

# THE DOUMBOUYA CASE



## Corruption as a Facilitator of the Illegal Wildlife Trade

The details contained in this document are provided as an example to highlight **successful legal charges pursued** and **money flows identified** to combat environmental crime cases globally. In this case, fraudulent CITES permits were used to legitimise the trade in chimpanzees, and certify the animals falsely as captive-bred to assist in their onward sale to destination markets. This case study is not intended to provide a full account of case events.

### Illegal Commodity



Chimpanzees



Rare Birds



Manatees

### Linked Jurisdictions

1



**PRIMARY**  
JURISDICTION



Guinea

2

**SECONDARY**  
JURISDICTION



China



Ghana



Japan



Singapore



## Legal Charges

Trafficking in protected species of wildlife under the law on the **Protection of fauna and the regulation of hunting (1965)**.

Forgery, falsification of records, and usurpation of function under the **Penal Code**.

## Legislation

- **Protection of fauna and the regulation of hunting (1965)**.
- **The Penal Code**.

## Summary

Mr. Ansoumane Doumbouya, the former head of the CITES Management Authority in Guinea was arrested in 2015 for his role in falsifying CITES permits. Doumbouya would certify the animals as captive-bred to allow for the “legal” export of the illegally obtained wildlife. He would receive bribe payments in exchange for issuing the permits. A number of well-known West- African networks benefited from this scheme allowing the export of hundreds of wild animals including: chimpanzees, manatees and live birds.



**2015**

## Legal Outcome

Doumbouya was convicted in Guinea of forgery, falsification of records, and usurpation of function. The court sentenced him to 18 month’s imprisonment and a fine of GNF 500,000 however he appealed this decision and the President immediately pardoned him. Five other well-known wildlife traffickers in Guinea were charged however the sentences were reduced to a maximum of 12 months with fines amounting to a maximum of approximately USD \$50.



**18 MONTHS**  
**+ GNF 500 000**



**PARDONED**



**12 MONTHS**  
**+ \$50**



# The Financial Investigation

## Payment Methods

The financial investigation revealed that well-known Guinean wildlife trafficking networks and their consumers used the international banking system to move the illicit funds for the purchase of live animals and to pay for fraudulent CITES permits.

1



### The International Banking System

The networks in Guinea utilized legitimate wildlife companies that were used as a front to facilitate the illegal wildlife trade.

- Funds were commingled with legitimate trade
- The networks also utilised their personal bank accounts
- US dollar clearing facilities were utilized to advance the transactions between Asia and West Africa

2



### Money Value Transfer Services

Chinese consumers allegedly paid via money transfer value services (MVTs) (Amounts indicate up to \$450,000 was transferred)

## Corruption

The CITES management official accepted bribe payments for the falsification of CITES permits.



**BRIBES  
ACCEPTED**



## Financial Investigations and Fund Flows

Payments were made from Asia to Africa in payment for the live animals.

### HONG KONG TO GUINEA

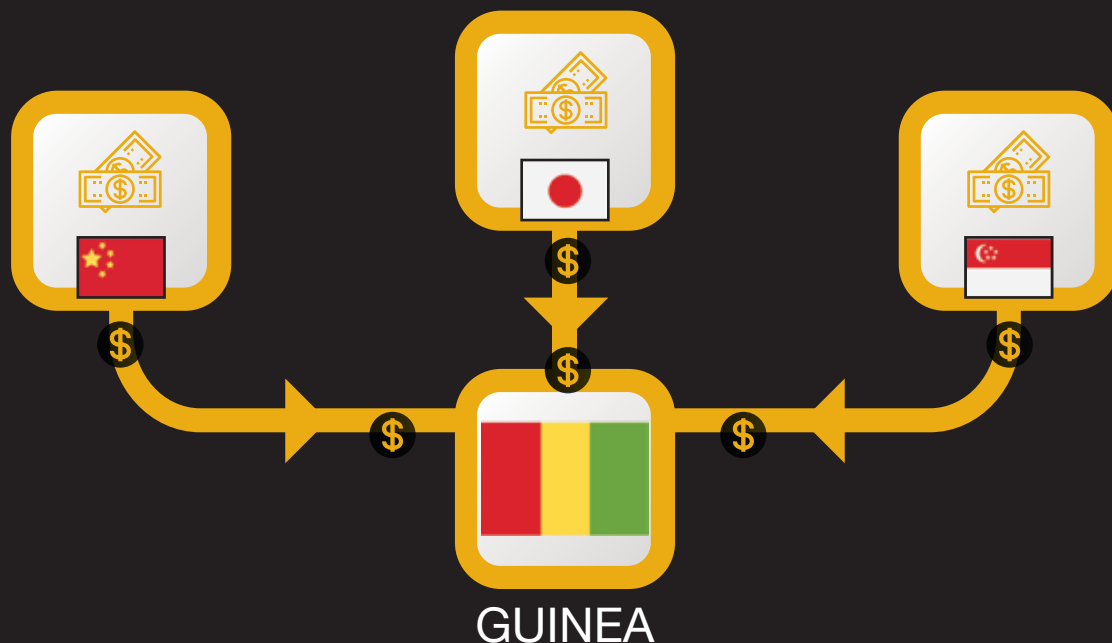
Hong Kong individuals purchased chimpanzees and manatees and sent payment to personal accounts in Guinea with varying amounts (USD \$30,000, \$50,000, \$5,400 and \$40,000)

### JAPAN TO GUINEA

Payments were made from Japanese banks to Guinea for the purchase of manatees.

### SINGAPORE TO GUINEA

Payments were made from a Singapore pet store to the CITES management authority to pay for a fraudulent permit (USD \$5.000)



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