

**Written evidence submitted by USC Gould School of Law’s International Human Rights  
Clinic (IEF0006)**

**Re: Inquiry on Responding to Illicit and Emerging Finance — How Effective are the UK’s  
Sanctions Regimes on Corruption and Human Rights?**

To the Honorable Members of the Foreign Affairs Committee:

1. We write to you as part of the University of Southern California Gould School of Law’s International Human Rights Clinic (“IHRC”). The IHRC was established in 2011 to address some of the most pressing human rights concerns of our day, including war crimes, crimes against humanity, genocide, and refugee rights and protection.
2. Since 2018, the IHRC has engaged in various advocacy efforts to bring attention to the Anglophone crisis. For example, in 2018 the IHRC made detailed factual and legal submissions under international human rights law with requests and recommendations for addressing the Anglophone crisis to various officials at international and regional bodies.<sup>1</sup> In 2019 and 2021, the IHRC made submissions to the United States (“U.S.”) Departments of State and Treasury under the U.S. Global Magnitsky Act, requesting that the U.S. impose targeted sanctions against several government officials involved in gross and serious human rights violations and abuses, as well as separatist leaders implicated in serious human rights abuses, in the context of the Anglophone Crisis. Finally, in December of 2021, the IHRC made a formal submission to the United Kingdom (“U.K.”) Foreign, Commonwealth & Development Office (“FCDO”), requesting that the U.K. similarly impose targeted sanctions against government officials and separatist leaders involved in serious human rights violations in Cameroon. To date, the U.S. Departments of State and Treasury and the U.K. FCDO have yet to designate individuals from Cameroon for their connection to human rights abuses committed during the Anglophone crisis.
3. Since 2016, government officials and the Ambazonia Defence Forces (“ADF”) have collectively been responsible for gross and serious human rights abuses including extrajudicial killings, torture, kidnapping, destruction of property, sexual violence, and arbitrary arrest without due process of law. In fact, the violence has caused the deaths of over 4,000 Anglophone civilians, the internal displacement of at least 573,000, and the flight of over 70,000 registered refugees to neighboring Nigeria.<sup>2</sup>

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<sup>1</sup> These include: the High Commissioner for Human Rights, His Excellency Zeid Ra’ad Al Hussein; the U.N. Deputy Legal Adviser on Prevention of Genocide in the U.N. Office on Genocide Prevention and the Responsibility to Protect, Mr. Castro Wesamba; the U.N. Special Rapporteur on Minority Issues, Professor Fernand de Varennes; the U.N. Special Rapporteur on the Promotion and Protection of the Right to Freedom of Opinion and Expression, Professor David Kaye; the U.N. Special Rapporteur on Violence Against Women, Ms. Dubravka Simonovic; the U.N. Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Professor Nils Melzer; the U.N. Special Rapporteur on the Right to Privacy, Professor Joseph Cannataci; the African Union Special Rapporteur on the Rights of Women in Africa, Lucy Asuagbor; and the African Commission on Human and Peoples’ Rights, Special Rapporteur on Freedom of Expression and Access to Information in Africa, Mr. Lawrence Murugu Mute.

<sup>2</sup> Cameroon Situation Report “Key Figures” UNITED NATIONS OFFICE FOR THE COORDINATION OF HUMANITARIAN

4. The violence continues to escalate today, emphasising the continued need for targeted sanctions and action on the part of the international community. On December 8, 2021, military forces committed extrajudicial killings of civilians and burned down homes and other buildings along Mbengwi Road in Bamenda, North West region, allegedly in response to an Improvised Explosive Device (“IED”) attack by the ADF.<sup>3</sup> On January 11, 2022, the same day the African Cup of Nations soccer tournament began in Cameroon, a Senator was found dead after being kidnapped by armed separatists.<sup>4</sup> And most recently, on March 2, 2022, ADF forces killed seven civilians, including senior administrative officials and the mayor of an English-speaking town, Nanji Kenneth, through the use of an IED.<sup>5</sup>
5. The Anglophone crisis has become so serious that it has drawn the attention of nations worldwide. In November 2021, the E.U. Parliament passed a resolution recognizing the Anglophone crisis, the impact it has had on civilians, and the rampant human rights abuses committed with impunity by government forces and armed separatists.<sup>6</sup> Similarly, in the U.S., the Senate and House of Representatives each issued resolutions in 2021 (S. Res. 684) and 2019 (H. Res. 358) respectively, condemning the government and separatist forces responsible for serious human rights abuses. In February 2022, Congresswoman Karen Bass introduced House Resolution 895 “[s]trongly condemning ongoing violence and human rights abuses stemming from Cameroon’s Anglophone crisis.”<sup>7</sup>
6. Given the magnitude and frequency of human rights abuses in Cameroon, the imposition of targeted sanctions through the U.K.’s Global Human Rights sanctions regime is warranted. Targeting the individuals most responsible for serious human rights abuses in Cameroon is not only the right thing to do, but is consistent with U.K. national interests. By pressuring both sides to engage in meaningful peace talks, targeted sanctions would promote political and economic stability in the region. Moreover, a peaceful resolution to the conflict would allow

AFFAIRS (Jan. 14, 2022) <https://reports.unocha.org/en/country/cameroon/>. Jess Craig, “Violence in Cameroon’s Anglophone crisis takes high civilian toll” AL JAZEERA (April 1, 2021), <https://www.aljazeera.com/news/2021/4/1/violence-in-cameroon-anglophone-crisis-takes-high-civilian-toll>.

<sup>3</sup> THE CTR. FOR HUM. RIGHTS AND DEMOCRACY IN AFRICA & CAMEROON ANGLOPHONE CRISIS DATABASE OF ATROCITIES, Joint Flash Report, (Dec. 11, 2021).

<sup>4</sup> Paul Myers “Cameroonian senator abducted and murdered in English-speaking region” RFI (Jan. 12, 2022) <https://www.rfi.fr/en/sports/20220112-cameroonian-opposition-senator-abducted-and-murdered-in-english-speaking-region>.

<sup>5</sup> Moki Edwin Kindzeka, “Cameroon Says Rebel Bomb Kills Officials” VOICE OF AFRICA (Mar. 3, 2022), <https://www.voanews.com/a/cameroon-says-rebel-bomb-kills-officials/6468320.html>.

<sup>6</sup> European Union: European Parliament, *European Parliament resolution of 25 November 2021 on the human rights situation in Cameroon* (2021/2983(RSP)) (25 Nov. 2021), [https://www.europarl.europa.eu/doceo/document/TA-9-2021-0483\\_EN.pdf](https://www.europarl.europa.eu/doceo/document/TA-9-2021-0483_EN.pdf)

<sup>7</sup> Strongly condemning ongoing violence and human rights abuses stemming from Cameroon's Anglophone crisis, H.R. 895, 117th Cong. (2021–22).

<sup>8</sup> *Ambazonian Governing Council (AGC) Fund Raising Led by Dr. Ayaba Cho*, YOUTUBE (Sept. 1, 2018), [https://www.youtube.com/watch?v=rtrjePJJ0Ks&ab\\_channel=AmbaFearless; Ambazonia Defence Stabilization Official Fundraising Launch](https://www.youtube.com/watch?v=rtrjePJJ0Ks&ab_channel=AmbaFearless; Ambazonia Defence Stabilization Official Fundraising Launch), YOUTUBE (Oct. 18, 2020), [https://www.youtube.com/watch?v=byXaxC1eBKs&ab\\_channel=MAKEAMBAZONIAGREATAGAIN; Ambazonia Coin](https://www.youtube.com/watch?v=byXaxC1eBKs&ab_channel=MAKEAMBAZONIAGREATAGAIN; Ambazonia Coin), ETHERSCAN, [https://etherscan.io/token/0x8f2c01b50a16482efd29560ecb2b4e6016cc3886?fbclid=IwAR3wCmaEiw\\_q4Kh1SecjUhS2gXwOi7d\\_mQN4sut13\\_HwUVuau1j3gyB-cPI](https://etherscan.io/token/0x8f2c01b50a16482efd29560ecb2b4e6016cc3886?fbclid=IwAR3wCmaEiw_q4Kh1SecjUhS2gXwOi7d_mQN4sut13_HwUVuau1j3gyB-cPI) (last visited Mar. 7, 2022).

Cameroon, as a U.K. ally in counterterrorism efforts in the region, to reallocate military resources back to the fight against Boko Haram and the Islamic State West Africa Province in the far north. Targeted sanctions would pressure both sides to refrain from committing further human rights abuses, consistent with the policy objectives of the Global Human Rights sanctions regime. Finally, the ADF has previously used platforms such as CashApp, GoFundMe, and Coinbase to collect money in support of the ADF from members of the global Cameroonian diaspora.<sup>8</sup> Imposing targeted sanctions may deter use of these financial pathways, which only serve to fuel the ongoing crisis.

7. As a final recommendation, the U.K.'s sanction regime should consider highlighting available delisting processes and requirements for those designated for sanctions under the Global Human Rights Sanctions Regulations. In so doing, the U.K. may incentivise individuals to change their behaviour, thereby increasing the effectiveness of targeted sanctions.
8. We hope that the Foreign Affairs Committee can support U.K. action in addressing the Anglophone Crisis and urge the FCDO to announce targeted sanctions against perpetrators of human rights violations in Cameroon.

***8 March 2022***