



**PUBLICATION OF ADMINISTRATIVE SANCTION IN TERMS OF SECTION 56(14) OF THE  
FINANCIAL INTELLIGENCE ACT 13 OF 2012, AS AMENDED**

---

**LEMON TREE PROPERTIES CC**

---

1. On 05 November 2024, the Financial Intelligence Centre imposed an administrative sanction in the form of a **Caution** against Lemon Tree Properties CC (“Lemon Tree”).
2. This caution was issued in consideration of the available facts and information, pursuant to section 56(3)(a) of the Financial Intelligence Act 13 of 2012, as amended (“FIA”), due to Lemon Trees' initial failure, at the time when the FIA compliance assessment was conducted, to develop, adopt, and implement a FIA Compliance Program, as required under section 20A (4) of the FIA.
3. The administrative sanction was imposed in consideration of the factors and circumstances surrounding Lemon Trees non-compliance.
4. Kindly contact the Legal, Policy, and Enforcement Division ([fic.legal@fic.na](mailto:fic.legal@fic.na)) should you have any further questions or queries in this regard.

Yours sincerely,

**Bryan Eiseb**  
**Director**

**23 December 2024**