including legal provisions, regulatory bodies, and enforcement practices. The study adopts a qualitative research methodology which makes use of empirical methods such as observation. It also makes use of the doctrinal method which entails content analysis of primary and secondary data. The ensuing result reveal that the sector is vulnerable as there is the absent of regulatory framework tailored to combat money laundering this sector which poses a great threat to same. The study proposes recommendations to strengthen the regulatory framework, enhance transparency, and foster international cooperation to combat money laundering effectively in Cameroon's real estate market. By addressing these issues, the study contributes to broader efforts aimed at promoting financial integrity, ensuring sustainable development, and protecting the national economy from illicit financial flows.

Keywords: real estate, money laundering, legal and appraisal

1. Introduction

Over the past two decades, money laundering has become a global phenomenon that has drawn a growing amount of attention. Money laundering is the process of processing criminal funds to conceal their illegal origin, according to the Financial Action Task Force (FATF)¹. Most of the time, money from illegal origins is concealed by passing it off as genuine through elaborate commercial deals or international trade. In addition to criminal groups and people, legal firms, institutions, and their officials may directly or indirectly influence laws or

¹ FATF, "International standards on combating money laundering and the financing of terrorism and proliferation", 2022 available at: www.fatf-gafi.org/media/fatf/documents/recommendations/pdfs/FATF%20Recommendations%202012.pdf, accessed 3/01/2023.

administrative procedures to aid in the money laundering process¹.

At the beginning of the 20th century, the term “money laundering” was first used. The criminalization of the real or attempted laundering of illegal proceeds is likewise relatively new. However, the practice of hiding money earned from illegal acts dates to the 13th century B.C. when the oceans and seas were first exploited as international commerce routes. The shipments were frequently emptied and looted for valuable goods and assets since they were rife with pirates. As they and even the empires they served attempted to benefit from their betrayals in a way that did not attract any ramifications, pirates were arguably pioneers in the technique of laundering such publications. Money laundering is a growingly expensive and time-consuming problem as awareness of it has increased².

However, Al Capone’s³ imprisonment ultimately backfired on the government as it compelled criminals to become more “organized” to materially profit from their illegal activities. The value of setting up enterprises was later realized by gangsters like Meyer Lansky, who used them as “fronts” for their illicit activities in addition to being able to launder money. Casinos are well-known “facade” businesses for illicit commerce. In the 1940s, people like Lansky and Benjamin “Bugsy” Seigel were notorious for using Las Vegas as a vehicle for money laundering.⁴

The value of foreign nations serving as havens for illicit activity was also recognized and acknowledged by Lansky⁵. Later in life, Lansky would amass countless sums of money in Swiss banks and in banks and businesses located in Hong Kong, Israel, and other countries⁶.

Money Laundering, despite having its roots in the developed world, is a global socioeconomic concern that affects both developed and developing nations. It happens at all levels of government, including global, governmental, state, and municipal. However, it is more obvious in African nations. Africa is the world’s poorest continent and has the most natural resources, though. Today, corruption and a leadership crisis have damaged the reputation of this great continent. Millions of African civilizations have tragically been destroyed by money laundering, leaving them in a desperate position. Money laundering has spread its tentacles over the whole African continent, endangering the right of African societies to develop⁷.

¹ Ahen, F., (2022). International mega-corruption inc.: the structural violence against sustainable development. *Critical Perspectives on International Business*, 18(2), pp. 178-200.

² Anti-Money Laundering Forum, available at [www.https://www.antimoneylaundering.org/Money_Laundering.aspx](https://www.antimoneylaundering.org/Money_Laundering.aspx), accessed on 7/01/2023.

³ Al Capone, known as Scarface, was born in Brooklyn in 1899. A member of various gangs, including his childhood, Al Capone was America’s most famous organized crime leader from 1925 to 1931. On June 5, 1931, Capone was charged with tax evasion of 22 federal income taxes between 1925 and 1929. On June 12, Capone and his gang were charged with violating the law between 1922 and 1931. In October, he appeared on trial and was found guilty of three of 23 crimes. He was sentenced to a \$ 50,000 fine and 11 years imprisonment. Capone, who spent many years in jail in various jails, was released on parole in November 1939. After his release, he moved to Florida and died in January 1947. Al Capone is also known as the person who gave the term money laundering. Money laundering is not a new activity in our lives. However, it was because of Al-Capone that we knew it in terms of terms. Al-Capone has made the source of the money illegally obtained by buying laundries in cash invisible. Thus, the laundries he bought became a front in hiding the money he obtained through drug smuggling, prostitution, and tax evasion.

⁴ Anti-Money Laundering Forum, available at [www.https://www.antimoneylaundering.org/Money_Laundering.aspx](https://www.antimoneylaundering.org/Money_Laundering.aspx), accessed on 7/01/2023.

⁵ Despite recent legislation and media attention money laundering is not a new phenomenon. Although various methods of moving cash obtained from the proceeds of crime through companies and bank accounts has been around for some time it is generally accepted that the form of money laundering as we know it today originated during the Prohibition era in the United States. Two events precipitated this. In 1931 Al Capone was convicted of tax evasion and in 1934 the Swiss Banking Act created the principle of bank secrecy.

One of Capone’s henchmen, a fascinating character called Meyer Lansky, began to transfer “Mob” funds to overseas accounts. Lansky was highly intelligent and was very financially astute. He was known as the “Banker for the American Mafia.”

He knew that with the conviction of Capone the American federal authorities would be looking to seize Mafia funds. So, Lansky bought a Swiss Bank (obviously with illegal funds) and began to transfer millions of dollars out of the country through a complex system of shell companies, holding companies and offshore bank accounts into “his” Swiss Bank. He was so successful at “money laundering” that despite their best efforts the authorities were unable to convict him. It was said that no one could put a finger on him because he “left no fingerprints anywhere”. Even the FBI had a grudging respect for him saying that if he had gone into a legitimate form of business, he could have been Chairman of the Board of General Motors or a similar Captain of industry. He died in 1983 aged 81.

⁶ Anti-Money Laundering Forum, Opt. Cit, p.3.

⁷ Abubakar. M, (2020). *The Role of EFCC in the Fight against Money Laundry in Nigeria*. International Institute of African Research Centre, p. 6.

In Cameroon, there is a considerable potential for money laundering and financing of terrorism. According to figures released during the first National Assessment of Money Laundering (ML) and Terrorist Financing (FT) Risks, more than 1050 billion FCFA, or roughly 1.8 billion dollars, were laundered in Cameroon between 2006 and 2017, according to the National Financial Investigation Agency (ANIF)¹. The Financial Action Task Force (FATF) recommendations in the matter, as well as the provisions of the Economic Community and Monetary Authority of Central Africa (CEMAC) regulations of April 16, 2016, on the prevention and repression of money laundering and the financing of terrorism, were both taken into consideration when conducting this evaluation, which benefited from the technical assistance of the World Bank (WB). The paper claims that theft of public funds and corruption result in increased quantities of money laundering².

The ANIF³ provides information on how vulnerable the state of Cameroon is to money laundering, and 700 cases were handed to the judicial authorities in 2018 as a result, the effects it has on development cannot be understated.

Banking, real estate, exchange offices, precious stone and metal dealers, notaries, casinos, and suppliers of building supplies all seem to carry a higher risk of money laundering. The second level of money laundering risk is made up of corporations that move money, specialized financial institutions, art dealers, and non-profit organizations, while the securities market and securities sector. The third degree of risk is represented by insurance companies, accountants and auditors, hire-purchase businesses, and cash transit businesses. From the alarming record of cases which has been tried by the special criminal court and the estimated amount of money for instance by the former minister of defence amounting to 100.000.000 billion FCFA leaves us wondering to what extent the right to development of the citizens of Cameroon might have been infringed by the Wickenden's of money launderers within Cameroon. As a nation, Cameroon has several domestic laws that aim to prevent money laundering to protect national security and uphold the right to development.

Money laundering is criminalized in Cameroon. The Cameroon penal code⁴ penalizes the conduct of money laundering in its Section 11. This Section provides in its paragraph one that *the criminal law of the Republic shall apply to mercenary, racial discrimination, piracy, trafficking in persons, slave trade, slavery, trafficking in narcotics, trafficking in toxic wastes, money laundering, cyber criminality, corruption and offences of misappropriation of public property committed even outside the territory of the Republic*.

Regardless of who perpetrated the crimes, where they were committed, or who the victims were, the State of Cameroon is allowed to exercise universal jurisdiction over offences that pose a threat to the common interests of humanity, such as the crime of money laundering. These are serious offences that any State that captures the offender or has effective control over him or her may pursue legal action against because they affect the international community's most important interests. In such circumstances, neither territorial nor national restrictions are enforced. The kind of crime that raises awareness worldwide is what counts.⁵ Money laundering is also dealt with by the banking secrecy law of 2003⁶ that empowers banks to fight money laundering by reporting suspicious transactions to judicial authorities.

Money laundering in Cameroon finds a haven in the real estate sector. Real estate is a piece of land that also includes anything that exists within the boundaries of that land that can be owned as property by a person or an entity. The ability to own real estate has created an industry that deals in the buying, selling, and management of real property. Most people understand the real estate industry from the perspective of realtors who facilitate house buying, but the real estate industry also extends to commercial property. Real estate businesses maintain a database of properties for sale or lease and may also manage their properties for use. The real estate industry is considered a business because it generates revenue based on the sale or lease of real property.⁷ Criminals employ various methods to launder money through real estate. The real estate sector, which is known for significant financial transactions, is an attractive avenue for money laundering. Notably, large sums of money change hands in real estate deals, making it an appealing choice for criminals seeking to integrate their illegal funds into the legitimate economy. This is a prevailing situation in Cameroon as money gotten from

¹ Achille. M, (2021). Cameroon: nearly \$ 2 billion in money laundering, Kapital Afrik, 1 January 2021, p. 2.

² *Ibid*.

³ National Financial Investigation Agency.

⁴ Law No.2016/007 of 12th July 2016 relating to the Penal Code.

⁵ Oana Adriana IACOB, (2004). "Principles Regarding State Jurisdiction in International Law", University of Bucharest, p. 602.

⁶ Law No. 2003/004 of 21st April 2003 relating to banking secrecy.

⁷ Study.com. Real Estate in Business. Available at <https://study.com/academy/lesson/real-estate-business-definition-types.html>. Accessed on 6/18/2024.

embezzlement, corruption, scamming and trafficking is laundered through the real estate sector as no one really follows up to know where the monies which are spent on buying properties came from.

Hence, this study seeks to examine the hoe the real estate sector is a conduit for money laundering in Cameroon thereby proposing possible solution to address same.

2. The Legal Framework Regulating the Real Estate Sector in Cameroon

In Cameroon, the real estate sector is regulated by various laws, regulations, and administrative provisions that govern property rights, transactions, urban planning, and related matters. Amongst them we have the Civil Code of Cameroon, particularly Book III (Property and Ownership), which provides the fundamental legal framework governing property rights, ownership, and contractual relationships related to real estate. Also, there is the Land Tenure Laws that operates under a dual land tenure system, which includes statutory (state) land and customary (traditional) land tenure systems. These are governed by customary law and specific statutes such as the Land tenure ordinance.¹ The OHADA Uniform Act on General Commercial Law² is also one of the available laws regulating the real estate sector in Cameroon. Cameroon is a member of the Organisation for the Harmonisation of Business Law in Africa (OHADA). The OHADA Uniform Act on General Commercial Law harmonizes rules on contracts, obligations, and security interests, including those relevant to real estate transactions. The Land Registry and Mortgage Registry regulate the registration of land titles, mortgages, leases, and other property transactions. These registries provide legal certainty and prevent disputes over property ownership. Local authorities establish urban planning and zoning regulations to guide land use, development projects, building permits, and infrastructure planning within urban and rural areas. Property transactions in Cameroon are subject to various taxes and fees, including stamp duties on property transfers, annual property taxes, and registration fees for legal documents related to real estate transactions.³ There are also Laws aim at protecting property buyers and tenants against fraudulent practices, misrepresentation, and unfair contract terms. Consumer protection provisions ensure transparency and fairness in real estate transactions. Environmental laws and regulations govern the impact of real estate development on natural resources, biodiversity, and environmental sustainability. These regulations aim to mitigate adverse environmental impacts from construction and development projects.

These laws are followed up by ministries charged with the duty of doing same such as the Ministry of Housing and Urban Development which oversees policies and regulations related to housing, urban development, and real estate. The National Agency for Real Estate *Cadastre* and Land Registration (ANCF) manages land registration and *cadastre* systems. These laws and regulations collectively aim to ensure transparency, protect property rights, promote sustainable development, and facilitate a conducive environment for real estate investment and economic growth in Cameroon. Understanding and complying with these legal provisions are essential for stakeholders in the real estate sector, including property developers, investors, buyers, sellers, landlords, and tenants.

3. The Money Laundering Process

As a process, money laundering follows a pattern and is accomplished through various stages. For more complex cases a three-stage model, proposed by William Rosenblatt, is a widely accepted framework to analyse the process of money laundering.⁴ The procedure starts with the placement, when the illicit funds are collected from their sources and are introduced into the financial system. Then comes the layering, when various, often complex transactions are executed to distance the money from the committed crime. During the last stage, called integration, these assets are converted into seemingly legitimate funds using a formally legal business entity.⁵ However, other authors have distinguished more steps and stress that not all stages are necessary during the process.⁶

3.1 Placement

More traditional forms of crime, such as drug and human trafficking, are cash-intensive activities and usually require placement. Criminals may partially sidestep this stage by directly paying co-offenders or other partners

¹ See Law n°80/21 of 14 July 1980 to amend certain provisions of ordinance n°74/1 of 6 July 1974 to establish rules governing land tenure.

² "UNIFORM ACT ON GENERAL COMMERCIAL LAW — Ohadalegis." <http://www.ohadalegis.com/anglais/telAUGB/2010-Ohada-General-Commercial-Law-en.pdf>. Accessed on 6/18/2024.

³ "Land registry: From Deeds to Digital: The Entrepreneur's Guide to Modern" <https://fastercapital.com/content/Land-registry--From-Deeds-to-Digital--The-Entrepreneur-s-Guide-to-Modern-Land-Registries.html>. Accessed 6/18/2024.

⁴ *Ibid* p. 4.

⁵ USDT (Department of the Treasury), *National money laundering risk assessment*, 2018, p. 2.

⁶ Levi & Soudijn, 2020, p. 4.

in cash or handing over valuables such as jewels, gems, or gold, but if they generate a significant illicit profit, this is not viable. During the placement, the goal is to deposit the cash into an account of a financial intermediary or transfer it using a money remittance provider. However, criminals want to avoid being detected, so they use several techniques to conceal the unlawful origin of their revenues.

The illicit income is often split into multiple parts (structuring or smurfing) to circumvent reporting thresholds.¹ In the absence of a proper monitoring system, a criminal could deposit smaller amounts several times at various branches of a bank if these transactions were not connected. Obviously, the criminal would still risk confiscation, so straw or front men or women are frequently employed to open and operate bank accounts. One possibility is to find complicit relatives or friends, in many cases the offenders' wives or girlfriends.²

Another solution is to recruit a money mule who will open an account, transport cash, or deposit it as needed. They are typically socially marginalized people having economic difficulties, who offer their services in exchange for a smaller amount. Many of them are homeless people, drug addicts, alcoholics, or students in a dire financial situation, who either do not understand their role in the illegal activity or are willingly turning a blind eye to it.³ If criminals have complicit connections in a bank, they may steal and use the documents of a third person, which is called identity theft.

3.2 Layering

In the next stage of layering a complex scheme of wire transfers or foreign money orders is used to hide the origin of the deposited cash. Higher reporting standards increased banking transparency in recent years, so criminals started to use more sophisticated methods to achieve their goal. However, financial innovations, globalizing financial markets, and less detailed reporting of ultimate owners in certain jurisdictions facilitated their job.

The more illicit revenue the offenders make, the more likely it is that they would employ a professional money launderer. Depending again on complexity, this can be a single individual who may have professional expertise in accounting, financial advisory, legal counselling, or company registration. For more complicated cases such experts can create a professional money laundering organization, where the members can specialize in separate fields, thus offering criminals a more advanced service. These organizations may cooperate internationally and form a professional money laundering network. Due to the general problem of limited observation, it is hard to tell what extent criminals use such networks, but highly organized crime groups, tax evaders, and high-ranking corrupt politicians typically collaborate with professionals to obfuscate the illicit source of their revenues.⁴

The role of money mules is crucial in the layering stage. Their work is often coordinated by a money mule herder, who directs their activities and is responsible for their recruitment and remuneration. Money mules often apply for online job advertisements offering a transaction manager or a seemingly similar administrative position. Their task is to perform transactions either actively with their bank accounts, or just to pass their credentials to their herder.⁵

The money mules usually quickly forward the illicit income abroad or to companies with an opaque ownership. There are certain jurisdictions where bank secrecy provides a haven for money launderers, and it is easier to open bank accounts owing to lax customer due diligence. Another issue is the case of shell companies, which are firms that do not conduct real economic activities, and just have a bank account and a letter box. Again, many countries and states facilitate the obscuration of the beneficial owners of such firms; consequently, foreign authorities may find it difficult during an investigation to identify the ultimate natural person who owns the company. Trusts are especially suitable for this purpose because the settler (i.e., the person who provides the assets to the trust) can create significant legal distance from the beneficiary (i.e., the person who is entitled to the benefits of these assets). There are specialized enterprises, called trust and company service providers, who may willingly assist criminals to set up such complex networks. To further decrease suspicion, they can offer their clients shell companies, which had been founded in advance and were left without a real business activity, just to be taken over by a prospective client. Once having a network of shell companies or infiltrated firms with real activity, the money launderers can create fictitious contracts to provide a seemingly satisfactory documentation,

¹ USDT, 2018, pp. 23-25.

² Kleemans, E., et al. (2014). Women, brokerage and transnational organized crime: Empirical results from the Dutch organized crime monitor. *Trends in Organized Crime*, 17(1-2), 16-30, p. 27-28.

³ Kruisbergen, E., et al. (2019). Money talks money laundering choices of organized crime offenders in a digital age, *Journal of Crime and Justice*, 42(5), 569-581, p. 576.

⁴ FATF (Financial Action Task Force), 2018, pp. 12-13.

⁵ FATF (Financial Action Task Force), 2018, pp. 22-24.

which would, at least on paper, necessitate such transactions.¹

One of the oldest money laundering schemes, called loan back, is anecdotally attributed to another notorious Prohibition-era mobster, Meyer Lansky. After learning in 1931 that Al Capone was sentenced to 11 years in prison for tax evasion, he realized the necessity of moving his illicit income abroad and removing its traces as much as possible. Switzerland had long been known for its bank secrecy, but the Federal Act on Banks and Savings Banks of 1934 raised existing regulations to a federal level. The most important feature was the possibility to open numbered accounts, and it became a federal crime to disclose the owners and the transactions of these accounts, unless the owner consented, or a Swiss court approved such request. Lansky started to move his funds to Swiss numbered accounts, and many journalists connected him with the Banque de Cr dit International in Geneva and other banks in The Bahamas. As soon as the money from illegal gambling was deposited into these numbered accounts, he could get a seemingly legal “loan” secured by the unlawful account balance at these complicit.²

Trade-based money laundering, a type of invoice fraud, is a similarly widespread scheme. In its simplest form, the criminals have two infiltrated companies at their disposal, which can be owned by professional money launderers. Depending on your needs, these businesses can be registered in different countries. To transfer money between the places, they trade in various types of goods, which can be physically delivered or solely exist on paper (phantom shipping). To move funds from Firm A to Firm B, the latter will over-invoice or deliver less than written in the packing list, called short shipping. To transfer money in the opposite direction, Firm B may under-invoice or do over-shipping. The seller can also issue multiple invoices for the same goods, one for the shipment and another for accounting purposes.³

3.3 Integration

During the last stage, known as integration, criminals attempt to use the funds from the layering to perform ostensibly legal economic transactions. The money from the loan back scheme can cover the acquisition of real estate, other forms of investment or luxuries. Organized criminals can infiltrate the legal economy by founding new firms using figureheads or by taking over existing ones with coercion. In different countries diverse economic sectors can attract them, yet they commonly target cash-intensive businesses, like the catering industry, tourism, entertainment, transportation, and construction. Labor-intensive industries with high unreported labour also facilitate laundering, although criminals may decide to formally employ themselves and their relatives in fictitious positions to decrease suspicion. In Italy sectors with high public spending are also prone to infiltration due to collusion between the organized crime and public officials.⁴ Nonetheless, it does not mean that other sectors are totally free of criminal presence. A notorious case resulted in the Italian anti-mafia authorities seizing €1.3 billion of a businessman who operated one-third of the Sicilian wind farms.⁵

For trade-based schemes, the goods bought at a below market price can be sold on the legal market with an excess profit. In 2016, a Europe-wide cooperation of the authorities uncovered an Iraqi organized crime group laundering income from heroin trafficking. The offenders shipped used cars, machinery, and construction equipment from Germany to Iraq, where they sold them on the legal market. Later they transferred the revenues back using remittance providers and an informal value transfer system called *hawala*, which is widespread in the Middle East and North Africa.⁶ The hawala has been facilitating long-distance trade for centuries. Assuming that Individual A owes money to Individual B in a distant country, A approaches a hawala broker X, called a *hawaladar*. Then A shares a password or token with both X and B, while X contacts another hawala broker Y in the country of B, who, upon B tells the correct password, pays the sum to B. If a significant balance accumulates over time, X and Y settle it. A key element of the whole system is honour, where individuals not keeping their

¹ FATF (Financial Action Task Force), 2010, *Money laundering using trust and company service providers*. Paris, France: Financial Action Task Force.

² OECD (Organisation for Economic Co-Operation and Development), (2019). *Money laundering and terrorist financing awareness handbook for tax examiners and tax auditors*. Paris, France: Organisation for Economic Co-Operation and Development, pp. 59-63.

³ *Ibid*, pp. 59–63.

⁴ Mirenda, L., et al, (2019). The real effects of Ndrangheta: Firm-level evidence, *Bank of Italy Working Papers*, 1235, pp. 14-15.

⁵ Faiola, A., (2013). Sting operations reveal mafia involvement in renewable energy. *The Washington Post*. Available at https://www.washingtonpost.com/world/europe/sting-operations-reveal-mafia-involvement-in-renewable-energy/2013/01/22/67388504-5f39-11e2-9dc9-bca76dd777b8_story.html, accessed on the 5/04.2023.

⁶ FATF, 2018.

word are excommunicated.¹ Hawala is known as *hundi* on the Indian subcontinent, but several similar systems exist, such as the *fei qian* or flying money in China.²

4. How Money Is Laundered Through the Real Estate Sector

Criminals employ various methods to launder money through real estate transactions, exploiting loopholes and utilizing third parties to conceal their involvement. Understanding these techniques is crucial for combating money laundering effectively. Amongst the methods used in laundering money through the real estate sector, we have the following.

4.1 Use of Third Parties

Criminals often rely on individuals they know, typically family members with clean records, to purchase real estate on their behalf. By conducting the transaction through the third party's account, the criminal's name is kept out of the purchase documents, making it harder to trace the illicit funds.³

4.2 Utilizing Credit and Mortgage

Credit and mortgage can serve as collateral for laundering criminal proceeds. Criminals may secure loans against the property, and the resulting funds are mixed with legitimate funds, making it difficult to distinguish between legal and illegal funds.⁴

4.3 Manipulation of Property Values

Collaborating with real estate agents or appraisers, criminals manipulate property valuations. This can involve either undervaluing or overvaluing the property. Undervaluation allows criminals to acquire loans while overvaluation maximizes the amount that can be laundered by obtaining larger loans based on inflated property values.⁵

4.4 Structuring Cash Deposits

Criminals may deposit cash across multiple banks to avoid triggering the reporting threshold, which would require the bank to report the transaction. These funds are then used to obtain bank checks or other legitimate forms of payment to purchase real estate.⁶

4.5 Rental Income as Legitimization

Criminals generate rental income from their properties and use illicit funds to cover the rent payments. Alternatively, they may purchase properties on behalf of third parties, rent them out themselves, and utilize illegal funds to meet the rental obligations, thereby legitimizing the origin of the money.⁷

4.6 Real Estate Transactions as Facilitators

Criminals purchase properties, invest black money in renovations, and subsequently sell the properties at higher prices. This process allows them to legitimize their illegal funds and create the appearance of legitimate transactions while laundering money in the process.⁸

4.7 Use of Front Companies

Criminals establish shell companies in foreign jurisdictions to own real estate, enabling them to move black money across borders. These front companies provide a veil of secrecy and make it challenging for authorities to

¹ FATF (Financial Action Task Force), (2013). *The role of hawala and other similar service providers in money laundering and terrorist financing*. Paris, France: Financial Action Task Force, p. 23.

² Cassara, J, (2016). *Trade-based money laundering: The next frontier in international money laundering enforcement*. Hoboken, NJ: John Wiley & Sons, pp. 73-88, available at <https://onlinelibrary.wiley.com/doi/book/10.1002/9781119125389>, Accessed 9/04/2023.

³ "Money Laundering Through Real Estate — Sanction Scanner." <https://www.sanctionscanner.com/blog/money-laundering-through-real-estate-318>. Accessed on 6/18/2024.

⁴ "Money Laundering through Real Estate — Ipsen Due Diligence." 01 Jul. 2023, <https://www.ipsenduediligence.com/post/money-laundering-through-real-estate>. Accessed on 6/18/2024.

⁵ "The Money Trail: How Criminals Exploit Real Estate for Money Laundering." 08 Mar. 2024, <https://financialcrimeacademy.org/how-to-launder-money-through-real-estate/>. Accessed 6/19/2024.

⁶ *Ibid.*

⁷ "Unveiling the Shadows: Financial Crime in Real Estate and ... — LinkedIn." 03 Jun. 2024, <https://www.linkedin.com/pulse/unveiling-shadows-financial-crime-real-estate-our-role-ho%C5%82oga-merye>. Accessed on 6/16/2024.

⁸ *Ibid.*

trace the flow of funds.¹

5. Detecting Money Laundering Through Real Estate

Several methods can be used to detect money laundering within the real estate sector. These measures include Asset Declaration, Regulation of Gatekeepers, Land Registers. These measures will be treated in turns.

5.1 Asset Declaration

Implementing a stringent system where public officials, particularly senior officials and their close associates, are required to declare their assets both before and after their term of service is a viable measure for combatting money laundering through real estate. These declarations should be publicly accessible, allowing independent officials to verify the accuracy of the statements.² By closely examining these declarations, any unexplained or suspicious wealth can be identified, potentially indicating money laundering. Sadly enough, it is not the case in Cameroon as most public officials do not disclose their assets before and after they leave office.³

5.2 Regulation by Gatekeepers

Professionals involved in real estate transactions, such as real estate agents, lawyers, and financial institutions, should act as gatekeepers to prevent money laundering. They should have access to a comprehensive beneficial ownership list, enabling them to verify the true identities of individuals behind corporate entities involved in transactions.⁴ Conducting thorough due diligence and monitoring for any suspicious transactions can help identify potential money laundering activities. Gatekeepers should promptly report any suspicions to the relevant authorities or beneficial owners. Additionally, independent officials should periodically review compliance with sanction bans and other regulatory requirements. In the context of Cameroon, those who ought to be acting as gatekeepers are most often the ones that facilitate the money laundering process for their clients.⁵

5.3 Digital Land Registration Process

Establishing a centralized and online land registry system can enhance the detection of money laundering in real estate. This system would maintain transparent and publicly accessible records of property ownership. By having a comprehensive database that reveals property ownership details, it becomes easier to track the origin of funds and identify any suspicious transactions or patterns of ownership. Greater transparency in land registers discourages criminals from using real estate for money laundering. The situation in Cameroon currently does not reveal this as land registration is a cumbersome process and it is possible for several persons to hold a land title duly established over the same property as it is observed daily by the researchers.⁶

6. Case Law Approach Revealing the Vulnerability of the Real Estate Sector to Money Laundering in Cameroon

6.1 The Edgar Alain Mebe Ngo'o Case

Edgar Alain Mebe Ngo'o spent a couple of years from 1991 to 1997 as a senior divisional officer, before making the long jump to become Director of the Civil Cabinet of the Presidency on December 7, 1997, where he spent seven years.⁷ He was later appointed Delegate-General for National Security, and subsequently as Minister of Defense. Rumor of him started circulating that he was amassing lots of money with the intention of eventually toppling the president, which he denied and was later appointed Minister of Transport.⁸ In 2018, he was finally kicked out of the government. After being dismissed from the government, reports of him being involved in

¹ *Ibid.*

² "Asset Declarations: A Threat to Privacy or a Powerful Anti-Corruption Tool?." 26 Sept. 2016, <https://www.worldbank.org/en/news/opinion/2016/09/26/asset-declarations-a-threat-to-privacy-or-a-powerful-anti-corruption-tool>. Accessed on 6/15/2024.

³ "Money Laundering Techniques — August 2023 — LinkedIn." 31 Aug. 2023, <https://www.linkedin.com/pulse/money-laundering-techniques-august-2023-forestier-cams/>. Accessed on 6/16/2024.

⁴ "Money Laundering Through Real Estate — Sanction Scanner." <https://www.sanctionsscanner.com/blog/money-laundering-through-real-estate-318>. Accessed 6/15/2024.

⁵ *Ibid.*

⁶ *Ibid.*

⁷ Killian Ngala. Cameroon: Jail Terms for Mebe Ngo'o, Wife Signals Turning Point in Running Battles To Succeed Nonagenarian Biya. Available at <https://timescapemag.com/2023/02/03/cameroon-jail-terms-for-mebe-ngoo-wife-signals-turning-point-in-running-battles-to-succeed-nongenarian-biya/>. Accessed on the 20/01/2024.

⁸ *Ibid.*

embezzlement surfaced, and in March, he was arrested and sent to the Kondengui maximum security Prison. The former minister Mebe Ngo'o was one-time Director of the Civil Cabinet at the Presidency of the Republic, and the Delegate General for National Security.

Edgar Alain Mebe Ngo'o, being jailed since 2019, was charged by the Special Criminal Court on four counts: embezzlement of public funds, aggravated money laundering, over-invoicing of contracts, and corruption.¹ As of 1st February 2023, the Special Criminal Court found him guilty of embezzling more than CFA F 23 billion. His wife was also found guilty of complicity in embezzling CFA F 5 billion, and for embezzling CFA F 310 million. The Court revealed that Mebe Ngo'o stole the money through a system of overbilling what it said were fictitious public contracts.

He was also found guilty of large-scale corruption, influence-peddling, and money laundering.

Maxime Leonard Mbangue, a Treasury inspector and ex-technical adviser to the Ministry of Defence, and Colonel Elie Mboutou, a former close ally of Mebe Ngo'o, were also found guilty of embezzling public monies for amounts of 6 and 16 billion CFA francs, respectively. Victor Menye, a former deputy general manager of the Cameroon Banking Company (SCB), was cleared of corruption charges but found guilty of involvement in aggravated money laundering.²

The court, after having found them all guilty sentenced Edgar Alain Mebe Ngo'o to 30 years for embezzling public funds. His wife, Bernadette, was sentenced to 10 years for complicity in embezzlement. The Court also sentenced a senior officer (Lieutenant-Colonel Mboutou) and a former technical adviser to the Ministry of Defense (Maxime Mbangue), each to 25 years in prison, as well as Victor Menye, the former -deputy managing director of the SCB bank, to 9 years of detention.

The guilty verdict was handed down by the Special Criminal Court in the wee hours of February 1st, 2023, after 15 hours of trial. The court also ordered the seizure of the couple's assets, including 53 buildings, 21 bank accounts, 39 vehicles, and more than \$500,000 in cash. However, the case is on appeal as the defendant's lawyers found the judgement to be erroneous and filled with a lot of ambiguities which they believe will be addressed at the level of the appellate court. ³Worth nothing is the fact that we were not given access to the case full records of the file at the time this research was being carried out as we were made to know that the file is on appeal.

6.2 Properties Recovered from Money Laundering in the Edgar Alain Mebe Ngo'o Case

Following the case of Edgar and co, several properties were recovered wherein he laundered the monies he embezzled from the state. The properties recovered from him as revealed by the judgment amount to approximately 301, 000,000 FCFA. These properties are represented as follows.

Approximately 39 Vehicles and heavy machinery which include Mercedes 221156 CE 055 HP, Toyota Avelon CE 317 HZ, Lexus LS430 CE 6171 W, Toyota Camry CE 325 FC, Toyota Yaris CE 036 GV, Toyota AVALON CE 316 HZ, Renault 6VFE4A Van CE 953 FE, TOYOTA LEXUS BF12G6 CE 536 IB, Mercedes S400 CE 547 HS, Mercedes Van 906633 LT 086 IC, Toyota Hilux LAN 25L CE 578 GS, Toyota Land Cruiser CE 661 GR, Mercedes VIANO CE 404 FQ, Mercedes VIANO CE 395 FQ, Mercedes Viano Minibus CE 111 FU, Toyota Coaster CE 529 GU, Toyota Coaster CE 157 GU, Toyota V8 Tundra CE 303 DJ, Peugeot 508 Allure CE 634 FR, Toyota Fortuner CE 643 HA, Nissan NTZ 15T2 CE 202 GI, Toyota Land Cruiser CE 275 HG, Volkswagen 7H2 CE 886 FV, Toyota Avalon 4TYBK CE 372 IC, Mercedes E-Class CE 909 CZ, Toyota Land Cruiser CE 830 EW, Nissan Maxima CE 826 AH, Volkswagen Caravelle CE 887 EV, Volkswagen CE 105 FU, Toyota Land Cruiser CE 1200 W, Peugeot 607 CE 715 BO, Mercedes 405 CE 349 EW, Caterpillar D7-G CE SE 1661 B, Mercedes CE 146 BR tipper, Mercedes 6743 Van CE 439 EW, Mercedes 638164 CE 621 GB, Volkswagen CE 887 EV, Caterpillar 970 F CE SE 1660 B, Mercedes 652008 Van CE 172 EU.

From the foregoing as revealed by the court judgment obtained at the special criminal court in Yaoundé, a total of 32 vehicles and 07 vehicle registration documents were seized. Away from those several laundered properties were also recovered from the former minister as his accomplice amongst which we had Land Title No. 3633/MAF, at a place called Mfou (Minkan), with an area of 5488 m², belonging to MEBE NGO'O Edgard Alain Abraham and others; Land Title No. 3821/MAF, at a place called Mfou (Nkolnda II), with an area of 2467

¹ Aurore Bonny. Cameroon's ex-defense minister gets 30 years in jail for corruption. Available at <https://www.aa.com.tr/en/africa/cameroons-ex-defense-minister-gets-30-years-in-jail-for-corruption/2804761#>. Accessed on 20/01/2024.

² Abdullahi Jimoh. Cameroon Jails Former Defense Minister, Mebe Ngo'o for Corruption. Available at <https://newscentral.africa/cameroon-jails-former-defence-minister-mebe-ngoo-for-corruption/>. Accessed on 20/01/2024.

³ Opt. cit. Aurore Bonny.

m², belonging to MEBE NGO'O Edgard Alain Abraham and others; Land Title No. 4173/MAF, at a place called Nkolnda II, with an area of 01ha 70a 22ca, belonging to MINLA NKOULOU wife MEBE NGO'O and others; Land Title No. 4863/MAF, at a place called Nkolnda II, with an area of 01ha 66a 61ca, belonging to MINLA NKOULOU wife MEBE NGO'O; Land in the process of being registered, with an area of 391 m², belonging to Dame MINLA NKOULOU wife MEBE NGO'O; Land Title No. 881 of the Department of Dja and Lobo, at the place called Shopping Center in Sangmelima, with an area of 1,931 m² belonging to MBANGUE Maxime (mortgage registration); Land Title No. 1758 of the Department of Dja and Lobo, at a place called Nkolnguét in Sangmélina, with an area of 1,656 m² belonging to MBOUTOU ELLE Ghislain Victor (mortgage registration); Land Title No. 2350 of the Department of Dja and Lobo, at a place called Nkol Mekomo in Sangmélina, with an area of 03 hectares 40 acres 64 centiares, belonging to MBOUTOU ELLE Ghislain Victor (mortgage registration); Land Title No. 3009 of the Department of Dja and Lobo, at a place called Mekom I in Sangmélina, with an area of 18 hectares 93 acres 19 centiares, belonging to MBOUTOU ELLE Ghislain Victor (mortgage registration); Land Title No. 2189 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 03 hectares 71 acres 66 centiares, belonging to MEBE NGO'O Edgard Alain Abraham (mortgage registration); Land Title No. 2190 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 05 hectares 59 acres 68 centiares, belonging to MEBE NGO'O Edgard Alain Abraham (mortgage registration); Land Title No. 2191 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 4,920 m², belonging to MEBE NGO'O Edgard Alain Abraham et al. (mortgage registration); Land Title No. 2192 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 02 hectares 23 acres 05 centiares, belonging to MEBE NGO'O Edgard Alain Abraham and others (mortgage registration); Land Title No. 2193 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 09 hectares 00 are 84 centiares, belonging to MEBE NGO'O Edgard Alain Abraham et al. (mortgage registration); Land Title No. 2194 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 10 hectares 27 acres 50 centiares, belonging to MEBE NGO'O Edgard Alain Abraham and others (mortgage registration); Land Title No. 2195 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 03 hectares 12 acres 14 centiares, belonging to MEBE NGO'O Edgard Alain Abraham and others (mortgage registration); Land Title No. 2224 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 29 hectares 41 acres 31 centiares, belonging to MEBE NGO'O Edgard Alain Abraham and others (mortgage registration); Land Title No. 2225 of the Department of Dja and Lobo, at a place called Nkolfong in Zoétélé, with an area of 10 hectares 68 acres 01 centiare, belonging to MEBE NGO'O Edgard Alain Abraham et al., (mortgage registration); a residence located at a place called MONE AVEBE in Sangmelima, consisting of a house (04 rooms and 02 rooms used as a store) and an outbuilding comprising 05 rooms belonging to the MEBE NGO'O spouses; a residence consisting of two (02) buildings: 07 rooms and 03 rooms respectively and a party room in Ngoulemakong (Sangmélina) belonging to MBOUTOU ELLE Ghislain Victor; a duplex (R+1) and an outbuilding (R+1) at a place called Lobo Si in Sangmelima belonging to MBANGUE Maxime Léonard; Land Title No. 8.629/Ocean of the Department of Ocean, at a place called Bissiang in Kribi, with an area of 05 hectares 94 acres 50 centiares, belonging to MENYE Victor Emmanuel, NGOUE ANDOUGOU Marie Laure wife MENYE, NANDTOUNGOU Anastasie Crescence, MBAZOA MENGOUNGOU Albertine Yvette and MISAM MADAYA Alain Maichel, (mortgage registration); Land Title No. 4.796/Ocean of the Department of Ocean, at a place called Bikondo in Kribi 2nd with an area of 03 ha 00 a 00 ca, belonging to Dame MEBE NGO'O née MINLA NKOULOU Bernadette, (mortgage registration); Land Title No. 4.288/Ocean of the Department of Ocean, at a place called Ebouoyoè in Kribi 2nd with an area of 3,000 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO'O, (mortgage registration); Land Title No. 4.308/Ocean of the Department of Ocean, at a place called Nziou in Kribi 2nd with an area of 870 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO'O, (mortgage registration); Land Title No. 8.417/Ocean of the Department of Ocean, at a place called Nziou in Kribi 2nd with an area of 1.507 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO'O, (mortgage registration); Land Title No. 9.661/Ocean of the Department of Ocean, at a place called Nziou in Kribi 2nd with an area of 573 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO'O; Land Title No. 3.169/Ocean of the Department of the Ocean, at a place called Elabè in Kribi 2nd with an area of 2.435 m², belonging to MEBE NGO'O Alain Abraham, Dame MEBE NGO'O née MINLA NKOULOU Bernadette, NGO'O MEBE Jean Philippe Stéphane, ADJOA MEBE Elise Christelle, MEBE NGO'O Alain Didier Serge and MEBE NKOULOU Lionel Thierry, (mortgage registration); Land Title n° 8.296/Ocean of the Department of Ocean, at a place called Malaba in Campo with an area of 2,000 m², belonging to the MBANGUE family represented by Mrs. and Mr. MBANGUE Maxime Léonard, (mortgage registration); Land Title n°5.611/Ocean of the Department of Ocean, at a place called Malaba in Campo, with an area of 07 ha 08 a 66 ca belonging to Dame NGO BAYIG Sandra wife MBANGUE, MBANGUE Maxime Léonard, MBANGUE Emmanuel Pharell and BAYIG MBANGUE Aaron Loïc, (mortgage registration); Land Title n° 5.621/Ocean of the Department of Ocean, at a place called Malaba in Campo, with an area of 03 ha 58 a 92 ca belonging to the

MBANGUE Family represented by Dame ZEH ANGO Madeleine and sieurs MBANGUE Maxime Léonard, MBANGUE ENZO William, (mortgage registration); Land Title No. 5.612/Ocean of the Department of Ocean, at a place called Malaba in Campo with an area of 15 ha 74 a 97 ca belonging to Dame NGO BAYIG Sandra wife MBANGUE, MBANGUE Maxime Léonard, MBANGUE NDO Line Sandra Léila, and MBANGUE Yves Edouard, (mortgage registration); Land Title No. 17,356/Mfoundi at a place called Mbog-Abang in Yaoundé IV, with an area of 5,723 m², under the name of “LE GRAND COLISEE SARL”, represented by Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land titles n° 39,377 and 40,305/Mfoundi at a place called MESSAMENDONGO (Yaoundé), of 2,178 m² and 1,088 m² respectively, belonging to MEBE NGO’O Edgar Alain Abraham; Land title n° 48.956/Mfoundi at a place called Mvan-Sud in Yaoundé, with an area of 894 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O and others; Land title n° 43.092/Mfoundi at a place called Mvan-Sud in Yaoundé IV, with an area of 220 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O and others; Land title n° 0092/Mfoundi at a place called Yaoundé NGOUSSO (Yaoundé V), with an area of 760 m², belonging to MEBE NGO’O Edgar Alain Abraham; A residence at a place called Odza, set up Kuwait City in Yaoundé, consisting of 04 buildings belonging to the MEBE Ngo’o spouses; a set of 06 shops adjoining a studio (bedroom, living room, kitchen, shower room) in Yaoundé-Ahala headquarters of Limousines Prestige Services, belonging to the MEBE NGO’O couple; Land title n° 5.948/Mfoundi at the place called Yaoundé Industrial Center in Yaoundé IV Coron district, with an area of 916 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land title n° 38,757/Mfoundi at a place called ETOA in Yaoundé II, with an area of 5,000 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land title n° 44,696/Mfoundi at a place called ETOA in Yaoundé II, with an area of 4,165 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land title n° 39,612/Mfoundi at a place called Odza II in Yaoundé IV, with an area of 3,053 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land title n° 18,353/Mfoundi at a place called OLIGA in Yaoundé II, with an area of 2,755 m², belonging to MBANGUE Maxime Léonard; Land title n° 3,597/Mfoundi at a place called MBALLA I; in Yaoundé I, with an area of 566 m², belonging to MBANGUE Maxime Léonard; Land title n° 37.323/Mfoundi at a place called MBANKOLO, in Yaoundé II, with an area of 471 (four hundred and seventy-one) m², belonging to MBANGUE Maxime Léonard; Land title n° 35.582/Mfoundi at a place called MINKAN, in Yaoundé IV, with an area of 875 m², belonging to MBOUTOU ELLE Ghislain Victor; Land title n° 02214/Mfoundi at a place called Mekoumbo I (Yaoundé III), with an area of 2ha 38a 01ca, belonging to MEBE Marie Leocadie and others; Land title n° 48,293/Mfoundi at a place called ETOA in Yaoundé III, with an area of 5,000 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O; Land title n° 43.944/Mfoundi at a place called MBANKOLO (Yaoundé II), with an area of 471m², belonging to MBANGUE Maxime Léonard; Land title n° 32.002/Mfoundi at a place called NKOMO-OKOUI (Yaoundé IV), with an area of 1237 m², belonging to MEBE NGO’O Edgard Alain Abraham; Land title n° 36,931/Mfoundi at a place called BITENG (Yaoundé IV), with an area of 1,568 m², belonging to MEBE NGO’O Edgard Alain Abraham and others; Land title n° 1.344/MVILA in Ebolowa, place called Adoum Soir, with an area of 7.973 m², belonging to Dame MINLA NKOULOU Bernadette wife MEBE NGO’O and others; a residence in Ebolowa, a place called Ekombité, TF n°281/NTEM belonging to MEBE NGO’O Edgard Alain Abraham; a residence in Ebolowa, place called Lotissement de Bilon Comice, lot n°87 belonging to MEBE NGO’O Edgard Alain Abraham; Land title n° 11,250/Mgo at a place called Yapaki, Arrondissement of ABO, with an area of 2,549 m², belonging to MBANGUE Maxime Léonard; A total of 57 (fifty-seven) buildings seized on the national territory. From these case, we can see to what extent the real estate sector is vulnerable to money laundering and the question we must ask ourselves is how was it possible for almost 26 billion FCFA to be effectively laundered with the real estate sector without any detection. That shows to what extent the need to be strengthening of the regulatory measures within the real estate sector in a bit to combat money laundering in Cameroon.

7. Findings and Conclusion

The legal appraisal of real estate and money laundering in Cameroon reveals significant challenges and opportunities within the regulatory framework governing this critical sector. Key observations and conclusions drawn from the study are included.

Legal Framework Assessment. The existing legal framework, encompassing laws on property rights, transactions, urban planning, and taxation, provides a foundation for regulating real estate activities and combating money laundering.

Money Laundering Risks in Real Estate. This finding reveals that real estate transactions in Cameroon are susceptible to money laundering due to inadequate transparency, lax enforcement of regulations, and loopholes in regulatory oversight.

Effectiveness of Anti-Money Laundering Measures. While efforts have been made to implement anti-money laundering measures, such as registration requirements and due diligence obligations, their effectiveness is

hindered by challenges in enforcement, resource constraints, and institutional capacity.

In conclusion, addressing the nexus between real estate and money laundering in Cameroon requires a multifaceted approach that combines legislative reforms, institutional strengthening, enhanced enforcement, and stakeholder engagement. By bolstering the legal framework and regulatory practices, Cameroon can mitigate money laundering risks in the real estate sector, promote transparency, and safeguard its economic stability and development goals. This legal appraisal serves as a foundational step towards advancing reforms that align with global anti-money laundering standards and contribute to a more resilient and accountable real estate environment in Cameroon.

8. Recommendations

Enhancing transparency in real estate transactions through improved land registration systems, stricter enforcement of compliance measures, and digitalization of processes will assist to minimize fraudulent activities. Hence this paper recommends the following:

Strengthening collaboration between regulatory authorities, law enforcement agencies, and financial intelligence units to enhance information sharing and coordination in combating money laundering.

Implementing robust training programs for stakeholders involved in real estate transactions to increase awareness of money laundering risks and compliance requirements.

Amending existing laws or introducing new legislation to address emerging threats and align with international best practices in anti-money laundering standards.

Recognizing the importance of collaboration among stakeholders, including government agencies, financial institutions, legal professionals, and civil society, to foster a united front against money laundering.

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