

Operation STELLA MARIS

Investigating Shark Fin Trafficking Networks
in Latin America and East Asia Through the
Lens of Environmental Crime Convergence

April 2024
Investigative Report



ACKNOWLEDGEMENTS

This report is produced by Earth League International. The findings, interpretations, conclusions, and views expressed are those of the authors and do not necessarily reflect the views of any individual partner organization.

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PART I:

ABOUT EARTH LEAGUE INTERNATIONAL

The Intelligence Agency for Earth: Revealing Truth, Protecting Nature and People

For over a decade, Earth League International (ELI) has been at the forefront of utilizing professional intelligence to combat environmental crime. With a proven history of success, Earth League International identifies and investigates the most significant environmental criminals and wildlife traffickers globally.

ELI comprises experienced multinational field investigators, researchers, analysts, and highly skilled retired professionals from various U.S. law enforcement and intelligence agencies, all with extensive experience in executing projects worldwide.

ELI conducts research into criminal networks, connections to transnational organized crime, and convergence with other serious offenses like money laundering, human smuggling, corruption, and drug trafficking. Through field investigations, research, and analysis, we target transnational criminal organizations involved in environmental crime, along with international traffickers, middlemen, and corrupt government officials. Our efforts unearth evidence and unveil previously undisclosed information regarding the criminal exploitation of nature.

ELI believes that, akin to combating other global threats like terrorism, drug trafficking, or organized crime, intelligence should be at the center of efforts to fight environmental crime. By providing first-hand intelligence about the mechanisms behind these crimes, we equip law enforcement agencies, government bodies, policymakers, academics, media outlets, and NGOs with the knowledge needed to affect change.

Everything done at ELI is grounded in facts and field-based information, ensuring that our findings serve as the building blocks for action and accountability. By shedding light on the hidden activities of the world's most important environmental criminals and their networks, we tackle the root causes behind the ongoing criminal exploitation of wildlife, natural resources, ecosystems, and biodiversity.

EXECUTIVE SUMMARY

- **About Operation STELLA MARIS: Earth League International (ELI) spent several years investigating shark fin trafficking from Latin America to East Asia under Operation STELLA MARIS, mapping out the main criminal actors, their networks, supply chains, and logistics.** Our findings, detailed in part in this redacted public report, clearly show that the criminal activities of the groups investigated extended far beyond fin trafficking. ELI collected robust evidence of a wide range of crimes, including multiple types of wildlife and environmental crime alongside different forms of trafficking, human smuggling, fraud, and related financial and corruption-related crimes. We also found evidence of overlap between key persons of interest (POIs) trafficking shark fins and POIs we investigated for jaguar poaching and trafficking in our 2019-2023 Operation JAGUAR. Additional unredacted information and corroborating evidence is shared with appropriate government partners and other stakeholders via ELI's Confidential Intelligence Briefs (CIBs).
- **Shark populations, especially those targeted by the fin trade, are crashing:** Global shark populations fell by 71% from 1970 to 2020 and continue to be killed at a much higher rate than is sustainable. Over a third of species are now listed by the IUCN as Vulnerable or Endangered. Most of this loss is from overfishing, to include shark finning, and sharks deemed particularly desirable for their fins have become some of the most endangered species.
- **Shark fin traffickers maintain diverse criminal portfolios:** While all of the POIs and criminal organizations in this report on Operation STELLA MARIS came to ELI's attention because of their involvement in trafficking shark fins, only one small group appeared to limit its criminal activities to this crime; we assess that it specializes in providing fins for multiple criminal organizations. The larger the group, the more diverse the group's range of criminal activities was.
- **Chinese criminal organizations dominate the IWT in Latin America:** All of the POIs that ELI investigated either were or were ultimately paid by Chinese nationals, often residing locally, with Latin Americans largely relegated to sourcing, processing, and providing logistics for IWT activities. While there are large-scale fin traders from Latin America, our sources indicated that Chinese traffickers ultimately controlled shark and other marine IWT throughout the region and internationally.

- **“Network” is a term that should be used loosely in relation to IWT:** In keeping with academic literature on Chinese criminal organizations (Finckenauer & Chin, 2004), the relationships among Operation STELLA MARIS POIs that ELI found were often too loose to be deemed networks in the same vein as, for example, Mexican drug cartels. Our groupings in this report are thus based on location as well as on the degree of connectivity between key POIs. We found high levels of communication and connectivity throughout the Latin American countries explored in this paper, including an intriguing statement by a source that supplies of shark fin are clearly divided between buyers in different South American countries. Especially within regions, POIs were aware of each other’s activities. Collaboration was often flexible and situational.
- **Chinese and local TCOs compete in Latin America:** Chinese transnational criminal organizations (TCOs) contend with local Latin American and other TCOs present in the region, navigating uneasy, low-trust relationships or outright competition. Relationships with local criminal groups offer some protection for Chinese traffickers where there are good relationships. However, ELI also learned of instances where drug traffickers tried to extract double payments from Chinese traffickers in Mexico, kidnap them for ransom in Ecuador, and extort them in Venezuela. In some places, local criminal groups are vying with Chinese TCOs to control trafficking of wildlife and other illicit commodities into East Asia.
- **Internecine rivalries among Chinese TCOs:** Based on anecdotal stories and comments from sources in multiple countries, we assess that many Chinese traffickers are organized around their provinces of origin, notably Fujian, Guangdong, and Zhejiang, and may compete with those originating elsewhere. Thefts of warehouses, shipments, and processing facilities occur.
- **Some members of the Chinese diplomatic community are allegedly complicit in wildlife trafficking:** Multiple ELI sources in multiple countries alleged the involvement and complicity of Chinese embassy officials in buying and smuggling shark fins and other illegal wildlife products (IWPs) such as jaguar parts, as well as offering political protection to Chinese criminal networks in Latin America. However, it should also be noted that multiple sources indicated increased risk of shipping shark fins into China, specifically mentioning Customs’ efforts. Because of this, we assess that at a minimum, some diplomats are taking advantage of their diplomatic status to take IWPs into China, though we would not rule out that others may be part of larger, well-connected TCOs.

- **Post-pandemic demand and competition for shark fins is strong:** While prices for shark fins and other IWPs dropped during 2020-21, demand rebounded after COVID-19 restrictions were removed in China, Hong Kong, and Macau. This has led to more people getting involved in poaching and trafficking IWPs in Latin America. In fact, a source in Colombia told investigators that some wealthy people in China were buying shark fins and fish maws as investments, in anticipation of further rises in prices. While fin sellers in Hong Kong reported that as of late 2023, they were not allowed to bring shark fins into China, they also noted that there is a thriving smuggling trade; claims supported by higher prices in China than in the open markets in Hong Kong and Taiwan.
- **TCOs are responsive to changes in local conditions:** Traffickers can quickly change shipping routes in reaction to increased law enforcement activity or an uptick in Customs seizures.
- **The weakest links for protecting sharks from poaching are Peru and Ecuador:** The biggest regional source of shark fins is Ecuador, which will not come as a surprise to anyone familiar with the sanctions placed on the country by CITES in March 2024 (Carrillo, 2024). While traffickers were often reluctant to ship IWPs from Ecuador directly to East Asia, suggesting effective export controls, it is clear that shark poaching in and near Ecuadorian waters—including, unfortunately, the Galapagos islands—is virtually unmitigated. For shipping to East Asia, POIs regionwide almost exclusively preferred Peru, suggesting that the country’s export controls are failing. Some smugglers referenced obtaining “C permits”, possibly referring to CITES permits, that allow for the controlled export of up to 60 tons of fins per year. However, these and other export permits were clearly being abused to ship prohibited species mislabeled as other cargo, and to ship more than the allowed amounts of legally traded species.
- **Consolidation nodes for fin trafficking offer law enforcement clear opportunities:** ELI’s investigations, combined with open-source reporting, made it clear that in each country there are geographic triage points for the fin trade, high-volume traffickers dominating the trade, or both. These people, companies, and places offer countries with the political will to act clear opportunities to conduct highly impactful operations.

Part II:

Shark Populations Declining Rapidly from Overfishing and Finning

Sharks are over 400 million years old—millions of years older than trees (Nuwer, 2012). Their consistency over many millennia is a testament to how optimized they are as the apex predators of the oceans. However, in just 50 years, the planet lost almost three-quarters of its sharks and rays, with many now at risk of extinction (Pacoureaux et al., 2021). A foundational 2021 article in *Nature* found that shark and ray populations fell by 71% from 1970 to 2020 (Pacoureaux et al., 2021). A January 2024 paper from *Science* estimated annual shark mortality at 76 to 80 million per year, with approximately a third of these from threatened species (Worm et al., 2024).

A seminal 2013 *Marine Policy* paper (Worm et al., 2013) (Georgiou & Susskind, 2023) estimated that the annual percentage of sharks killed is much higher than the sustainable replacement rate: no more than 4.9% of the world's sharks can be killed in a given year without population declines, but as much as 7.9% of the *total* global shark population is killed annually: 60% higher than estimated sustainable amounts. As not all shark populations are equally targeted by fisheries, this suggests that losses in overexploited species are even higher. According to The International Union for Conservation of Nature (IUCN) Red List as of December 2023, 37% of shark and ray species were Critically Endangered, Endangered, or Vulnerable (*IUCN Red List of Threatened Species*, n.d.) (Potenski, 2021). A study published in 2023 assessed that reef-dwelling species had dropped over 60 percent, based on video surveys of 391 reefs in 67 nations (Sautner, 2023). A 2020 study showed no evidence of sharks in 20% of the 371 reefs surveyed in 58 countries, calling sharks in those areas “functionally extinct” (Randall, 2020) (MacNeil et al., 2020).

The rapid and precipitous drop in many shark populations is driven by overfishing (Potenski, 2021), which in turn is largely driven by finning (*Sharks and Rays*, 2022). Because shark fins are valuable in East Asia as a culinary “delicacy”, many fishing vessels only take the fins of caught sharks, sometimes slicing them off while the animal is still alive and then throwing the mutilated sharks back into the ocean to die of suffocation or blood loss (Fairclough, n.d.).

This allows fisheries to fill the vessels' holds with only the parts of the sharks that fetch the highest prices (SAFONOV, n.d.), even in species where there are also markets for their meat, oil, and non-fin cartilage (*Porbeagle Sharks*, 2011). Nonetheless, overfishing for the meat and other materials also drives declines, and in some places, laws requiring that whole sharks be landed may have increased the market for shark meat (Worm et al., 2024).

These blurred lines, aided by the exploitation of bycatch loopholes and official permits obtained via corruption, add extra difficulty to the persistent challenges of trying to quantify illegal trade. "Legal" permits obtained via corruption still qualify as wildlife trafficking; they just make it that much harder to assess its scope. Comparing the volumes of interdicted illicit shipments against official trade volumes could help develop better estimates of the size and proportion of illegal trade, but official numbers are inconsistent and unreliable (Godoy, 2021) (*Evidence of Declines in Shark Fin Demand | China 1*, n.d.). To be clear, some of the global shark trade is legal, and some countries manage shark fisheries sustainably, though what is sustainable and what is legal do not always overlap. ELI focuses on where criminals break the law by poaching and trading protected species and/or engaging in widely banned activities such as finning, and on the convergence with other serious crimes.



Photo credit: Shark Stewards

Common practices to hide the illicit shark trade include mislabeling shipments and products, mixing illegally sold protected species with permitted shark exports or other wildlife products, and abusing fishing permits granted for other species to poach sharks (Ramírez & Dalby, 2023).

Both cruelty and population crashes should be sufficient reasons for finning to end globally. However, the environmental repercussions are broader. A lack of apex predators allows populations of their prey to explode, leading to overexploitation of foundational plants and animals in ecosystems, as demonstrated in the iconic case studies of otters and sea urchins in California (Masterson, 2021), and wolves and elk at Yellowstone (Farquhar, 2023). A lack of sharks can lead to follow-on imbalances in species below them in the food chain that damage populations of coral reefs (Than, 2006), scallops (Myers et al., 2007), clams, and oysters (SAFONOV, n.d.). Many countries have banned finning or passed broader measures against shark fishing, at least of endangered species. But enforcement is challenging, and often thwarted by corruption.



Pictured: Without sharks as apex predators, the entire ocean ecosystem could fall out of balance. They not only maintain the species below them in the food chain, but also indirectly maintain seagrass and coral reef habitats.



Consumer Demand Driving Multiple Shark Species to Extinction

Despite warnings from scientists and environmental advocates, sharks remain a lucrative global business. The Food and Agriculture Organization of the UN (FAO) estimated the annual fin trade at \$378 million/year from 2000 - 2011, and markups along the supply chain are large. As of 2022, fins sold in Asia in the range of \$700 to \$1000 per kilo (Ramírez, 2022) (*Brazil's IBAMA Seizes 28.7 Tons of Shark Fins for Trafficking to Asia*, 2023), depending on size, species, fin position, etc. (Wu, 2016). Reuters and OCCRP reported in 2023 that shark fin soup in Hong Kong could cost up to \$200 a bowl (OCCRP et al., 2023) (Castaneda & Aquino, 2023), double the \$100 a bowl that Oceana reported in 2010 (Baxter, 2010).

The rapid increase of the middle class in parts of East and Southeast Asia has increased demand for perceived status items (Palomares et al., 2011), including illegal wildlife products. Chinese demand for seafood increased eightfold from 1980 to 2015, and the demand curve for shark fins closely mirrored its GDP growth. Some observers reported that demand for shark fins in China and Hong Kong dropped after 2011 (Eriksson & Clarke, 2015)—aided by a CCP ban on shark fin soup at state events in 2013—but imports rose again in 2020 and 2021 (Calderón, n.d.). Demand has grown in Indonesia and Thailand (Denyer, 2018) (Alberts, 2020). The NGO Shark Stewards has pointed out that increased prices driven by declining populations and increased illegality can inadvertently increase the soup's prestige (*Shark Fin FAQs – Shark Stewards*, n.d.).



Pictured: Shark Fin Soup

It is worth highlighting that shark fin, composed of cartilage, has neither a distinctive flavor nor any nutritional value; in fact, fins are often very high in mercury (Kwan, 2020) and neurotoxins (*Shark Fin FAQs – Shark Stewards*, n.d.). Demand is solely driven by conspicuous consumption. In a 2020 study in Hong Kong, all tested samples were well over the legal limit for mercury (Kwan, 2020). Shark meat, likewise, poses health risks from mercury levels (Heo et al., 2020). Ironically, some historians suggest that fin soup was created as a way to use the wasted parts of sharks (Eilperin, 2011, 89).



Pictured: Shark Meat



Pictured: Shark Fins

Shark meat and oil are growth markets, and increasing demand may in part simply be a result of rapid human population growth over the past hundred years (de Hoog et al., 2022). Many consumers of shark meat and oil (*Shark Squalene*, n.d.) are unaware they are consuming sharks. Worldwide, shark meat is commonly eaten under names that consumers do not connect with sharks; in the biggest markets, Brazil and Spain, names include dogfish, cação, cazón, or marrajo (Malleret, 2022) (*96% of Spaniards Eat Shark Meat Without Knowing It*, 2009). Australians similarly may not realize that the “flake” they buy at the supermarket is shark meat. While the consumption of shark meat is not necessarily illegal, disassociated labeling or deliberate mislabeling often obscures the illegal sale of endangered species, including in the U.S. (Márquez, 2021) (Chu, 2021) (Zuccolo et al., 2023) (White, 2023) (de la Lama et al., 2018) (Jacquet & Pauly, 2008). Vegan squalene is now the norm in Western beauty brands (*Shark Squalene in Cosmetics*, n.d.), which largely discontinued shark-derived squalene in the mid-2000s under pressure (Eilperin, 2011, 101-102), suggesting that meat and beauty products present opportunities for consumer education campaigns and demands for transparent labeling. Shark liver oil and cartilage in the supplements industry may prove tougher to reduce, as they have been hawked as treatments for cancer, HIV, and other maladies despite a lack of evidence. In cases where shark meat does not have a consumer market, protected species can wind up in pet food (Alberts et al., 2022).

The 2015 FAO report listed the shark species reputed to be most desired for shark fin soup as hammerhead, oceanic whitetip, and blue sharks (Dent & Clarke, 2015), so we took a closer look at those specific species.

The most recent estimates done over a 3-generation for each species span by the IUCN show the following declines in populations:

77-97% SCALLOPED HAMMERHEADS



80-95% OCEANIC WHITETIP



Scalloped, great hammerheads and oceanic whitetip sharks are Critically Endangered.

Blue sharks present a more complicated picture, depending on which part of the ocean is in question, but their populations have also been adversely impacted.



Despite how close some of these species are to extinction, available interdiction (Ramírez, 2022) and East Asian market (Fields et al., 2017) data continue to show that these species are prevalent in shipments and stores, indicating robust illegal trade. A 2020 study that sampled DNA from fins in Hong Kong and China found that 90% of the 12,000 samples came from blue sharks, silky sharks, scalloped and smooth hammerheads, and the shortfin mako (Carrere et al., 2023), very similar to findings of a 2014-15 sample study of Hong Kong shops (Fields et al., 2017). Blue and shortfin mako sharks are targeted for both fins and meat, helping to explain their rapid population declines. Porbeagle sharks, the popular species for meat in Brazil, are also valued because of their liver oil and skin, and are categorized as Vulnerable by the IUCN because of overfishing.

An important compounding factor in shark population declines is that fisheries often do not discriminate between juveniles and mature sharks (Gonzaga, 2022) (Porcher & Darvell, 2022). Some interdictions have contained up to 85% juveniles (*114 Tiburones Fueron Pescados En El Mar De Bahía Solano, Chocó*, 2022) (Bonaccorso et al., 2021) and even legal longline fishing kills a disproportionate number of immature sharks, as Greenpeace has reported in relation to Spanish and Portuguese fleets that fish in known shark breeding areas (Porcher & Darvell, 2022) (Gonzaga, 2022). We thus assess that shark kill estimates with methodologies based in part on the average weight of a species probably underestimate population loss. Sharks mature slowly, so catching them before they are of breeding age damages populations long-term. For example, hammerheads mature at around 9 years (Godoy, 2021) and then give birth every 2 years. The Pew Charitable Trusts reported in 2021 that shortfin mako populations in the North Atlantic would continue to drop even if none were caught for the next 15 years (Hopkins & Miller, 2021) (Stanhope et al., 2023). Low numbers of mature sharks have also led to high levels of inbreeding in some species, such as the great hammerhead (Stanhope et al., 2023).



Assessing International and Latin American Wildlife Laws

Below is an overview of the major international trade agreement pertaining to threatened species, and national laws in the Latin American countries that were the focus of ELI's investigations, to clarify what kind of accountability is possible for traffickers, where enforcement of existing laws and agreements is adequate (spoiler alert: no country has adequate enforcement), and the role of corruption in undermining good-faith efforts to protect sharks.

International Agreements

The primary international agreement relevant to regulating trade in sharks and their parts is The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). CITES has mechanisms by which parties to the treaty may issue limited permits for species listed on one of 3 appendices (*How CITES Works*, n.d.), and all trade in these species is to be logged into a common database. As of late 2023, there were 184 parties to the Convention. At CITES CoP19 in fall 2022, 54 requiem shark species, including tiger and bull sharks, six hammerhead shark species, and 37 species of guitarfish were added to Appendix II of the CITES Convention (*Selection of Species for Inclusion in the Review of Significant Trade Following CoP18: Summary Output*, 2020) (Alberts & Jeffries, 2022). The addition of requiem and hammerhead species in 2022 meant that CITES appendices as of December 2023 covered over 90% of global shark fin trade (Chu & Vierus, 2023) (*CITES Proposals for Endangered Sharks Pass First Hurdle at COP19, 2022*) (*Creating a Sustainable Future for Sharks at CITE4S CoP19*, n.d.)

CITES was designed as a trade cooperation body, not a law enforcement tool. Even so, it is far from a perfect trade regulation mechanism. In general, countries set their own “sustainable” limits for trade in species, and domestic regulations may not be in line with either CITES listings or IUCN status. Any species on Appendix II requires a non-detriment finding (Kimber & Cornthwaite, 2023) only by the exporting party, which facilitates corruption.

The U.S. assessed in 2020 that 15 of 28 “focus countries” had poor implementation of CITES, and officials responsible for certification in multiple countries have been involved in corruption (Butler & Kessler, 2015) (Outhwaite, 2020) (Gaworecki & Butler, 2016). Parties are supposed to submit annual reports on their illicit wildlife trade (*Annual Illegal Trade Report*, 2023), but fewer than half comply. Even with the lack of binding oversight or enforcement, and the lack of universally set trade limits on species, there are still sizable gaps and omissions in the official database (Okes & Sant, 2022). A review by TRAFFIC found that of 74 countries with reported catches of a CITES-listed shark species from 2001-2019, 51 had no relevant trade records in the CITES database (Okes & Sant, 2022).

CITES PROTECTED SPECIES

BASKING SHARK



Listed in Appendix II since 02/13/2003.

WHALE SHARK



Listed in Appendix II since 02/13/2003.

GREAT WHITE SHARK



Listed in Appendix II since 01/12/2005.

SAWFISH



7 species listed in Appendix I since 09/13/2007.

PORBEAGLE SHARK



Listed in Appendix II since 09/14/2014.

OCEANIC WHITETIP



Listed in Appendix II since 09/14/2014.

HAMMERHEAD SHARK



3 species listed in Appendix II since 09/14/2014 and 6 more species since 02/23/2023.

THRESHER SHARK



Listed in Appendix II since 10/4/2017.

SILKY SHARK



Listed in Appendix II since 10/14/2017.

GREAT WHITE SHARK



Listed in Appendix II since 01/12/2005.

MAKO SHARKS



2 species listed in Appendix II since 11/26/2019.

GUITARFISH



8 species listed in Appendix II since 11/26/2019 and 37 more species since 02/23/2023.

WEDGEFISH



Listed in Appendix II since 11/26/2019.

REQUIEM SHARKS



54 species, in addition to great white, oceanic whitetip, and silk shark, listed in Appendix II since 11/25/2023.



Part 3:

Laws, Enforcement, and Corruption in Latin America

In Latin America, wildlife protection laws are a hodgepodge of regulations by species, season, and quantity. Even countries with solid laws and stiff penalties in the criminal code struggle with enforcement, from chronic under-resourcing, the realities of the size and scope of the terrain to monitor, and the corruption pervasive through the region. Violence is often intertwined with this corruption, and Latin America is the deadliest region in the world for environmental defenders (*Standing Firm: The Land and Environmental Defenders on the Frontlines of the Climate Crisis*, 2023). Brazil, Colombia, Ecuador, Mexico and Peru make up 5 of the 10 most biodiverse countries in the world (Butler & Butler, 2016). None of them scored higher than 39/100 on Transparency International's 2022 Corruption Index (*2022 Corruption Perceptions Index: Explore the... - Transparency.org*, 2023). Investigations resulting in record interdictions are not sufficiently supported in the subsequent judicial process by robust prosecutions and penalties.

Graphic by Maggie McGraw/ELI copyright.

LATIN AMERICA'S Corruption Essential to the Shark Fin Trade



Corruption Indices

Transparency International's Corruption Perception Index (CPI) ranks countries and territories by perceived levels of public sector corruption on a scale of 0 (highly corrupt), to 100 (very clean).



Of the source countries for shark fins ELI conducted our investigations in, the CPI for those countries ranged from 13 to 55, with **Venezuela** being the most corrupt, and **Costa Rica** being the least. Meanwhile, the world's largest exporter of shark fins, **Peru**, clocks in at 33.



The Interlinkage of the Shark Fin Trade and Corruption

Laws protecting sharks and regulating shark trade in the region are not well-enforced and, despite being the only Latin American country to designate wildlife trafficking as organized crime, organized crime groups in **Peru** are continually assisted by corrupt government officials (Lerch, 2021). Similarly, **Ecuador's** corrupt practices earned it a rebuke from CITES leadership in 2023, which recommended its total shark trade suspension (CITES, SC77 Com.8, 2023). ELI's sources also alleged extensive corruption of Chinese embassy officials in **Peru** and **Ecuador**.



In **Costa Rica**, illegal hammerhead shark fishing in Isla del Coco is allegedly facilitated by corruption. An InSight Crime analysis concluded that, because of cuts to the general police budget, instability and lack of investment in social welfare and public trust allow corruption, homicides, and drug trafficking to flourish.

“The lack of funding for police forces has also increased and has also created an environment ripe for corruption.”
(InSight Crime, 2024)

What's Next?

Smugglers avoid shipping shark fins from countries with more export controls, notably Ecuador, Panama, and Colombia. Thus, increased enforcement and presence of enforcement officials deter criminals from smuggling IWP from that country, and cross-border coordination allows officials to track and prosecute criminal networks involved in these illicit activities.


Nonetheless, while most countries have significant deltas between laws on the books and enforcement (*Sharks in Trouble: Hunters Become the Hunted*, n.d.), having good laws is a foundational first step toward accountability, creating possible paths to justice. Multiple countries in the region have made recent efforts to strengthen their penalties for wildlife and natural resource crimes, and/or create new categories of crime to catch up with undesired activities. For example, in 2021 Colombia made deforestation, appropriation of land, and the funding of these activities specific crimes under the law (Cuberos, 2024). Enforcement is challenging but not futile; in countries with strong rule of law and good management practices, species like the great white shark have shown signs of recovery (Baxter, 2023). The 2024 Science paper did not find evidence that finning bans reduced mortality by themselves; however, certain types of bans or retention requirements were correlated with reduced mortality (Georgiou & Susskind, 2023).



In most countries, there is little if any monitoring of the activities of fishing boats, and abuses of bycatch allowances—which may have no limits—are rampant, with shark “bycatch” sometimes outnumbering the non-shark species that are supposedly the fisheries’ focus. Mongabay journalists noted year-on-year increases in tuna fisheries’ “bycatch” of sharks in Ecuador. Reported “bycatch” of silky sharks among tuna fisheries rose by 64% in a single year before new throwback regulations took effect based on a change in IUCN status (Carrere, 2020). Similarly, silky shark “bycatch” increased more than fivefold after a 2007 ban with a bycatch loophole went into effect (Carrere, 2020). All of this is despite the existence of best practices proven to reduce tuna fisheries’ impact on sharks (*Sharks in Trouble: Hunters Become the Hunted*, n.d.) (Tasoff, 2023). The illegal trade from Ecuador, including the huge proportions of fins trafficked via Peru, has been so egregious that in March 2024 CITES recommended that all parties suspend trade of Appendix II shark products from Ecuador (Secretariat of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), 2024).


Some agencies have made consistently dedicated good-faith efforts to catch criminals involved in shark fin and other IWT and have seized truly shocking volumes. The downside, of course, is that by the time there is an interdiction, the sharks have already been killed. Some observers have expressed concern that interdictions may lead to additional poaching, to “make up” for the lost goods.

This risk underscores the need: 1. to see the criminal justice process all the way through to sentences with significant jail time and asset seizures, so that the criminal groups are dismantled, and 2. to look for effective upstream, preventative anti-trafficking measures.

Below, we look at wildlife laws, enforcement, corruption, and case precedents in the Latin American source countries relevant to our IWT criminal network investigations.

Country	Applicable Laws	Enforcement Reality	Notable Interdictions and Cases
<p data-bbox="224 1270 293 1297">Brazil</p> 	<p data-bbox="370 1075 683 1213">Finning ban and “naturally attached” law (<i>Tem Barbatana No Seu Prato</i>, 2023).</p> <p data-bbox="370 1255 695 1499">Deliberate fishing of sharks is illegal, but “bycatch” loopholes are widely exploited (<i>Shark Fin Trade Thriving in Latin America, Despite Promises of Progress</i>, 2023).</p>	<p data-bbox="745 968 1049 1211">Shark fishing bans are not well enforced (AQ Editors, 2010) (Feitosa et al., 2018), but environmental authorities have done some robust investigations.</p> <p data-bbox="745 1255 1019 1430">The same companies rack up repeated fines, showing a lack of deterrence (Nickel, 2012).</p> <p data-bbox="745 1472 1040 1610">Fishers misuse permits granted for other species to catch sharks (Madureira, 2023).</p>	<p data-bbox="1092 1024 1435 1234">A world-record seizure of almost 29 tons of shark fin—an estimated 10,000 sharks, including endangered species—was made in July 2023 (Mendes et al., 2023).</p> <p data-bbox="1092 1276 1430 1556">An environmental group sued one of the largest shark fin export companies in 2010, after reports that almost 300,000 sharks were caught in Brazil in a single year (<i>Brazilian Group Sues Over Shark Killings</i>, 2010).</p>

<p style="text-align: center;">Colombia</p> 	<p>Trade in sharks and shark parts was banned in 2021 (Republica de Colombia, 2021). Targeted shark fishing was banned, with bycatch allowances up to 35% (Alexander & Pineda, 2023) (Republica de Colombia, 2021) (Held & Espinal, 2020), but as of publication time, this ban was being reconsidered by the government.</p> <p>Article 328 of the criminal code stipulates penalties of 60 to 135 months in jail for wildlife trafficking (<i>114 Tiburones Fueron Pescados En El Mar De Bahía Solano, Chocó, 2022</i>), with a provision that increases penalties by one third to one half for trafficking in sharks and rays (Vega, 2023).</p>	<p>Laws regulating shark fishing received a great deal of pushback (Held & Espinal, 2020) and are often disregarded.</p> <p>Colombian forces have made efforts at enforcement regarding fin exports, with investigations and seizures of fin made at the Bogota airport (Klein, 2021), warehouses, and at sea.</p>	<p>Colombia seized 23 shark fin shipments from the 2021 ban to July 2023. A 2022 interdiction included 119 shark bodies and an additional 89 fins. 85% were juveniles (<i>114 Tiburones Fueron Pescados En El Mar De Bahía Solano, Chocó, 2022</i>).</p> <p>A 2021 seizure at Bogota airport of 3493 fins was estimated to represent between 900 and 1000 sharks, all of which were from CITES-protected species (Symmes Cobb, 2021) (OCCRP et al., 2023).</p> <p>An investigation into seized shark fins from 2021 connected them to the family of a former head of the Cali cartel (OCCRP et al., 2023).</p>
<p style="text-align: center;">Costa Rica</p> 	<p>Finning ban and “naturally attached” law (Cota, 2012). In 2020, the Supreme Court struck down a previous attempt to legalize trade in sharks by executive decree (Cerdas, 2020).</p>	<p>Very little enforcement of either artisanal or commercial vessels, including in protected marine areas (American University Center for Latin American & Latino Studies & Insight Crime, 2022) (Cárdenas & Ramírez, 2022).</p>	<p>The first prison sentence for finning was against a Taiwanese woman in 2017, who was sentenced to 6 months and a \$5000 fine for unloading 652 shark fins (<i>Costa Rican Court Issues First Criminal Sanction Against Shark Finning, 2017</i>).</p>

	<p>Specific protections were passed for hammerheads in 2023 (Arauz & Madrigal, 2020) (Radwin, 2023), but there is little regulation or enforcement of shark fishing (<i>Shark Laws in Costa Rica</i>, 2019).</p>	<p>A practice called “spining” is used to get around the “naturally attached” law. Shark fins are landed attached to the sharks’ spines, with all other meat having been discarded (<i>Shark Spining</i>, n.d.).</p>	<p>Previous sanctions include a fine of \$124,000 for a Taiwanese boat captain who was caught unloading 20,000 kilos of finned blue sharks in Puntarenas in 2011 (Lopez, n.d.).</p> <p>InSight Crime interviews confirmed that vessels fishing illegally often transport drugs as well, including at-sea cargo transfers (American University Center for Latin American & Latino Studies & Insight Crime, 2022).</p>
<p>Ecuador</p> 	<p>Finning ban. Had strict shark fishing and fin trade laws until 2017, when a presidential decree created bycatch loopholes with no defined limits (Crespo, 2022) (Carrere et al., 2021) (Carrere, 2020).</p>	<p>Laws are very rarely enforced, with some exception for the Galapagos marine reserve. Financial penalties are inadequate. Fines for a 26-ton fin seizure in 2021 were one-third of one percent of the shipment’s value (Cárdenas, 2021).</p>	<p>From 2020 to 2021, shark fin exports quadrupled from 90 to 321 metric tons; reported revenue increased 15-fold (Alberts, 2020). Shark products are first moved into Peru (Zambrano, 2021), representing 62% of Peru’s total fin exports (Huamán & Amancio, 2022).</p>

	<p>Section 247 of the Comprehensive Organic Penal Code codifies sentences of 1-3 years for the destruction of wild protected species (<i>Preventative Detention for Five of the Six Arrested in Shark Fin Trafficking Case</i>, 2015). Fines for illegal fishing can be up to \$700,000 (Carrere et al., 2021).</p> <p>The rights of Nature are enshrined in the Constitution, and it can be a named defendant in court (<i>Shark Laws in Ecuador</i>, n.d.).</p>	<p>Ecuadorian military forces monitor the activities of Chinese fleets that fish the edges of and sometimes make incursions into the Galapagos (Klein, 2020) (Bale, 2017).</p> <p>Ecuador's laxity earned it warnings and rebukes from CITES leadership in 2023 (SC77 Doc., 2023), leading to a recommended suspension of its shark trade in 2024.</p>	<p>An Insight Crime investigation found that nearly 800 tons of fins were sent from Ecuador to Peru from January 2017 to June 2022 (Alarcon, 2022). In February 2022, 2 businesspeople were sentenced to 4.5 years for trafficking fins (Huamán & Amancio, 2022).</p> <p>A 2015 seizure of 200,000 fins resulted in the arrests of 6 people, including a Chinese national (Regan, 2015). The captain and crew of a Chinese ship caught poaching sharks in the Galapagos in 2011 were sentenced to jail, the ship was scuttled, and other equipment was seized (<i>Table 1: Ecuador's Rights of Nature Cases</i>, n.d.).</p>
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Mexico



Finning is banned. Under NOM-059, penalties for wildlife crime range from 1 to 9 years in jail, with three more years for commercial purposes (Godoy, 2021). Most sharks, even endangered ones, are not domestically protected (Olivera, 2021).[152]

Mexico has opposed their inclusion on CITES appendices (Godoy, 2021). Bans shark fishing 3 months of the year in specific areas for breeding season (Sosa, 2021).

As is the case generally for crime in Mexico, impunity for wildlife trafficking is high (Yagoub, 2016) (*Código Penal Federal | Capítulo Segundo | Título Vigésimoquinto | Libro Segundo | Ley De México*, 2023).

Endemic corruption and the violence it enables makes it extremely hard to enforce laws. It's easy to find export companies online that will supply shark fin from Mexico (*Mexican Shark Fins Suppliers and Manufacturers*, n.d.).

Mexico exports the majority of the world's hammerheads (Godoy, 2021), raising questions about corruption, CITES permitting, and its refusal to implement national protections.

Relationships between Mexican and Chinese TCOs are robust. Mexico watchers have noted the inclusion of wildlife trafficking into criminal portfolios since the 2010s (Alfonso, 2022), and TCOs sometimes directly exchange trafficked wildlife products for drug precursor chemicals (Felbab-Brown, 2022).

Finning cases originating in Mexico often have a U.S. nexus, whether because of transshipment into U.S. ports or use of U.S. companies (United States District Court Southern District of Georgia Savannah Division, 2020) (Godoy, 2021).

A 10.4-ton shipment was interdicted in Manzanillo in 2019. At least one person was arrested, though we could not determine what happened after they were released on bail (Procuraduría Federal de Protección al Ambiente, 2020).

Panama



Finning is illegal in territorial waters, but shark fishing and exports, including of fins, remain legal (Ramírez & Dalby, 2023).

There are few laws regulating fishing, including for sharks.



There is a lack of protection for key areas like breeding grounds (Dwindling Fisheries: Panama Fish Catch 40 Percent Larger Than Reported, 2014).

Panama's popularity as a ship flag of convenience is abused by foreign vessels (*Dwindling Fisheries: Panama Fish Catch 40 Percent Larger Than Reported*, 2014).

A law pending as of 2023 sought to ban finning by any Panamanian-flagged vessel, including in international waters (Twin Ocean Research Panama, 2023).

Panamanian forces made significant seizures in 2023, of almost 7 tons of fins in July (*Five Arrested in Panama Over 6.8-Ton Record Seizure of Shark Fins Destined for Asia*, 2023) and 602 more in September (*Illegal Fishing Vessel Carrying Over 600 Shark Fins, Sailfish, Marlin, and More Seized in Panama - WildAid*, 2023).

Panama led a successful proposal to add 56 sharks to the list of regulated species at the 2022 CITES conference (Estrada & Huamán, 2022) (Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES), 2022).

<p style="text-align: center;">Peru</p> 	<p>“Naturally attached” law since 2016 (Guy, 2016) (Ipenza, 2018). Only whale sharks and hammerheads are specifically protected nationally.</p> <p>Peru has opposed the inclusion of additional species such as blue sharks on CITES appendices (Huamán & Amancio, 2022).</p> <p>In 2022, Peru became the first Latin American country to designate wildlife trafficking as organized crime (Peru Protects Sharks and Other Marine Species From Illegal Trafficking, 2022).</p>	<p>Peru almost tripled exports of shark fins in the decade leading up to 2021, when it exported a record 400 tonnes.</p> <p>The number dropped somewhat in 2022 in the face of criticism (Castaneda & Aquino, 2023), but organized crime groups exporting shark fin from Peru continue to be assisted by corrupt officials from the Ministry that grants CITES permits (Lerch, 2021) (Fernández, 2023).</p> <p>This corruption may have facilitated suspect permitting for as many as 2 million sharks in less than 5 years (Lerch, 2021).</p>	<p>In Feb 2022, the first—and only—people were sentenced for shark fin trafficking (Ramírez, 2022); 2 people each got 4.5 year prison sentences for attempting to sell 1800 kilos of fins (Ommati, 2022).</p>
<p style="text-align: center;">Venezuela</p> 	<p>“Naturally attached” law (Venezuela Bans Shark Finning, 2012).</p> <p>Created a sanctuary banning commercial fishing in breeding areas (<i>Venezuela Bans Shark Finning</i>, 2012).</p>	<p>Venezuela’s dire poverty and humanitarian crisis led to residents newly consuming endangered species such as whale sharks (Gutman, 2019), as well as selling fins cheaply (Carrere, 2019).</p>	<p>None known, given state capture by criminal networks (U.S. Department of Justice, 2020) (Transparency Venezuela, 2020) (InSight Crime, 2018).</p>

China's Role as a Driver of Wildlife Crime Worldwide

A large body of research points to China as a major driver of wildlife trafficking and other types of environmental crime (Global Initiative Against Transnational Crime, 2023), particularly illegal logging and mining, in Latin America, Africa (Africa Defense Forum, 2023) (Ruiz-Benitez de Lugo & Burrows, 2017) (Gbadamosi, 2024), North America (Vieira, 2024), Europe (Europol, 2018.), South and Southeast Asia (Global Witness, 2022), and China itself (Oxpeckers Investigative Environmental Journalism & the Global Initiative Against Transnational Organized Crime, 2021) (Gomez, 2014). China's role in driving numerous species toward extinction—elephants, rhinos, tigers, pangolins, vaquitas, jaguars, leopards, snow leopards, turtles, and eels in addition to sharks—is well documented, including in ELI's own previous reports on jaguar trafficking (Earth League International, 2023) and crime convergence (Earth League International & John Jay College of Criminal Justice, 2023). While this paper focuses on Latin America, readers should be aware of similar dynamics at play in other parts of the world for a holistic picture. ELI's investigations pointed to Chinese dominance in not only shark fin trafficking, but in wildlife trafficking and environmental crimes in every country we examined. **ELI also found overlap between criminal actors in Operation STELLA MARIS, Operation JAGUAR and ELI's other operations.** When comprehensive investigations that include following financial trails are made, financiers from China are often found bankrolling illegal activities. For example, a Chinese national reportedly funded an attempt to export 6 tons of illegal shark fins from Panama in 2023 (Russell, 2023). In several of the cases in the table on Latin American laws and enforcement, Chinese nationals were arrested as part of law enforcement operations, in keeping with what ELI found during its previous investigations on jaguar, rhino horn, ivory and totoaba trafficking.

Regarding sharks specifically, China claims to have banned shark finning and the deliberate catching of sharks by its fisheries in 2019, with some species previously on protected lists. However, we found very few examples of enforcement, and then only in cases of well-publicized videos (Jacobson et al., 2022) (Griffiths, 2016) (Picchi, 2023). To the contrary, Chinese vessels and its distant water fleets have repeatedly been caught illegally fishing for shark, squid, and other marine species in other countries' national waters and in protected marine reserves such as the Galapagos, as well as on the open ocean (Bonaccorso et al., 2021) (Klein, 2021).



A frequently observed behavior of Chinese vessels is to hover at the edge of territorial or protected waters with their AIS systems turned off, and sometimes make incursions while the ships are “dark” (Fu, 2022) (*China's Global Fishing Footprint*, n.d.). Chinese fishing vessels are also notorious for aggressive maneuvers at sea, including ramming other countries’ official vessels (Márquez, 2022). One partially state-owned Chinese fishing company deliberately targeted and finned sharks in the Western Pacific using banned gear, according to a Mongabay investigation, which also found that in 2019, the company’s shark catch from just 5 ships exceeded what China had reported for its *entire* national longline fleet (Jacobson et al., 2022).

Ninety-five percent of interviewed 3rd-country nationals working on Chinese ships reported witnessing finning (Fitt & Kessler, 2022). This strongly suggests that the Chinese government continues to be witting of and complicit in the shark trade, including in endangered species, around the globe. Species that are supposed to be protected continue to be sold openly and in abundance at Chinese markets (Cardeñosa et al., 2020). While the U.S. has sanctioned some of the most notorious actors (Alberts et al., 2022), China’s economic power may play a role in its impunity in much of the world, particularly in IWP source countries that receive development aid (Comolli, 2021) (Nicholls, 2023)—and the bribes that come with development aid and the granting of infrastructure and other contracts. It should be noted that where China’s government has had the political will to prosecute wildlife trafficking, punishments are often severe, and the law provides for sentences up to life imprisonment (Jia & Xuejiao, 2021). However, the government has not applied this political will to shark traffickers, nor made consumption of shark fin soup illegal, despite its ban at official events. Demand reduction has primarily come from businesses and individuals (*Shark Conservation in China*, 2015) who partially stop consuming shark because of awareness campaigns.



Pictured: A photo of various sea creatures on sale in a market in Guangzhou, China, captured by ELI’s field investigators.

Hong Kong: A Leading Shark Fin Importer

While shark products are imported, exported, and consumed in many countries in the region, four comprise most of the volume of trade, particularly in fins: Hong Kong, China, Singapore, and Malaysia, with Taiwan and Indonesia also significant. Fin imports into Hong Kong and China increased during the COVID-19 pandemic, reaching the highest numbers in a decade in 2021 (Huamán & Amancio, 2022) even as traffickers complained about the difficulty of shipping and falling prices. The sale and consumption of shark products, including fins, are generally legal throughout the region, and multiple studies and investigations have found that protected species are pervasive in Asian markets, particularly the aforementioned species deemed most desirable. Despite this large volume of open sale and consumption, there are still large amounts of illegal shipments, probably to try and hide the robust trade in protected species. As with the shark trade elsewhere, solid numbers are difficult to come by, due to mismatches in the CITES database, neglect of reporting obligations, corruption, and the volume of re-exports (Liu et al., 2021). While several countries have taken steps to strengthen their laws, add new species to protected lists, and increase enforcement, progress may not be fast enough to save the most endangered sharks. It's simply too easy to mix endangered species with others in places where consumption is so high. Efforts to make shark fin soup unpopular must battle misinformation, such as false industry assertions that sharks are caught sustainably (Hicks, 2019) or even that sharks can be farmed (Rolfe, 2023).

Hong Kong is the largest importer and trader of shark fin—and many other IWPs—in the world, with most of its imports re-exported. It is legal to sell and consume shark fin in Hong Kong (Keegan, 2020); signs in the market town of Sai Ying Pun proudly declare it to be “Shark’s Fin City [sic]” (Marina, 2020). Though it is illegal to import, export or process threatened species of wildlife without an appropriate license, interdiction indicates a robust illegal shark trade. Despite the consistently impressive achievements by Customs that bring this to light (*Hong Kong Seizes \$2.2 M in Illegal Shark Fins!*, 2021) (Hong Kong Customs, 2021), prosecutorial follow-through has been lacking. Only 5 cases were prosecuted in a 6-year span that saw seizures of over 12 tonnes of illegal shipments, according to WWF Hong Kong (Godfrey, 2020), and these cases neither targeted high-level traffickers (*Hong Kong Lacks Legal Power to Tackle Wildlife Trafficking Syndicates*, 2021) nor included money laundering offenses (Alberts, 2021).



In spring 2020, Customs seized a record 26 tonnes of non-permitted fins from protected species in 2 shipments from Ecuador (Hong Kong Customs, 2020). By contrast, official imports totaled less than 5 tonnes in 2018.

Maximum penalties for wildlife trafficking were increased from 2 to 10 years in 2018, and fines from \$1 million to \$10 million (Oxpeckers Investigative Environmental Journalism, 2021) (Sellar, 2016). Wildlife trafficking was added to the organized crime statute in 2021 (*Hong Kong Adds Wildlife Trafficking to Organised Crime Law*, 2021) (*Protection of Endangered Species*, n.d.), and Hong Kong updated its list of endangered species to reflect the 2022 additions of the hammerhead and requiem shark families to CITES appendices (*Hong Kong Adds Two Shark Families on Controlled Trade List*, 2023). As of early 2024, it was too soon to assess how the most recent legal changes affected import controls, enforcement, and prosecution. Previously, failure to prosecute meant that fins from any non-protected species were released back to the consignees, even if they committed other crimes in relation to the shipment (The Government of Hong Kong, 2018). The addition of the oft-consumed blue and hammerhead sharks to Hong Kong's own control list could make this far less rewarding for offenders, as well as reduce its acceptance of imports of these species from countries with poor export controls (The Government of Hong Kong, 2018) (Godoy, 2021).

ELI's investigators visited Hong Kong in late 2023 to further assess demand for shark fins, price fluctuations post-pandemic, and the openness of the trade, including the knowledge of vendors regarding endangered species.



ELI's investigators visited 13 stores In Hong Kong:

Vendors confirmed our information from source countries that commodity prices were very close to pre-pandemic levels as of late 2023. Some vendors, when asked, expressed an awareness that certain shark species were endangered, and said that a special permit was needed to sell these.

However, most were vague about the origin of their seafood products or claimed it was impossible to know, suggesting that they knew items came through illegal supply chains. No one was forthcoming about their own suppliers. Additionally, while vendors stated that they could not send fins to China, some were candid about people smuggling them in from Taiwan. In the same shopping districts, ELI's investigators saw that a number of stores that had previously sold ivory products had signs claiming to sell "mammoth ivory", suggesting that authorities are not looking too closely at abuse of legal loopholes.

Fin Prices in Hong Kong circa late 2023 (collected by ELI)

Fin Size	Price	Species
8 inches	RMB 1750 (\$245.88)	Unspecified
10 inches	RMB 2800 (\$393.40)	Unspecified
12-14 inches	RMB 4500 (\$632.25)	Unspecified

*Currency conversions to USD in this table were made according to historic exchange rate information on exchange-rates.org, based on the date of information collection.



Pictured: A photo of shark fins and fish maws being sold in a local market in Hong Kong, captured by ELI's field investigators.

Other East Asian Consumer Countries of Shark Fins

Singapore is also a top-3 importer of shark fins (Dasgupta, 2017), though most are re-exported (Pei Ya, 2017), and imports from 2017 rose until dropping again during the COVID-19 pandemic (Tan, 2022). Sampling of fins for sale have found, as in other East Asian markets, the ubiquitous presence of protected species (Choy & Wainwright, 2022) (Liu et al., 2021). As in Hong Kong, the Endangered Species Act was revised in 2022 to strengthen penalties (*Amendments to the Endangered Species (Import and Export) Act*, 2023), with maximum jail sentences tripled and fines doubled. For CITES-listed species, fines are now up to \$50,000 per specimen, vs. \$50,000 per species (Tan, 2022). Singapore also criminalizes some key enabling behaviors, such as the advertising of protected species (Lee, 2020). In 2023 it joined a group of 6 other countries to improve efforts against the illegal wildlife trade (Carrillo, 2023). None of the wildlife trafficking cases pursued from 2017 to 2021 did so with an organized crime element (Yong & Wallace, 2022), suggesting the need for capacity-building to follow financial trails and target high-level traffickers.

Indonesia is both a source and consumer country, with uncontrolled shark fishing feeding some domestic demand among Chinese expats (Vallianos et al., n.d.) in cities like Jakarta, but mainly exporting via Surabaya to places like China, Taiwan, Singapore, and Vietnam (Asnawi & Gokkon, 2023). A 2023 MongaBay article reported that 6-inch fins could be sold for \$33-\$46 per kilo, while 16-inch fins sold for \$132-\$159. In contrast, shark meat sold for less than \$1 per kilo (Asnawi & Gokkon, 2023). While Indonesia has national laws banning the fishing of endangered species and of finning, and is a party to CITES, there is little monitoring or enforcement. Regulation 61/2018 of the Minister of Marine Affairs and Fisheries, which mandates permits for the sale of sharks and rays and the registering of involved vessels, is largely ignored (Asad, 2023). A practice called “undernaming” allows unlicensed fisheries to “borrow” the license of another one; in some cases, this appears to be a sourcing mechanism for fins for the larger exporters (Asad, 2023). Marine management professionals assess that the unreported catch is bigger than the reported catch, and have stressed the need for oversight (Asad, 2023).

Taiwan remains a major consumer of shark products, including of protected species (Schwenzfeier & Hofford, 2021), and its deep-water fleets continue to engage in wildlife crime, to include the poaching of protected species of sharks and dolphins (Environmental Justice Foundation, 2020). It was on the EU’s yellow card list for its IUU fisheries practices from 2015 to 2019, and as with China, Taiwanese vessels have been caught poaching and finning sharks in other countries’ waters (Oliver, 2018) (Variety News, 2009).

Under pressure, the country has made efforts to improve and enforce its laws. Taiwan augmented its finning ban with a “naturally attached” law (Environmental Justice Foundation, 2020) and banned the fishing of great whites, megamouths, and basking sharks in 2020 (Davis, 2020). Fines imposed are not always insignificant: in 2020 a ship owner and captain were fined nearly \$400,000 for a cargo of 38 tons of protected sharks, a sanction upheld on appeal (Taiwan Fisheries Agency, 2021). Fishing licenses are suspended for caught violators in addition to fines (Aspinwall, 2018).

In **Thailand**, shark products are consumed by both locals and tourists, and it also exports shark to China, its biggest trade partner (*Shark Meat Popularity in Bangkok Weathers Covid, Drop in China Tourists*, 2022). Wildlife protections were strengthened in 2019 under international pressure, with maximum fines increasing 25-fold (USAID, n.d.), though critics find its permitting systems prone to abuse and lacking sanctions for corrupt issuing officials. Even newly strengthened penalties may not help sharks in Thailand much, as the only domestically protected shark in Thailand is the whale shark, regardless of IUCN status (*Thailand's Shark Experts Discuss Urgent Actions Needed to Protect Sharks - WildAid*, 2021). Endangered species are still consumed; in a 2023 study, 62% of sampled fins at Thai markets were from IUCN-listed threatened species. The same study noted that many of Thailand’s shark populations collapsed years ago due to overexploitation, which accounts for signs of the exploitation of juveniles (Klangnurak et al., 2023) (Macdonald, 2014). A restaurant went viral in 2016 for offering whole baby hammerhead (Coconuts Bangkok, 2016).



Pictured: Photo of dried shark fins obtained by ELI’s field investigators from traffickers.

The Role of the United States

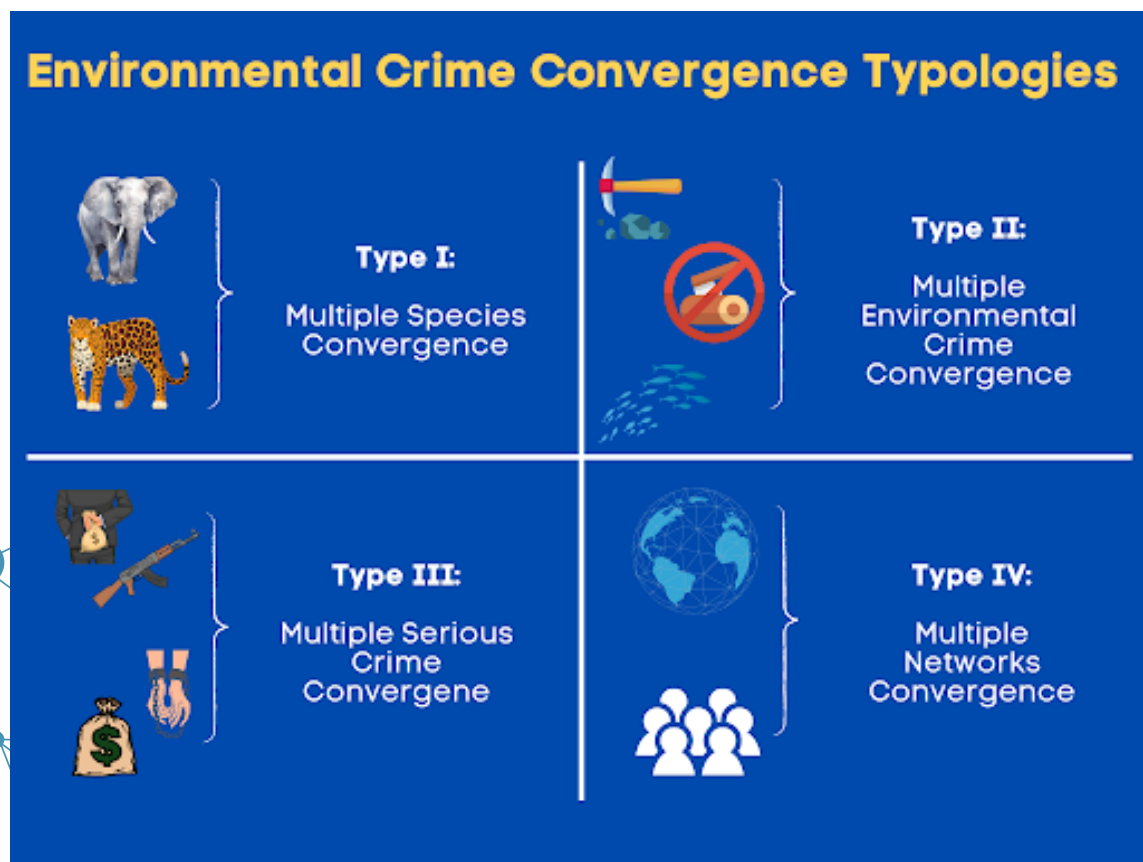
U.S. laws and enforcement are vital, given the transnational nature of wildlife trafficking. Many criminal organizations use U.S. ports of entry for transshipment (Bittel, 2019) as well as U.S. companies, banks (Financial Crimes Enforcement Network, U.S. Department of the Treasury, 2021), and other enablers. This presents opportunities for federal and state authorities to act. The Lacey Act, which prohibits trade in illegally taken flora or fauna, was strengthened in 2008. In 2020, the State Department implemented a new visa restriction for those proven or believed to traffic in wildlife or timber (Bureau of Oceans and International Environmental and Scientific Affairs, 2021). In 2020, the U.S. Department of Justice prosecuted “Operation Apex”, which involved a criminal network that trafficked in shark fins from protected species as well as large quantities of drugs (U.S. Attorney's Office, Southern District of Georgia, 2020).

A federal ban on all trade in shark fins was passed in 2022, replacing what had been a piecemeal system of state laws (*Shark Conservation Act*, 2021) that allowed criminal networks to change their logistics to evade states with restrictions (Murdock & Villanueva, 2019). While observers have rightly pointed out that U.S. shark fisheries are generally well-managed and the ban financially impacts legal American fisheries, this argument ignores the U.S. position as a hub for transshipment of protected species (Bittel, 2019) and the role of U.S. entities in trading shark products from less-scrupulous places. The U.S. has set a precedent of working with other countries and the private sector on shark trafficking offenses that involve multiple nations. In 2020, it prosecuted the captain and crew of a Japanese fishing vessel attempting to smuggle fins to Asia from Hawaii. The U.S. and Japan both applied penalties, and the Japanese parent company of the vessel terminated the employment of all involved (U.S. Attorney's Office, District of Hawaii, 2020).



Part IV: Transnational Organized Crime and Crime Convergence

As with most organized criminal groups, the networks that illegally catch and butcher sharks engage in many other crimes as well, especially other environmental crimes. As defined in **ELI's 2023 Environmental Crime Convergence report** (Earth League International & John Jay College of Criminal Justice, 2023), our convergence typologies include: **1.** trafficking in multiple species, **2.** committing multiple types of environmental crime, **3.** committing a broad array of serious crimes to include financial crimes, and/or **4.** the convergence of multiple TCOs.



Convergence is beneficial for criminal organizations. Like any good business plan, it offers diversification of income sources and a buffer against changes in supply chains, demand, etc. as well as against stovepiped law enforcement agencies and operations that only target one type of crime. TCOs that already have established shipping logistics with specific companies, ports of entry, bribed officials, etc. for one type of illicit product can get more for their money by using these same resources and paths for additional goods. The direct exchange of illicit goods and services may help avoid leaving banking trails; for example, criminal networks have exchanged illegal wildlife products for drugs and drug precursors (Felbab-Brown, 2022) (Nelson, 2023), and they use proceeds from one type of crime to finance others (van Uhm & Wong, 2021) (*7 Indicted in Human Trafficking Ring Involving Denver Massage Parlors*, 2020). It is common for those transporting shark fin to also smuggle fish bladders (*More Than 3,000 Shark Fins Confiscated in Colombia*, 2021), sea cucumbers, and other overexploited marine “delicacies”. The mixing of drug shipments with illegal wildlife products is also common in exports from Latin America. Fishing fleets engaged in shark poaching additionally engage in drug trafficking (American University Center for Latin American & Latino Studies & Insight Crime, 2022) and human trafficking (Urbina, 2019) (Gokkon, 2020) from poorer countries for labor on their vessels.

Criminal groups use complicit companies to mix licit and illicit goods, for both physical and financial concealment. In 2018, Taiwan had the biggest drug bust in its history when over a metric tonne of ketamine was found on a fishing vessel that had become disabled and was towed to port (*More Than 1 Tonne of Ketamine Seized From Fishing Boat*, 2018). In October 2023, Hong Kong Customs intercepted a shipment of seashells from Mexico that contained over a ton of methamphetamines. The following month, it seized a shipment of electronics that attempted to conceal shark fin, totoaba bladder, deer tails and birds’ nests. Perhaps most memorably, a Mexican narcotics trafficker shipped cocaine inside frozen shark carcasses, though we could not find additional information on whether the sharks were protected species (CAMHAJI, 2023)

The advantages of crime convergence for TCOs also offer opportunities for law enforcement to dismantle networks. Criminal organizations may be less careful regarding crimes that carry less severe legal penalties, as is often the case with wildlife trafficking, giving investigators openings. Given that penalties for drug and arms trafficking are often more severe, holistic cases, ideally with multiple agencies cooperating, can stop wildlife traffickers and environmental criminals when penalties for the wildlife/environmental offense(s) alone would not create an effective deterrent or result in jail time.

We assess that emphasizing the full range of crimes committed by TCOs may also increase support and cooperation from countries for whom wildlife trafficking/environmental crime is not a priority, if there is a nexus with crimes like drug trafficking that are more aggressively pursued by the partner nation.

Mapping out and prosecuting a network's full range of crimes and profits can pay dividends in jail penalties and asset seizures, including when connected under organized crime statutes like RICO, and can help dismantle organizations to prevent them from continuing their activities, assuming there is a justice system up to the task. For example, in Operation Apex, initiated by the U.S. Fish and Wildlife Service and the U.S. Drug Enforcement Administration, the volume of drugs involved opened the possibility of life sentences without parole for some defendants, and approximately \$8 million was seized in cash, diamonds, and precious metals (United States District Court Southern District of Georgia Savannah Division, 2020). Depriving an organization of its proceeds, regardless of what form they've been laundered into, is essential to creating insurmountable barriers to re-entry. TCOs know this and hide their assets in various formats, including difficult-to-trace precious metals and gemstones (Coote, 2020) as well as laundering money via real estate, gambling, and other means.

It can be very difficult to pinpoint complicit parties at banks, companies, and ports of entry, given the extensive use by TCOs of false permits, invoices, bills of lading, etc. in addition to the use of bribes. In the case of a shipment of fins into Hong Kong via Mexico, representatives of both shipping companies blamed "misdeclared" cargo (Master, 2019). However, understanding entire criminal networks, including enablers, is essential to identifying bottlenecks and members' specialized roles, and understanding the logistics and financial flows of crime

Operation STELLA MARIS: Criminal Network Field Investigations, Analyses and Dissemination

Over several years of field investigations and research around the world, ELI identified and mapped transnational wildlife trafficking networks and an astonishing array of their other criminal activities, including a large number of environmental crimes such as illegal logging/deforestation of protected areas, throughout Latin America. Our investigators identified multiple Persons of Interest (POIs) and their supply chains across a number of countries from Mexico to Brazil, and in East Asia, and ELI has provided a number of significant leads and corroborating evidence to government partners and other stakeholders. **Operation STELLA MARIS was specifically designed to focus on the most significant shark fin trafficking networks from Latin America to East Asian markets;** however, our years of on-the-ground investigations clearly demonstrated that fin trafficking—and even wildlife crime more broadly—was only a segment of the broad criminal portfolios of those involved in these crimes. **Enumerated in each of the five case studies (ten transnational trafficking networks)** we've chosen to highlight below is the full range of crimes that ELI uncovered and documented, framed by our crime convergence typologies, referenced above and first published in our 2023 “Environmental Crime Convergence” report (Earth League International & John Jay College of Criminal Justice, 2023).

This public version of our investigative report was first conceptualized to help understand how shark trafficking networks operate in source countries and smuggle fins and other goods to consumer markets in East Asia. However, a no less important goal is to provide a clear understanding, via the case studies, of the globalized and convergent nature of modern organized crime. **It is vital to note that only one group detailed in this report limited itself to the niche of supplying shark fins.** At a minimum, fin traffickers were involved in the trade of other illegal wildlife products (IWPs), most often other marine items such as sea cucumbers and fish maws (1), and including non-marine IWPs such as jaguar products, live Galapagos tortoises, and even donkey skins. Much more commonly, they were involved in other types of environmental crimes in every country we examined, as well as different forms of trafficking, such as drugs and human trafficking. The crimes committed by these networks naturally extended to related financial crimes, such as money laundering, fraud, bribery, and corruption.

(1) While “maw” is normally used to indicate the jaws and/or throat of an animal, it is used to reference the swim bladders of totoaba, the part that is dried and sold to Chinese markets.

Methodology Note: ELI's Operations and Analyses

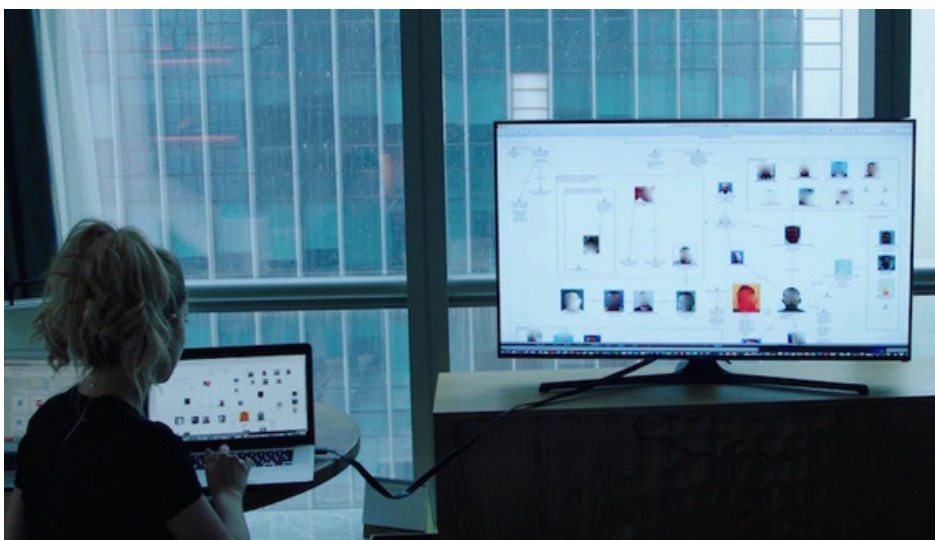
ELI is composed of experienced multi-national field investigators, researchers, analysts, and highly skilled retired professionals from various U.S. law enforcement and intelligence agencies who have experience executing projects worldwide. Through ELI's research, intelligence collection, and analysis of environmental crimes, we have successfully identified and exposed top wildlife traffickers and environmental criminals, the TCOs they belong to, and the converging criminal activities that perpetuate the destruction of the environment, natural resources, wildlife, and local communities.



First-Hand Information Gathering (Fieldwork):

ELI has been executing intelligence collection and research operations around the world for the past decade, employing internationally recognized experts with decades of experience in intelligence and law enforcement. As a first step of ELI's process, the investigators and research team carefully design context-specific investigative field operations. When in the field, ELI's team collects large amounts of unstructured data, including hundreds of hours of recorded conversations, videos, photos, audio, and a variety of documents (e.g. forged customs documents, passports, and messages from various messaging apps), financial and shipping information.

These operations offer important opportunities to strengthen working relationships with skilled local partners and cultivate local collaborators and informants who are well-positioned to provide information on Persons of Interest (POIs) and their networks. ELI's field operations also include official and unofficial meetings with local institutions, policymakers, and law enforcement officers to establish relationships and gather additional information.



Pictured: ELI's criminal analysts work alongside the investigative team to process all unstructured data from the field and other sources.



Criminal Network, Cyber, and Geospatial Intelligence (GEOINT) Analysis:

All data gathered from the field and first-hand sources are passed to the analytical team to be converted from unstructured data to structured and usable data. Analysis occurs in real-time alongside the work of the investigative team, and it continues indefinitely. This process involves the manual extraction and understanding of raw information that is translated, transcribed, and evaluated for reliability. The data are then integrated and analyzed to capture and visualize variables related to environmental crime, converging criminal activities, and associated TCOs.

ELI's team utilizes various analytical methods, including social network analysis, geospatial analysis, and cross-referencing open-source intelligence. Social network analysis investigates the relationships and structures within a criminal network and can be represented by graphs or maps. Criminal groups are social structures, therefore social network analysis can be applied to them in the form of Criminal Network Analysis (CNA). CNA is used to identify the relations among individuals based on information regarding the activities, events, and places derived from various investigative activities. CNA enables ELI to identify POIs and nodes, predict the success of key players, and provide actionable intelligence needed by law enforcement authorities to develop a targeted and effective response to transnational environmental crime networks.

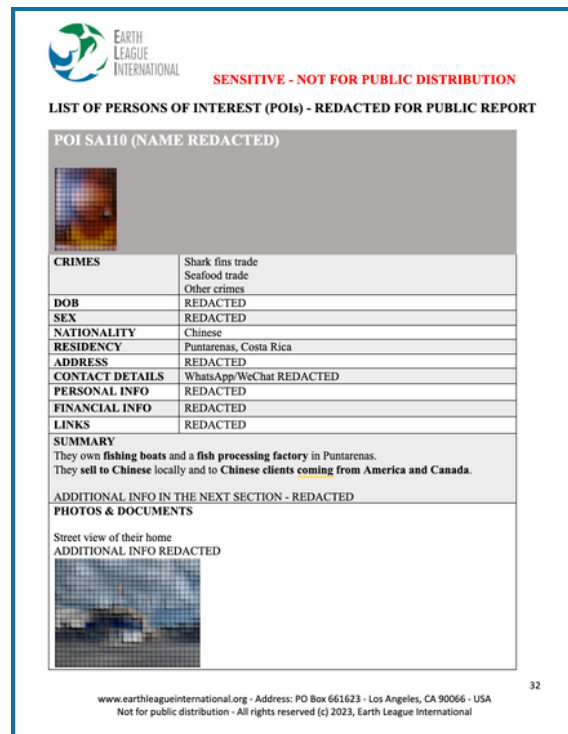
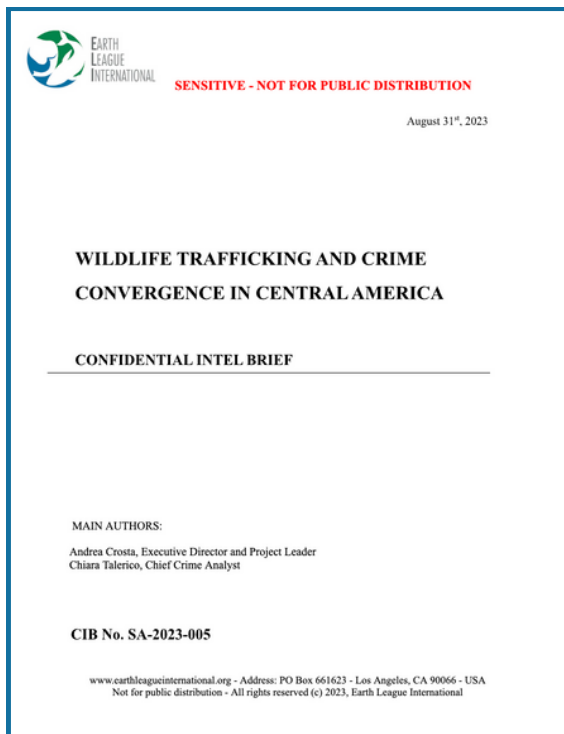
When needed, ELI's team also utilizes GEOINT analysis to effectively integrate and interpret multiple data sources and enhance the contextual knowledge within a location, space, and time environment. GEOINT begins with a base map of key features and domains that describe the team's operational landscape, such as wildlife habitats, key transit ports, wildlife trafficking routes, criminal hotspots, and areas of criminal convergence determined from ELI field operations and open-sources analysis. The incorporation of the link analysis integrates the criminal networks analysis within a geographic context. ELI's GEOINT analysis is often shared with law enforcement authorities to assist in strategically addressing the issues of environmental crime and its convergence with other serious crimes.



Production and Dissemination of Actionable Intelligence:

Upon the conclusion of ELI’s research and data analysis activities, ELI’s team publishes analytic reports and Confidential Intelligence Briefs (CIBs), which are disseminated to law enforcement authorities, governmental organizations, and stakeholders best positioned to act upon the provided information. CIBs are one of the most critical outputs of ELI’s research activities, addressing information gaps, serving as important knowledge transfer tools, and providing the tactical evidence needed for authorities to act. Among other uses, they assist authorities in investigations, arrests, and possibly prosecutions of Tier 1 traffickers and middlemen, improving policy and enforcement, and enhancing cooperation among governmental agencies.

It is important to note that all data and information presented in this report are a result of over five years of field missions and intelligence gathering by ELI’s team in Latin America and East Asia. During this time, ELI collected hundreds of hours of recorded conversations with POIs, informants, and sources in various languages. Additionally, hundreds of photos, videos, documents, financial information, fake and real certifications, social media accounts, phone numbers, addresses, emails, and other materials were collected to identify, assess, and target these top-tier environmental criminals and their networks. All raw data from the field was meticulously translated, transcribed, and processed by our team to produce actionable intelligence that could be utilized by authorities to take action or continue their investigative activities.



Pictured: Sample of a CIB shared by ELI with government agencies.

Criminal Roles Defined:

Poachers/Producers: These individuals illegally capture and sell protected wildlife, sometimes doing the first stage of processing, such as finning sharks or butchering jaguars. This typically occurs after traders and middlemen place orders, and they are often completely unaware of the rest of the illegal supply chain.

Traders: Some of these individuals buy raw products or live animals directly from poachers on a small scale and then resell to higher-level traders who consolidate, and possibly arrange processing and facilitate shipments. Large-scale traders may source from a variety of suppliers and arrange shipment to multiple buyers in consumer countries, depending on how closed or open their networks are.

Processors: These individuals prepare wildlife products for shipment, such as the drying and skinning of shark fins. In our investigations, POIs who owned processing facilities were often also high-level traders as well as using the legitimate side of their businesses to launder money derived from illegal business. However, these individuals were still usually dependent on the logistical networks of smugglers to move their products to Asia.

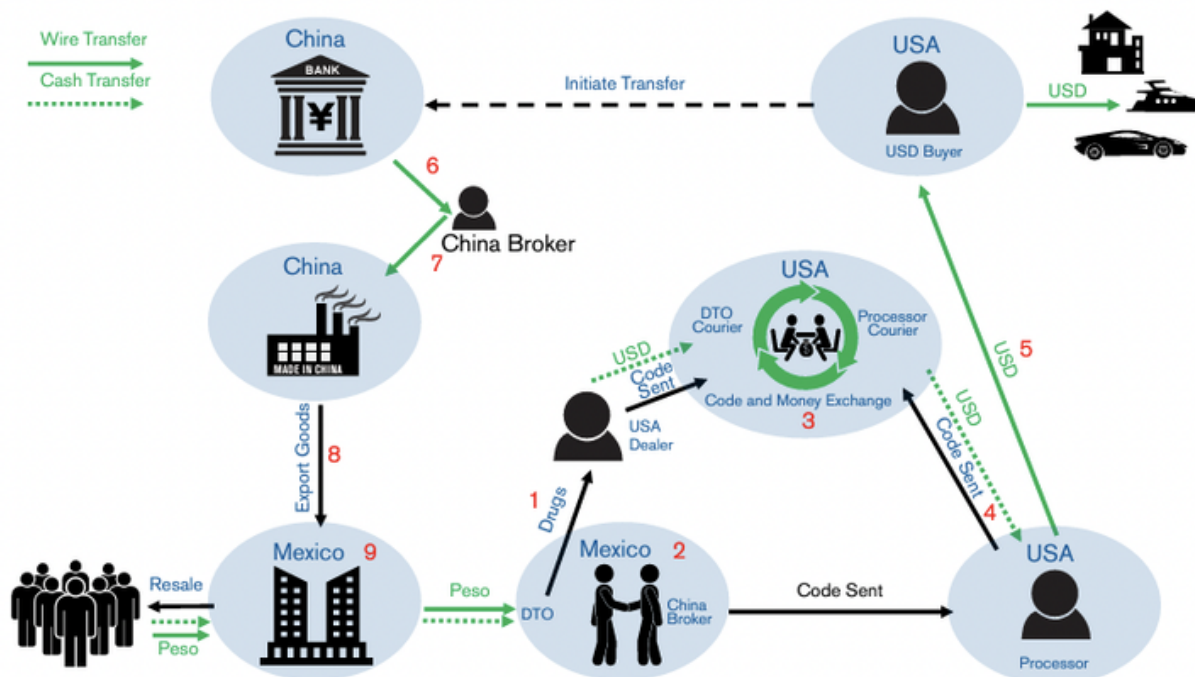
Smugglers: These individuals handle transportation logistics and organize the physical smuggling of illegal seafood and wildlife from the source location to the retail location. In these case studies, shark fins are transported either by air, generally via transit points, or by sea. Note that there is often overlap between smugglers, processors, and money launderers. High-volume smugglers not tied to a company may launder their proceeds via real estate and other investments.

Money Launderers/Underground Remitters: These middlemen have ties to several powerbrokers around the networks, often organizing money laundering schemes and maintaining bank accounts in multiple countries. In the context of this report, all known underground bankers and money launderers are Chinese nationals who make use of cash apps, cryptocurrency, mirror transfers, currency exchanges (Rotella & Berg, 2022), and bank transfers (2), sometimes as part of a *fei-chien* or “flying money” system (Cassidy, 1990). While not inherently illegal and often used simply for remittances, *fei-chien* is convenient for criminal purposes, as the transactions avoid traceable paths via traditional banking transactions. While we know that trade-based money laundering (TBML) is also frequently used in the IWT, we lack insight about the specific use of TBML by the criminals detailed below.

(2) Some of these overlap some of the time. For example, mirror transfers involve bank transfers and currency exchanges, but not all bank transfers or currency exchanges are part of a larger mirror transaction scheme.

Corrupt Officials: Traffickers often rely on a network of public officials to facilitate the movement of commodities. Corrupt officials are an essential category of enablers for criminal networks, at a minimum accepting payment to look the other way, or possibly directly facilitating illegal trade, as is often the case at ports of entry. This category encompasses police and military officers, port and customs authorities, elected politicians, and civil servants who are able to approve or falsify paperwork. These individuals are often highly knowledgeable about the local dynamics of illicit economies but may or may not be full members of TCOs.

Chinese brokers: Brokers sell commodities directly to China and/or Hong Kong and may be members of Chinese organized crime groups colluding with Latin America-based groups. We distinguish this group from other traders because they are the connecting nodes to Chinese criminal actors in the receiving countries, and thus they are more connected than most traders, almost always participating directly in Type 3 and 4 crime convergence activities.



Pictured: Figure from the 2020 U.S. Department of the Treasury report “National Strategy For Combating Terrorist and Other Illicit Financing”

CASE STUDY 1: Networks SA8, SA9, and SA10

Countries of Operation:
Ecuador and Peru

Convergence Types:

- Species Convergence (Type I)
- Environmental Crime Convergence (Type II)
- Serious Crime Convergence (Type III)
- Transnational Network Convergence (Type IV)

Criminal Activities and Crime Convergence Types:

The criminal networks centered in Peru and Ecuador involve Chinese, Ecuadorian, and Peruvian nationals, with indications that IWPs are often moved to Peru from additional countries for onward shipment to East Asia. Our team collected detailed information on individuals involved in the IWT in the region and built a trusted network of sources who helped us identify the most influential POIs, as well as provided critical details regarding how shark fin trade in this region operates.

The networks that ELI has named SA8, SA9, and SA10 are based in Guayaquil, Ecuador, where POIs supply **shark fins as well as other IWPs such as seahorses, sea cucumbers, fish maws, and jaguar skins, teeth, and bones (Type I convergence)**. One POI openly advertised products from “protected areas” in the Galapagos and participated in **poaching and smuggling** live protected species, such as tortoises, from the islands. As noted in the Executive Summary, ELI found overlap between POIs from Operation Jaguar and POIs involved in shark fin trafficking, indicating a significant level of Type 1 crime convergence.

Two of our key POIs operating in Peru and Ecuador **launder money**, and one of them, who claims extensive global connections, including to the Chinese diplomatic community, is allegedly able to both **create fraudulent passports** and obtain legitimate ones via corrupt connections in the Peruvian government (**Type III convergence**).

Based on the information collected and analyzed since 2018, ELI can confidently confirm that individuals from SA8, SA9, and SA10 have committed criminal offenses related to wildlife trafficking and smuggling, counterfeiting, money laundering, and bribery. Multiple sources alleged the involvement of Chinese Embassy staff in Ecuador and Peru in the IWT. Some alleged that both high-level Chinese and Ecuadorian officials are involved in IWT-related corruption.

Key POIs:

ELI assesses that the highest-value POIs for law enforcement in this hub are POI 2 and POI 12, due to their high volume of trade, the extensiveness of their criminal networks, and the breadth of the crimes they are committing. We also assess that POI 6 deserves greater scrutiny.

Activities conducted by **POI 12** include wildlife trafficking, money laundering, bribery, and passport counterfeiting.

- POI 12 has been involved in trafficking and smuggling live endangered species and IWPs since the early 2010s, including shark fins, jaguar skins and teeth, Galapagos tortoises and jaguar bone wine. He arranges shipping from Latin America into Asia and maintains connections with wildlife traffickers worldwide that allow him to facilitate shipments of rhino horn and ivory. He also may be involved in drug smuggling through the Amazon and Iquitos regions to Brazil and Colombia.
- His supermarket in Lima serves as his base for money laundering and underground banking, through which he handles up to \$1 million/day, with trusted money transfer contacts in at least 4 other countries. Prior to this, he worked on a Chinese fishing vessel that fished sharks and trafficked as much as 2 tons of fins annually.
- POI 12 forges official documents such as passports and claims he can provide genuine Ecuadorian passports for \$30,000 with sufficient lead time, suggesting contacts with corrupt officials within the Ministry of Foreign Affairs. According to a source, South America is popular with Chinese fugitives because of the ease of getting false identity documents.
- POI 12 has an extensive network of poachers, smugglers, and corrupt officials that reportedly includes Chinese Embassy officials in Peru, indicating that he is a large enough player to maintain relationships at multiple levels of trafficking networks and to have some knowledge of corrupt practices by Chinese officials. A source described how, because Chinese officials do not like receiving cash, favor is carried by “gifting” their preferred luxury items—“luxury” often indicating products derived from endangered species. In fact, many of ELI’s sources in Ecuador and Peru alleged extensive corruption of Chinese embassy officials in Peru and Ecuador. Complicit Chinese Embassy officials in Peru allegedly each take back 2 jars of POI 12’s jaguar bone wine every time they return to China.



Pictured: A trafficker sends a photo of a live Galapagos tortoise to ELI's Investigators.



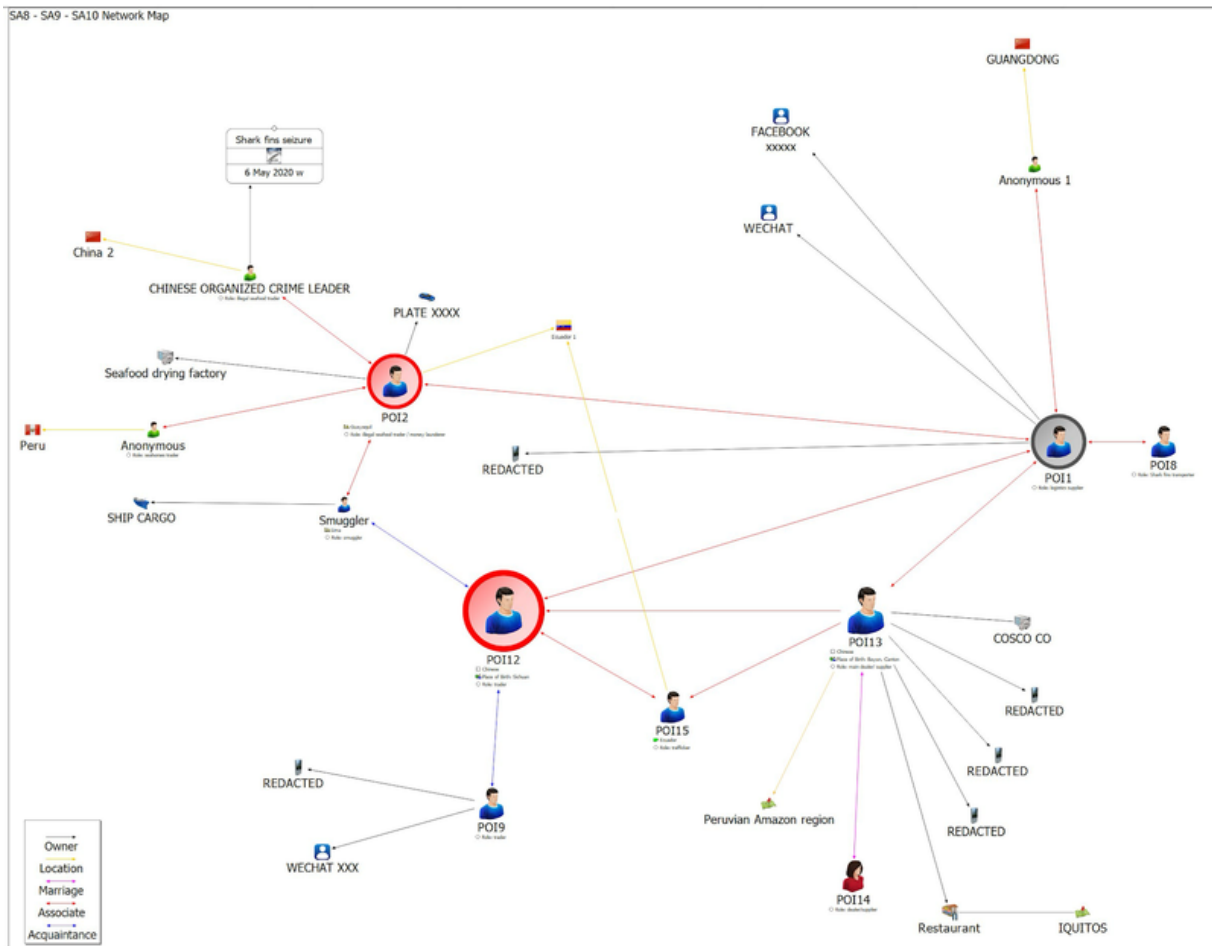
Pictured: Jaguar bone and seahorse wine filmed by ELI's investigators.

POI 2 launders money and is involved in multiple aspects of wildlife trafficking. He owns a seafood processing company and uses it to source and ship shark fins and other IWPs. He uses his company to launder proceeds from his illegal activities; we do not know if the company does any legitimate work. POI 2 is a collaborator of the unnamed Chinese crime boss who owned the record-breaking shark fin shipments seized in Hong Kong in spring 2020 (Leung, 2020).

POI 6 is a fin trader in Ecuador, who had a reported 600 kg of dried fins in stock as of spring 2020. Two sources named POI 6 as a source of quality fins for the Hong Kong market.



Pictured: Shark fins at a trafficker's facility, filmed by ELI's investigators



Pictured: A crime chart produced by ELI’s criminal analysts depicts relationships between key POIs

Transcript of a conversation with a source in Peru:

Source: “Usually it takes 7 days to be delivered to open seas. They use small boat [sic] to transport, and it can be very fast, also they have to hide from ocean patrol teams. Then they would move my stuffs to a ship which I have already set up in open seas. They would meet there. Once my stuffs have all been moved to the ship, it should be safe. Open seas are not controlled by anybody.”

ELI: Any guarantee from the fishing boats if we consign them the stuff to smuggle?

Source: If the boats sink, no refund or any guarantee. You know a shipping boat also costs a lot of money too.

ELI: Big fishing boats?

Source: At least costs about 100million RMB.

ELI: Owned by private people?

Source: They fish tuna or squids.

Details of Shipping Logistics and Routes:

While a few specific routes were detailed by sources, they reported that many logistics/shipping companies in the region had some kind of relationship with Chinese IWP traffickers. The COVID-19 pandemic and other factors caused shifts away from some hubs and routes. For example, a source claimed that much of the industry around Chimbote port in Peru went bankrupt in the absence of business during 2020-21, exacerbated by violent conflict between traders, disrupting shipping logistics. ELI's sources corroborated open-source reporting that most shark fins from Ecuador are moved to Peru for onward shipment to East Asia. One source reported that in general, IWPs sourced from Ecuador and Bolivia are transported to Lima for onward shipment into East Asia and asserted that the volume of illegal trade is the impetus behind the construction of the new port at Chancay, touted as "the gateway from Latin America to Asia" (BRICEÑO, 2023). Chancay will be the 9th major oceanfront port in Peru when completed, amid dozens of smaller ones, offering ample smuggling opportunities.

Many fin traffickers temporarily stopped sending shark fin shipments to or through Hong Kong after its record-setting Customs seizures in spring 2020, with the avoidance lasting through late 2021. Sources also reported that increased activity by Ecuadorian authorities made it risky to ship fins directly to East Asia from Ecuador, which increased the movement of fins to Peru for onward transit.



Land transportation from Ecuador into Peru:

The route between Huaquillas, Ecuador and Tumbes, Peru is the main artery by which shark fins and other IWPs are moved overland across the Peruvian border. Shipments are frequently taken to Lima for onward shipment, though those transported by sea can depart from any number of points along the coast.



Air Method 1:

Some traffickers use air cargo routes from Ecuador or Peru to China or Hong Kong, sometimes with a transit point in Vietnam.



Sea Method 1:

Small local boats take up to a week to move IWPs out to larger tuna or squid fishing ships on the open ocean, which then take them directly to Chinese ports, particularly at Zhoushan island in Zhejiang province. One source indicated that the largest fisheries, possibly meaning international companies, were too risk-averse to carry illegal products such as shark fins, so he and his associates primarily worked with smaller companies from Zhejiang with fleets of around 10 ships. Other regions may be better connected to networks from Fujian or Guangdong, however, our sources from Peru and Ecuador corroborated each others' assertions re: using fishing vessels from Zhejiang. Different senders jointly hire ships, both to lower costs and as a hedge against cargo seizures, so that no one sender loses all their goods in the event of an interdiction. A few million USD worth of cargo is sent at a time, a few times a year, to make the shipping costs worthwhile.



Sea Method 2:

Traffickers bribe tugboat captains to take items all the way to China by sea. POI 12 has established routes and relationships with tugboat captains, which are sometimes also used for consignments by other POIs.



Sea Method 3:

At least one trafficker sends fins via maritime container from Lima, transiting Hong Kong en route to Guangdong province in China.





Commodity Prices and Volumes:

Disruptions to transportation logistics during the pandemic caused significant price drops in certain IWPs. For example, one source reported that the price of seahorses dropped from \$400 to \$100 a kilo between 2017 and 2021, selling wholesale in China in late 2019 for 6000 RMB [approximately \$861.66] (3). Fish maw only dropped by around a dollar from 2019 to 2021, from to \$30 to \$29 per kilo.

Similarly, the same source had a small stockpile of jaguar skins in China for want of buyers, though it is unclear whether this is solely attributable to the pandemic. Prices as of late 2019 were from 15000 to 20000 RMB per skin (approximately \$2154 to \$2872).

Jaguar bone wine, which includes seahorses, sold for 1200 Peruvian soles per jar (approximately \$135) in 2021 in Lima. A source claimed that Chinese Embassy officials would transport 2 at a time when traveling back to China. Small jaguar teeth sold locally for 600 soles (approximately \$162) apiece as of late 2019. According to one source, as of late 2020, jaguar skins and seahorses were charged by the weight together for shipment at \$280/kg per transport.

(3) Currency conversions to USD in this section were made according to historic exchange rate information on exchange-rates.org, based on the date of information collection. Prices originally given to ELI's investigators in USD were left as is.

Information of Interest on Illicit Finance:

Underground remitters often use WeChat for transfers into China or involving Chinese nationals. Sources claim that Chinese criminal networks in Peru close their businesses every 3 years and reopen new ones to evade tax and other authorities.

Additional Context on the Criminal Environment:

While several POIs have their own product sourcing, transportation routes, and enablers, all the POIs detailed in this case study were at least aware of each other's operations, and sometimes collaborated. However, there is also competition. One source claimed that 3 Chinese factions sought to monopolize IWP shipping to China, discussed a murder, and indicated that rivalries may be based on Chinese province of origin, mentioning a Zhejiang "faction" and stating that he did not work with Fujianese. Another source referenced 4 separate Chinese groups sourcing illegal seafood—such as shark fins, seahorses, cucumbers, and fish maws—in Ecuador.



Pictured: Photos of dried seahorses (left) and sea cucumbers (right) provided by POIs to ELI's team.

Corruption in **Ecuador** is endemic at all levels of government: two recent former Presidents have been charged with or convicted of corruption; a third attempted to dissolve Congress before it could impeach him for corruption (Cabrera, 2020) (Reuters, 2023) (Ioanes, 2023). The country has struggled with a rapid increase in violence since 2021, mainly driven by criminal groups fighting to control the cocaine trade (Dalby, 2024) (Radwin, 2022). Essential infrastructure such as ports, especially Guayaquil and Esmeraldas, saw homicide rates skyrocket in 2022 and 2023. In addition, Ecuador is a major money laundering hub, with criminal actors from multiple regions seeking to launder cash from their cut of other illegal activities (Manjarres, 2023). Because of this, we expect that Chinese IWP traffickers, viewed as wealthy outsiders, may be increasingly targeted by Ecuadorian gangs and may opt to try and continue sourcing shark fins from Ecuadorian suppliers from the relative safety of other countries in the region.

Peru's high degree of political instability has also made it especially vulnerable to organized crime and corruption (Radwin, 2022). Peru's consolidation of regional shark fin exports is a product of both corruption by authorities responsible for protecting wildlife and a lack of political will. On the heels of a massive 2018 fin seizure and subsequent precedent-setting trial for fin trafficking (Castilla & Moreno Custodio, 2018), *Ojo Publico* reported on a corruption investigation into CITES permits issued by the Ministry of Production for illegal fin shipments (Huamán & Amancio, 2022). Corruption plays a large role in other environmental crimes, such as illegal logging (Cárdenas, 2022) (EIA, 2012) (Finer et al., 2014); a 2017 *Associated Press* report stated that almost 15% of forestry officials with the ability to sign logging permits were under investigation for falsification (Bajak, 2017). In 2008, special prosecutors' offices for environmental crimes were established in hotspots, with a federal-level office set up in 2021 (Marinoni & Mistler-Ferguson, 2022). It remains to be seen whether they are a match for TCOs abetted by corrupt officials, especially when prosecutors report being pressured by politicians to back down, ministries seek repeal of the law that added wildlife trafficking to Peru's organized crime law (Cárdenas, 2022), and at least one uncorrupted official had to flee the country under death threats (Global Witness, 2017). Authorities working in good faith to protect Peru's resources are fighting on two fronts: against TCOs and the public officials who should be their allies. However, one source stated in 2021 that it was very difficult to obtain export permits, suggesting that public scrutiny and the sentences of the fin traffickers arrested in 2018 may have helped rein in some corruption.

CASE STUDY 2: Network SA1

Countries of Operation:

Suriname, Brazil, Venezuela,
Guyana, French Guiana

Convergence Types:

- Species Convergence (Type I)
- Environmental Crime Convergence (Type II)
- Serious Crime Convergence (Type III)
- Transnational Network Convergence (Type IV)

Criminal Activities and Crime Convergence Types Within SA1:

SA 1 is a sprawling and well-connected network of Chinese nationals in the Northeast part of South America with an extensive criminal portfolio. It **traffics in shark fins and other IWPs, including jaguar parts (Type I convergence)**. SA1 sources claim that state-owned Chinese fishing fleets source the sharks from Venezuela, using Venezuelan-flagged ships run by Chinese nationals from Shandong province. To smuggle the fins in shipping containers, members of the group **brIBE Customs officials and law enforcement officers** at the ports they use in Suriname and Cambodia. SA1 is also involved in non-IWT forms of environmental crime such as **illegal mining and logging (Type II convergence)** in both Venezuela and Suriname near the Brazilian border, in conjunction with Chinese, Venezuelan, and Brazilian criminal organizations.

SA1 furthermore has interests in **human smuggling, human trafficking, narcotrafficking, and drug cultivation**, which are linked: smuggled Chinese migrants are used as forced labor in marijuana-growing facilities. While the workers are reportedly paid well, their labor is compulsory, leading us to label this as human trafficking. An employee of Conservation International noted seizures of jaguar fangs in massage parlors in Suriname, which are often staffed by human trafficking victims and have been used to facilitate drug trafficking (Skene, 2022); **another example of Type III convergence** (Is Suriname the Latest Hunting Ground for Cartels Trafficking Jaguar Parts? n.d.). ELI's investigations indicate that SA1 has business relationships with drug trafficking organizations in Colombia, Brazil, and Guyana. Members of SA1 had knowledge of, if not direct involvement in, the record cocaine shipment to Belgium in November 2020 that had originated in Guyana and was consequently interdicted by Belgian authorities. (Suriname and Guyana are popular departure points for cocaine shipments to Europe). We do not know if the port manager and law enforcement officers arrested in Belgium were part of POI 3B's network of bribed officials. SA1 was likely directly involved in an intercepted air shipment of cocaine from Colombia to Suriname in spring 2021.

SA1 is involved in **arms trafficking** and maintains connections to a number of other TCOs in East Asia and Latin America (**Type IV convergence**), **laundering large amounts of cash**.

Sources told ELI's investigators that SA1 leaders were connected to former President Boutserse's son Dino and other people close to the President. Dino Boutserse was extradited and convicted in a U.S. court in 2015 for charges related to narcotrafficking, and one charge for attempting to provide material support for a Foreign Terrorist Organization. Specifically, in exchange for a multi-million dollar payoff, Boutserse offered to allow large numbers of Hezbollah operatives to use Suriname as a base for, among other things, attacks on American targets. ELI assesses that given the variety and scope of crimes committed, SA1 must in fact be well-connected to powerful public and private sector figures. In addition to its political connections in Suriname, SA1 has links with private sector entities that run the largest timber, gold, and stone businesses in the country. At least one associate of SA1, POI 4B, is a leader of Brazil's First Capital Command (PCC), the country's largest criminal organization (InSight Crime, 2023), and another alleged co-conspirator of Dino Boutserse.

Based on the information collected and analyzed since 2018, ELI can confidently confirm that SA1 commits crimes related to wildlife trafficking, illegal logging, illegal mining, human smuggling, human trafficking, narcotrafficking, drug cultivation, arms trafficking, money laundering, fraud, and bribery.



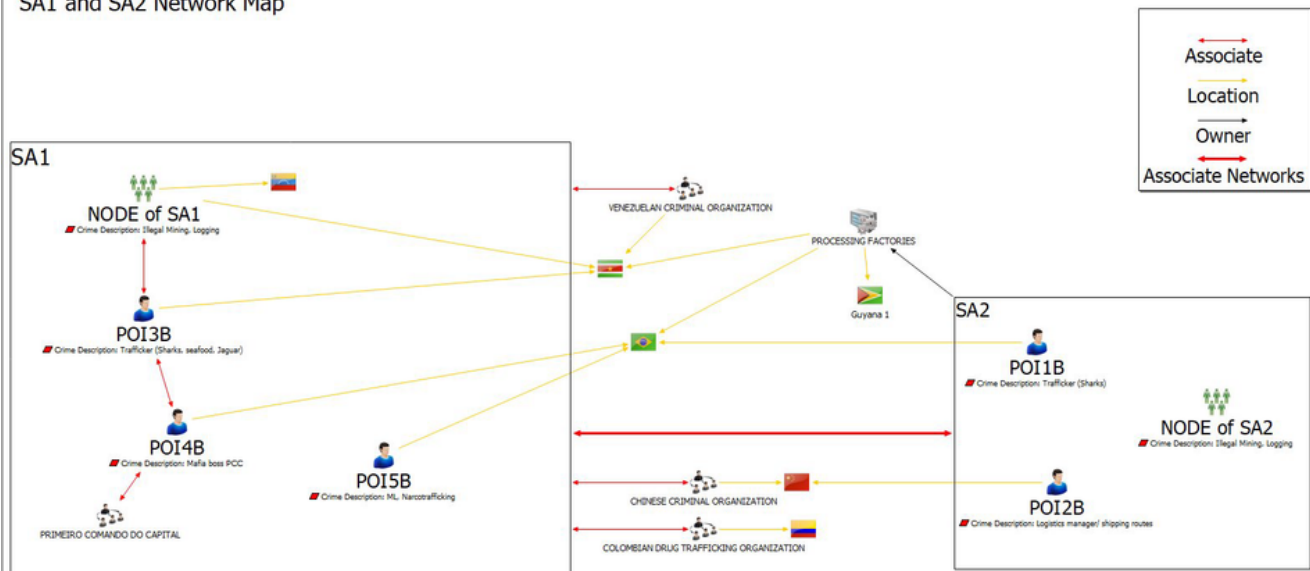
Pictured: Jaguar fangs filmed by ELI's investigative team.

POI 3B is a Cantonese leader of SA1 based in Paramaribo whom sources describe as having a large appetite for risk if he thinks it will be profitable. He has been in Suriname trading shark fins for approximately 10 years as of this report's date of publication. POI 3B also traffics in jaguar parts. He personally directs human smuggling and money laundering activities in Suriname, making him one of Suriname's biggest money launderers. He also directly bribes officials at ports in Suriname and Cambodia used to smuggle shark fins. He owns a registered business in Georgetown, Guyana and owns a boat that he uses to smuggle bulk cash.

POI 4B is a leader in Brazil's Primeiro Comando da Capital (PCC), the largest Brazilian criminal organization, with a membership of almost 20,000 people. He was previously arrested for his involvement in narco trafficking and arms trafficking, but released with the help of political connections. He is wanted by U.S. authorities and may be in Suriname.

POI 5B resides in Brazil and oversees money laundering activities, including the use of cryptocurrency (Bitcoin). POI 5B is also deeply involved in narco trafficking and arms dealing and has been arrested for both on multiple occasions. While we lack many details about this individual, they are likely a high-ranking individual, as they are a communication node between China and SA1 network members in multiple countries in Latin America.

SA1 and SA2 Network Map



Pictured: Crime Chart of Networks SA1 and SA2 produced by ELI's analysts

Transcript of a conversation with a source in Suriname:

“The customs here in Suriname airport is very easy to bribe and sneak the stuff and cash out or in [...] Every time I go to the airport in Suriname, I would bribe some customs officer first to let me pass with the cash or other stuff. Each time only a few hundred USD I can sort them out.”



Pictured: Shark fin drying facility filmed by ELI's team

Details of Shipping Logistics and Routes:

SA1 ships its shark fins via maritime shipping container through three different routes. Based on these routes, we assess that there are significant processing facilities in both Venezuela and Suriname.



Sea Route 1:

Fins sourced in Venezuela are sent to Suriname, then are sent to China through a stop in Cambodia, with the help of a complicit official.



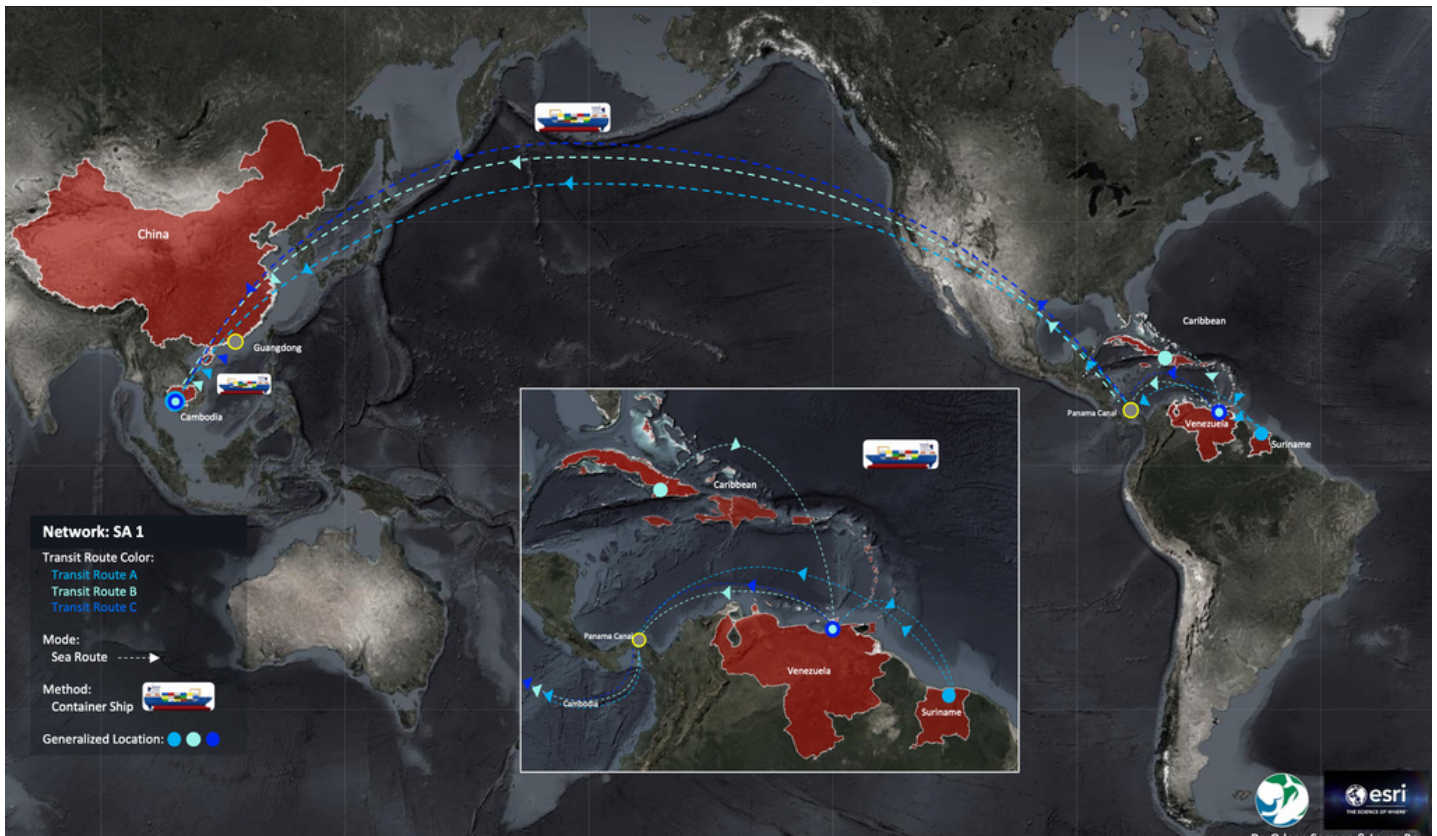
Sea Route 2:

Fins sourced from the Caribbean are landed in Venezuela, then sent on to the complicit official in Cambodia for onward shipment to China.



Sea Route 3:

Fins sourced in Venezuela are sent to Cambodia and then on to China.



Commodity Volumes and Prices:

Judging from trade volumes reported by SA1 sources, SA1 and SA2's joint venture may be only a fraction of the shark fins sourced from the Venezuelan-flagged Chinese ships. A source reported that these ships are providing 30 to 50 tons of fins every month, whereas SA1 and SA2 working together reportedly sell 1-2 tons of fins per month.

Information about Illicit Finance:

SA1 has moved bulk cash between countries; at one point it transferred \$8 million by boat from Colombia to Suriname. In another instance, POI 3B used his private boat to move approximately \$500,000 from Suriname to an unknown destination. POI 3B also has a registered business in Georgetown, Suriname that is used to conceal the illicit income.

Additional Context on the Criminal Environment:

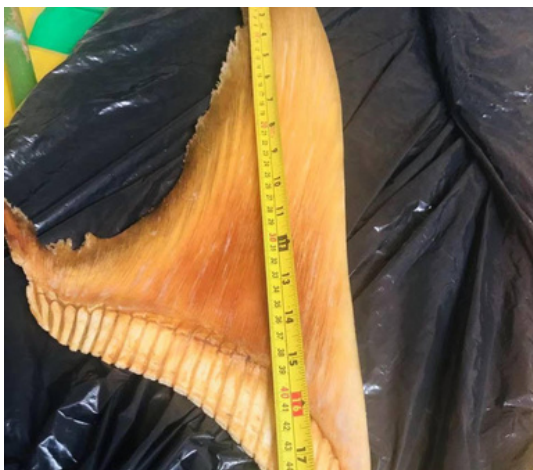
Sources in multiple countries indicated an aversion to shipping from **Venezuela** for two reasons: first, the amount of bureaucracy and paperwork and second, the extortion activities by Venezuelan authorities. Sources throughout South America indicated that moving illegal items through Venezuelan ports is not as simple as making financial arrangements with corrupt officials, but that multiple parties were prone to try to “shake down” the Chinese traffickers for additional payments, making smuggling here both unpredictable and expensive. Nonetheless, Venezuela is sometimes used by SA1 as either a transit hub or to directly ship fins to China; possibly another indication of the extent and level of their connections to ranking officials.

As indicated by the aforementioned information about the Bouterse family, corruption in **Suriname** extends to the top of the government, making it challenging for other governments or NGOs to identify reliable partners for countering criminal activities. Ex-president Bouterse was convicted of murder in December 2023, having previously been convicted of drug trafficking in Europe amid years of information about his ties to various types of crime and to terrorist organizations (den Held, 2023). Despite this conviction, current state leadership is no cleaner: Vice President Ronnie Brunswijk—Bouterse’s former bodyguard turned political opponent—has been convicted of drug trafficking in multiple European countries (den Held, 2023).

As of early 2024, President Chandrika Santokhi was embattled by corruption allegations, though ELI is not positioned to evaluate those accusations as it gathered no direct information from sources regarding Santokhi (BNN Breaking, 2024). As of 2022, gold made up 80% of the value of Suriname’s exports: poor controls and corrupt mining concessions mean that other countries launder and sell or export their illegally mined gold through Suriname, and criminals’ mining and logging incursions are linked to jaguar poaching (Romo et al., 2021). There is robust fraud below the executive level as well: American University and Insight Crime reported in 2022 on the vibrant reselling and duplicating of fishing permits to Surinamese and Guyanese citizens (Center for Latin American & Latino Studies, American University & InSight Crime, n.d.), which is likely an essential element of the shark fin trade there. The head of the Coast Guard stated in the same report that if there is sufficient gas for their boats, they patrol the coast twice a month.

Security forces in **Guyana** are similarly starved for adequate resources; according to the American University and Insight Crime report, the country has a single, aged vessel capable of reaching the outer parts of the country's EEZ, with a few additional boats that can patrol up to 40 miles off the coast (Center for Latin American & Latino Studies, American University & InSight Crime, n.d.). Overcrowding and overexploitation by fishing vessels due to non-existent controls resulted in murders of some fishers in 2018, and piracy is also a threat along the coasts of Guyana, Suriname, and Venezuela (*Piracy Attack That Killed 12 Guyanese Linked to Turf War - Inquiry*, 2020). As in Suriname, gold is the country's biggest export (Jones & Lizcano, 2022), and illegal mining converges with other environmental and financial crimes, providing levels of funding that would make it difficult for even a government without serious corruption struggles to confront them.

Venezuela is an example of a government fully enmeshed with organized crime. Years of breakdown of the country's institutions have nurtured the rise of powerful criminal gangs that the state cannot control (InSight Crime, n.d.). Officials have plundered profits from the country's natural resources, notably oil, for years (OCCRP et al., 2022). Drug trafficking and illegal gold mining comprise a significant portion of the country's GDP, and government officials and criminal gangs both participate with enthusiasm, often collaborating (Venezuela Investigative Unit, 2024) (Venezuela Investigative Unit, 2021). A drug trafficking network composed of military officers is known as the Cartel de los Soles (Venezuela Investigative Unit, 2020), so named for the sun insignias on commanders' uniforms (InSight Crime, 2022), and military officers assist drug planes (Venezuela Investigative Unit, 2023). Cocaine proceeds have almost certainly helped President Nicolas Maduro cling to power, and he and other powerful political figures were formally indicted by the U.S. on narcoterrorism charges in 2020 (U.S. Department of Justice, 2020). The Basel Institute named Venezuela the second-worst country for money laundering in Latin America in its 2023 report, closely followed by Suriname (Voss & Sistermans, 2024). Corruption among the lower ranks of security forces is a given for basic survival; starting police salaries as of early 2024 were less than \$15 a month (Venezuela Investigative Unit, 2024).



Pictured: Shark fins filmed by ELI's team.

CASE STUDY 3: Network SA2

Countries of Operation:

Suriname, Brazil,
Guyana, China

Convergence Types:

- Transnational Network Convergence (Type IV)

Criminal Activities and Crime Convergence Types Within SA2:

The SA2 network primarily sources shark fins in or just off Guyanese waters, taking advantage of less strict laws regarding the catch and sale of sharks. In conjunction with SA1, the group has facilities to process fins in Guyana, Suriname, and Belem, Brazil, and processes 1-2 tons of fins every month. Given the seeming specialization of SA2, and the collaboration between SA1 and SA2 on shark fin trafficking (Type IV convergence) SA2 may be our lone example of a criminal group that focuses on one type of wildlife crime and sells to multiple buyers.

Based on the information collected and analyzed in the past four years, ELI can confidently confirm that SA2 has committed crimes related to wildlife trafficking.

POI 1B is the leader of the SA2 network, from Hong Kong or Shenzhen and based in Brazil.

POI 2B was referred to as the “big boss” by sources. He is based in either Shenzhen or Hong Kong—or both—and controls the shipping route from Guyana into Vietnam or China.



Pictured: Shark fins at various traffickers' facilities filmed by ELI's team.

Details of Shipping and Logistic Routes:



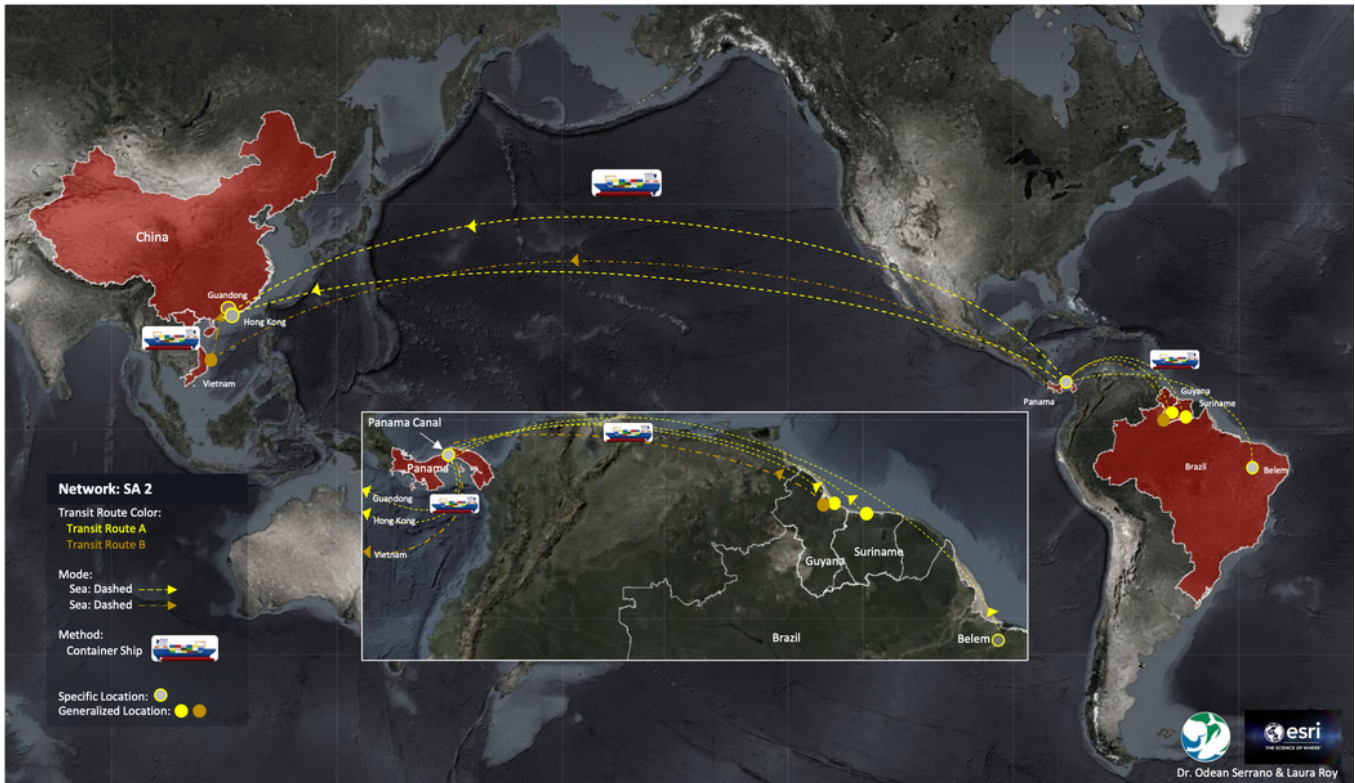
Maritime Route 1:

Fins sourced in Venezuela are sent to Suriname, then are sent to China through a stop in Cambodia, with the help of a complicit official. SA2 moves fin shipments from its processing facilities in Suriname, Guyana and Belem, Brazil to Hong Kong and China via Panama, suggesting the group may be using container ships that transit the Panama Canal to get their products from the Atlantic to the Pacific for transit to East Asia, consistent with global shipping patterns.



Maritime Route 2:

POI 1B allegedly controls a shipping route from Guyana to China, sometimes transiting Vietnam. We do not know if this route also uses the Panama Canal.



Commodity Volumes and Prices:

The SA2 network processes and ships between 1 and 2 tons of shark fins every month in conjunction with SA1, making it a large-volume trafficker.

Additional Context on the Criminal Environment:

Brazil's size and biodiversity, combined with porous borders, and myriad active criminal organizations, mean that an estimated 35-38 million animals are trafficked annually, not counting fish or insects (National Geographic, 2023). The country's largest gang, the First Capital Command (PCC in Portuguese) is involved in a wide array of illicit activities, has links to TCOs in other Latin American countries, Europe, and Africa, and controls some of Brazil's border areas (Doherty & Dalby, 2023) (*Transnational Criminal Organizations in Brazil and the Southern Cone*, n.d.). Colombian guerrilla groups, to include the ELN and elements of the FARC that did not demobilize after the 2016 peace accords, are also deeply involved in Brazilian crime (Voss, 2023), including extorting small-scale illegal mining operations (Pedroso, 2023) and threatening rangers and indigenous communities in protected areas (Yeung et al., 2020).

There is a high degree of Type 1, 2 and 3 crime convergence in Brazil (Yeung et al., 2020), and drugs and illicit environmental products being entwined and transported via the same routes to such an extent that the word *narcogarimpo* was coined to describe the combination of drug trafficking and illegal gold mining (Doherty & Dalby, 2023). Data specifically linked to wildlife trafficking is sparse, but anecdotal reporting suggests that it is rampant (Charity & Machado Ferreira, 2020), enabled by widespread corruption (Cárdenas, 2022) among local elected officials (Jones, 2022) and security forces (Austin, 2023). Military police that have been involved in piracy along the rivers exploited by the illegal miners (Pedroso, 2023). Brazil's efforts to combat wildlife and other forms of trafficking have also suffered from political whiplash between very different administrations.



CASE STUDY 4: Networks SA3, SA22, SA23, and SA24

Countries of Operation:

Colombia, Peru, Ecuador,
Panama, U.S., China,
Hong Kong, Singapore,
Malaysia

Convergence Types:

- Species Convergence (Type I)
- Environmental Crime Convergence (Type II)
- Serious Crime Convergence (Type III)
- Transnational Network Convergence (Type IV)

Criminal Activities and Crime Convergence Types Within Colombia:

The members of the networks SA3, SA22, SA23, and SA24 are centered in Colombia and active throughout the Andes. **They traffic high volumes of shark fins and other IWPs**, some sourced in Colombia and most from other parts of the region. In 2021, ELI's investigators were able to confirm and document that **many of the fins were from endangered species**, POIs understood the trade in them was not legal, and sources discussed multi-ton fin purchases. In fact, one source complained that they had so much product that they were running into shipment challenges. This group encompasses the full range of roles from poacher to Fujianese crime boss, with a stunning range of activities and connections. Indeed, a Colombia-based source said that fin traffickers in Ecuador and Colombia "clearly divide" their fin supplies, suggesting a high level of connectivity and communication amongst fin traffickers across the region. POIs are **also involved in illegal logging and gold mining (Type II convergence)**

POIs participate in **narcotrafficking** as well as related financial crimes such as **bribery and money laundering**. One POI reportedly even facilitates the **smuggling of antiquities** to China via fishing vessels with other networks covered in this report (**Type III and IV convergence**) multiple sources implicated high-level Chinese Embassy officials in the region in trafficking shark fins and other IWPs.

Based on the information collected and analyzed in the past three years, ELI can confidently confirm that individuals in SA3, SA22, SA23, and SA24 have committed crimes related to wildlife trafficking, illegal logging, illegal mining, narcotrafficking, antiquities smuggling, money laundering, and bribery.

POI 15 is a Chinese-Colombian smuggler based in Cartagena who smuggles shark fins, sea horses, and totoaba, as well as drugs. He has at least one relative involved in illegal logging though he reportedly no longer personally deals in illegal timber. Several of his criminal associates are close relatives, and together they comprise a criminal network involved in several types of trafficking and money laundering. 15 is well connected, with contacts at the Chinese consulate and a direct connection to a crime boss in Hong Kong. He may use his businesses, including a restaurant, to move products as well as launder cash. 15 buys fins from POI 16, and also sources IWPs from the Galapagos.

POI 16 is a Taiwanese supplier also based in Cartagena who owns a fishing company and at least one commercial boat. Licensed to catch tuna, 16's company poaches large quantities of sharks and sells to Chinese buyers in South America, including 15. A source told ELI's investigators that 16 bribes a fisheries official for papers that allow him to export fish maw.

POI 17 is an alleged Fujianese crime boss residing in Bogota, possibly with Colombian citizenship, who owns at least one fishing boat. 17 maintains close ties to corrupt police and Customs agents. In addition to trafficking shark fins and other marine IWPs, 17 is involved in narco-trafficking and money laundering, and has also participated in illegal logging. One source told investigators that 17 was instrumental in improving poor relationships between Chinese wildlife traffickers and Colombian narco-traffickers. Intriguingly, the source also said that 17 helped to "coordinate" shark finning and drug trafficking activities at sea. A source told ELI's investigators that 17 has been on Wanted lists in the U.S. and/or Europe.

POI 45 is another alleged Fujianese crime boss living in Bogota. He holds an official role in a high-profile civic organization and allegedly leverages it to facilitate connections between the Fujian mafia, the Chinese embassy, and the Colombian government. Sources claim that 45 is able to guarantee security for littoral shipments of illegal goods as well as offer a degree of political protection to members of the network, including 17.

Similar to 45, **POI 46** is well-connected, with relationships with high-ranking Chinese diplomats in Colombia, according to sources. One source claimed that 46 has also conducted assassinations at 45's behest. 46 sources large volumes of fins from both 15 and 16.

POI 98 probably is from Shenzhen and was heavily involved in smuggling Chinese nationals to Colombia in the mid-2010s and laundering money. A source claimed that at that time, smugglers could get 1000 visas at a time for \$3000 apiece. Once the Colombians created a less welcoming environment for these abuses and smugglers turned to visa-free Ecuador, 98 turned to wildlife trafficking, while continuing to launder money. He is an ambitious sourcer of marine wildlife products, trading in shark fins, fish maws, seahorses, sea cucumber, and totoaba from Colombia, Ecuador (including the Galapagos), and Mexico. 98 works to increase both the volume and variety of IWPs he can ship to Shenzhen and is facilitating improved shipping logistics to that part of China. 98 also maintains robust relationships with traders from Zhejiang in trade-based money laundering schemes.

POI 135 smuggles shark fins via maritime shipping containers from his processing facility in Colombia. Ninety percent of his fins are sourced from Ecuador, with the remainder from Peru and Colombia. He has associates that help with sourcing and smuggling logistics in Ecuador, Peru, Venezuela and Panama, and Colombia. Due to high risk of interdiction in Colombia, many of 135's Asian clients opt to not have their shipments sent from there. Those who do assume any costs associated with interdictions. As of early 2023, POI 135 was supplying four customers in Hong Kong, Singapore, and Guangzhou, sending 12 40-foot shipping containers a year containing 14-15 tons of fins each. One shipment of 14 tons of fins cost 135's biggest client 700,000 yuan [approximately \$100,971] (4). Pre-pandemic, this customer ordered 16 containers from 135 in a single year. POI 135 avoids doing business with other Chinese traders, preferring to source from Latin American suppliers and ship directly to his buyers. POI 135 and at least one of his buyers are fully witting that they are illegally trading in endangered species. POI 135's fins from Ecuador are sourced from a high-volume supplier, POI 138, who only sells to Chinese traders in Latin America and does not ship to Asia. POI 138 owns a large processing facility a few hours from Guayaquil, fishing boats, and a warehouse. Sources report that 138 is powerful and well-connected locally, with a farm in addition to his other businesses.

(4) This currency conversion to USD was made according to historic exchange rate information on exchange-rates.org, based on the date of information collection.

POI 159 processes, packs, and smuggles shark fins and other marine IWPs from Lima into the U.S., Canada, China, and possibly Mexico. This POI sells to well-known Chinese restaurants in Lima and buyers from Chinese state-owned companies in Peru; some of the latter buy large fins to display instead of consume. POI 159 sources fins from Ecuador, then has them moved over the Peruvian border to be shipped to a warehouse in Lima. POI 159 stores processed or partially processed fins and packs them for buyers. When moving products by plane, they pack 5 kilos per suitcase, wrapped in clothing. POI 159 appears to have calibrated the degree of processing that makes it difficult for U.S. authorities to detect fins moving through U.S. airports or the postal system. For shipments by post, the cartilage threads of the fins are processed and packaged so that they appear to be noodles. For airports, the fins must be skinned and “deboned”. As of 2023, POI 159 experienced increased demand and competition for fins and sea cucumbers, sometimes selling out in a single day. The main seahorse supplier is POI 173.

POI 160 is a trader and smuggler from Guangzhou based in Peru who sources IWPs from across Latin America, including totoaba from Mexico and shark fins and fish maws from Peru. Some of his exports may be legitimate; for example, he sells maca to China, but it is unclear whether this is in the legal powder supplement form or illegal roots and seeds (Black, 2022). Information about him can be inconsistent, possibly due to his ambivalence regarding the increasing risks and costs of the shark fin trade. He works with Colombian and Mexican partners, including corrupt police officers, and appears well-connected to Chinese crime figures throughout Latin America, to the extent it may be worth further investigating and mapping his collaborators. He owns a restaurant that is probably used as a cover business for both shipments and money laundering. He is a high-volume trader of donkey skins from across Latin America, perhaps one of the biggest. POI 160 travels often and deals directly with narco-trafficking groups in other countries. He has purchased elephant ivory in Peru, though we are unsure whether he is involved in selling/trading ivory or simply a consumer and from where the ivory came from. **POI 160 frequently collaborates with:**

- **POI 175** is a contact in Leon, Mexico, from whom 160 sources totoaba bladder.
- **POI 163** a trader and processor in Bogota who sells 160 marine IWPs sourced from rebel-controlled areas of Colombia. According to sources, 163 is also involved in illegal gold mining with insurgent groups. He came to Colombia from Macau, and reportedly maintains ties to organized crime figures there.

POI 161 is a supplier and processor of shark fins and other IWPs in Ecuador with a large facility. According to sources, he has been in business for many years and sells to almost all of the Chinese traders in Ecuador.

POI 162 is another fin trader and smuggler who sources shark fins from around the Andean region. He has been in Lima for 20 years, though we do not know if he has been involved in IWT the entire time. He collaborates with POI 176, an Ecuadorian, and helps transport the fins into Peru for onward shipment, though he may not be involved in smuggling into Asia.

POI 172 manages a Chinese-owned fishing logistics company and assists approximately 800 Chinese-owned vessels get fishing licenses, maintenance, and other bureaucratic needs. He also abuses his position to assist traders who use the fishing vessels to smuggle marine IWPs, jaguar products, and even antiquities to China.

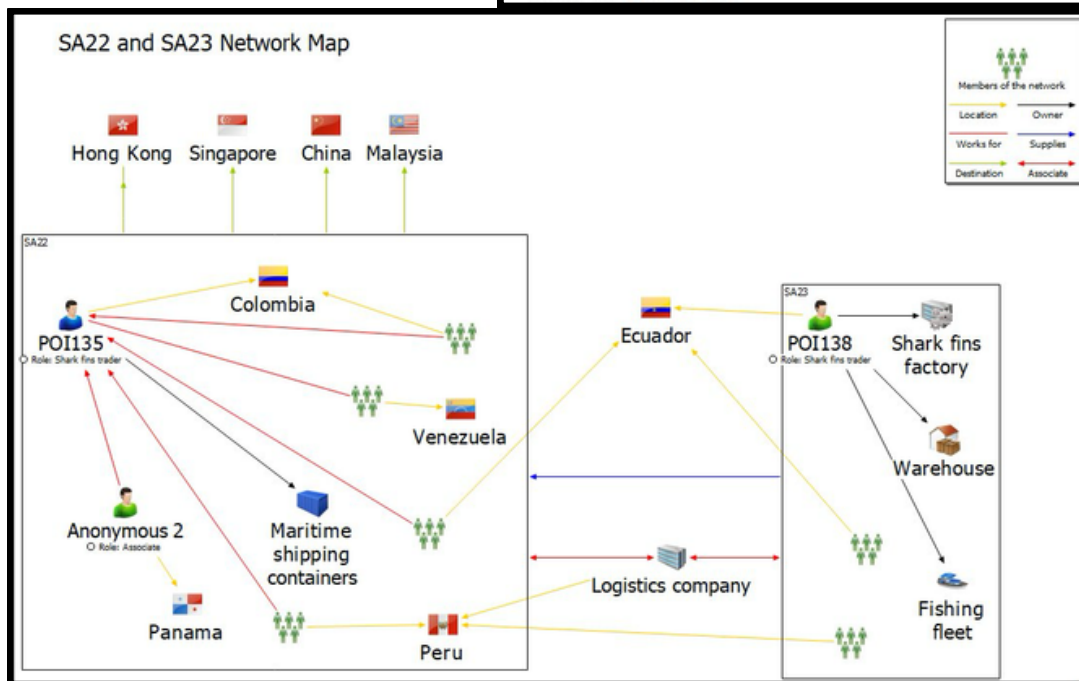
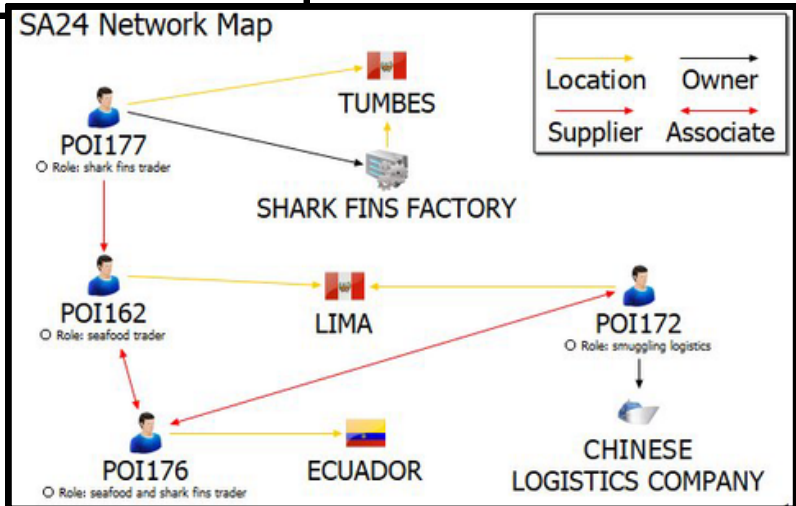
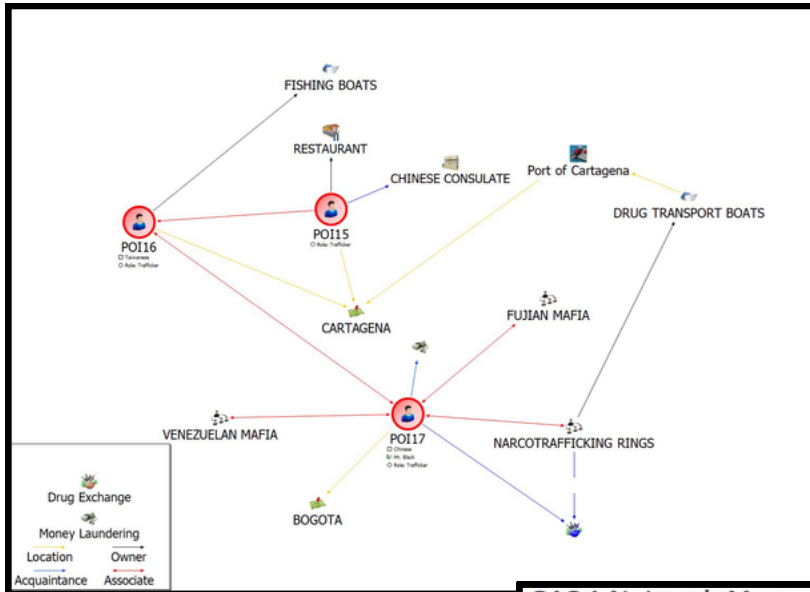
POI 173 supplies shark fins and seahorses from Northern Peru, and sends them to his buyers, including POI 159, by long-distance bus.

POI 174 is one of the biggest fin and fish maw traders in Peru, with a large warehouse. 174 supplies POI 160 with marine IWPs. According to a source, 174 has a high-ranking financial backer for the sourcing of IWPs in Peru and Ecuador. POI 174 sources large volumes of shark fins in Ecuador and arranges shipping to Hong Kong via Peru in 20 and 40 meter containers.

POI 176 traffics shark fin and other marine IWPs in Ecuador and one of POI 162's main suppliers there. One of his collaborators is the manager of a boat logistics company who handles the smuggling into East Asia.

POI 177 is based in Tumbes, Peru, and sources claim that his fin processing facility is the largest in the country. He is a supplier for POI 162.

Simplified and Redacted Network Maps:



Transcript of a conversation with a source

“In 2019 there is a Hong Kong customer who bought 3 containers of shark fins from us and one went through Hong Kong customs and the other 2 containers were all confiscated. Because some of the species we sent to him are endangered species banned by Hong Kong.”

“This is a new trend for rich businesspeople to invest. They can leave the products there for 10 years and then sell at a very high price later like investing in stock markets. The key is to have a frozen warehouse to store the expensive seafoods stuff and make sure they are not going rotten. In Peru few people are doing this as not so many super rich people here with extra lots of cash but in Asia, yes.”



Pictured: Shark fin drying facility
filmed by ELI's team



Details of Shipping Logistics and Routes:

Shipping logistics for these networks are varied and complex because of the number of source countries used as embarkation points for final shipment to East Asia. Container ships, small and large fishing vessels, private boats, commercial air and postal service are all used by POIs in these groups. One source said that he did not ship from Venezuela due to both bureaucracy and extortion; so fins sourced from the country tend to be sent elsewhere for transit to East Asia. The same source indicated that Colombia and Panama were also not popular places from which to ship to Asia, that payments were due earlier in the process, and that buyers assumed costs associated with seizures, suggesting that there is sufficient enforcement there to deter smugglers and shipments to East Asia are being monitored. Peru remained a highly popular place to collate shipments to send across the Pacific via various methods, with Suriname and Guyana used for containerized shipments collected on the Atlantic Coast of the continent.



Air Route 1:

A POI based in Lima who sources her fins in Ecuador has methods of packing processed shark fins into checked luggage, wrapped in clothing, to take them into China. The POI has also carried fins into the U.S. and Canada via luggage on commercial flights but indicated that the fins must be in a more processed state to avoid detection.



Land Route 1:

Sources assert that to move products from Cartagena to Bogota, strong relationships with corrupt law enforcement officers are essential, because of roadblocks and checkpoints. A17 and A45 reportedly have very strong connections that allow them to smuggle illegal goods without interdiction.



Land Route 2:

Some Colombia-based traffickers also source from Ecuador and arrange for overland shipment into Peru for onward transit to East Asia. A source disclosed a “huge” processing facility in Ecuador that delivered fins to the Peruvian border with all necessary documentation.



Land Route 3:

One supplier of fins and seahorses sends shipments to buyers in Lima from Northern Peru via long-distance bus.



Maritime Route 1:

Fins in shipping containers are sourced from the Caribbean coast of Colombia or sent from Ecuador or Panama into Colombia, then transit via different permutations of Aruba, Suriname, or Guyana to East Asia. A combination of fishing vessels, private boats, and cargo ships are used, with the cargo ships used for the transit to China.



Maritime Route 2:

In a slightly less complex variation, containerized fins sourced from Guyana or Suriname are sent directly to East Asia.



Maritime Route 3:

Squid fishing boats from Zhoushan and Shandong are used to transport shark fins back to China. Because of the high level of risk, boat captains demand the full payment in cash upfront. As seen with SA8-SA10, smaller fishing vessels sometimes transport the cargo to the larger fishing vessels on the open ocean, outside of territorial waters. The fishing boats charge \$20/kilo for IWPs.



Maritime Route 4:

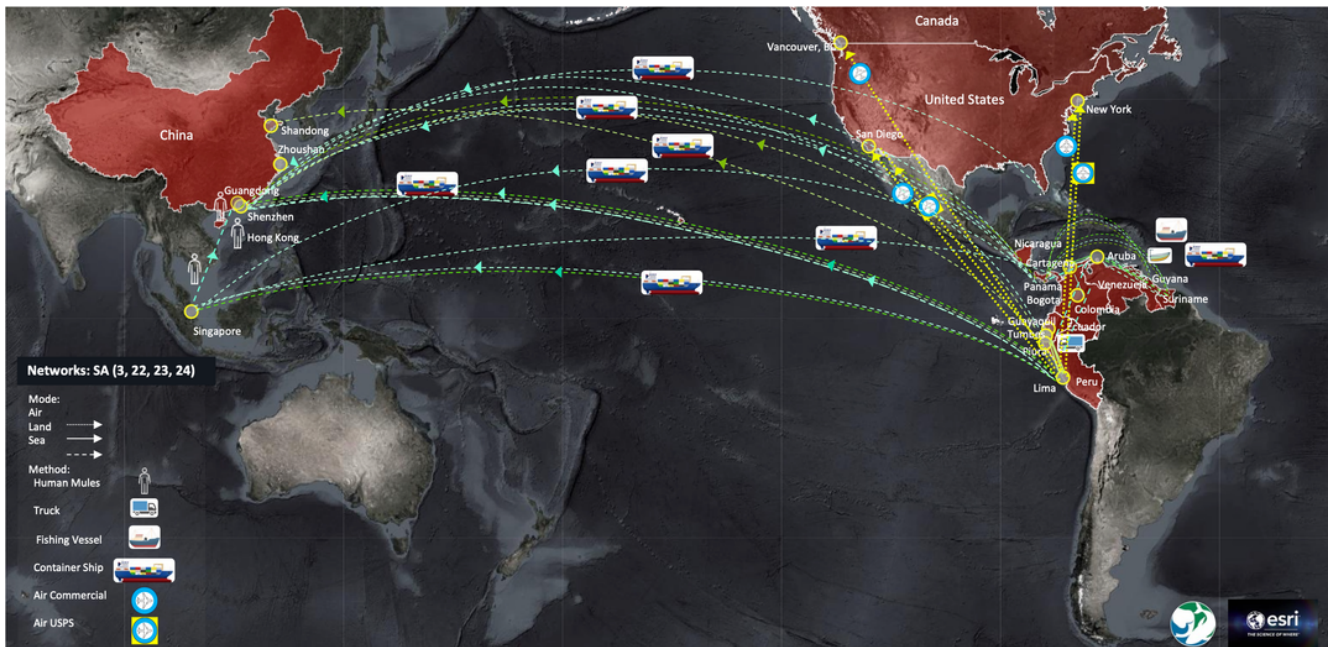
One POI sends large fin shipments via shipping container from Lima to a small number of high-volume buyers in Hong Kong, Singapore, and China.

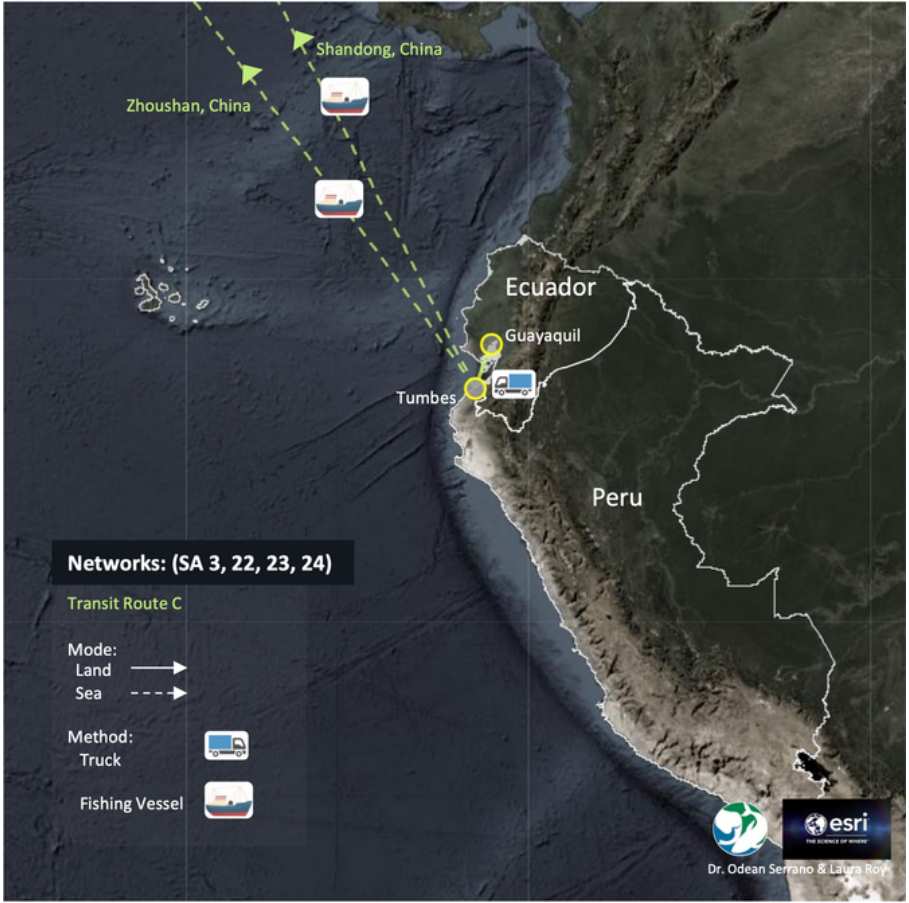


Maritime Route 5:

- Fins sourced in Panama or Nicaragua are sent to Peru for containerized shipment to Hong Kong. Fins sent from Venezuela to Peru may take the same path to Hong Kong, though we lack details of the final transit leg of this route.

Geospatial Maps of Networks SA3, SA22, SA23, and SA24







Commodity Volumes and Prices:

As of early 2023, commodity prices for shark fins and other marine IWP had risen significantly, though prices always vary by species, size, and destination. Some traffickers complained that prices in Peru were high enough to chip into their profits from sales in East Asia. Another source said that wealthy Chinese were investing in shipments of marine IWPs, and in some cases storing them in anticipation of sales prices rising further.

As detailed under POI 135's bio, as of 2023, he allegedly shipped a 40-foot shipping container of 14-15 tons of shark fins every month to buyers in East Asia. Prices were between 700,000 and 800,000 yuan [approximately \$100,971 to \$115,395] (5). For shipments sent first to Hong Kong, the price to transport from Hong Kong into China was an additional 120 yuan (\$16.70) per kilo as of 2023. Large fins (over 1 meter) can be sold for \$40,000. Due to overfishing, these are less and less common. A kilo of small fins sold in Lima for \$200-\$250. PA15's associates involved in illegal logging pay locals, primarily in Chaco state. As of 2023, they could send approximately 700 containers of about 10,000-10,500 cubic feet of timber to China every three months. Sources indicate that Colombian TCOs and complicit Customs officers are involved in the illegal timber trade, and also sometimes establish monopolies on legal goods, similar to what has happened in Mexico with certain agricultural products.

(5) Currency conversions to USD in this section were made according to historic exchange rate information on exchange-rates.org, based on the date of information collection. Prices originally given to ELI's investigators in USD were left as is.

Information about Illicit Finance:

POI 160 may have alluded to mirror transactions when discussing how \$2 million paid in China reached him in Peru “in some special way”. POIs 162 and 176 have both moved to cash payments only, in advance, in an effort to avoid any traceable transactions.

One POI in Peru discussed the purchasing of businesses and land to launder proceeds, mentioning that they had too much cash to know how to hide it. Some investments include hotels and restaurants; popular types of businesses for money laundering by TCOs worldwide.

Additional Context on the Criminal Environment:

As is well-publicized, sources corroborated that **Colombia** is a rich environment for multiple types of criminal activities. Our investigators learned of multiple province-of-origin-based Chinese TCOs operating there. One source additionally named large tuna fishing companies from Japan and South Korea that allegedly poach and traffic shark fins from their fleets’ base in Cartagena. Colombian TCOs are far more diversified than drugs, and sufficiently powerful that foreign criminal organizations must find a way to collaborate or pay them to engage in illegal activities. The son of the former head of the Cali cartel was directly implicated in the trafficking of shark fins and other IWPs (OCCRP et al., 2023). An area where Chinese and Colombian TCOs have collaborated closely for years is in money laundering, with Colombian TCOs commonly using the cheaper Chinese MLOs’ use of mirror transactions and TBML.

Some sources painted a picture of a permissive poaching environment in **Colombia** enabled by corruption. One source reported that officials in charge of monitoring boats for evidence of shark finning or drug shipments in Colombia had almost universally been corrupted. However, this view that every official can be bribed was not universally shared among ELI’s sources. Most fin traffickers based in Colombia preferred to ship fins from other countries because of law enforcement activity in Colombia; a sign that many officers and agencies are working hard and in good faith. ELI finds it encouraging that it seems to take relatively little enforcement or increased risk of seizures to discourage or displace smuggling. Similarly, sources reported that sourcing fins from Colombia fell largely out of favor after its ban on shark fishing. In fact, one source noted that fins sourced from there tend to be large: potentially a positive indicator that more sharks may be reaching maturity because of less poaching.

CASE STUDY 5: Costa Rica: Network CA1

Countries of Operation:

Costa Rica, Panama, Nicaragua

Convergence Types:

- Species Convergence (Type I)
- Environmental Crime Convergence (Type II)
- Serious Crime Convergence (Type III)

Criminal Activities and Crime Convergence Types Within CA1:

Since January 2022, ELI has been collecting first-hand intelligence and evidence regarding the smuggling methods, hotspots, and key POIs in CA1, a network active in Central America and centered in Costa Rica. **Our investigations into CA1 confirm the presence Type I, Type II, and Type III crime convergence.**

Examples of **Type II convergence** within CA1 include **illegal timber trafficking and gold mining**. We believe that the same companies and individuals are involved in both the illegal timber and shark fin trade, using the same Customs agents, companies, and storage facilities. Examples of **Type III crime convergence** within CA1 include **money laundering and bribery**.

Fin poaching and trading hotspots in Costa Rica include Puntarenas and Limon, on the country's Pacific and Atlantic coasts, respectively. According to ELI's sources, most of the "good" shark fins are sourced from the Pacific coast, where Puerto Caldera, located in Puntarenas province, is becoming an increasingly popular port for exporting IWPs. [Note: Puntarenas is a province, a city, and a port. We refer to the province unless otherwise specified]. A large quantity of shark fins are also brought to Limon, Costa Rica from Venezuela or Nicaragua. Additionally, the protected area of Isla del Coco continues to be a hotspot for **illegal hammerhead shark fishing in Costa Rica**, facilitated by corruption, despite local press coverage of poaching challenges here since at least 2011. Three species of hammerheads are protected in Costa Rica and the genus that encompasses them are on CITES Appendix 2, and international trade in this family should only be authorized by the granting of an export permit or re-export certificate (CITES, 2019). Additionally, 4 species in the hammerhead family are considered "critically endangered" by the IUCN (Rigby et al., 2019).

The IWT and environmental crime are conducted secretly in Costa Rica, which has a reputation for prizing and protecting its environment despite its lack of enforcement in “protected” areas or prosecution of environmental and wildlife crimes. The secrecy and caution indicate that corruption is not yet so pervasive as to allow these traffickers to operate openly. Nonetheless, shark poaching and the fin trade continue to thrive (Rodriguez, 2021). Corruption may be increasing; in addition to the information ELI collected about corruption surrounding Isla del Coco, a source alleged **illegal campaign donations by Chinese officials** to an elected official in Puntarenas suspected of facilitating IWT.

Chinese timber traffickers source **illegally harvested cocobolo timber and teak, which are almost exclusively logged from protected areas by local loggers**, including indigenous groups. As with the shark fin trade, illegal logging is conducted much more secretly in Costa Rica than in much of Latin America. Throughout the region, it is popular to ship contraband, including maritime IWPs, either in or mislabeled as banana shipments, as their high perishability encourages quick clearance for transit. Timber trafficking is no exception. As with the smuggling of IWPs, intercepted timber is confiscated, but there are rarely any further investigations, sanctions or prosecutions for these crimes. In some cases, traffickers secure valid permits for a specified amount, which they show to officials, and then log far more than permitted. In some cases, timber traffickers have bought back their seized shipments at government auctions.

As elsewhere in the region, Chinese criminal networks in Costa Rica seem to be roughly segmented along province-of-origin lines. Most of the traffickers are from Fujian or Guangdong. According to one source, Cantonese individuals (from Guangdong) are more prevalent in Costa Rica, while there are more Fujianese in Nicaragua. According to ELI’s sources, it is very common for undocumented Chinese immigrants to get legal residence via **marriage fraud**. Sources also discussed the role of the Chinese criminal community in running brothels, underground casinos, and conducting kidnappings for ransom, though none of our sources directly implicated our key POIs in these enterprises.

Based on the information collected and analyzed since 2022, ELI can confidently confirm that individuals in CA 1 have committed criminal offenses related to wildlife trafficking, illegal logging, money laundering, and bribery.

POI 70 is a prominent shark fin, seafood, and Traditional Chinese Medicine (TCM) product trafficker based in San Jose, Costa Rica. POI 70 can transport products from the U.S. to China with the help of relatives based in the U.S. She both imports and exports marine IWPs.

POI 78 uses his shop in San Jose's Chinatown as a front for underground banking and money laundering, moving \$1-2 million a day with his associates. A source indicated that money is moved in China and then made available for pickup in Costa Rica. POI 78 and his associates conduct the same activities in the U.S., making U.S. currency available after deposits are made elsewhere in Chinese accounts. The source indicated that the source of the U.S. currency is from drug sales, and that POI 78 launders money for "cartels," possibly referring to Mexican narco-trafficking groups. POI 78 is always personally present for these transactions. Additionally, a source disclosed that Chinese-American police officers in New York, possibly naturalized citizens from Guangdong, help protect these activities.

POI 79 is a large-scale timber trader in Panama who sources illegal timber from both Costa Rica and Panama. He also launders money and engages in underground banking. He is acquainted with POI 78, who launders bulk cash via his San Jose salon/barbershop, and the two may thus be part of the same money laundering organization (MLO). POI 79 prefers to fund his own activities instead of working with partners.

POI 90 is a Chinese timber trafficker in San Jose who uses a solar panel company as a cover. His family owns a construction company in China and may receive illicit shipments there; at least one relative is known to have access to rhino horn, indicating that more of POI 90's family is involved in the IWT. POI 90 also sells illegally logged wood to customers in the U.S. and India, meaning that if his U.S. customers are aware of the products' origins, they may be guilty of violating the Lacey Act. The manager of POI 90's company, POI 97, is complicit in the timber trafficking.

POI 94 is a Cantonese shark fin and seafood trafficker who owns a fishing fleet on the Pacific side of Costa Rica that catches large volumes of sharks and smuggles the fins out of Costa Rica. He was reportedly under investigation as of the date of publication.

POI 115 is a middleman connected to various traffickers in the shark fin, illegal seafood, and timber trafficking businesses. POI 115's uncle was a well-known shark fin trafficker in Costa Rica and was among the first to establish the business in Puntarenas, Costa Rica.

POIs 130a-b (husband and wife) process and trade shark products in their warehouse. A sack of fins generally costs between \$1,200 and \$2,800; we do not know the likely higher price of hammerhead and oceanic whitetip shark fins. The couple hires individuals to process the fins, and they claim they can ship large quantities to Singapore and Hong Kong via a major international airline. SA130a also gets totoaba from Mexico, where he likely has cartel contacts. They also sell sea cucumbers. While the totoaba maws and sea cucumbers are sourced in Mexico, Nicaragua, and Honduras, the shark fins are sourced in Costa Rica or Venezuela. They are also involved in cocobolo timber trafficking.

Transcript of a conversation with two sources:

Source A: *"He cuts them in the shape when they're dry and puts[s] them through a process with which they take the smell away."*

Source B: *"The price is different if with or without the smell."*

Source A: *"If they send it by flight, they have to make sure it doesn't smell."*

Source B: *"We have hammerheads, but they're illegal to have."*



Pictured: Hammerhead fins filmed in Costa Rica by ELI's team

Details of Shipping Logistics and Routes:

According to some traffickers, smuggling by flight has become increasingly difficult because Customs personnel at the airports are familiar with identifying IWPs coming from the Puntarenas area. That said, Customs officials are inclined to adopt a lenient approach toward people attempting to smuggle illegal products, often only confiscating them without imposing a fine or initiating any type of law enforcement follow-up. Even so, because of the high rate of confiscation we found few smugglers using commercial air, the single exception being the couple that uses an airline to move fins via commercial flights into Hong Kong and Singapore. **According to the same traffickers, it is easier to smuggle from the U.S. directly to China than from Costa Rica.**

Many of the Costa Rica-based traffickers preferred smuggling IWPs to or through Hong Kong: the main destination of all shark fins exported from Costa Rica by maritime shipping container as of 2022-2023. Some shipments depart for East Asia directly from Puntarenas, Moreso Puerto Caldera than Puntarenas port, though in 2022, 75% also transited the port of Balboa in Panama, destined for Hong Kong. Fins that are sent to Costa Rica from Nicaragua or Venezuela for onward shipment may arrive by small boats or already containerized. Balboa was also a common transshipment point for illegal timber shipments originating or collected in Costa Rica



Custom Codes and Export Fraud Methods:

According to a **special research project that ELI did on the misuse of shipping codes** to obscure illegal trade in shark fins, between January and September 2022 a total of 36.7 tons of dried shark fins, worth almost \$6 million, were exported from Costa Rica by three companies. Two of the companies are owned by the same individual, who owns 10 companies in total; the owner of the third company also owns multiple other businesses that may also be involved in the IWT. These three companies engage in fraud and tax evasion, to include mislabeling shipments to avoid obtaining the necessary permits and fees. **ELI obtained evidence that these companies—and likely others—label cargo as unprotected species of sharks to obscure endangered species content.** For example, ELI assesses that the 15.3 tons of shipments of silky sharks were likely not all silky sharks, and that the trafficking of hammerheads increased after a 2017 CITES decision by Costa Rica.

A fourth company of interest, whose owner serves as treasurer for multiple other companies, was established in 2016 or 2017 for the express purpose of illegally sourcing and exporting hammerheads from Nicaragua. This company mainly exported its cargo by commercial airline but may have changed its SOPs with the improvement of detection by airlines.

Suspicious indicators of fin trafficking include different invoicing rates and shipments that are valued at far higher amounts than the expected value of the reported merchandise, claims to the tax authorities that the companies are no longer active, tax evasion, and the incorrect use of customs codes during export. Smugglers of shark fins mislabel their cargo in part because the correct customs codes are subject to inspection by both the Fisheries Department and the Animal Health Service. The misuse of customs codes also allows traffickers to ship without acquiring necessary permits and evade relevant taxes and tariffs. We assess that the tax abuses are likely common even when not shipping endangered or controlled species.

Commodity Volumes and Prices:

One trafficker sent **sea cucumbers** to East Asia for \$115/lb.

Some traffickers of marine IWPs made **totoaba** from Mexico available, at \$20,000 per kilo.

POI 130 had the following prices per “sack” [NFI] of the following shark species:

- A sack of **silky shark fins**: \$2,800
- A sack of **blue shark fins**: \$1,800
- A sack of **thresher shark fins**: \$1,200
- POIs 130a and 130b also had **hammerhead fins**, but we lack pricing information.

Cocobolo timber sourced from Nicaragua and smuggled to East Asia from Costa Rica from one POI was priced at \$6700 per cubic meter in 2022.

Information of Interest on Illicit Finance:

Underground bankers helping Chinese traffickers move and launder money set up multiple accounts in China to receive structured deposits. Then, the total equivalent of this money can be picked up in USD in New York, most likely currency from drug sales in the U.S. This system of mirror transfers between China, the U.S., and Latin American countries has been well-documented (Jorgic, 2020) (Cassara, 2023) (U.S. Attorney's Office, Eastern District of Virginia, 2021).

In Costa Rica, Chinese traffickers sometimes still use local banks or bank-based money transfer apps, offering authorities opportunities to trace, freeze, and seize illicit proceeds associated with their investigations.

Sources reported that the Chinese criminal community in Costa Rica operates a number of underground casinos. We did not tie ownership of these directly to our key POIs, but would be remiss not to mention them as a popular money laundering venue.

Additional Context on the Criminal Environment:

Costa Rica as a poaching hotspot for sharks and other wildlife is not new; Costa Rican and international press have publicly discussed the poaching of sharks from protected areas such as Isla del Coco for over a decade. In fact, the country's famed biodiversity and relatively non-confrontational approach to poachers makes it a hotspot (Humane Society International/Latin America, 2023) for the trafficking of birds, reptiles and amphibians (Fendt & Scherer, 2015), and even insects (Gorder, 2019), not only sharks.

The increased presence of foreign criminal organizations and increased cocaine flows transiting the country over the past decade have changed the criminal environment in Costa Rica significantly. While the smuggling hotspots at the ports in Puntarenas and Limon have long histories of criminal activity, violence has increased significantly: the homicide rate increased by 38% between 2022 and 2023 alone (Woolston & Vicent Fernández, 2024). Corruption, largely from cocaine profits, has become a bigger problem in what had been the cleanest and most technocratic government in Central America as drug flows transiting the country have risen (Jones, 2021) (Bleszynska, 2021). Nonetheless, Costa Rica remains cleaner than much of the region (Araya Montezuma, 2019) and has sought to rise to the challenges. Its comparatively late entry into the struggle against violence and corruption has allowed it perspective from having witnessed the downward spirals of its neighbors that it could follow if it fails to act assertively (Asmann, 2021) (Tico Times, 2023).

Final note on our work in Costa Rica:

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Mexico: A Special- and Especially Sensitive- Case

Through **Operation FAKE GOLD**, on the illegal trade in totoaba, a critically endangered fish found only in Mexico whose fishing is linked to the possible extinction of the vaquita, **ELI uncovered intersections with the shark fin trade in Mexico and collected large amount of data.**

Due to numerous sensitivities, we have opted as of publication time not to detail Mexican shark fin trafficking the same way we have in the above case studies. However, there is no doubt that Mexico is a hotspot for the trafficking of shark fins and a vast array of other IWPs.

Mexican TCOs are some of the most powerful criminal organizations in the world, and we assess that any foreign criminal networks seeking to do business in Mexico must find mutually beneficial ways to collaborate or risk extreme violence. One type of collaboration between Mexican and Chinese TCOs, documented by the Brookings Institution, is the increasing exchange of drug precursor chemicals for IWPs. This in-kind trade advantages both parties by eliminating potentially traceable cash transfers. Mexican TCOs have sought to prevent direct relationships between Chinese IWP traffickers and Mexican fisheries, placing themselves in the middle and suggesting they still seek ultimate control—and a cut—of the full range of illegal activities in the country. Mexican TCOs sometimes also seek to control supply chains of legal commodities. Mexican TCOs increasingly rely on Chinese MLOs to launder money via mirror transactions in multiple countries (Jorgic, 2020), as do their Colombian counterparts (Gill, 2017) (Daugherty, 2015).

Corruption in Mexico is pervasive at every level of government, meaning that honest brokers in ministries, law enforcement, or prosecutors' offices face a dangerous and uphill battle to hold traffickers of any stripe accountable. Some Mexican investigative journalists, including the assassinated Regina Martinez, asserted that they have more to fear from corrupt politicians than from the narcotics traffickers. Mexico remains one of the world's deadliest countries for both journalists (Giraldo et al., 2022) and environmental activists (*Land and Environmental Defenders: Annual Report Archive*, n.d.). Good-faith efforts by honest officials to combat illegal trade are similarly perilous; attempts by the Mexican government to crack down on the totoaba trade resulted in protests by fishermen that culminated in the burning of a police station. As if this weren't difficult enough to navigate, officials tasked with protecting the environment have suffered political whiplash between administrations, with the Lopez Obrador government slashing funding for natural resource protections (SHAILER, 2023).

Many U.S.-based social media companies continue to enable a large amount of IWT, especially on Meta and the Meta-owned WhatsApp (Méndez & Olivera, 2022), even when IWPs are openly advertised.

For its part, the Chinese government has generally treated criminal behavior taking place outside of China as the problem of other countries' governments, regardless of involvement by its citizens, though it sometimes executes other countries' citizens caught smuggling drugs into China (GOODMAN, 2017) (Agence France-Presse, 2023) (Topping et al., 2009). Though the government has occasionally cracked down on certain IWPs imported into China, most observers believe that this has simply made the IWT less open there. Similarly, China has not concerned itself with financial crimes that do not involve money leaving China and there are few signs that it takes action at either Chinese banks or cash apps involving illegal transfers.

Sharing of Information, Opportunities and Pressure Points

ELI prioritizes mapping and analyzing criminal networks and their operations in ways that can be directly operationalized by multiple types of relevant authorities. First and foremost, as demonstrated above, **ELI prioritizes identifying key POIs and providing law enforcement and government entities with proof of criminal activities via long-term, firsthand intelligence collection.** In addition to this, ELI's analysts also assess where maximum impact can be made in dismantling wildlife trafficking organizations, whether this is a location, a shipment modality, or illicit financial flows. **ELI also creates public reports,** where sensitive operational leads have been redacted, but other information revealed by our intelligence collection regarding the business model of wildlife trafficking and environmental crime can inform non-governmental stakeholders. **There are numerous audiences and stakeholders to be served by better understanding the key pressure points and vulnerabilities of these organizations,** such as intergovernmental organizations, policymakers, academics, NGOs, scientists and conservationists, media, and private sector partners such as logistics companies and the financial sector.

Bottlenecks to Address for Maximum IWT Disruption:

Our research and investigations have found that shark trafficking is somewhat consolidated in many countries by a small number of key companies, locations, or both. We assess that these chokepoints offer actionable opportunities to triage efforts for a substantial and rapid impact in almost every nation, though we do not underestimate the challenges posed by political will, funding, and corruption.

- **Exporters** In Latin America, work by the investigative journalists at Ojo Publico found that 3 export companies linked to a naturalized Chinese citizen in Peru were responsible for 43% of shark fin exports—including illegal cargo—to China, Singapore, and Hong Kong (Calderón, n.d.) (Castilla & Moreno Custodio, 2019). Despite Customs interventions, each increased its exports from 2019 to 2021 (Calderón, n.d.). In the record 29-ton shipment interdicted in Brazil in 2023, only 2 export companies were involved (Dalby, 2023), and testing of seized items belied vehement denials from Comércio e Indústria de Pescados Kowalsky Ltda. regarding its trade in protected species (Mendes et al., 2023).

- **Importers** The same concentration may be true of Asian buyers in some countries. For example, a 2020 Guardian article noted that two large restaurant groups in Hong Kong, Choi Fook Wedding Banquet Group and Palace Banquet Group, were thought to be the biggest drivers of shark depletion in Hong Kong’s market (Keegan, 2020). The 3 Peruvian companies tied to the same Chinese-Peruvian man investigated by Ojo Publico in turn sold to 3 companies in Hong Kong (Castilla & Moreno Custodio, 2019).

- **Locations** The major geographic trade hubs for the shark fin trade are often an open secret, to the extent that at least one area has its own Wikipedia page, with port and city hubs easily compiled from even casual readings of media coverage.
 - InSight Crime points to Puerto Bolivar in Ecuador (Ramírez, 2022), and the port of Bolivar reportedly has more than 200 warehouses used by shark traffickers (Lerch, 2021). Tumbes, on the Ecuadorian-Peruvian border, a major crossing spot for fin laundering (Calderón, n.d.). [287]
 - In Peru, the Port of Callao is a hub with weak enforcement (Calderón, n.d.)
 - Mongabay has covered the role of Surabaya, Indonesia in shipments to East Asia.
 - The Wikipedia page for “shark fin trading in Costa Rica” not only specifically calls out Puntarenas, but 2 specific Taiwanese-run docks in Puntarenas (*Shark Fin Trading in Costa Rica*, n.d.).
 - Buenaventura and Tumaco are major shark trafficking areas in Colombia, according to a 2023 OCCRP report (OCCRP et al., 2023).
 - Mexico’s Pacific coast port in Manzanillo is central to illicit trade with Chinese criminals. [291]

- **Focus on specific network roles that lack redundancies:** We assess that the most effective points of network disruption for law enforcement efforts are the highest-level Chinese traders in Latin American countries, who serve as the connection to buyers in China. Due to the general lack of cooperation of Chinese officials with foreign officials, including via official MLAT requests, the arrest and prosecution of buyers in China is unfortunately an unlikely outcome. We also recommend targeting high-volume traders, who condense IWPs from multiple sources, such as those who sell from their own processing facilities, as this can disrupt the supply chain on either end of their activities more so than targeting the more numerous and easily replaceable low-level traders and suppliers.

Ways to Get More from Investigations and Prosecutions of IWT Networks

- **Get information from rival networks:** As competition and commodity prices rise, we anticipate greater and possibly more violent competition between shark fin traffickers. Sources discussed instances of robberies and murder; it is possible that law enforcement officials could prompt POIs to share information on competitors even if they will not discuss their own business, allowing a more complete picture to be built. Similarly, Latin American narcotraffickers may be more willing to disclose their knowledge of Chinese IWT activities than their own activities.
- **Coordinate between countries:** Most traffickers are part of criminal networks, however loose, active in multiple countries, including the U.S. This presents an opportunity for officials in multiple countries to coordinate arrests and asset seizures to attack multiple nodes: for example, Ecuador could seize shark fin processing facilities as U.S. counterparts freeze bank accounts and revoke visas.
- **Deter trafficking via arrests and interdictions:** Despite the region's battle with corruption, smugglers avoid shipping shark fins from countries with more enforcement, notably Ecuador, Panama, and Colombia, suggesting that Customs' and other officials' efforts are having a deterrent effect. One network that smuggles through Colombia and Panama makes buyers assume costs if their shipments are confiscated because of the high risk. It therefore may not take many high-profile seizures and prosecutions in countries like Peru to make traffickers recalculate their risk-benefit analysis.
- **Follow the money:** A 2017 UNODC report found that only 11% of the countries they studied investigated wildlife crimes beyond poachers or couriers, and only 1% investigated the money laundering aspects of IWT cases (Environmental Investigation Agency, n.d.). This means that only a tiny fraction of countries are spending their resources in ways that have any chance of dismantling wildlife trafficking networks in the long run.

- **Declare complicit Embassy officials PNG:** For Latin American countries with the will to protect sharks and other natural resources, designating Embassy personnel implicated in the IWT as persona non grata (PNG) when evidence of guilt is sufficient would send a strong message to home country officials that abuse of diplomatic status to decimate the region's nature preserves and endangered species will not be tolerated.
- **Engage non-law enforcement expert resources:** While assessing wildlife and natural resource protection from the perspective of conservation (Galland & Miller, 2021) (Felbab-Brown, 2020) (MacNeil et al., 2020) (Carrere et al., 2023) (MigraMar & Pacifico, 2018), alternative development (Skolnick, 2022) (Oceana, 2017) (SAFONOV, n.d.) (Sharpless & Bacon, 2017), or demand reduction (*Sharks - WildAid*, n.d.) (Parry, 2018) is outside the scope of ELI's mission and law enforcement capabilities, many scientific organizations, NGOs, and journalists are a wealth of information and resources to help law enforcement and prosecutors, including with evidentiary tools such as genetic testing of fins to detect the presence of protected species (Calderón, n.d.) (Murdock & Villanueva, 2019). They can also offer investigators potential leads: the Animal Welfare Group and Al-Jazeera have named restaurants that still offer shark fin soup in the U.S. despite the federal ban (Hancock, n.d.). Some NGOs also offer training and capacity-building for agencies that want to increase their detection of IWPs, though many lack counter-corruption vetting capabilities (Defenders of Wildlife, 2017).

Conclusion

Our investigations into the shark fin trade in Latin America and the links to East Asia first and foremost underscored how deeply intertwined TCOs from different regions are and how truly transnational criminal networks are in the 21st century. They also drive home how diversified modern criminal networks are. Nonetheless, we were encouraged that almost universally, even in countries that struggle with corruption, traffickers avoided areas with high risk of seizures and arrests, showing that pockets of robust anti-trafficking efforts can have outsized deterrent effects. Just as one weak link can weaken the rule of law, equally true is that one dedicated agency or area can short-circuit criminal enterprises. For this, we have the utmost admiration for the Customs agents, police officers, and prosecutors who resist both bribes and threats to do their duty.

We wish to re-emphasize our previous points regarding the need to fully investigate and charge criminal organizations involved in shark trafficking for *all* crimes committed, to maximize penalties and prevent them from continuing to traffic in wildlife and natural resources. It has been proven that fines that are nowhere near the level of profit from wildlife trafficking encourage repeat offenses rather than providing a deterrent, and we've yet to see a country with fines large enough to match IWT profits (Associated Press, 2022). While we understand that this type of investigation demands more time, resources, and cross-agency coordination, prosecuting the full range of crimes adds insurance that if charges for one type of crime are dropped, or carry light penalties, there is still a high chance of bringing traffickers to justice. It also rightly focuses criminal cases on high-ranking, high net worth criminals whose convictions can significantly disrupt or dismantle TCOs, rather than easily replaceable poachers. The U.S. DOJ's Operation Apex was able to impose significant penalties on a TCO trafficking shark fins because of drug felonies and other charges. Given the light sentencing guidelines and lack of prosecutorial appetite in many countries for wildlife trafficking cases, convictions for additional felonies can be what in practice stops criminals from slaughtering endangered species. Only criminal penalties that effectively handicap a criminal organization to the point that it can't continue business will prevent it from simply moving elsewhere to reconstitute itself and carry on (Landers, 2017).

Given the challenging contexts that officials combatting the IWT and other illegal activities face, it is important for countries to be strategic about how they use resources and invest in personnel, training, and equipment. It is also important to focus investigative and prosecutorial resources on cases and targets that will have the most disruptive impact on criminal networks. **While interdictions of smuggled shark fins are essential evidence to build criminal cases, arresting those doing the transporting is minimally disruptive to the networks or their financial bottom line.** In fact, overly focusing on interdicting fin shipments may provide a perverse incentive to slaughter more sharks to compensate for seizures. **Investigations and legal action must identify and hold accountable those high up in criminal hierarchies,** who consolidate and launder the illicit financial flows from criminal activities, or they will continue to use that money to hire replacement smugglers, bribe new dockworkers, or order additional shipments of fins from poachers at sea. Prioritizing accountability for those who stand to gain the most monetarily--and to lose the most from public exposure and criminal conviction--is the most effective downstream way to break a criminal group's ability to keep operating, and deter others who would hide behind of a legitimate business or political role while driving endangered species to extinction. Upstream solutions that focus on deterrence are also an essential part of the equation, as post-crime punishments alone allow populations to continue plummeting. We hope that the findings and recommendations above will help authorities conduct impactful investigations and operations against IWT networks with lasting results.

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