

# MONEY LAUNDERING: CHALLENGES, PROGRESS, AND THE URGENT NEED FOR STRENGTHENED ANTI-MONEY LAUNDERING MEASURES

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## Abstract

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Money laundering is a significant and prevalent problem worldwide that causes substantial issues for businesses and societies everywhere, and Sudan is no exception. Sudan's weak legal, financial, and banking systems provide fertile ground, making it easy for individuals to commit money laundering offences. The primary objective of this essay is to investigate the frequency of money laundering in Sudan. The history of money laundering in Sudan is a significant component of this study, which explores the intricate mechanisms of money laundering. It examines the country's laws and regulations and the obstacles to implementing anti-money laundering (AML) measures. In addition, the study examines international cooperation, assesses Sudan's efforts to combat money laundering, and identifies flaws in the current legal and regulatory framework, building transparency and providing stronger institutions. International criteria such as the Financial Action Task Force's (FATF) 40 Recommendations and the Basel AML Index are employed to assess the state's AML initiatives. The results demonstrate the importance of enhancing Sudan's legal and regulatory framework to prevent money laundering and safeguard the country's economy and people for wider global collaboration.

**Keywords:** Money Laundering, Sudan, Global Perspective, Hawala System, Africa

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## 1. INTRODUCTION

Money laundering is defined as “the process of creating the appearance that large amounts of money obtained from serious crimes, such as drug trafficking or terrorist activity, originated from a legitimate source” (Caravias, 2017). Money laundering is considered a “white-collar crime”. It is a highly organized criminal activity that involves complex operations of individuals and financial

institutions to hide the illegal source of money (Hopton, 2020). It may have a destabilizing effect on the financial system, impairing the fairest possible fiscal policies and, hence, affecting decisions. Additionally, money laundering greatly encourages organized crime, distorts private sector decisions, and is a focus of corruption and a serious threat to institutions.

The issue of money laundering in Sudan is a significant difficulty, mainly due to the fragility of

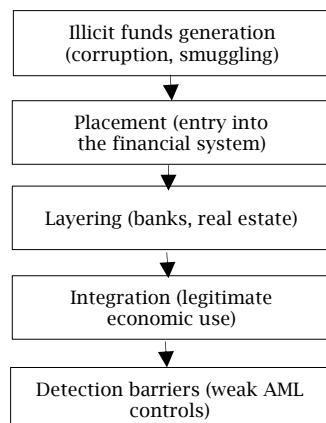
its legal, banking, and financial institutions. The convergence of the country's accessible borders, insufficient economic laws, and a longstanding vulnerability to illegal financial practices has positioned it as an appealing centre for money laundering activities (Ateku & Owusu-Mensah, 2023). Despite implementing many efforts designed to strengthen the legal framework and promote compliance with Anti-Money Laundering (AML) measures, Sudan nevertheless faces significant challenges in successfully implementing these laws and handling cases of financial misconduct. The intricacy of the matter is intensified by the volatile political environment prevailing in the nation, the limited advancements in establishing institutions, and the restricted capacities of these institutions. Therefore, it is crucial to expeditiously address these difficulties and develop efficient measures to counteract money laundering in Sudan. The money-laundering process has three fundamental stages (Smith et al., 2011):

The first step, "Placement", is discreetly incorporating unlawfully acquired funds, sometimes called "tainted money", into the lawful financial framework. Many approaches may be undertaken to allocate the funds, ranging from depositing the money into a financial institution to giving it towards physical assets such as real estate or collectibles, or even participating in ventures with a higher level of risk, such as gambling.

The subsequent stage after the placement is referred to as "Layering". Currently, those engaged in the unlawful act of money laundering is actively attempting to disguise the origins of stolen funds. The individuals establish a complex network of financial transactions, hindering the authorities' ability to track the funds to their initial illicit source. The concept of "layering" pertains to the strategic approach of obscuring the actual ownership of assets using several protective measures, including but not limited to multiple bank accounts, investments, overseas wire transfers, and shell organizations.

The last phase, "Integration", involves reintroducing the "cleaned" financial resources to the legitimate economic system. Now, the money has originated from a legitimate source. This makes them ideal for undercover operations since they will go unnoticed. Criminals may utilize the funds for legitimate purposes, such as making purchases, supporting enterprises, or satisfying basic requirements. To detect and prevent money laundering, government agencies and financial institutions must thoroughly understand these intricate processes.

**Figure 1.** Money laundering flowchart



Sudan remains on the Financial Action Task Force (FATF) "grey list". Still, there is a lack of comprehensive research that elucidates the reasons for the stagnation of AML reforms or the impact of political and economic realities on establishments. There is a pressing need to prioritize the implementation of measures to strengthen Sudan's legal and regulatory frameworks to successfully combat money laundering and protect the country's economic and social well-being. The majority of previous research has focused on technical compliance rather than implementation. The most recent one investigated the nature and scope of money laundering in Sudan with a Corruption Perceptions Index (CPI) score of 15, identifying the major industries most prone to misuse and assessing the barriers to successful AML enforcement (Transparency International, 2022).

This study, hence, aims to analyze and evaluate the inadequacies present in Sudan's legislative and regulatory system for preventing and controlling money laundering activities. It focuses on how effectively existing AML standards function, identifies major impediments to their implementation, and proposes strategies for strengthening Sudan's financial monitoring systems. This paper contributes to existing concerns about enhancing regulatory compliance in weak countries by situating Sudan's AML issues within the greater global framework of financial crime prevention.

The rest of the paper is structured as follows. Section 2 reviews the existing literature on money laundering in fragile states with research questions and a conceptual framework. Section 3 presents the research methodology. Section 4 presents the background of Sudan's AML with sub-sections discussing IMF initiatives, money laundering impact on Sudan's economy, legal and regulatory framework on Sudan AML, hawala system, and the Al Cardinal case. Section 5 discusses the key challenges and implementation gaps in Sudan's AML regime. Section 6 concludes the paper by highlighting the broader implications of the findings for the region.

## 2. LITERATURE REVIEW

The transfer of funds in Sudan dates back many years. In the 1980s, the nation became a central transit point for the transfer of illicit funds worldwide (Baker, 2005). Due to its convenient location, open borders, and negligent enforcement of financial rules, Sudan was a popular destination for criminal organizations wanting to conceal large sums of cash. Several studies have focused on the institutional and structural deficiencies that expose countries such as Sudan to illegal money transfers (Organisation for Economic Co-operation and Development [OECD], 2018). The majority of research, however, has focused on technical compliance rather than the actual usefulness or implementation of AML frameworks.

Money laundering in Sudan has evolved and become more complicated over time. The United States has maintained economic sanctions on Sudan since 1997, severely restricting the country's ability to access international financial markets (Joffe, 2018). Due to the existing state of affairs, an increasing number of individuals and organizations are rerouting funds to circumvent regulations and quicken the transfer of capital

across national boundaries. Drug trafficking, bribery, and terrorist financing are some of the many new additions. Transparency International (2022) observes that in regions such as East Africa, particularly Sudan, these variables significantly degrade state financial controls. Despite this, there is a paucity of research that gives exact statistics on the magnitude and specific patterns of money laundering in Sudan. There has been minimal study on how AML compliance efforts differ between businesses such as banking, real estate, and informal markets.

To combat money laundering, Sudan has strengthened its legal and regulatory framework. Punishments for those found guilty of money laundering were established under this statute. The Financial Intelligence Unit (FIU) was established under the legislation and is now responsible for investigating money laundering and coordinating with foreign governments to halt this kind of criminal conduct. However, Kifle and Olonisakin (2023) assert that these changes are essentially cosmetic, hindered by inadequate judicial independence, political instability, and ineffective inter-agency collaboration (Kifle & Olonisakin, 2023).

Another gap in the existing literature is a more in-depth study of how Sudan's political and economic dynamics influence AML results. While the FATF promotes a risk-based approach, this alone cannot explain why reforms fail in conflict-prone countries. According to the Global Initiative Against Transnational Organized Crime (2023), political leaders frequently utilize their positions to influence financial institutions for personal or factional gain—a trend that appears to be particularly pertinent in Sudan's post-revolutionary context.

Although there is a lack of data-driven, Sudan-specific studies, the literature demonstrates a growing recognition of AML challenges in unstable countries as a whole. This study intends to address that gap by assessing the practical efficiency of Sudan's AML activities using both qualitative and empirical data, as well as recommending specific adjustments based on weaknesses discovered.

### 2.1. Research questions

In addition to determining the current level of money laundering in Sudan, this research aims to provide an explanation for the failure of previous reforms and pinpoint practical policy levers for quick progress:

*RQ1: What are the most common ways and locations for money laundering schemes in Sudan's banking and non-banking sectors?*

*RQ2: Which institutional obstacles stand in the way of the efficient execution of anti-money laundering and combating the financing of terrorism (AML/CFT) duties?*

*RQ3: How much of a workable road map do the new FATF and IMF guidelines provide for Sudan?*

### 2.2. Conceptual framework

Using a political-economic approach that combines the FATF's risk-based methodology with the "crime-opportunity" theory, we highlight the primary enabling factors as conflict-related rent-seeking and inadequate governance.

## 3. RESEARCH METHODOLOGY

This study examines the shortcomings in Sudan's AML legislative and regulatory framework using a qualitative research methodology. Through an examination of shortcomings of legislation, enforcement barriers, and compliance deficiencies, the study would provide a comprehensive evaluation of Sudan's AML reforms. To ensure rigour and replicability, the research is structured around data collection, assessment criteria, data analysis, and theoretical foundation.

Secondary data for the study is primarily derived from official FIU reports from Sudan and the Central Bank of Sudan, global regulatory evaluations by the FATF, Basel AML Index rankings, and reports from organizations such as the United Nations Office on Drugs and Crime (UNODC) and the Egmont Group. The study examines Sudan's legislative framework and regulatory strategies used to address the issue of money laundering. Specifically, it investigates Sudan's involvement in the Eastern and Southern Africa AML Group (ESAAMLG) and its compliance with the guidelines set out by the FATF. Peer-reviewed scholarly articles, case studies of money laundering instances in Sudan, and financial news were also researched to provide context and support the findings.

The report uses numerous well-established standards to assess the performance of Sudan's AML system. Compliance with the FATF's 40 Recommendations is an important prerequisite since they serve as the global standard for AML rules. Sudan's position on the Basel AML Index is also taken into consideration as it assesses the country's risk of money laundering and terrorism funding. Furthermore, legislative revisions, enforcement statistics, and institutional reforms from the previous decade are analyzed to determine if Sudan's regulatory system has improved in line with worldwide best practices. The report also looks at Sudan's international cooperation by evaluating its interactions with global AML organizations, regional regulatory authorities, and foreign financial institutions.

This study is based on three important theoretical frameworks that give greater insights into Sudan's AML issues. The risk-based approach (RBA) to AML advocates for financial institutions and regulators to allocate resources based on the risk level offered by different sectors. Particularly in high-risk sectors, including banking, money transfers, and real estate, this study examines whether Sudan's AML structure effectively applies risk-based controls. The institutional theory is employed to illustrate the impact of political instability and subpar governance policies on AML enforcement. The research looks into whether Sudan's regulatory agencies lack independence, funding, or political will, thereby rendering AML regulations ineffective. Lastly, deterrence theory is applied to evaluate whether Sudan's legal penalties and enforcement mechanisms act as a sufficient deterrent against money laundering.

## 4. BACKGROUND OF MONEY LAUNDERING IN SUDAN'S INTERNATIONAL CO-OPERATION EFFORTS: IMF INITIATIVES

The International Monetary Fund (IMF) has made a significant shift in its norm-setting policy in recent years, expanding its focus on monetary and fiscal

policy issues to embrace legal and institutional frameworks. This development assumes special significance in the context of the model legislation on money laundering and financing of terrorism published in December 2005 by the IMF in collaboration with the UNODC and the World Bank (Mæhle et al., 2021). In October 2016, the IMF discussed a paper on a modernized framework for integrating tools to detect and respond to AML/CFT Act risks. The IMF aims to contribute to the fight against money laundering and terrorism financing by integrating AML/CFT tools into policy advice and capacity development solutions for its diverse membership.

#### **4.1. The intersection of terrorism and money laundering: Analyzing the financial networks of terrorist organizations**

The system of terrorist financing is similar to money laundering in that it replaces profit-making activities with political purposes. The volume of illegal fundraising or proceeds used to finance terrorists is weaker compared to the financial services provided by money launderers. Terrorist organizations invest their funds and channel them through fundraising activities within the financial system. The term terrorism originates from Roman Law and encompasses acts of revenge, subversion, and the use of criminals. Its targets are individual well-being, public security, political stability, freedom, and democracy (Smith, 2023). Terrorism undermines confidence and causes public anxiety, hindering economic recovery and globalization.

#### **4.2. Techniques used by terrorists in fund movement**

Some of Osama's power rows were intriguing in style, with transactions mainly traditional (DeFronzo, 2021). Saudi Princess Haifa bint Faisal transferred funds to support two Saudi students in California. Young men aged 18-22 absorbed commands, made arrangements, and opened bank accounts, funneling 300-400 dollars to finance M16 databases (Riedel, 2021). These databases had detailed information on money flow to terrorists and individuals worldwide. Funding the September 11 attacks discreetly was challenging. Terrorists use advanced techniques to move funds and avoid detection. They leveraged technology to link al Qaeda operatives and encrypt messages. The US lacks actionable intelligence to prevent tragedy (Dazi-Héni, 2021).

#### **4.3. Legal and regulatory framework for AML in Sudan**

Part III of the AML Act defines the money and property subject to the provisions. According to the Act, proceeds of any predicate offence means the property derived or obtained, directly or indirectly, by any person as a result of the commission of a predicate offence. Predicate offence shall mean any offence outlined in Appendix (A), Act No. 30/1988, as amended, provisions of the International Organized Crime (IOC) which were identified in the Resolution of the United Nations Security Council. Predicate offence shall mean trademark violations, infringement of copyright, etc., committed outside

Sudan if it is punishable under Act No. 30/1988, as amended. Conduct of any natural or legal person who knows that any property is the proceeds of the predicate offence shall be regarded as an offence. All parties of the proceeds of the predicate offence and those who transferred these proceeds into money, transferred or swallowed it for any of the following purposes shall be regarded as committing offences. Part VI of the Act imposes penalties on any person who has committed an offence as per its provisions. Part VII has general provisions. The second article, in general provisions, says that the Act shall be called the AML/CFT Act 2014 and shall come into effect as of May 16, 2014.

The legal framework for AML in Sudan is comprehensive and was issued in compliance with the recommendations of the FATF on the suppression of money laundering and the financing of terrorism. The early legislation was a Presidential Decree issued in the year 1989 to establish the FIU. This Decree is followed by many laws regulating financial institutions to report to the FIU. The latest amendment was in 2014, and the amendment was made by the President of the Republic. The Act aims to strengthen the transparency and integrity of the financial system, prevent the laundering of money and the financing of terrorist acts, and prosecute violators of AML/CFT. The Money Laundering and Terrorist Financing Act of 2014 is the fundamental legal framework in Sudan to handle these problems. The FIU has been given the primary responsibility of preventing and investigating money laundering and terrorist financing due to this statute. Reporting suspicious transactions to the FIU is required under the Money Laundering and Terrorist Financing Act of 2014, which all financial institutions must follow. Records of transactions or client identification verification must also be kept for at least five years. Fines and perhaps jail time apply to those who violate these rules. Sudan has passed further AML regulations in addition to the Money Laundering and Terrorist Financing Act of 2014. The Criminal Code of 1991 classifies money laundering as a severe violation punishable by jail time and fines. Money laundering was at the heart of the allegations against the accused. The accused was found guilty of using shell companies to conduct illegal financial activities. Banks are required under the Banking Act of 2006 to adhere to AML regulations, and there are consequences for noncompliance.

Financial institutions in Sudan are required by law to do customer due diligence, although they are not always fulfilling this requirement. Customer due diligence is where Sudan's adherence to international requirements for combating money laundering falls short. Concerns have also been raised about the ability of Sudan's regulatory organizations to carry out these requirements efficiently. Initiating commercial relationships and conducting transactions necessitates that financial institutions engage in customer due diligence, as recommended by the FATF, where identifying and verifying the client, determining the beneficial owner, and assessing risk are all part of the process.

#### **4.4. Hawala system**

Like many other nations, Sudan extensively uses the hawala system, an unofficial money transfer mechanism. Hawala may have some legitimate uses, but its lack of documentation makes it an easy

target for criminals looking to launder money (Teichmann & Wittmann, 2022). Concerns about the hawala system being misused for illicit purposes are growing in Sudanese political circles. The technique in question is frequently criticized for being poorly documented and opaque, which makes it hard to monitor and control adequately. As a result, this complicates efforts to curb criminal exploitation, money laundering, and the probable financing of terrorism. Many people working in the private financial industry have this opinion because they believe it threatens the security of the current economic system and thus requires immediate regulatory action. Hawala may operate freely since so little information is available about it. In response to these worries, Sudan has launched public awareness programs to raise awareness of hawala's dangers and their impact on the country's economy. However, it is still unclear how practical these courses are.

The recent events in the Sudanese economy illustrate the following reliance of the country on Hawala systems. Towards the end of 2024, reports suggest that 70% of the export firms in Sudan had entirely withdrawn from the formal banking system, and cross-border payments were being conducted via hawala. This shift alone is contributing to tremendous revenue and tax deficits (Sudan Events, 2024). Sudan is facing greater regional enforcement actions to enhance scrutiny. Karachi in Pakistan saw five people arrested by the Federal Investigation Agency (FIA) for dealings in unregulated hawala systems. These arrests were accompanied by the confiscation of over Rs 25 million (Dogar, 2024). At the beginning of 2024, the Central Bank in Kenya was issuing statements regarding the misuse of informal money transfer services, leading to the creation of unlicensed remittance centers, thus forcing a crackdown on such off-the-books remitting services.

Hawala systems have also made waves in the United Arab Emirates, where a court in 2023 pronounced several citizens guilty of running unlicensed hawala services without prior registration approval and imposed harsh sanctions.

These instances highlight the pressing need for legislative modernization in Sudan and represent larger regional difficulties in managing unregulated financial institutions.

It is essential to remember that those responsible for ensuring the security of legal enterprises are also aware of the adverse effects of security flaws. Companies that function as intermediaries in money laundering are frequently viewed as either complicit in illegal activities or incompetent due to their failure to establish and enforce robust AML protocols. Nonetheless, it is widely believed that the unlawful hawala system has extensive and adverse effects on the entire financial sector. As a result, the credibility of prestigious financial institutions is diminished.

#### **4.5. Ahmad Hussein Ali ("Al Cardinal"): Sudanese money laundering and corruption allegations**

The case of Al Cardinal, a business magnate, philanthropist, and humanitarian by profession or choice, was instrumental in engaging the attention of those Sudanese whose business is to see to money laundering offenders. The investigation reportedly lasted several years, during which

the operations of the suspects' companies were said to be under strict police surveillance as the government suspected the existence of a criminal network that graced such diverse activities as tax evasion, crimes relating to public authorities, and the illicit financing of terrorism.

##### *4.5.1. Background of Al Cardinal*

Al Cardinal is the majority shareholder of DAL Group (a CAR-DAL crossover of Jordanian businessmen "CAR" and Al Cardinal) in Sudan. The conglomerate holds roughly 29 companies, with significant stakes in many other Sudanese businesses (Hoffmann & Lanfranchi, 2023). Among other businesses, the cartel operates the biggest brewery plant in the country in total, the largest fruit farming projects, the two largest automotive companies, the largest roofing company, and the second-largest soft drink bottler in the country. Further, it has interests in insurance, telecommunications, banking services, cigarette production, farming automation, etc. The full list of all companies is, however, presently unknown. The DAL group is reported as being owned 47% by Mr. CAR and 51% by Al Cardinal, with a nominee director (ND) as tens of shares of the remaining 2%. Yet, these numbers are somewhat fluid given that company directors and, indeed, Al Cardinal appear to own the company of the 2% (Windridge, 2022).

Al Cardinal is an interesting person to study in the field of money laundering allegations for two reasons. Firstly, Al Cardinal has a previous criminal conviction, albeit in absentia, by an Egyptian Court for smuggling 47,000 kilograms of drugs from Sudan to Egypt (ENACT, 2023). Markedly, when one looks at the information surrounding the allegations, the amount of drugs involved in the case is simply staggering. Nonetheless, in this case, world operations, alongside the significant natural history of the case, clearly highlight the connections of white-collar crime with the operation of the black market.

##### *4.5.2. Allegations and investigations*

On April 8, 2007, Dr. Izzeldinn Ibrahim addressed the second session of the ninth general Conference of the Sudanese Businessmen and Investors Associations. Drawing upon his banking experience and his professional work, he explained the role of the US Federal Reserve and the US Department of the Treasury in the clearance of international bank transactions (Tekdogan & Atasoy, 2021). Then he explained that if the US Federal Reserve smells a rat in any such transaction, that party is sent for indictment (Weissmann, 2021). If the transaction is proved to be corrupt and to have served the smuggling of money, that case is opened and fought within the US and its legal system of habeas corpus and appeal.

The unusual aspect of the allegations, known as the "Al Cardinal Case", is the pre-publication of details by two individuals who were almost certain that the findings were accurate and that the Federal Reserve Bank in New York had initiated a criminal investigation. According to these two individuals, a general panic set in among the business community, which compromised any investigation. There were no mechanisms within the country to conduct public inquiries or public hearings, to

examine anyone, or to order any person other than a bank to account publicly for their official act in laying or paying out millions of dollars whenever such a level of doubt exists.

#### 4.5.3. Money laundering allegations

Al Cardinal's lawyer categorically stated that his client had requested an independent investigation. Still, the government denied him authorization to engage an independent firm to conduct an investigation, even if it was at his own expense. Despite such a high-profile case, the Sudanese media had restrictions imposed upon it and was not able to produce wide coverage. Notwithstanding the international profile of the case, it came as a surprise that it has not been easy to obtain the full trial of the main accused, Al Cardinal. Only a hefty bribe paid to someone who works in the system as a driver of a judge provided a relatively short piece of raw transcript.

Al Cardinal, the Inspector General of Police at the time, was accused of money laundering of huge sums of money estimated to be in millions of US dollars. Various people, including prominent business people, also faced charges. The case has garnered significant interest both in Sudan and abroad due to the personality of the accused and the scale of the alleged money laundering operations. The accused were not convicted, notwithstanding that the government spared no effort to establish the case against them and to close any avenue through which any improper influence could be exerted on the court process.

#### 4.5.4. Investigation process

The principal challenges of the investigation resulted from the fact that the representative of the government who had carried out the foreign exchange transactions for its account was able to leave the country suddenly, using the facilities of the bank where he was employed. The search for accurate evidence was the main difficulty to be faced. However, after several months of searching, it became possible to find several significant documentary items that could prove crucial in casting light on the entire process. The evidence pertained to two aims: firstly, to establish a line of spending by the government, which was to be related to the period of the acquisition of foreign currencies by the Central Bank of Sudan from banks, even though these monies were derived from oil. Secondly, to demonstrate a line of exchanges carried out by the banks on behalf of the government for its account, which were accompanied by payments outside the country. A description of the main evidentiary documents is provided before detailing the principal lines of spending by the government and the principal transactions carried out by banks of the country for the account of the government.

#### 4.5.5. Legal proceedings

Another letter from the Attorney General demanded that the governor of the Central Bank of Sudan comply with the request of the public prosecution. Both of these letters display a deep knowledge of the financial operations of the government of Sudan, of financial companies, and the power of the IMF to request specially prepared reports about

the companies dealing with Sudanese banks. They also show the ability of agencies to exert pressure on the government of Sudan's legal and financial machinery to finally pursue the aim of identifying people related to any money laundering.

In examining the legal aspects of the matter, it is clear that the rule of law in the Sudanese government is in irreversible decline. It is essentially a military regime, and the courts seem to be becoming more and more administrative institutions. Nonetheless, evidence shows that the case of Al Cardinal was only taken seriously after a very confidential letter from the IMF to the Government of Sudan dated September 15, 1997 (Baldo, 2021). This confidential document reportedly requested Sudan to present to the IMF's Organized Crime Control Center (OCCC) subparagraphs (1) and (6) of Article VIII showing that Sudan took necessary measures regarding the case of Munzir center represented in the manager of the Munzir Expectations Company and the Case of the Faisal Islamic Bank accredited by currency by foreign currency for more than two million dollars during the last year. The letter, however, does not assign any Bank for the money laundering accusation reported. The letter also requested the Government of Sudan to present to the Organized Crime Control Center (OCCC) a report on the new dealings in transactions of Munzir Company, within seven days from the date of receiving this letter, supporting them with audited documents with details of the transaction figures that show the numbers and contents of papers, in addition to the reports presented by managers of sector banks, including the deals accredited through the Manager of the Munzir Expectations Company (Hatchard, 2021).

#### 4.5.6. Sentencing and fine imposed

Discussion of the charges brought by the financial and administrative crime attorney did not prove this issue at all. Material 6 of the 1970 Act requires the defendant of where the source of money or securities was obtained to be shall be imposed to address how capital is used (Kharisma & Hunaifa, 2023). The provisions of the court ruling under paragraph 91 are as follows:

- Sentenced the second defendant, Altait, to imprisonment and to pay a fine equivalent in value to the amount involved (Arbogas & Jadav, 2024).

- The amount of money or the value of the securities is not subject to seizure contrary to the provision of the 1974 Criminal Act, and confiscation of these funds or securities cannot be made unless the proceeds are from the source of her income and cannot be affiliated with the laundering of the income.

- It is forbidden to convert money and securities outside the framework of the act. The ruling of the President of the Criminal Court, Grand Rooms Group A, on July 12, 1985 is final (Stewart, 2021).

When the second defendant pleaded not guilty to the charges, a different judge was summoned to hear the case, a case that was preceded by a total of 23 sittings on different dates during the last six months of 1985 (Gürtler, 2023). Although the names of the judges and other court officials involved in the case can be found in the court sentence, the location of the court is mentioned as Rimal Kuwait Street North, where the ruling was to be

delivered in the case of money laundering allegedly carried out by Mohamed Ahmed Mohamed Suleiman and Mohamed Al Faqui Altaït under the Foreign Exchange Act 1970. The case was heard in the criminal court with four members, including Abdelhamed Abdullah Suleiman, the President of the Criminal Court.

#### 4.5.7. Impact and implications

The case of Al Cardinal involves a web of individuals and corporations. Rhetorically, the allegations involve some issues that normally evoke strong reactions among Sudanese people. It is the contention of this study that Sudan desperately needs transparency. Transparency should be viewed as a tool necessary to induce good corporate governance and not as an end, because it will save Sudan's banking industry. In a democratic society,

transparency allows for checks and balances and is one way to control abuses. This is not to say that transparency will stop all corruption; it will establish a political and administrative responsibility, which makes it difficult to avoid being held to account. Money laundering, bribery, and corruption are key issues threatening economic development, and collective commitment is essential in the quest to solve these problems. The banking industry and regulatory authorities can no longer presume that individuals and corporations are beyond reproach regarding corruption. The sum of the findings in this study demonstrates that regulators are correct in expressing concern, declaring that they must implement measures to curtail money laundering from non-government organizations.

Table 1 provides a clear insight into the key developments throughout the Al Cardinal case.

**Table 1.** The Al Cardinal case timeline

<i>Date/Period</i>	<i>Event description</i>
Early 2000s	Allegations surfaced that Al Cardinal, then Inspector General of Police, engaged in laundering millions of US dollars, involving prominent business figures and government foreign exchange transactions.
Mid-2000s	A key government representative involved in these transactions leaves the country unexpectedly, using bank privileges, delaying evidence collection.
2005–2006	Investigators begin recovering financial records and documents connecting foreign exchange activities to oil revenues and offshore payments by the Central Bank of Sudan.
2010–2020	Al Cardinal's legal team requests an independent investigation; the government denies the request. The Sudanese media faces restrictions in reporting on the case. Partial transcripts are leaked informally through unofficial sources.

## 5. RESULTS AND DISCUSSION

Given the youth of these laws, inconsistency persists in jurisprudence despite increased money laundering cases. This paper assesses the impact of these laws on eradicating money laundering, particularly through financial institutions. It also examines whether Sudan's AML Act achieves a fair balance between client rights and professional responsibilities. Money laundering involves disguising criminal proceeds to make them seem legitimate. It is often linked to transnational organized crime or abuse of authority. In Sudan, money laundering has historically involved smuggling gold, contraband, and marijuana. Current sources include terrorist financing, corruption, and war profiteering. Sudan has enacted laws to address these risks. However, the limited number of successful convictions reveals deficiencies in Sudan's legislative framework. The Central Bank has implemented additional measures and established an AML/CFT unit to monitor compliance.

There is a conducive environment for money laundering in Sudan due to the country's inadequate judicial, financial, and banking institutions. According to the CPI, a significant amount of corruption has been perceived in Sudan, ranking the country among the most corrupt in the world (Zouaoui et al., 2017). The FATF has also classified the country as a high-risk area. The ineffective enforcement of AML laws is endemic to Sudan's legislative system. Weak and susceptible to corruption, the country's judicial system is marked by understaffed and underfunded law enforcement agencies. This means that investigations into and judicial proceedings against money laundering are not being carried out to their full potential in Sudanese courts.

It is also evident that many institutions in Sudan lack the personnel, resources, and technology

necessary to monitor and report money laundering incidents adequately. Claims of theft and money laundering under the presidency of ousted leader Omar al-Bashir are quite intriguing since they provide insight into the systemic corruption that plagued the Sudanese government then (Lutz & Reiger, 2009). The dictatorship's purported use of shell companies and offshore accounts for money laundering points to a sophisticated effort to hide the ill-gotten assets obtained via corrupt means. Due to Sudan's conservative economy, banks and other financial institutions are susceptible to money laundering. This kind of effective surveillance and regulatory measures serves as a haven for the Sudanese banking industry and for those seeking the illicit practice of money laundering.

Sudan is a refuge for money laundering and other forms of illicit activity due to its poor legal, financial, and banking systems, resulting from its weak governance. To successfully address the money laundering problem and shield the Sudanese economy and society from the adverse effects of this illegal activity, the country's legal and regulatory framework must be improved as soon as possible. Sudan's financial institutions have significant challenges in identifying and mitigating money laundering due to a lack of institutional capabilities. Money laundering schemes are challenging to execute because they require sophisticated investigation techniques and effective communication between numerous agencies. Begin by noting that Sudan's FIU is still developing and lacks resources, making it difficult to conduct comprehensive investigations and prosecute money laundering cases effectively.

In 2019, the US Department of Justice (DOJ) charged two Sudanese individuals with money laundering and terrorism-related offences (U.S. Department of State, Bureau of Counterterrorism, 2019). Reportedly, these individuals ran a money-

laundering scheme that aided Hezbollah, a violent Lebanese organization that the US government has designated a terrorist organization. According to the DOJ, they are accused of using complex financial techniques to transfer money without being detected. These include hawala transactions and the use of front companies. This case exemplifies how difficult it is for Sudanese banks to track down and prevent money transfers. The accused used intricate financial methods to conceal their activities from the authorities and transfer money, despite international law enforcement eventually discovering them. These crimes may have been challenging to investigate and prosecute due to the limited institutional capacity of Sudan's banking institutions.

To effectively address these issues, Sudan should prioritize enhancing the capacity of its institutions and law enforcement to detect and prevent money laundering. For instance, allocating additional funds could bolster the nation's FIU. Financial institutions and law enforcement officers could also receive professional training and technological assistance worldwide.

Political instability in Sudan has persisted for a long time, with the nation seeing repeated changes in leadership and precarious internal security. President Omar al-Bashir, who had held the post for many years, was forced out of office in 2019 due to a massive rebellion (Ezeifekwuaba & Nakitende, 2023). Uncertainty reigned inside the nation due to the aforementioned political upheaval, as leadership changed hands and the government's aims and strategies were unclear. Because national leaders may be busy with more pressing problems during political instability, the government may be less able to prioritize installing and enforcing AML measures.

Sudan must improve governance and strengthen its institutions to address this problem successfully. For example, authorities and relevant organizations might get training and tools to help them improve their levels of openness and accountability. In addition, Sudan must play an active role in worldwide cooperative efforts to combat money laundering. Collaboration with international institutions like the FATF and exchanging information and experience between countries are necessary. Criminal groups may effectively move funds across international borders, making it difficult for authorities to track and investigate any potentially illegal dealings with money. This endeavour is more challenging because of Sudan's large and thinly inhabited border areas, which significantly hinder effective surveillance. A Sudanese national was arrested in Kenya in 2020 on suspicion of 300 million dollars in money laundering activities (Hatchard, 2022). Companies in Sudan, the United Arab Emirates, and other nations participated in the aforementioned illegal transactions. There is suspicion that the suspect sent money to countries including China, India, and South Africa via a web of front companies and fraudulent invoicing. This incident exemplifies the complexities inherent in implementing AML programs in Sudan, particularly concerning international financial transactions. Money launderers commonly use various strategies to avoid being caught, such as using front firms, engaging in fraudulent invoicing practices, and working with money transfer intermediaries.

Numerous instances of criminal groups in Sudan using gold smuggling to both launder money and finance their unlawful activities can be found throughout Sudan's history. The Jebel Amir gold

mine in North Darfur is one such example; it is now in the hands of armed groups that have used the profits from the illegal trade of gold to finance their operations. Despite the Sudanese government enacting several policies and pieces of law designed to crack down on unlawful gold smuggling, these efforts are insufficient. The Enough Project, an advocacy group working to end human rights abuses and crimes against humanity, has released a study detailing the difficulties the gold mining industry in Sudan faces due to smuggling and money laundering (Ardigo, 2020). Researchers have found evidence that a criminal underworld network is responsible for illegally exporting Sudan's gold. Many methods, including bribing authorities and using forged documents, are used by these actors to evade detection. Small-scale miners are typically exploited due to a lack of regulation and oversight, and as a result, they are subjected to dangerous and unclean working conditions for little pay. Since the miners live in dire poverty, criminal groups may easily exploit their situation to commit crimes against them.

The problem of gold smuggling in Sudan can only be solved by instituting and enforcing strict controls inside the business. This includes the need for gold mining licenses and oversight, the strict implementation of customs regulations, and the development of robust law enforcement systems. Furthermore, policies aimed at boosting job opportunities and providing resources to the appropriate sector are required to address the underlying reasons contributing to the problem, such as socioeconomic deprivation and restricted economic prospects. The Islamic banking system in Sudan may provide some protection against the illegal conduct of money laundering. Nonetheless, Sharia law, upon which Islamic banking is founded, forbids the charging of interest (known in Arabic as *riba*) and encourages the spreading of financial risk. It is possible that this would make it harder for criminals to cover up their money laundering. There are more than 30 active Islamic banks in Sudan, making the Islamic banking sector one of the largest in Africa (Mohsin, 2005). The Central Bank of Sudan is in charge of monitoring these businesses to make sure they adhere to AML and Sharia regulations.

Sudan is also ready to work with international entities to prevent money laundering. The country participates in the ESAAMLG, a regional group that helps its member countries combat money laundering and terrorism financing. To further fight money laundering and terrorist financing, Sudan has also been an active member of the FATF. This international body sets standards and supports the effective implementation of legal, regulatory, and operational measures. In 2020, Sudan achieved a significant victory when it was removed from the list of countries whose efforts to prevent money laundering and terrorist financing were deemed insufficient by the FATF (Baldo, 2018). Sudan's commitment to bolstering its AML processes and its willingness to engage with international bodies were stressed in the statement.

However, it is essential to note that the problem of money laundering cannot be solved by relying only on Islamic banking. Money launderers may keep trying to exploit the system in other ways, such as by creating fake trade invoices or engaging in hawala transactions. Due to their restricted availability, secondary data, such as official crime statistics and instances of money



laundering in Sudan, have posed unique challenges to researchers. This limitation hampered our efforts to conduct in-depth interviews with high-ranking officials from government agencies, including the AML Commission, the Ministry of Justice, and

the Central Bank. These discussions were planned to determine whether or not the current AML procedures in Sudan need revision in light of the evolving nature of international trade and business (Table 2).

**Table 2.** Summary: Challenges vs. progress in Sudan's AML efforts

<i>AML element</i>	<i>Challenges</i>	<i>Progress</i>
Legal framework	Outdated or vague laws	Recent revisions to meet FATF standards
Institutional capacity	Underfunded and politicized regulators	Ongoing capacity-building efforts
International compliance	Low FATF compliance; Basel Index score weak	Partial ESAAMLG engagement; increased reporting
Enforcement mechanisms	Inconsistent sanctions; lack of deterrence	Some prosecutions; FIU involvement
International cooperation	Limited regional and global alignment	Emerging cooperation with UNODC, Egmont, etc.

The difficulty, if not impossibility, of accurately estimating the rate or percentage of funds vulnerable to unlawful money laundering operations was one of the major obstacles we encountered. The fact that some of the proceeds from massive illegal drug trafficking end up being laundered demonstrates how serious a problem this is. There is a discrepancy between the amount of money laundered and the amount confiscated, the size of which depends on how successful the measures taken to combat money laundering have been. It is important to note that those who launder money tend to stay away from the banking system. When people utilize it, they often put their money into elaborate financial instruments that will hopefully meet their future medical expenses and retirement needs. While some of the proceeds of their illegal activities may be allocated to legitimate forms of financial speculation, the vast bulk of their dirty cash goes to other uses. Inadequate data and the complexity of money laundering practices highlight the need for a comprehensive and adaptable plan to combat money laundering in Sudan. This plan should consider established and novel money laundering methods for maximum effectiveness.

### 5.1. Impact of money laundering on the Sudanese economy

The main consequences of money laundering fall into two categories, which are mainly economic and non-economic consequences. Economic consequences aim at total destructive effects on the national economy as a whole. To assess these arguments, we have to consider sectoral distribution. This includes an increase in some parasitic sectors and a decrease in sources of the economy. To measure the effect of money laundering in a specific amount, we start from the assumption that the monetary base of the country, composed of money issued and international reserves, should satisfy symbols, legal coverage, and transactional demand. This equilibrium can be represented graphically by using a diagram similar to the Baumol model (Baumol, 1952).

Many public and commercial enterprises were sold during the so-called economic reform in 1989 (Bowman, 2020). Secondly, and more generally, money laundering is negatively affecting the national economy. When illicit money is injected into the economic system, business is conducted with the wrong concept of competition. The one with more power might be the winner or even the survivor. Business does not continue based on the selective advantage of the country, but rather on the selective advantage of the criminals.

Additionally, large amounts of money are being laundered. Those who benefit from this do not pay taxes and certainly do not contribute to the welfare of society. Money laundering in Sudan has had some negative impacts on the banks. The banks are at great risk, and they would lose both their reputation and the trust of their clients. This could result in a run on deposits when bank clients find out that the bank is involved in money laundering.

### 5.2. Recommendations for strengthening AML measures

To address the money laundering situation in Sudan, improve the operation of the FIU, and empower the law enforcement agencies supervising the nonfinancial business, several key recommendations are provided. The following are the significant approaches that Sudan might take to improve the efficiency of its monetary, judicial, and banking institutions.

- Strengthen the Sudanese legal framework so that money laundering crimes may be more easily investigated and prosecuted. Because of this, the government must provide resources to the legal system and law enforcement to improve their capacity to fight money laundering.
- A strict regulatory structure should be applied to Sudan's banking and financial industries. The government must set broad regulatory rules for the financial sector and enforce severe consequences for those who break them.
- Sudan should increase its participation in international organizations to guarantee that its AML/CFT policies align with internationally recognized norms. By taking this step, Sudan would have easier access to global financial markets and be able to attract more foreign investment.
- Organizations and regulatory bodies should invest in cutting-edge technology and reporting systems to better identify and report suspicious financial activities.
- Governments are encouraged to launch informational campaigns to educate the public about money laundering issues and their repercussions.

## 6. CONCLUSION

In recent years, Sudan has made significant progress in combating money laundering and related issues. The U.S. Department of State no longer lists this nation as a state sponsor of terrorism as of 2018 (Rennack, 2015). The calamity severely hampered its ability to collaborate with international financial institutions. The financial regulations in Sudan have been strengthened. It has, for instance, tightened up

on know-your-customer (KYC) rules and increased the amount of control of financial institutions.

The study depends largely on data from other sources, such as the FIU and FATF reports, which are not necessarily representative of the current or hidden money laundering techniques in Sudan. Lack of access to internal enforcement statistics or to private investigations prevents the assessment of institutions' performance in real time. Furthermore, even though the study mentions the global

frameworks, it does not incorporate interviews with the stakeholders or field observations that can provide a more accurate assessment of the issues on the ground. These constraints could weaken the study's capacity to comprehend how the money laundering networks function in Sudan as a whole. Future research should assess and explore the impact of international regulatory models on Sudan's AML system.

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