

OPERATION SANDOKAN:

UNMASKING
THE LOWER
MEKONG'S
BIGGEST WILDLIFE
TRAFFICKERS



ACKNOWLEDGEMENTS

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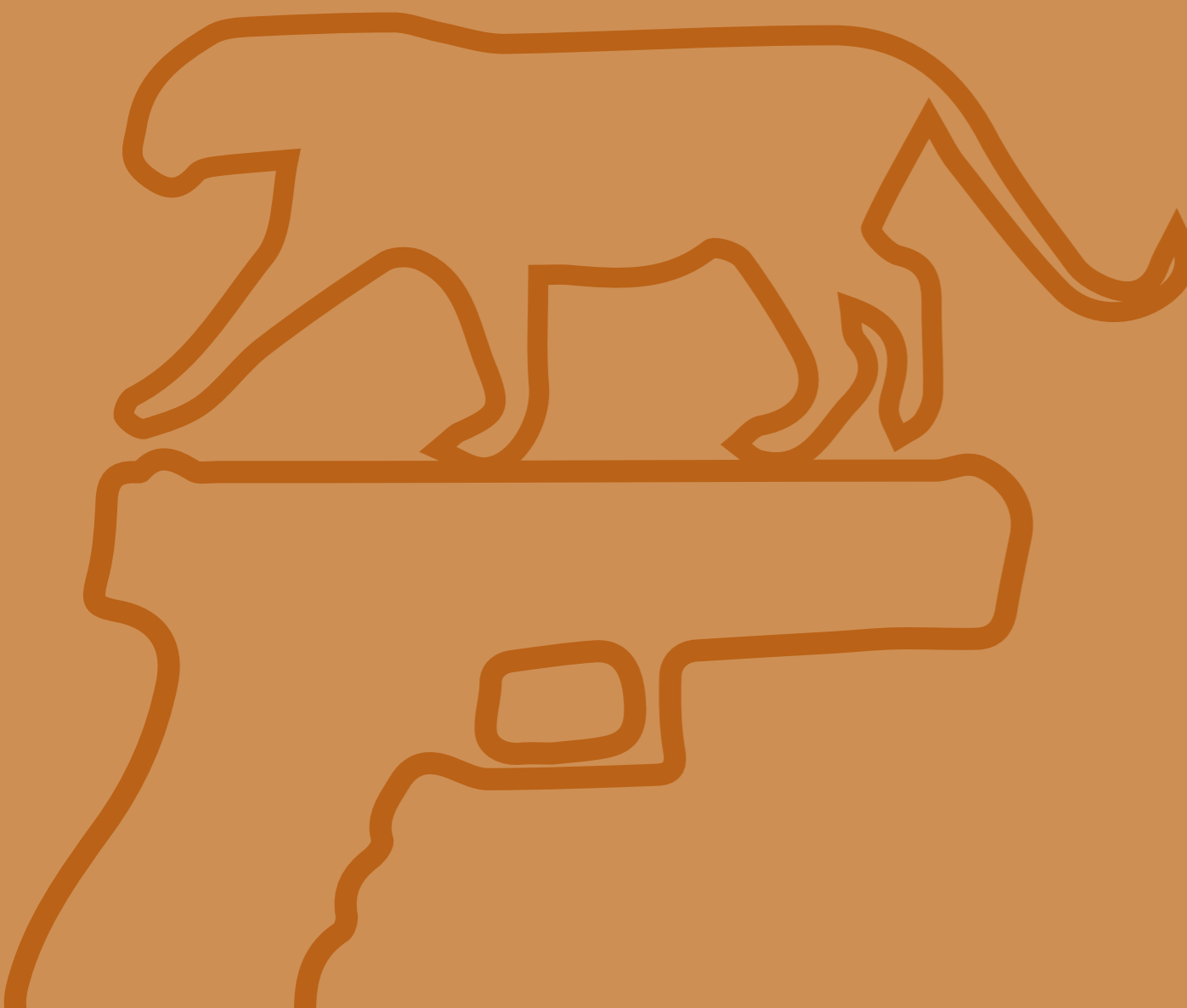
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EXECUTIVE SUMMARY

In 2025-6, ELI investigated wildlife trafficking networks in Cambodia to identify the country's biggest offenders, focusing on hubs in Phnom Penh, Sihanoukville, and Bavet, including Special Economic Zones (SEZs).

ELI's field teams mapped out a number of persons of interest (POIs) involved in the illegal wildlife trade (IWT), their international trafficking activities and smuggling logistics routes, and the convergence of the IWT with other types of crime.

Among ELI POIs, converged crimes included drug trafficking, prostitution with the potential to be human trafficking, the smuggling of counterfeit goods, and money laundering. Among our POIs, one pair in particular stood out for the sheer volume, global reach, and variety of their activities and sales. **They are the largest wildlife traffickers that ELI has encountered to date, and contenders for the biggest traffickers in not only Cambodia, but in the entire lower Mekong.**

ELI's field operations found high levels of collusion between Chinese criminal networks trading in endangered species and Cambodian political and business elites. ELI POIs work with high-ranking enablers in both the public and private sectors, who facilitate use of land and sea ports and SEZs for the import and export of wildlife and oth-

er contraband. POIs were open about their political and law enforcement connections, naming their protectors as a show of strength; an indicator of the high level of impunity in Cambodia. ELI shares unredacted information on POIs, enablers, and their illegal activities with U.S. law enforcement partners via Confidential Intelligence Briefs (CIBs).

Given Cambodia's role as an important transshipment hub for illicit goods, including the abuse of its SEZs, ELI POIs used a number of air, land, and maritime routes to move contraband. These are detailed with maps in the full report, alongside intelligence collected on methods used to evade detection. For example, air routes from source countries were often nonsensically complex, offering authorities and airlines opportunities to flag POIs using these trav-

el patterns for extra scrutiny. Wildlife products such as ivory were frequently routed through 3rd countries and reloaded or relabeled to avoid scrutiny. Small high-value items, such as tiger teeth or pangolin scales, are often altered—made into jewelry or ground into powder—when being carried, worn, or shipped to high-risk destinations such as mainland China; a pattern that ELI has observed elsewhere. The use of human mules over littoral border crossings remains common, and the refusal of many mules to carry drugs for fear of execution by the Chinese government shows that deterrent effects are possible when the CCP is serious about specific types of crime.

ELI's team found a startling amount of domestic sale and consumption of illegal wildlife. While Cambodia's role as a transit hub for not only the wildlife trade but a wide range of contraband is well known, its domestic demand has been less publicized. Much of this domestic demand was until late 2025 driven by scam centers that are primarily owned and operated by Chinese nationals. Specifically, local sale and consumption of wildlife products was driven by three main groups: Chinese scam center bosses, corrupt Cambodian officials, and organized shopping tours for illegal wildlife products. ELI identified a number of exclusive clubs and restaurants catering to corrupt elites with exotic species, some of which were slaughtered on demand on the premises. These restaurants and affiliated businesses such as tiger "farms"

are used to launder animals poached abroad and trafficked into the country.

Nonetheless, dramatic changes happened in Cambodia midway through our operations there, amid crackdowns on the scam centers and their bosses from late 2025. While ELI's findings on key POIs and their smuggling routes remain relevant, local demand became an example of what the intelligence community calls OBE, or "overtaken by events". By April 2026, the scene in Cambodia had changed dramatically, as scam center bosses were arrested, extradited, or fled. ELI sources reported that former hubs for all manner of contraband had become ghost towns, and that luxury commodities, including wildlife products, were being offloaded at steeply discounted prices.

Preliminary reporting from ELI sources suggests that the surviving scam groups have often broken into smaller, less noticeable cells, operating largely from other countries, as far away as Sri Lanka. As of spring 2026, a number of them were being absorbed into operations in Burma or moving their base of operations to Laos. Laos provides a welcoming environment for criminals amid highly consolidated control by a small number of families, characterized by a high degree of state capture. Its high-speed rail connection with China also provides vast opportunities for the IWT.

KEY FINDINGS

- Among the POIs that ELI investigated, two wildlife traffickers' sales volume, product variety, global connections, and number of businesses throughout the region suggest they may be the lower Mekong's biggest wildlife traffickers.
- POIs involved in the IWT are also involved in drug trafficking, timber trafficking, prostitution, and potential human trafficking.
- The domestic IWT within Cambodia was largely bankrolled by the wealthy bosses of scam compounds until crackdowns and arrests in late 2025, with one ELI POI estimating their spending at \$500,000 a month at his business alone.
- After crackdowns on the scam industry in late 2025, domestic illicit economies changed dramatically as scam center bosses were arrested or fled, notably to Burma and Laos. Cambodia remains an international transit hub for the IWT.
- There are high levels of collusion between Chinese wildlife traffickers and Cambodian elites, and exclusive restaurants specializing in endangered species cater to Cambodian officials and Chinese diplomatic and private sector leaders.
- As in ELI investigations in other countries, some leaders of Chinese business and trade associations in Cambodia are involved in the IWT, using their official positions—and the connections that come with them—as cover and protection.
- Illegal wildlife shopping tours are a regional driver of demand. ELI sources claimed that the majority of IWT tourists in Cambodia are Chinese government officials or employees of state-owned companies.
- Given the direct involvement in environmental and wildlife crime by elites in countries such as Cambodia and some of its neighbors, external efforts to disrupt these illicit economies are paramount. State capture and embedded corruption are prohibitive to effectively combatting TOC solely from within these countries.



Tiger parts sold by weight shown to ELI investigators

INTRODUCTION: ELI'S IWT INVESTIGATIONS IN CAMBODIA 2025/26

A lot of what is known about the illegal wildlife trade and environmental crime in Southeast Asia comes from the outside looking in. It is built on seizure records, court filings, open-source research, a few short-term investigations, and the information that surfaces after arrests and prosecutions.

These are valuable, but they only capture what has already been intercepted or exposed. They tell us what was seized, not what got through. They tell us who was caught, not who is still operating. They reveal little about how trafficking networks actually function from the inside: how their members think, how they calculate risk, how they choose routes, how they build relationships with corrupt officials, and how they adapt when pressured. That information does not exist in any database, any AI model, or any public record. It can only be obtained the way we obtain it: by earning the trust and confidence of the criminals themselves.

This report is the product of more than a year of undercover intelligence operations by ELI in Cambodia, with additional collection in Laos and across the lower Mekong. Our field teams operated inside active wildlife trafficking networks, sitting across from kingpins, smugglers, logistics facilitators, and their enablers. They documented how contraband moves through ports, airports, and border crossings. They witnessed endangered species slaughtered on demand at exclusive restaurants. They heard traffickers name their political protectors as casually as they quoted prices. They mapped the convergence of the illegal wildlife trade with drug trafficking, human exploitation, counterfeiting, and the massive scam compound industry that until recently was pouring hundreds of millions of dollars into Cambodia's illicit economies. This is intelligence that did not exist before ELI collected it, and it cannot be replicated through any other methodology.

For over a decade, ELI has been at the forefront of applying professional intelligence methodologies — including sustained undercover operations and human intelligence (HUMINT) — to environmental and wildlife crime. We do not study these crimes from a distance. We investigate them the way intelligence and law enforcement agencies investigate national security threats and organized crime: by getting close to the people responsible, understanding how they operate, and producing actionable intelligence.

From the body of intelligence gathered during Operation SANDOKAN, Confidential Intelligence Briefs (CIBs) have been produced and shared with U.S. law enforcement partners and other key stakeholders, continuing to inform investigations and enforcement actions.

What follows is the public, redacted version of our findings: the major trafficking networks and their operations, the international smuggling routes, the scale of domestic wildlife consumption, the role of scam compounds as engines of crime convergence, the pervasive corruption that sustains it all, and the case for external action in countries where state capture makes internal reform insufficient. It is told, wherever possible, in the criminals' own words — because no one explains how wildlife trafficking works better than the people who do it.



Elephant trunk
offered to ELI
for sale by weight

I.

IDENTIFYING THE IWT KINGPINS OF CAMBODIA

POIs Cam1 and Cam2 are the most prolific wildlife traffickers that ELI has encountered to date. Based in Cambodia with global reach, they sell illegal wildlife wholesale and retail, in physical locations and online. Their sales volume, geographic reach and contacts indicate that they are candidates for the biggest wildlife traffickers in not only Cambodia, but in the entire lower Mekong. Cam1 described their supply as “endless”, assuring ELI investigators that they needn’t fear being unable to get whatever they desired. The pair sources high volumes of wildlife products and live animals from a wide range of species, including tigers, elephants, rhinos, pangolins, sea turtles,

coral, bears, primates, birds including eagles and owls, and snakes, advertising their wares online almost daily. They access supply chains around the world, sourcing poached wildlife from abroad, ‘farmed’ animals, and products such as rhino horn obtained from zoos obtained via corrupt personnel in multiple countries. They have suppliers in Africa, Europe, Russia, and South Asia as well as Southeast Asia. They ship products to a number of other countries in addition to their local storefront sales.

The pair owns at least nine shops throughout Cambodia and they sell products openly, indicating that they are well connected and protected by corrupt officials. This is supported by photographs seen by ELI of the pair with high-ranking national and local politicians. They own homes and businesses in Laos, Thailand, and Vietnam. To support these, they have warehouses, at least one factory, and a brewery for making tiger bone wine. Ivory and rhino horn products are carved at their facility in Vietnam. As of 2025, Cam1 and Cam2 planned to expand their role in illegal wildlife shopping tourism, having already hosted organized tours in Vietnam. They supply other POIs throughout the lower Mekong, referring to some of their wholesale customers as their “agents”. These agents often work out of businesses such as restaurants that are also used to launder illicit proceeds. Some agents manage sales in multiple countries; further indication that Cam1 and Cam2 sit atop a sizable IWT network.

The majority of Cam1 and Cam2’s customers are from the Chinese diaspora, with Cam1 claiming that he has agents “wherever there are Chinese people”.

Cam1: ...the shops sell our illegal products to all the Chinese in Chiangmai... and all my clients are Chinese in Thailand.

Cam1: ...a lot of Chinese live in Thailand and Laos like here and so our products sell so well there too.

Cam2: Last night we went there, and... [wholesale client] bought another 40K USD of new products and his customers are all rich Chinese.

Cam1 and Cam2 are major providers of tigers and tiger products: ELI’s investigations revealed that they kill at least one tiger every week. They sell skeletons, meat, live cubs (generally as pets but sometimes as a culinary delicacy), and make and sell tiger bone, tiger penis, and even tiger cub wine. They supply exclusive restaurants in places such as Phnom Penh that specialize in game, including endangered species. Cam1 claimed that demand for tiger claws greatly increased in China circa 2024.



Cam1 and Cam2 source rhino horn from poachers and corrupt zookeepers

IWT PRODUCT PRICES IN CAMBODIA AS OF MARCH 2026

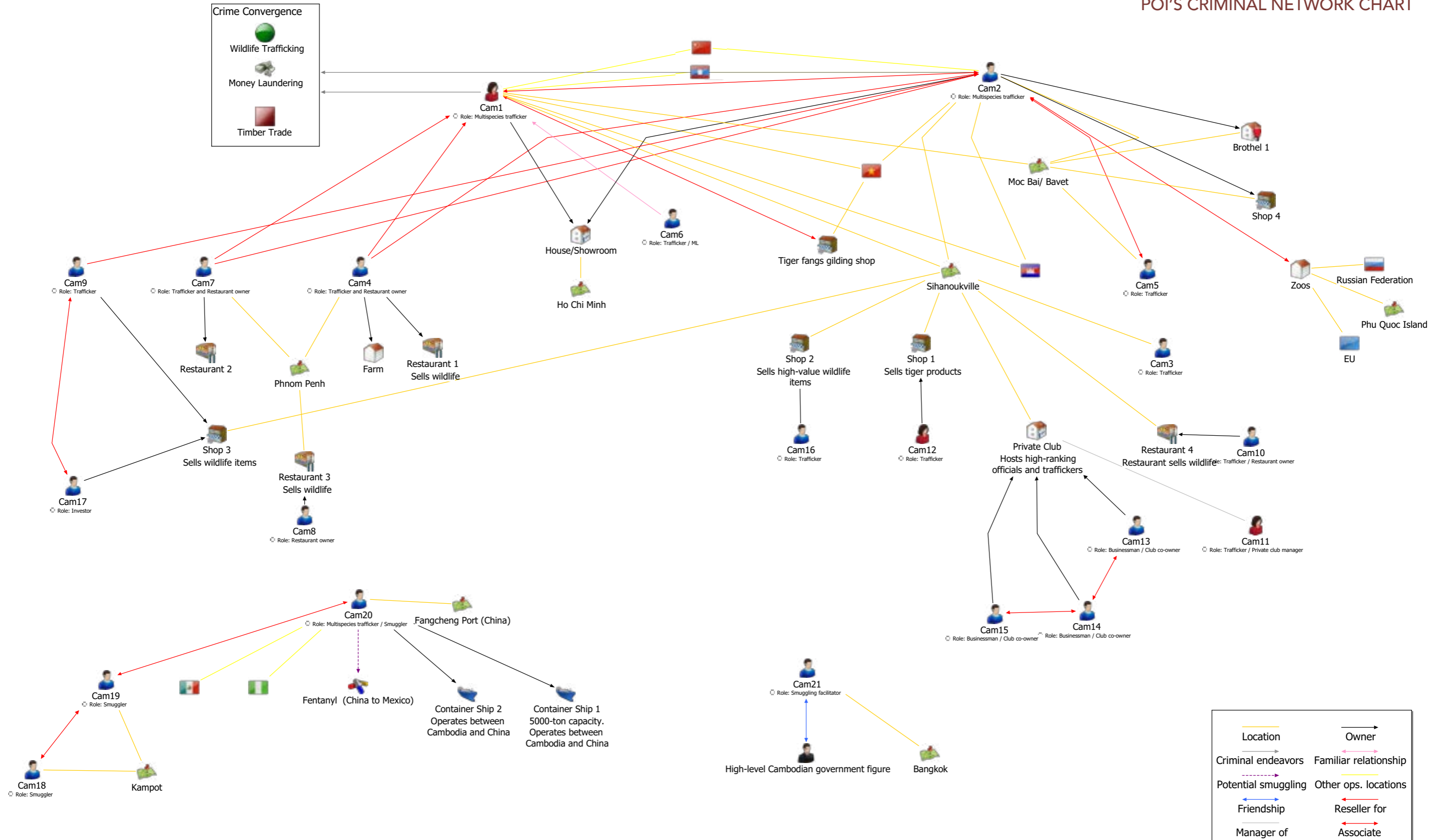
WILDLIFE PRODUCT	PRICE
Tiger bone	10000-13500 RMB/kg (\$1463 - \$1975)
Tiger penis	15000-18000 RMB/each (\$2194 - \$2633)
Pangolin Scales	1200-1400 RMB/kg (\$175 - \$205)
Bear bile	3500-4000 RMB/100 gram (\$512 - \$585)
Rhinoceros horn	130-180 RMB/gram (\$19 - \$26)

In addition to their large-scale wildlife trafficking activities, Cam1 and Cam2 have also been involved in timber trafficking and prostitution, owning at least one brothel. ELI was unable to determine whether the prostitution includes human trafficking.



Butchered tiger shown to ELI in Cambodia

POI'S CRIMINAL NETWORK CHART



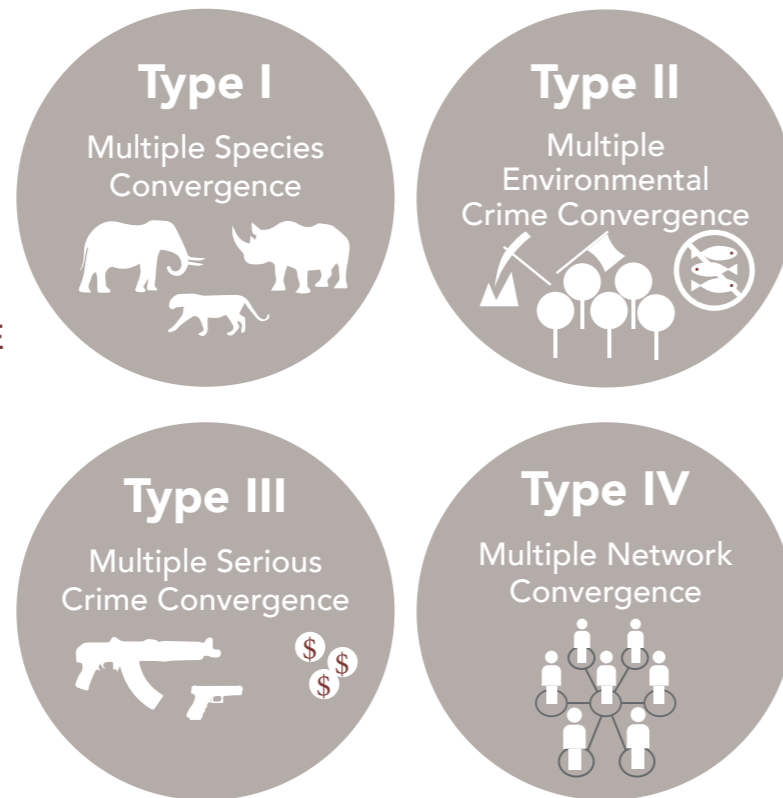
II.

ADDITIONAL SELECTED ELI POIs OPERATING IN CAMBODIA

Many of ELI's POIs are expat Chinese nationals who married locals from Southeast Asia, or are the descendants of these unions. As with ELI's investigations in other parts of the world, expat criminals tend to cluster with compatriots. For example, a source estimated that around 90% of those operating in Buvet had origins from the same city in Fujian. Their customer base is in turn mostly if not exclusively Chinese. While there are wildlife traders and buyers of other nationalities in Cambodia, the majority are Chinese.

ELI's IWT POIs are also involved in timber trafficking, drug trafficking, and prostitution: examples of Types I, II, and III of ELI's four-level crime convergence typology.

ELI'S CRIME CONVERGENCE TYPOLOGY FRAMEWORK



As noted in previous ELI reports, major nodes of crime convergence within all four categories include logistics, financial flows, and corrupt relationships. Cambodia offered robust examples of all three. For example, the same warehouses in SEZs are used to store wildlife, timber, and methamphetamines. Casinos used to launder money also directly sell wildlife products and bushmeat to customers. The proximity of ELI's POIs to scam bosses also resulted in a high level of incidental collection regarding crimes committed within scam compounds. For example, in a conversation overheard between two scam center bosses shopping for ivory and rhino horn, they estimated that they could make \$60,000 per young person kidnapped [their word] to run scams.



POIs Cam4, Cam7, Cam8, Cam9, Cam10 and Cam11 own restaurants specializing in wildlife, some of which slaughter live tigers and pangolins onsite. Cam7 raises lions, tigers, and primates on one of his properties and trafficks primates, bear parts, and birds through another. Cam4, Cam7, and Cam9, among others, are supplied in whole or in part by Cam1 and Cam2. ELI was able to obtain information that Cam9, who also owns a shop, is backed by a trio of investors from abroad and ultimately answers to a "boss" from Hainan Province. This is worthy of investigative follow-up and may point to ways to identify and target the financiers of wildlife crime.

Rhino horn and ivory items that a POI tried to sell to ELI. These items are popular with IWT tourists.

Cam20 is a smuggler of drugs and drug precursor chemicals between China, SE Asia, and the Western Hemisphere, as well as of wildlife products.

Cam21 is a logistics facilitator who has boasted about having nearly total control over Cambodian Customs despite living outside the country. She has close connections with Cambodian political, military, and business elites, claiming kinship with some of them.

III.

INTERNATIONAL LOGISTICS ROUTES TRANSITING CAMBODIA

Due to Cambodia's position as a major trafficking hub—it is a source, transit, and destination country for many forms of contraband—smuggling methods disclosed to ELI by sources covered an extensive range of air, land, and sea transport methods, often in conjunction with each other. SEZs at Sihanoukville and Phnom Penh remain central to the transport of larger consignments of illicit goods. For example, sources reported that ivory enters Cambodia from Mozambique, Angola, Kenya, and Cote D'Ivoire, primarily via containerized shipments that transit a third country to lessen Customs scrutiny. The primary transit points used by POIs to send products onward to mainland China were Malaysia, Singapore, and Hong Kong, where products were repackaged or relabeled for onward transit.

It should be noted that some POIs expressed a perceived increased risk in shipping ivory into the Sihanoukville port, though ELI was unable to determine if this indicates law enforcement efforts or simply a lack of necessary connections. ELI sources commonly referenced the same two POIs—one public sector and one private sector—involved in the operation of ports and border crossings who allegedly are complicit in trafficking every type of contraband except for drugs, due to a ruling family member's total control of the drug market.

MARITIME IVORY TRAFFICKING ROUTES



ELI sought to determine how contraband shipments enter mainland China once they leave Cambodia. One POI who participates in drug trafficking as well as the IWT moves products to Guangdong or Guangxi by sea, moving items from larger to smaller vessels before coming into port. Other maritime routes included shipping from the port at Sihanoukville into Thailand, and then once unloaded, commodities were moved by land into Yunnan Province via Myanmar, en route to Guangdong.

Air routes used by ELI POIs seeking to reach Cambodia or Vietnam with IWT products were deliberately circuitous, as shown below, with a number of layovers. For example, POIs as of 2025 often preferred to make South Korea a stop between Africa and Southeast Asia, though patterns are always subject to change. Nonsensical routes such as the one depicted in the air route map below present an opportunity for airlines and authorities to collaborate and flag these travel patterns to consider whether their users, particularly repeat users, are good candidates for additional scrutiny and screening.



AIR IVORY TRAFFICKING ROUTES

Tiger teeth or smaller pieces of ivory are carried via couriers on commercial flights, also via circuitous or multi-stop routes such as the previous example, eventually transiting Cambodia's lax airports en route to destination markets. Some items are modified to better evade detection. For example, tiger teeth are gilded into jewelry at a Sihanoukville gold shop for customers before onward transit to mainland China. In 2025, a restaurateur in the Phnom Penh area advised ELI to grind pangolin scales into powder before taking them into mainland China, offering the powder for \$150 per kilo. Pangolin scales could be resold there for approximately \$430 per kilo as of mid-2025.

This information mirrors information from ELI investigations elsewhere indicating that the higher the risk in a destination country, the more effort sellers take to disguise the items. During ELI's investigations into shark fin trafficking in South America, a fin trader pre-processed fins into soup noodles for customers in the U.S. and Canada to make them harder for authorities to visually identify as a wildlife product. It is essential to share this information with authorities tasked with identifying and seizing illegal wildlife products. For small, high value parcels sent via post, two of ELI's POIs claimed to favor Chinese shipping logistics companies Shunfeng and China Post for sending packages from SEZs and/or border towns. Only a QR code is needed for parcel pickup, so recipients are anonymous. [ELI did not find evidence that the companies were witting of this use of their services.] Other POIs mentioned making "arrangements" so that buyers could personally carry their items home, or advised customers on how to wear them home.

Given the porousness of borders in the region, overland routes continue to be used regularly, including into destination markets Vietnam and mainland China. For example, the Poipet border crossing is often preferred for moving contraband between Cambodia and Thailand. Locals from nearby towns are used as mules to carry items across the border between

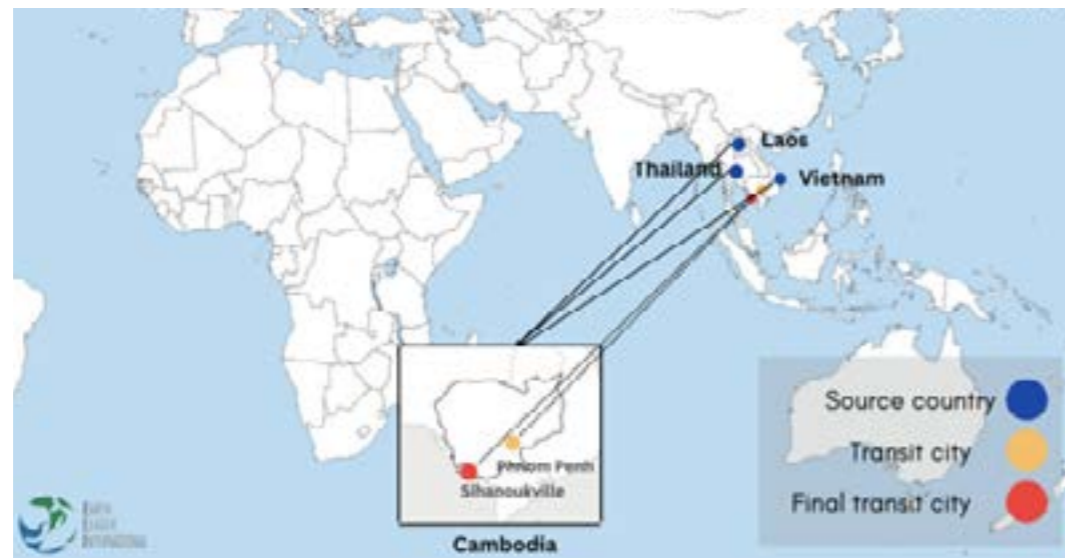


Two ELI POIs used a local jewelry shop to gild tiger teeth for customers. Tiger teeth are sometimes smuggled into destination markets by being worn as jewelry

Vietnam and China at favored points such as Muc Bai, though ELI sources report that many mules refuse to carry drugs, given the risk of execution if caught in China. Getting caught with a tiger skin would only result in a brief detention. Routes can be somewhat indirect depending on where the lowest perceived risk is, which includes relationships with complicit officials. For example, tiger bone wine brewed by one POI moves first overland from Cambodia into Thailand and then into Vietnam, eventually making its way into China via its border with Northern Vietnam.

Public transit is also used by ELI POIs in the region to cross borders with illegal wildlife and other contraband, just as it has been in multiple other countries in which ELI has investigated, from Peru to Poland. Buses and trains that cross borders are used by traffickers because of the lack of inspection, ease of hiding cargo, and benefits of low visibility at busy, crowded

OVERLAND IVORY TRAFFICKING ROUTES IN SOUTHEAST ASIA

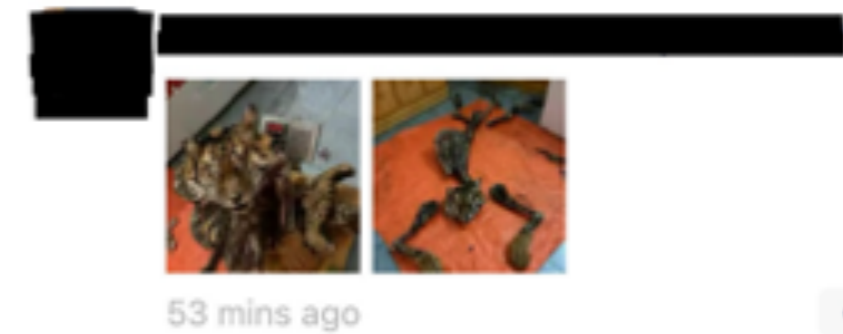


stations. Because buses and trains have come up repeatedly in ELI investigations as key shipment modalities, we assess that they are understudied compared with the attention given to air and sea transport, and deserve more scrutiny and enhanced screening protocols from the private sector and government agencies.

Social media sales posts of rhino horn and tiger skeleton by an ELI POI



53 mins ago



53 mins ago

ELI POIs extensively use online platforms to sell and ship wildlife products overseas, including WeChat and Telegram. There is no separation between POIs selling online or in physical shops, but rather almost complete overlap. ELI investigators were able to confirm the use of these online platforms via firsthand viewing of sales posts.

Overall, traffickers showed high levels of confidence in impunity regardless of sale and shipment methods, thanks in large part to extensive bribery. Cam9 assured ELI that his shipment routes into mainland China were well-established and very secure, and had been used to send high volumes of ivory, rhino horn, and tiger products. POIs were open about the ease of bribing officials at ports on both the Myanmar and China side of the Mekong river, mentioning payoffs to Customs and military officers. Sellers often guaranteed shipments, offering to reimburse or resend any merchandise that failed to arrive. This is not always the case: in places with higher chances of interdiction, buyers often assume all responsibility for losses once items are shipped. Therefore, seller guarantees likely correlate to strong complicit relationships and high impunity.

Nonetheless, domestic efforts to combat both the illegal wildlife trade and corruption in Vietnam and mainland China have raised costs and decreased profitability for traffickers, and multiple ELI POIs indicated that bribery has become more difficult and expensive in parts of these countries. One Cambodia-based smuggler told ELI that his daily income from smuggling had diminished by 70-80 percent [exact timeframe unclear, but over years]. He also noted that a recent cargo shipment had been confiscated in Vietnam and that despite a relationship with a Customs official at that location, he was uncertain about whether he would be able to get the cargo released, due to aggressive national anti-corruption efforts. Another POI had increased the shipping fee to send a \$2200 tiger tooth into China by 30%, which may reflect increased risk or increased bribe amounts, or both, as they tend to be closely correlated. The same POI complained about luggage being checked by Customs on the Vietnam side of the border, making it harder to hand-carry items from Cambodia into Vietnam.

IV.

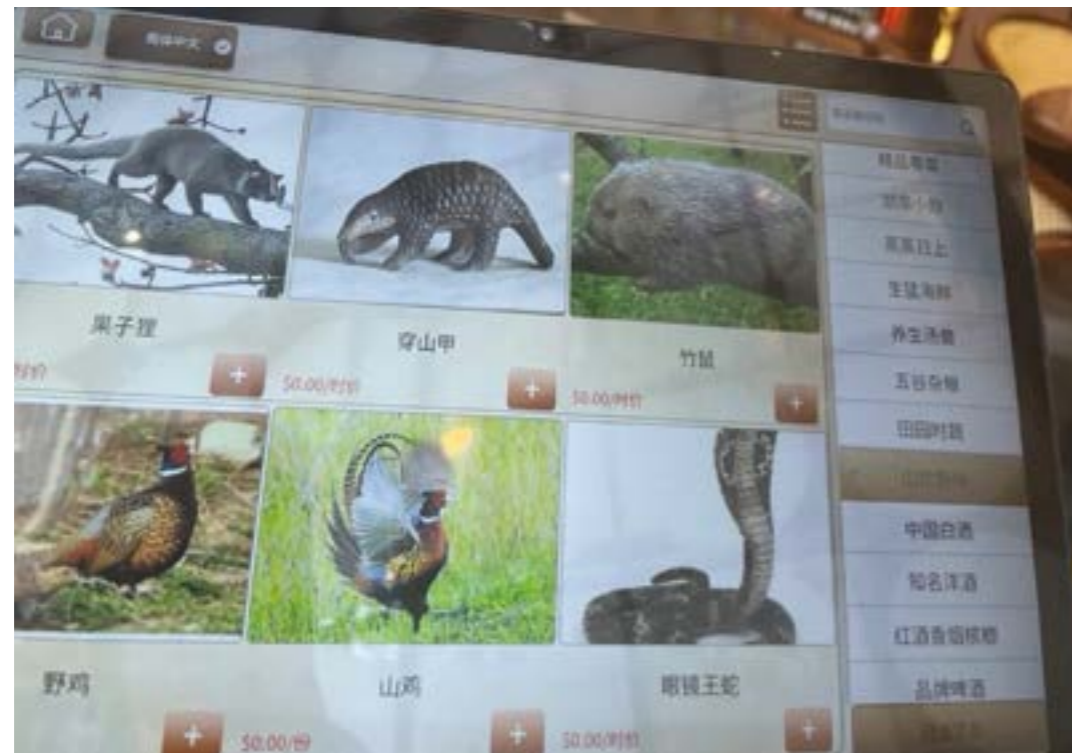
CAMBODIA'S DOMESTIC IWT MARKET

While Cambodia is a popular transit country for the international IWT and other contraband trafficking, as detailed above, in 2025 ELI also found high levels of local wildlife sales for domestic consumption. The centers for these sales included restaurants, supermarkets, and hotels and casinos, particularly within SEZs and scam compounds. While Vietnam's role as a major consumer of certain types of wildlife is well known, local demand and consumption within Cambodia has been less publicized. As previously noted,

several ELI POIs own multiple IWT-linked businesses, and ELI's field team confirmed local consumption of a wide range of endangered species.

While the majority of IWT demand in Cambodia is driven by the Chinese diaspora, there is also a market among wealthy Cambodian elites for status symbols and traditional medicines. A shop owner told ELI that some wealthy Cambodians will even finance the killing of an elephant to obtain "fresh" tusks rather than buy carvings off the shelf. While many people are familiar with controversies over the use of endangered species in Traditional Chinese Medicine (TCM), less well known are Southeast Asian traditional medicine traditions that involve the use of protected flora and fauna. For example, Traditional Khmer Medicine uses loris and serow¹.

Wildlife on a photo menu at an exclusive restaurant in Phnom Penh



1 Heinrich, S., Ross, J., Gray, T., Delean, S. Marx, N. & Cassey, P. (January 2020). Plight of the Commons: 17 years of wildlife trafficking in Cambodia. *Biological Conservation*: Vol. 241. <https://www.sciencedirect.com/science/article/abs/pii/S0006320719314089>

The enmeshment between Chinese traffickers—including those hiding behind official titles—and Cambodian elites has provided ELI POIs with confidence in their impunity, observable in the openness of well-connected traffickers who openly have storefronts. Those whose activities have received law enforcement attention are often able to bribe officials to evade arrest or prison, and continue to traffic species even if their platforms change. When one POI's shop was raided by law enforcement, he was able to avoid arrest via bribery and is still active via online sales.

ELI identified multiple restaurants and private clubs specializing in game, including endangered species, which cater to both Cambodian and Chinese elites. The clientele of one exclusive private club near Phnom Penh that serves endangered species—including both farmed and wild tigers—includes the leaders of Chinese business associations, top tier Cambodian political leaders, and members of the diplomatic community and law enforcement, according to ELI sources. These social settings underscore the depth of complicity between corrupt Cambodian political and business leaders and their Chinese counterparts. ELI's investigations into the restaurants and associated POIs yielded particularly rich insights into tiger and pangolin trade, including firsthand evidence of these species being killed and butchered onsite for customers.

PANGOLINS

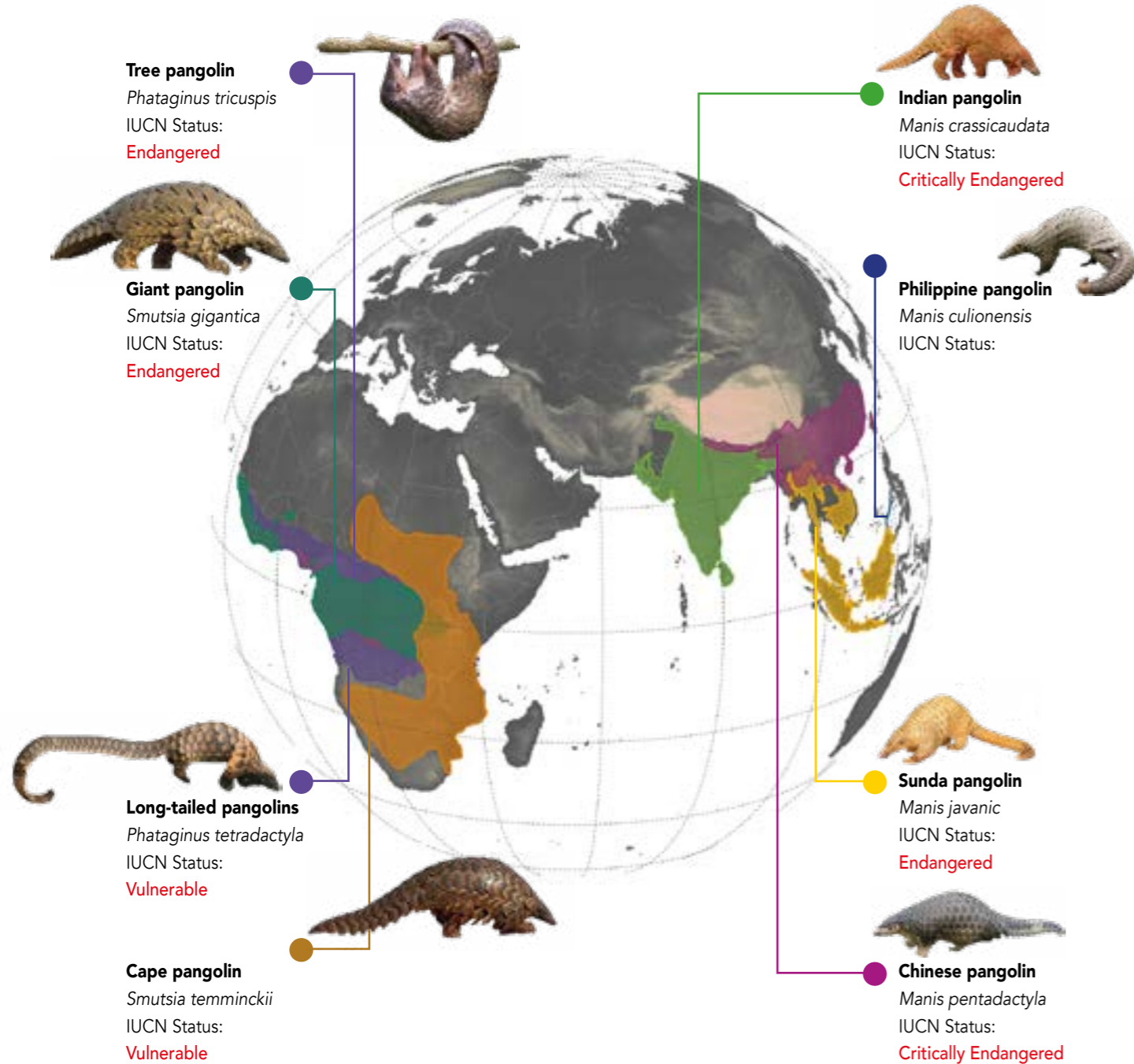
At one restaurant, pangolin cost \$120 per kilo, and the buyer could keep the scales. Alone, the scales cost \$110 per kilo. [Note: smaller pangolins are considered more desirable for culinary purposes, which explains some of the price discrepancies between scale prices from these smaller pangolins and the prices for large scales from other species] Other local restaurants sold pangolin at \$90-\$100 per kilo; it was unclear whether this was for the meat only or also scales. A live adult as of mid-2025 sold for \$2000. A POI



Pangolin scales privately shown to ELI in a POI's storeroom

stated that the costs to source pangolin more than doubled from 2023 to 2025—from \$40 per kilogram to \$90 per kilogram—due to rising demand. ELI assesses that price increases are a reflection of both increasing scarcity and increased risk, given the amount of global attention on pangolins. Rampant poaching of all eight different pangolin species, almost all of which are endangered, continues despite this².

SPECIES OF PANGOLINS



Info credit: IUCN Pangolin Group, DOI 2023³

- U.S. Fish & Wildlife Service. (n.d.) Pangolins. U.S. Fish & Wildlife Service. <https://www.fws.gov/international-affairs/pangolins>
- IUCN SSC Pangolin Specialist Group. (2023, February 18). Pangolins. Pangolin Specialist Group. <https://pangolinsg.org/pangolins/>

Given the extreme markup along supply chains between sourcing and retail sales, it is highly unlikely that pangolins will reach a point where traffickers cannot absorb increased sourcing costs, meaning that prices will not be a limiting factor on the illegal trade. In fact, there is a danger that increasing scarcity as these species tip toward extinction will make their commoditization even more desirable for a subset of wealthy consumers unburdened by ethics, and commensurately rising prices will only encourage traffickers. During ELI's Operation Red Cloud in 2016, a trafficker in Vietnam told an ELI investigator that he believed there would be no more rhino horn in 10 years, but then the prices would be higher. During Operation Stella Maris, field teams similarly heard of buyers purchasing endangered species as "investments", hedging against the species' survival by stockpiling items in anticipation of commodity price increases driven by the threat of extinction.

Tiger skeleton and paws for sale shown to ELI by a POI

TIGERS

ELI also discovered tigers sold for consumption at a number of restaurants in Cambodia, perhaps unsurprising given the number of tiger and lion 'farms' in the country and across the region. POI Cam11 went so far as to describe the differences between the meat of wild and farmed tigers to ELI:

POI Cam11: The whole wild tiger is all lean meat and no fat. The caged ones have some fat and so we need to stew the wild tiger meat with some pork as pork has fat. We are famous for our tiger stewed meat, and we kill the tigers alive.

This strongly suggests that pressure on dwindling wild populations is not eased by the proliferation of tiger farming, despite dubious claims by proponents. Academic literature is available on the premium placed on wild animals and plants in some Asian cultures for traditional medicine, due to greater perceived "potency". However, consumption of wild flora and fauna is too often simply a particularly egregious and reckless type of conspicuous consumption. The majority of wild tigers trafficked into Cambodia are from India, according to sources, and often laundered through so-called zoos or farms.

POI Cam11 told ELI that Chinese Embassy officials are major consumers of his tiger penis wine, which as of 2025 retailed for \$1200 a bottle, often sold in sets of three. Another POI claimed that he was unable to keep tiger bone wine in stock despite brewing it every day and a sale price of over \$200 USD per bottle. The abundance of farmed tigers appears to have the dispiriting effect of making even cubs a culinary commodity. In addition to the previously mentioned tiger cub wine sold by Cam1 and Cam2, a promotional video for a holiday menu advertised cubs alongside other wildlife.



Cam2: You see the wine tank here and a whole baby tiger is sucked inside with its head and it's very good and all the fur and skin are sucked inside and I can sell you tiger and tiger babies and I can sell you with wines together and I will seal it and then send to you... I have a lot of tiger babies as many were born at the same time."



Stockpiled tiger skins for sale shown to ELI in a POI's storeroom



A captive white tiger cub to be either sold as a pet or consumed as shown to ELI

V.

THE ROLE OF SCAM COMPOUNDS IN THE IWT AND CRIME CONVERGENCE

Scam centers, as wealthy hubs for crime convergence, unsurprisingly have been major drivers of the IWT in Cambodia and its neighbors. Local wildlife sales in Cambodia until late 2025 were largely dependent on scam center bosses who consumed, gifted, and resold large volumes of wildlife products, and organized shopping tours for tourists to buy illegal wildlife products. In mid-2025, POI Cam2 discussed these two main client groups, as well as their particular interest in ivory and rhino horn to give as gifts:

Cam2: Cambodia has so many Chinese online scamming bosses and they are so rich and they can easily spend over 20 or 30k USD per week. A few of my best customers can spend over half a million USD per month and they just spent money like water and bought our wild animal products for gifts to give away. They make money so easy and so spend like water ...sometimes one boss in Sihanoukville can spend over 100 thousand USD to buy rhino or ivory products to give to his friends as gifts.

He added that some of his sales agents used scam center bosses' businesses to provide cover for their wildlife sales; an interesting detail indicating close ties:

We have our Chinese agent clients all over Cambodia, like Phnom Penh, Sihanoukville and Bavet, Poi Pet, Pursat everywhere because the online scam business parks and compounds are all around the country. These scam bosses are our big consumers, Even in Phnom Penh, we have a few agents who use their restaurants or offices as cover to sell our products there.



Two large ivory tusks shown on a scale to ELI as part of a sales pitch

Cam1 and Cam2's other major client group, Chinese tourists, buy wildlife products at their shops and at the hotels, restaurants, and casinos that they help supply. Cam1 and Cam2 claim that the majority of shopping tour customers are Chinese government officials or employees of state-owned companies. This is consistent with what sources have told ELI about the role of Chinese diplomats and employees of state-owned companies as the IWT customer base in countries such as Peru.

Cam2: A big Chinese group came to my new house to buy the stuff and they love ivory, rhino and also tiger stuff and they love it but their only concern is how to bring these safe to China as they all work for the Chinese government or state-owned enterprises. We help them to smuggle into China after they pay the money here.



Whole rhino horns sold by weight at one of Cam1 and Cam2's businesses

Regarding the close relationships between Cambodian power brokers and Chinese scam bosses, there were common assertions among ELI sources regarding specific Cambodian figures' involvement with the scam centers and their illicit activities. Most notably, multiple sources claimed that Hung Du, a nephew of Hun Sen widely assumed to be his illegitimate son, is responsible for collecting bribes for the ruling family. Multiple sources also told ELI that Hung Du was an investor in the scam centers and responsible for supplying them with drugs, a market which he is thought to control. This was considered open local knowledge to the point of not appearing sensitive to discuss.

Midway through ELI's investigations in Cambodia, there were intense crackdowns on scam compounds, with so many arrests that sources reported as of early 2026 that all of the country's jails and even its old airport were full. The most notable arrest was of Chen Zhi,¹ the head of the Prince Group, who was extradited to China in January 2026.

1 Fraser, S. (2026, January 8). Cambodia extradites alleged scam mastermind to China after arrest. BBC. <https://www.bbc.com/news/articles/cy4q8e88n2vo>

His arrest was followed by that of his close associate Li Xiong in April 2026.² Multiple governments have gotten involved via asset freezes and seizures, indictments, law enforcement operations, and extraditions.^{3,4,5,6,7} Pressure from countries whose nationals were victims of forced labor, scams, or both had been building for years. In 2022, Thai authorities sent law enforcement officers to properties in Sihanoukville and Phnom Penh to remove their nationals from the premises.⁸

ELI's field team reported in early 2026 that the areas that were previously criminal hotspots had become ghost towns. This has been echoed by others on the ground: OCCRP called Sihanoukville "a shadow of its former self" in January 2026.⁹ One POI noted a drop in sales as early as spring 2025 amid rumblings of pressure, well before major operations and arrests. According to ELI's investigators, prices for luxury goods dropped dramatically, with items such as sports cars being offloaded at steep discounts. In addition, many of the estimated one million people whose livelihoods depended on the centers, from restaurants to brothels to barber shops, are moving, including to other countries where scammers are heading in smaller, more discreet groups.

That does not mean that there are no longer active criminal networks in the country: Cambodia remains a focal point for a wide range of illicit economies and a popular transit hub for multiple types of contraband. There is still a great deal of international trafficking taking place into and out of the country. However, local contraband markets and inflated economies centered on scam compounds' profitability have gone from boom to bust. A group of Fujianese smugglers claimed to ELI in spring 2026 to be working indirectly with Chen Zhi—after his extradition—asserting close connections with the Fujianese mafia worldwide. These POIs claimed that the Prince Group was the biggest money laundering entity in Southeast Asia, and discussed importing and exporting contraband between the Western Hemisphere and Southeast Asia. For example, they claimed to export contraband cigarettes to the U.S. from Cambodia with the complicity of Cambodian officials, and to

- 2 Adamovic Davies, J. & Young, M. (2026, April 1). Cambodia extradites another associate of alleged 'Criminal' conglomerate to China. Organized Crime and Corruption Reporting Project (OCCRP). <https://www.occrp.org/en/news/cambodia-extradites-another-executive-from-alleged-criminal-conglomerate-to-china>
- 3 U.S. Department of Justice. (2025, October 14). Chairman of Prince Group Indicted for Operating Cambodian Forced Labor Scam Compounds Engaged in Cryptocurrency Fraud Schemes. U.S. Department of Justice. <https://www.justice.gov/opa/pr/chairman-prince-group-indicted-operating-cambodian-forced-labor-scam-compounds-engaged>
- 4 South China Morning Post. (2026, March 5). Singapore police seize yacht, cars, properties worth US\$390 million in Prince Group probe. South China Morning Post. <https://www.scmp.com/news/asia/southeast-asia/article/3345539/singapore-police-seize-yacht-cars-properties-worth-us390-million-prince-group-probe>
- 5 Amarthalingam, S. (2025, Oct 22). Up to 91.2B Won of Prince Group's Deposits in Five Cambodian-Korean Banks Frozen. Kiripost. <https://kiripost.com/stories/up-to-912b-won-of-prince-groups-deposits-in-five-cambodian-korean-banks-frozen>
- 6 Reuters. (2025, Nov 4). Hong Kong Freezes \$354 million. Reuters. <https://www.reuters.com/world/asia-pacific/hong-kong-freezes-354-mln-assets-tied-prince-group-syndicate-2025-11-04/>
- 7 Ji-Yeon, M. (2026, March 3). Taiwan auctions "Four Kings" supercars for 20.25 billion won. *The Chosun Daily*. <https://www.chosun.com/english/world-en/2026/03/03/OPUFFVEO75A7PP4DK13SOS7OT4/>
- 8 Keeton-Olsen, D. (2022, April 12). Thai police visit concludes with 66 rescued, other victims moved. VOD. <https://vodenglish.news/thai-police-visit-concludes-with-66-rescued-other-victims-moved/>
- 9 OCCRP, Voice of Democracy, & Rappler. (2026, January 21). Major Cambodia-Based real estate conglomerate linked to scam, gambling operations. Organized Crime and Corruption Reporting Project (OCCRP). <https://www.occrp.org/en/investigation/major-cambodia-based-real-estate-conglomerate-linked-to-scam-gambling-operations>

import niche products such as totoaba from Latin America into Vietnam. Some Fujianese smugglers suggest that Chen Zhi is still active from within China, and believe that he was extradited to prevent his arrest by the U.S. and to protect sensitive information regarding CCP officials and activities.

While most attention on crime convergence focuses on the ways that diversified activities and revenue streams strengthen criminal networks and add resilience, Cambodia offers an interesting case study of crime convergence's vulnerabilities. The proportion of local IWT sales (and drug sales, prostitution, and gambling) that depended on the profitability and impunity of scam compounds shows that domino effects within multiple criminal economies are possible if the right node is attacked. This will prove an important case study of the interdependence of illicit economies and the extent to which the targeting of one can weaken others, particularly when the others rely on one that is more profitable.



Ivory, tiger, and coral products for sale at a POI's store visited by ELI in Cambodia

VI.

CRIME AND CORRUPTION CONTEXT FOR CAMBODIA

Cambodia is among the world's most beleaguered countries when it comes to corruption.¹² The U.S. Department of State issued a 2021 advisory regarding the risks of doing business in Cambodia, stating baldly in its first section heading that "Corruption is Endemic".³ The country's anti-corruption law provides for the jailing of whistleblowers whose claims are not endorsed by the Anti-Corruption Unit.⁴ Because of this highly permissive environment, criminal networks from multiple countries have generally operated freely. In addition to the Chinese networks investigated by ELI, TCOs from countries such as Japan and South Korea are active.^{5,6} Cambodian passports are easy to obtain,⁷ and fugitives from justice can often find refuge. Criminal networks in Cambodia cooperate with counterparts in Latin America, Africa, and Russia: Type IV convergence in ELI's convergence typology.

The degree to which the ruling party and Hun Sen's family have consolidated control⁸ means that political, military, and business elites need not take pains to hide their criminal activities or associations, and even those who have long been publicly implicated in crimes usually continue to operate unimpeded.⁹ Foreign sanctions, asset seizures, and investigative reporting have shed light on how lucrative crime and corruption are for elites. In 2025, asset seizures by Thailand included those of a Cambodian ruling party senator and one of the nation's richest men, who was linked to scam compounds, human trafficking, and money laundering and had already been sanctioned by the U.S.^{10,11}

- 1 Transparency International. (2026, February 10). Corruption Perceptions Index 2025. Transparency.org. <https://www.transparency.org/en/cpi/2025>
- 2 Freedom House. (2026). Cambodia. <https://freedomhouse.org/country/cambodia>
- 3 U.S. Department of State. (2021, Nov 10). Cambodia Business Advisory on High-Risk Investments and Interactions. U.S. Department of State. <https://2021-2025.state.gov/cambodia-business-advisory-on-high-risk-investments-and-interactions/>
- 4 ODC. (2020, November 9). Anti-corruption. Open Development Cambodia (ODC). <https://opendevelopmentcambodia.net/topics/anti-corruption/>
- 5 Adelstein, J. (2024, October 3). Inside the Yakuza's growing empire of crime in Cambodia. CrimeReads. <https://crimereads.com/yakuza-cambodia-jake-adelstein/>
- 6 OCCRP. (2026, January 26). South Korea Detains 55 Scam Ring Suspects Repatriated from Cambodia. Organized Crime and Corruption Reporting Project (OCCRP). <https://www.occrp.org/en/news/south-korea-detains-55-scam-ring-suspects-repatriated-from-cambodia>
- 7 Allard, T. (2026, January 21). How Cambodia became a haven for criminals. Organized Crime and Corruption Reporting Project (OCCRP). <https://www.occrp.org/en/feature/how-cambodia-became-a-haven-for-criminals>
- 8 Allard, T. (2026, January 21). How Cambodia became a haven for criminals. Organized Crime and Corruption Reporting Project (OCCRP). <https://www.occrp.org/en/feature/how-cambodia-became-a-haven-for-criminals>
- 9 Flynn, G. (2024, October 21). Angkor Plywood, the 'timber cartel' shipping Cambodian forests internationally. MongaBay. <https://news.mongabay.com/2024/10/angkor-plywood-the-timber-cartel-shipping-cambodian-forests-internationally/>
- 10 Reuters. (2025, December 3). Thailand seizes more than \$300m in assets and issues 42 arrest warrants in cyberscam crackdown. The Guardian. <https://www.theguardian.com/world/2025/dec/04/thailand-scam-cyberscam-crackdown-arrests-south-east-asia>
- 11 Khaosod. (2025, November 17). Kok An's Children Obtained Thai Citizenship by Fraud, Run 5 Businesses. Khaosod. <https://www.khaosodenglish.com/news/2025/11/17/kok-ans-children-obtained-thai-citizenship-by-fraud-run-5-businesses/>

In 2024, another powerful senator and tycoon was sanctioned by the U.S. for human trafficking and human rights abuses.¹² Multiple other powerful political and business figures have been similarly sanctioned abroad.¹³

Environmental and wildlife crimes are big business in Cambodia, resulting in rampant deforestation, nearly unchecked wildlife trafficking, and illegal mining for gold, critical minerals, and sand¹⁴ that have poisoned land and waterways.¹⁵ Alongside these are human, drug, and arms trafficking and a lively counterfeiting industry.¹⁶ The lack of government commitment to protecting Cambodia's forests, rivers, and wildlife because of elites' direct involvement and financial interests is readily apparent.¹⁷ Environmental crime and corruption have enriched some officials sufficiently to become consumers of "luxury" goods rather than simply enablers: one of ELI's POIs makes a tiger bone wine just for Cambodian officials. In 2023, Hun Sen advocated for a legal amendment to allow private citizens to keep endangered species, unconvincingly attempting to frame this as conservation after a high-profile wildlife seizure.¹⁸ In 2022, hunting was legalized in forest reserves, and more "protected" land was opened for privatization.

While traveling to attend a CITES meeting in 2022, Cambodia's Deputy Director for Wildlife and Biodiversity was arrested on charges of trafficking endangered primates¹⁹ alongside the Director of Cambodia's Forestry Administration and six employees of a bioresearch company.²⁰ While a jury ultimately declined to convict the Deputy Director, the U.S. Fish & Wildlife Service amassed a large amount of evidence during its five-year investigation into the laundering of 55,000 macaques, many into the U.S.^{21 22 23} The trafficking and laundering of macaques continues to be a major problem.



Meanwhile, the state criminalizes environmental groups and journalists who call attention to the destruction and corruption.^{24 25 26} It is quick to defend and protect those scrutinized by foreign governments, journalists, or NGOs.²⁷ Little independent journalism still exists.²⁸ For this and other reasons, ELI expanded its Wildleaks whistleblowing platform to Cambodia in 2025, to offer a secure, safe way to report environmental and wildlife crime, including in Khmer.²⁹

Photos of trafficked macaques courtesy of MongaBay

12 U.S. Department of The Treasury. (2024, September 12). *Treasury sanctions Cambodian tycoon and businesses linked to human trafficking and forced labor in furtherance of cyber and virtual currency scams*. U.S. Department of The Treasury. <https://home.treasury.gov/news/press-releases/jy2576>

13 U.S. Department of The Treasury. (2019, December 9). *Treasury sanctions corruption and material support networks*. U.S. Department of The Treasury. <https://home.treasury.gov/news/press-releases/sm849>

14 Reaksmey, H., & Khmer, V. (2017, July 13). *Cambodia bans sand exports from province over environmental, social concerns*. VOA News. <https://khmer.voanews.com/a/cambodia-bans-sand-export-from-province-over-environmental-social-concerns/3942750.html>

15 Flynn, G., & Srey, G. (2023, December 7). *Chinese gold miners 'illegally' tearing up Cambodian wildlife sanctuary*. MongaBay. <https://news.mongabay.com/2023/12/chinese-gold-miners-illegally-tearing-up-cambodian-wildlife-sanctuary/>

16 GI-TOC. (2025). *Global Organized Crime Index 2025: Crime at a Crossroads*. Global Initiative against Transnational Organized Crime. <https://ocindex.net/country/cambodia>

17 Global Witness. (2007). *Cambodia's Family Trees*. Global Witness. <https://globalwitness.org/en/campaigns/forests/cambodias-family-trees/>

18 Delgado, A. (2023, March 27). *Hun Sen's reforestation plan falls far short of the mark*. Mekong Eye. <https://www.mekongeye.com/2023/03/27/hun-sens-reforestation>

19 Delgado, A. (2022, November 28). *Cambodian Officials Charged with Wildlife Trafficking, a 'Wake-Up Call' for Global Monkey Trade*. Pulitzer Center. <https://pulitzercenter.org/stories/cambodian-officials-charged-wildlife-trafficking-wake-call-global-monkey-trade>

20 U.S. Department of Justice. (2022, November 16). *Cambodian officials and six co-conspirators indicted for taking part in primate smuggling scheme*. U.S. Department of Justice. <https://www.justice.gov/usao-sdfl/pr/cambodian-officials-and-six-co-conspirators-indicted-taking-part-primate-smuggling-0>

21 Flynn, G. (2024, March 29). *Cambodian official acquitted in trial that exposed monkey-laundering scheme*. MongaBay. <https://news.mongabay.com/2024/03/cambodian-official-acquitted-in-trial-that-exposed-monkey-laundering-scheme/>

22 Adamović Davies, J. (2024, April 17). *How the US failed to stop a Cambodian monkey 'smuggling conspiracy'*. Radio Free Asia. <https://www.rfa.org/english/news/cambodia/cambodia-monkey-smugglers-04172024141501.html>

23 Adamović Davies, J. (2023, May 5). *Damning evidence emerges in Cambodian monkey smuggling case*. Radio Free Asia. <https://www.rfa.org/english/news/cambodia/cambodia-monkey-05052023165359.html>



Click the logo above to access Wildleaks. Before using Wildleaks to report information, please review the safety tips on page 30 of our 2020 report: <https://earthleagueinternational.org/wp-content/uploads/2024/11/WildLeaks-Report.pdf>

24 Chen, H. (2024, July 6). *The 'fearless young activists' thrown in jail for climate campaigns in Cambodia*. CNN. <https://edition.cnn.com/2024/07/06/asia/mother-nature-cambodia-climate-youth-activists-intl-hnk/index.html>

25 Amnesty International. (2024, October 3). *Cambodia: Charges against journalist highlight clampdown on press freedom*. Amnesty International. <https://www.amnesty.org/en/latest/news/2024/10/cambodia-charges-against-journalist-highlight-clampdown-on-press-freedom/>

26 GI-TOC. (March 2021). *Forest Crimes in Cambodia: Rings of illegality in Prey Lang Wildlife Sanctuary*. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2021/03/Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf>

27 McPherson, P. (2024, September 13). *Cambodia Says US Sanctions against Tycoon Ly Yong Phat Unjust, Politically Motivated*. Reuters. <https://www.reuters.com/world/asia-pacific/cambodia-says-us-sanctions-against-tycoon-unjust-politically-motivated-2024-09-13/>

28 Amnesty International. (2024). *Human rights in Cambodia*. Amnesty International. <https://www.amnesty.org/en/location/asia-and-the-pacific/south-east-asia-and-the-pacific/cambodia/report-cambodia/>

29 ELI. (2025, June 4). *Wildlife Trafficking: ELI launches Wildleaks in Cambodia*. Earth League International (ELI). <https://earthleagueinternational.org/2025/06/04/wildleaks-cambodia/>

Cambodia has long been a hotspot for illegal logging and timber exports. More than half of the logging in 2024 was in designated protected areas,³⁰ and Economic Land Concessions are granted in these areas despite laws that should prevent it.³¹ In 2021, the U.S. government pulled its funding to Cambodia's government for the protection of Prey Lang Wildlife Sanctuary due to continued unchecked logging and a lack of action against wildlife trafficking.³² The reserve had lost 9 percent of its forest in five years.³³ No corrective action was taken by the government, though it arrested environmental defenders³⁴ and banned local forest patrols.³⁵

This problem goes back decades: Cambodia's forest cover was halved from the early 1970s to the early 1990s.³⁶ An estimated 95% of logging in 1997-98 was done illegally.³⁷ More recently, Forbidden Stories,³⁸ MongaBay,³⁹ Global Forest Watch,⁴⁰ Mekong Eye⁴¹ and GI-TOC⁴² have reported on logging done outside of concessions in protected areas, and timber truck convoys traveling to sawmills with armed police and military escorts. Some concessions are granted in places with little commercially valuable timber, such as on a sugarcane plantation, opening questions as to how such concessions would be used. Many

- 30 MongaBay. (2025, October 27). Most Cambodia & Laos tree cover loss in 2024 happened inside protected areas. MongaBay. <https://news.mongabay.com/short-article/2025/10/most-cambodia-laos-tree-cover-loss-in-2024-happened-inside-protected-areas/>
- 31 GI-TOC. (March 2021). Forest Crimes in Cambodia: Rings of illegality in Prey Lang Wildlife Sanctuary. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2021/03/Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf>
- 32 Flynn, G. (2021, August 5). USAID redirects funding in Cambodia as future of Prey Lang Wildlife Sanctuary hangs in the balance. MongaBay. <https://news.mongabay.com/2021/08/usa-id-redirects-funding-in-cambodia-as-future-of-prey-lang-wildlife-sanctuary-hangs-in-the-balance/>
- 33 Tetra Tech. (August 2021). Angkor Plywood: An Existential Threat to Prey Lang Wildlife Sanctuary. USAID. https://www.documentcloud.org/documents/25199546-gpl-angkor-plywood-report_august2021_updated/
- 34 Flynn, G. (2021, August 5). USAID redirects funding in Cambodia as future of Prey Lang Wildlife Sanctuary hangs in the balance. MongaBay. <https://news.mongabay.com/2021/08/usa-id-redirects-funding-in-cambodia-as-future-of-prey-lang-wildlife-sanctuary-hangs-in-the-balance/>
- 35 GI-TOC. (March 2021). Forest Crimes in Cambodia: Rings of illegality in Prey Lang Wildlife Sanctuary. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2021/03/Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf>
- 36 Peters, J.L. (1991). The Illegal Trafficking of Timber in Cambodia. Colorado Environmental Law Journal. <https://scholar.law.colorado.edu/cgi/viewcontent.cgi?article=1532&context=celj>
- 37 GI-TOC. (March 2021). Forest Crimes in Cambodia: Rings of illegality in Prey Lang Wildlife Sanctuary. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2021/03/Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf>
- 38 Peruchon, L. & Thang, S. (2025, February 20). In Cambodia, the death of a journalist highlights the secrecy shrouding environmental crimes. Forbidden Stories. <https://forbiddenstories.org/in-cambodia-the-death-of-a-journalist-highlights-the-secrecy-shrouding-environmental-crimes/>
- 39 MongaBay. (2025, October 27). Most Cambodia & Laos tree cover loss in 2024 happened inside protected areas. MongaBay. <https://news.mongabay.com/short-article/2025/10/most-cambodia-laos-tree-cover-loss-in-2024-happened-inside-protected-areas/>
- 40 Global Forest Watch. (2025). Cambodia Deforestation Rates & Statistics. Global Forest Watch. <https://www.globalforestwatch.org/dashboards/country/KHM/>
- 41 Cambodia Deforestation. (n.d.). Mekong eye. <https://www.mekongeye.com/tag/cambodia-deforestation>
- 42 GI-TOC. (March 2021). Forest Crimes in Cambodia: Rings of illegality in Prey Lang Wildlife Sanctuary, pp.24-28. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2021/03/Forest-crimes-in-Cambodia-Rings-of-illegality-in-Prey-Lang-Wildlife-Sanctuary-GITOC-2021.pdf>

natural resources obtained from protected areas are laundered via such suspect concessions. While imagery often helps expose the crimes and there has been abundant coverage of this type of fraud, authorities' will to act is not always forthcoming.



Photo credit: Christian Pirkl via Wikimedia⁴³

Mining for sand, critical minerals, and gold contaminates Cambodia's waterways, drives deforestation and erosion,⁴⁴ and introduces salination into freshwater sources as sea levels rise and banks erode.⁴⁵ Chemicals from illegal mining sites have affected ecosystems and communities that can no longer use local rivers to drink, fish, or bathe.⁴⁶ Monsoon season flooding can carry the contaminants into agricultural land, with seasonal flooding exacerbated by the erosion from mining activity. "Legal" mining also causes serious harm, given the loose regulatory environment and ease of bribery, and as with logging, concessions overlap with areas that are supposed to be off-limits, sometimes long after illegal mining has commenced, effectively regularizing crime.^{47 48} Trade gap analyses

- 43 Pirkl, C. (2014, January 4). Mondul Kiri Cambodia. Wikimedia Commons. https://commons.wikimedia.org/wiki/File:Mondul_Kiri_Cambodia_3080.jpg
- 44 Delgado, A. & Pulitzer Center. (n.d.). Going for Gold: The modern-day gold rush toppling Cambodia's forests. CDH - Cambridge Digital Humanities. <https://www.cdh.cam.ac.uk/dataschools/going-for-gold/>
- 45 Leyland, J. (2025, March 5). How sand mining is eroding rivers, livelihoods and cultures. The Conversation. https://phys.org/news/2025-03-sand-eroding-rivers-livelihoods-cultures.html#google_vignette
- 46 Ball, A., Flynn, G. & Vantha, P. (2025, November 24). Cambodia: Gold mining activities allegedly cause toxic pollution into rivers and put communities at risk including health concerns. MongaBay, reposted by The Business & Human Rights Centre. <https://www.business-humanrights.org/en/latest-news/cambodia-gold-mining-activities-allegedly-cause-toxic-pollution-into-rivers-and-put-communities-at-risk-including-health-concerns/>
- 47 Khmer, RFA. (2024, December 23). Activist: Mining companies clearing forest inside Cambodian wildlife sanctuary. Radio Free Asia. <https://www.rfa.org/english/cambodia/2024/12/23/cambodia-gold-mining/>

have shown large discrepancies between stated mining exports and imports reported elsewhere, suggesting that the scale of illegal mining is much larger than official numbers.⁴⁹ Wealthy Cambodians associated with illegal logging allegations also appear to be involved in mining, according to MongaBay.⁵⁰

The government's approach to other types of organized crime in the country is similar to its approach to environmental crimes: deny that crimes were committed, protect perpetrators and enablers and criminalize victims, journalists, and those seeking justice. For example, a forced labor victim from a scam center who claimed that his blood was harvested for sale was criminally charged, alongside a doctor who treated him and corroborated his claims, even after the Chinese Embassy requested an investigation by Cambodian authorities.⁵¹ A helpline for victims in Cambodia was subsequently disabled.

48 Flynn, G., & Srey, G. (2023, December 7). Chinese gold miners 'illegally' tearing up Cambodian wildlife sanctuary. MongaBay. <https://news.mongabay.com/2023/12/chinese-gold-miners-illegally-tearing-up-cambodian-wildlife-sanctuary/>

49 Global Organized Crime Index: Cambodia. (2025). Global Initiative Against Transnational Organized Crime. <https://ocindex.net/country/cambodia>

50 Flynn, G. & Srey, V. (2022, August 29). Mining the Mekong: Land and livelihoods lost to Cambodia's thirst for sand. MongaBay. <https://news.mongabay.com/2022/08/mining-the-mekong-land-and-livelihoods-lost-to-cambodias-thirst-for-sand/>

51 Kennedy, L. & Southern, N.P. (2022, July 25). Modern slavery in the Mekong's casinos. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/analysis/modern-slavery-mekong-casinos/>



VII.

IS LAO PDR THE NEW CAMBODIA?

While many scam bosses and employees have been arrested and are in detention in Cambodia or have been extradited, many remain at liberty. ELI's sources report that as of spring 2026, many of those remaining are moving to other countries, notably to Laos and Burma. While there have also been law enforcement operations against scam centers and other illegal businesses in SEZs in Laos, they remain open and active, if slightly subdued. Sources indicate that in light of recent events, scammers operate in smaller, more discreet groups to avoid detection and arrest.

Other illicit economies around them continue, sometimes a bit more discreetly, but often not. ELI investigators have seen firsthand and been told by sources that businesses that depended on the scam centers in Cambodia, from restaurants to illegal massage businesses to barbers, are moving to Laos as well. This is also true of some wildlife traffickers, given the permissive environment in Laos and high levels of corruption. As in Cambodia, a small core of elites controls both licit and illicit economies; in Laos there are four dominant families that are complicit in various types of criminal activities. Corruption is as rampant as in Cambodia, and environmental and wildlife crime are equally big business. For example, ELI discovered a member of a prominent family who reputedly helps arrange CITES permits at the Ministry of Agriculture and Environment. ELI sources also named a member of the legislature as involved in tiger trafficking.

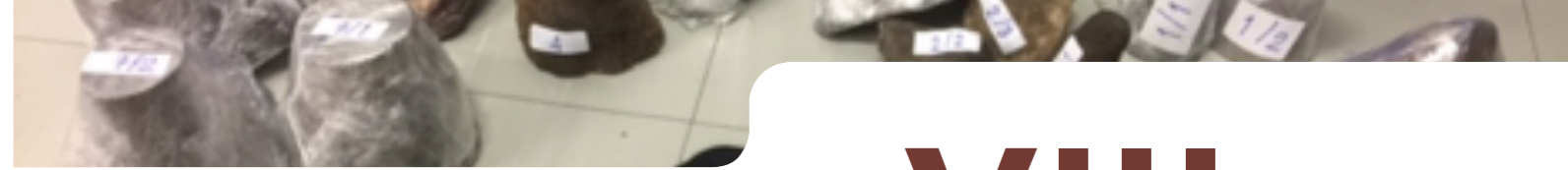
Sales of wildlife in the country are open and wildlife tourism is popular. Chinese tourism to Laos increased more than 20-fold in just two years because of the China-Laos high-speed railway. In the first two months of 2023, more than 400,000 riders used the railway between Kunming and Vientiane.¹ While not all of these tourists are purchasing illegal wildlife products, the ease of access, alongside efforts by sellers to fool customers into thinking sales are legal, does not bode well for demand trajectories. Sales in Laos can already forecast trends in IWT demand; in early 2026, ELI's field investigators reported that the sale of elephant skin was increasing.

Open sales of bear products in Laos suggest similar levels of IWT impunity to those that ELI witnessed in Cambodia, with the Ministry of Health even granting a company a license to sell products containing rhino horn and bear bile, despite its own national laws and being a signatory to CITES.^{2,3} The grim bear farms where bile is harvested in cruel conditions also serve as fronts for trafficking and laundering other species,

1 Delgado, A. & Siviero, B. (2023, May 11). Luang Prabang braces for new dam, influx of tourists. Mekong Eye. <https://www.mekongeye.com/2023/05/11/luang-prabang-dam-tourism>

2 EIA. (2025, November 21). Bear bile and rhino horn products openly on sale in Laos despite international bans. Environmental Investigation Agency (EIA). <https://eia-international.org/news/bear-bile-and-rhino-horn-products-openly-on-sale-in-laos-despite-international-bans/>

3 Davies, N., & Holmes, O. (2016, September 27). Revealed: how senior Laos officials cut deals with animal traffickers. The Guardian. <https://www.theguardian.com/environment/2016/sep/27/revealed-how-senior-laos-officials-cut-deals-with-animal-traffickers>



such as lions and primates. IWT kingpins in Laos first opened “wildlife farms” in the early 2000s, using them to smuggle and launder macaques, bears, tigers, and reptiles.⁴ Since then they have proliferated.⁵

A source reported in 2026 that wealthy clients visiting tiger farms can choose which tiger they would like to have slaughtered, sometimes consuming the blood afterwards. As in Cambodia, tiger farms and false zoos in Laos are used to launder wild tigers, and due to official corruption many have obtained licenses and even CITES permits. Multiple sources pointed to deep corruption within the CITES system in Laos that helps owners obtain paperwork to aid in the laundering of trafficked wild animals through these businesses, including elephants and lions as well as tigers. Sources also claimed that some of these “zoos” in Laos do a steady business with zoo owners in mainland China. Entire animals as well as products from these businesses are both sold within Laos and exported into mainland China. In early 2026, ELI was told that tiger bone wine sold for over \$850 in Nanchang; the profit from the making of one tiger’s remains into wine is approximately \$150,000.

POI Cam26: They all use the zoo as a cover to sell the tigers and they kill them all here and then say the tigers are naturally dead, not by slaughter... CITES is facilitating the whole business of the tiger industry here. Without their protection, no one can do this business.

4 Davies, N., & Holmes, O. (2016, September 26). The crime family at the centre of Asia’s animal trafficking network. The Guardian. <https://www.theguardian.com/environment/2016/sep/26/bach-brothers-elephant-ivory-asias-animal-trafficking-network>

5 EIA. (2022, March 8). Footage reveals criminal-run tiger ‘farms’ in Laos have actually been expanded, not shut down. Environmental Investigation Agency. <https://eia-international.org/news/footage-reveals-criminal-run-tiger-farms-in-laos-have-actually-been-expanded-not-shut-down/>

VIII.

APPLICABILITY OF ELI’S INVESTIGATIONS FOR THE LOWER MEKONG

Given reports by ELI sources that much of the remaining scam industry and portions of the illicit markets that it supported, including the IWT, are moving to Laos and Burma, it is essential to understand that the same permissive conditions for crime are broadly present among all of Cambodia’s neighbors. The region offers fertile ground for criminal networks to move and adapt if displaced from one location. Because so many of ELI’s findings regarding the enabling environment in Cambodia are applicable to its neighbors, and there are indications that criminal networks are capitalizing on this, there is a pressing need for similar intelligence investigations and the mapping of criminal networks and their illicit activities within and between each of these countries.

Across the lower Mekong, there are high—and rising¹—levels of criminality and low levels of resilience, and high levels of corruption and impunity, including state-embedded criminality.² Regionally, there is a lack of programming or political will to address the role of corruption, according to the OECD, and public corruption related to environmental crime rarely meets the threshold to trigger investigations.³ SEZs in particular are packaged crime convergence playgrounds, where illegal wildlife, drugs, gambling, and human exploitation are the major draws for clientele. At Shwe Kokko in Burma, elite customers could “play war games with armed Chinese security personnel using automatic weapons”.⁴ The Golden Triangle, where the Thai, Laotian, and Burmese borders meet, manufactures meth and ketamine at an industrial scale.⁵ The notorious Kings Romans Casino in the Golden Triangle SEZ in Laos not only sells illegal wildlife to, as the *South China Morning Post* put it: “a predominantly Chinese high roller clientele seeking out bear-paw soup and tiger-bone wine to go with their rounds of baccarat and call girls”, but has tiger and bear farms on the premises.^{6,7}

1 Eligh, J. (January 2026). The Mekong Methamphetamine Economy Rethinking The Narrative. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2026/01/Jason-Eligh-The-Mekong-methamphetamine-economy-Rethinking-the-narrative-GI-TOC-December-2026.pdf>

2 MacBeath, A. (2025, November 24). A Deep Dive into the Mekong Results (webinar). Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/analysis/the-2025-global-organized-crime-index-a-deep-dive-into-the-mekong-results/>, 10:00

3 OECD. (2019). The illegal wildlife trade in Southeast Asia: institutional capacities in Indonesia, Singapore, Thailand and Viet Nam. OECD Publishing, Paris. https://www.oecd.org/content/dam/oecd/en/publications/reports/2019/09/the-illegal-wildlife-trade-in-southeast-asia_d91002c8/14fe3297-en.pdf p.30

4 Tower, J. (2025, August 27). Scam empire strikes back: Crackdowns on Myanmar’s scam industry have had little material impact. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/analysis/scam-empire-strikes-back-crackdowns-on-myanmars-scam-industry-have-had-little-material-impact/>

5 United Nations. (2025, May 28). Exponential rise in synthetic drug production and trafficking in the Golden Triangle. UN News. <https://news.un.org/en/story/2025/05/1163741>

6 Southern, N. P., & Kennedy, L. (2022, October 15). Laos’ criminal casino empire: Chinese gangsters suspected of running brothels and online scams, and trafficking humans, animal parts and drugs. South China Morning Post. <https://www.scmp.com/magazines/post-magazine/long-reads/article/3195932/laos-criminal-casino-empire-chinese-gangsters>

7 EIA. (2024, March 15). EIA at 40 – Lifting the Lid on Sin City, Laos’ Notorious Playground for Illegal Wildlife Trade. Environmental Investigation Agency. <https://eia-international.org/news/eia-at-40-lifting-the-lid-on-sin-city-laos-notorious-playground-for-illegal-wildlife-trade/>

Everything is for sale in the Special Economic Zones of the Lower Mekong



Conditions in Southeast Asia writ large allow for extensive crime convergence. All four levels of environmental crime convergence from ELI's typology exist at high levels in the region. In November 2025 a vehicle near the Thai-Cambodian border was carrying 81 macaques and multiple forms of meth; an example of Type III convergence that highlighted commingled logistics.⁸ In another example of Type III convergence, in 2024 the sales of endangered birds trafficked from the Philippines were used to buy M16s in Indonesia.⁹ This type of illicit financial convergence, with proceeds from one type of crime used to invest in another, is common. Government inefficacy and corruption have facilitated the cross-border spillover of all types of crime.

While a great deal of attention has rightly been paid to the region's source and transit role for the IWT en route to mainland China, Hong Kong, and Taiwan, there is also significant local demand. Vietnam is the second largest market for rhino horn after China and a major

8 CBS News. (2025, November 17). 81 monkeys and meth found in car driven by suspected wildlife smugglers, rangers in Thailand say. CBS News. <https://www.cbsnews.com/news/monkeys-meth-car-suspected-wildlife-smugglers-thailand/>

9 Picard, M. (2024, July 31). Wildlife and weapons trafficking converge in Southeast Asia. East Asia Forum. <https://eastasiaforum.org/2024/07/31/wildlife-and-weapons-trafficking-converge-in-southeast-asia/>

consumer of pangolins. Its demand for ivory to support a local carving market was established circa 2008. Thailand remains a hotspot for wildlife demand and abuses, sometimes very conspicuously; in 2024 a lion cub owner in Pattaya City drew scrutiny after her friend took it for a joyride in a Bentley convertible.¹⁰

Many endemic species have already been eliminated or nearly eliminated. While the region is native tiger habitat, the species has been poached to levels that can no longer support breeding populations in Cambodia, Laos, and Vietnam.¹¹ Asian elephants as a whole are endangered and critically endangered in Vietnam.^{12 13} There is also a high volume of trade in less monitored and publicized species, particularly songbirds and reptiles, which may not have CITES or other protection designations.¹⁴

As in Cambodia and Laos, neighboring countries' lax laws and enforcement have resulted in a proliferation of false farms and zoos that breed animals for the wildlife trade in poor conditions while also laundering trafficked animals. ELI's aforementioned findings regarding the continued poaching of wild tigers despite the abundance of tiger farms is also true for lesser-studied animals such as porcupines, according to academic research;¹⁵ additional evidence that these enterprises fail to alleviate pressure on wild populations. These businesses ultimately increase demand, do nothing to help the genetic diversity or recovery of wild populations, and cause immense suffering. While global scrutiny has pushed wildlife sales more underground in some locations, business is still robust, and sellers use WeChat and other online tools to avoid openly displaying their wares.¹⁶

Private property is too often a safe haven for criminal activities, as local authorities have traditionally not investigated or accessed them operationally. This impunity has played a role in the proliferation of scam centers,¹⁷ privately held farms and false zoos, and factories and warehouses used to make and store drugs and other types of contraband. The lack of attention or appetite to inspect or investigate private property is a major part of what allows criminal networks to operate without scrutiny or oversight.

10 The Nation Thailand. (2024, January 23). Pet lion cub in Bentley convertible raises police hackles. The Nation Thailand. <https://www.nationthailand.com/thailand/general/40034957>

11 Wong, R. & Krishnasamy, K. (November 2025). Beyond Skin and Bones: A 25-year analysis of tiger seizures from 2000 to June 2025. TRAFFIC. https://www.traffic.org/site/assets/files/29537/full_report_skin_and_bones_2025_v6_highres.pdf p.13

12 WWF. (January 2026). Asian Elephant. World Wildlife Fund. <https://www.wwf.org.uk/learn/wildlife/asian-elephant#:~:text=Asian%20elephants%20once%20roamed%20across,elephants%20left%20in%20the%20wild.>

13 Snell, G., & Delgado, A. (2023, July 18). Vietnam's last wild elephants on the brink of survival. <https://www.mekongeye.com/2023/07/17/vietnam-last-elephants>

14 Heinrich, S., Ross, J., Gray, T., Delean, S. Marx, N. & Cassey, P. (January 2020). Plight of the commons: 17 years of wildlife trafficking in Cambodia. Biological Conservation: Vol. 241. <https://www.sciencedirect.com/science/article/abs/pii/S0006320719314089>

15 Brooks, E., Robertson S., & Bell, D. (November 2010). The conservation impact of commercial wildlife farming of porcupines in Vietnam. Biological Conservation. <https://www.sciencedirect.com/science/article/abs/pii/S0006320710003368>

16 Van Uhm, D. P., & Zhang, M. (2022, December 5). Illegal wildlife trade in two special economic zones in Laos: Underground–open-sale fluctuations in the Golden Triangle borderlands. *Frontiers in Conservation Science*, 3. <https://doi.org/10.3389/fcosc.2022.1030378>

17 Hankookilboo. (2025, October 17). 'It's practically a prison city': Inside Sihanoukville's largest scam compound. Korea Times. <https://www.koreatimes.co.kr/southkorea/law-crime/20251017/its-practically-a-prison-city-inside-sihanoukville-largest-scam-compound>

Protected corals shown to ELI by POIs, both whole and cut and polished into jewelry.



As described, wildlife traffickers across the region facilitate shopping tours, with Cam1 and Cam2 doing so in at least four countries via their associates. EIA reported on IWT tours for Vietnamese tourists in Thailand, and referenced hearsay on tours for Japanese and South Korean buyers.¹⁸ Most buyers are well aware that their purchases are illegal, and sellers provide shipping methods so that buyers do not have to personally carry items home. The potential for increased demand with increased mobility means that addressing this type of tourism needs to be a central pillar of countering the IWT across the region. While ideally governments would act assertively to close these locations and end the shopping tours, it's unlikely in most Mekong countries, requiring demand-side interventions. A few ideas include:

- **Outreach:** Reporting on IWT tourism indicates that buyers are often pressured, price gouged, and/or sold fake goods at these outlets.¹⁹ Targeted messaging to populations likely to engage in this type of tourism offers opportunities to highlight the negative aspects of these trips, diminish enthusiasm, and further educate the public about the risks and illegality of purchasing illegal wildlife products.
- **Bad review bombing:** These stores are often thinly masked online as museums, cultural centers or even coffee shops. Civil society organizations and other stakeholders can expose their illegal activities via en masse bad reviews or other online "outing", with care not to inadvertently advertise for them.

18 EIA. (2019, July 19). 'Tiger Bone' Products Made in Thailand and Sold to Vietnamese and Chinese Tourists. Environmental Investigation Agency. <https://eia-international.org/news/tiger-bone-products-made-in-thailand-and-sold-to-vietnamese-and-chinese-tourists/>

19 Mongabay. (2025, July 22). Large-scale illegal wildlife shops in Laos found scamming Chinese tourists. MongaBay. <https://news.mongabay.com/2025/07/large-scale-illegal-wildlife-shops-in-laos-found-scamming-chinese-tourists/>

- **Publicize claimed affiliations between IWT outlets and government officials:** While photography by shoppers is generally banned, the stores' use of photos of host nation officials to imply legitimacy offers an opportunity for more bad publicity. The exposure of the photos in these locations offers a prompt for implicated officials to demand removal of their images and denounce the entities, and may prompt investigations if deemed to threaten the officials' careers - though the feasibility of this will vary widely depending on local official acceptance of and involvement in the IWT.

Despite the sobering regional realities, there are serious and successful efforts taking place in parts of Vietnam and Thailand^{20 21 22 23} that show what is possible with political will and cooperation. In 2017, ELI's operations in Thailand and Laos enabled Thai authorities to arrest two members of the Bach family syndicate: Kampanart Chaiyamart and Bach Van Hoa, prolific wildlife traffickers who moved endangered species from Thailand, Laos and Vietnam into mainland China.²⁴ ELI was able to make the connection between a Thai seizure of 12.5 kg of rhino horn and the Bach network. While the POIs were different in those cases, there were similarities to the rhino horn supply chains ELI saw from South Africa to Cambodia during its 2025-6 investigations.



Rhino horn seized in Thailand in 2017 enabled by ELI (formerly EAL) investigations

20 Ngamkaiwan, C. (2023, March 7). Thailand wildlife protection laws are better but not perfect. 360.org. <https://360info.org/thailand-wildlife-protection-laws-are-better-but-not-perfect/>

21 Rusch, V. (2021, December 21). Vietnam imposes record 14-year prison sentence for wildlife trafficking. Dipping Through Geometries. <https://dippingthroughgeometries.blog/2021/12/21/vietnam-imposes-record-14-year-prison-sentence-for-wildlife-trafficking/>

22 Nguyen, T., Nguyen, P., & La, T. (2025, January 2). International instruments against wildlife trafficking by sea route and recommendations for Vietnam. Vietnam Online Law and Legal Forum. <https://vietnamlawmagazine.vn/international-instruments-against-wildlife-trafficking-by-sea-route-and-recommendations-for-vietnam-73526.html>

23 Royal Thai Embassy in Washington DC. Thailand Sets Up Wildlife Crime Intelligence Unit to Fight Wildlife Trafficking. (2023, November 1). Royal Thai Embassy in Washington DC. <https://washingtondc.thaiembassy.org/en/content/thailand-sets-up-wildlife-crime-intelligence-unit>

24 ELI. (2017, December 12). Earth League International (ELI). Operation Mozart: Three High-Profile. Ellis, E. (2025, March 26). PRC influence and the status of Taiwan's diplomatic allies in the Western Hemisphere. CSIS. <https://www.csis.org/analysis/prc-influence-and-status-taiwans-diplomatic-allies-western-hemisphere>

More recently, Thailand arrested and sentenced both an official who was granting private land deeds for public land and the wealthy private-sector recipient.^{25 26} In 2021, a Vietnamese court sentenced a rhino horn trafficker to 14 years in prison; a record sentence for wildlife offenses.²⁷ In 2023, another wildlife trafficker was given 13 years.²⁸ ELI POIs' previously cited complaints about the increased difficulty of trafficking contraband into Vietnam supports that these efforts are impacting criminal networks.



Pangolin scales prominently displayed at a store

25 Bangkok Post. (2024, July 4). *Ex-official arrested for illegal land deeds*. Bangkok Post. <https://www.bangkokpost.com/thailand/general/2823099/ex-official-arrested-for-illegal-land-deeds>

26 Karnjanatawe, K. (2025, May 3). *Thailand: Chairman of Thai companies convicted of corruption in land grab case*. Bangkok Post reprinted by The Business & Human Rights Centre. <https://www.business-humanrights.org/en/latest-news/thailand-chairman-of-thai-companies-convicted-of-corruption-in-land-grab-case/>

27 Agence France-Presse. (2021, December 8). *Vietnam hands down record 14-year sentence to rhino horn trader*. South China Morning Post. <https://www.scmp.com/news/asia/southeast-asia/article/3158887/vietnam-hands-down-record-14-year-sentence-rhino-horn>

28 Reuters. (2023, February 21). *Vietnam jails trafficker 13 years over 10 tonne haul of ivory, rhino horn*. Reuters. <https://www.reuters.com/world/asia-pacific/vietnam-jails-trafficker-13-years-over-10-tonne-haul-ivory-rhino-horn-2023-02-21>

IX.

OPPORTUNITIES TO ENGAGE CHINA ON THE IWT

While China often declines to involve itself in criminal matters abroad, even those perpetrated by its nationals, it has selectively supported exchanges and joint law enforcement operations it perceives to be in its interests.¹ Its involvement is generally based not on the level of criminal activity by its nationals or broader anti-TOC goals, but on the scope of harm against its domestic citizens and the corresponding potential for domestic unrest. As Martin Thorley writes: "...substantive international cooperation with China on crime prevention would be possible only where it aligns with the interests and principles of the Chinese Communist Party (CCP)."²

There are crimes in the lower Mekong, apart from the scams that harm its nationals, that are very much in China's self-perceived interests to address. ELI investigations have repeatedly shown that the IWT and environmental crimes negatively affect China's domestic efforts to combat official corruption. The evidence provided by the traffickers who smuggle wildlife products into mainland China for the express purpose of bribery could encourage China to collaborate more with other countries and take environmental crime by its diaspora more seriously, at least insofar as it pertains to anti-corruption efforts. There are several reasons that China should consider involvement in anti-IWT efforts as an integral part of its corruption fight, as well as its efforts against the scam compounds that victimize citizens:

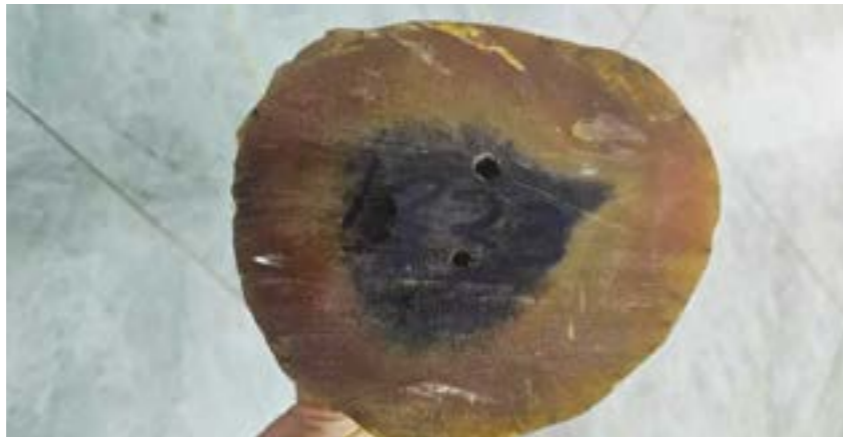
- 1. Full accountability for scam compound bosses:** Given the scope of victimization of Chinese nationals in scam compounds, both as the victims of labor trafficking and victims of the scams perpetrated by trafficked scammers, the Chinese government should pursue all relevant charges against crime bosses regarding their illicit activities and enrichment. Wildlife crime is embedded in the compounds' business models and has enriched and strengthened criminal networks. It should therefore be part of law enforcement and judicial processes, to augment charges, penalties, and asset seizures.
- 2. Address bribe-taking by corrupt officials:** Chinese wildlife traffickers in multiple countries have told ELI how their products are smuggled into mainland China to be "gifted" to officials there. One went so far as to say the quiet part out loud: that these officials prefer such items over cash to avoid being detected and punished by the CCP. ELI investigations in multiple countries have pointed to expat members of the diplomatic community and employees of state-owned companies as conduits of wildlife contraband into mainland China, and points of connectivity between traffickers abroad and

1 GI-TOC. (2025). *Mekong Risk Monitor: Vol. No. 1*. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2025/12/Mekong-Risk-monitor-Issue-1-December-2025.pdf>

2 Thorley, M. (2024). *A Changing Landscape: China's New Model of Global Governance and Its Impact on the Fight against Organized Crime*. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2024/05/Martin-Thorley-A-changing-landscape-Chinas-new-model-of-global-governance-and-its-impact-on-organized-crime-GI-TOC-May-2024.pdf>

corrupt officials back home; showing that what expats do abroad does in fact have a deleterious impact back home.

- 3. Corruption of Chinese officials abroad:** China has aggressively purged corrupt officials in recent years, and may also be interested in how Chinese civil servants posted to a country such as Cambodia can afford to frequently consume items such as tiger penis wine, which sells at restaurants in the Phnom Penh area for \$30 per 100cc. As it is unlikely that official salaries are sufficiently high to support the purchase of these products, officials consuming them are likely either supplementing their income with bribes or expensing prohibited items.
- 4. Scams of Chinese tourists:** As will also be noted in the discussion on the broader Mekong region, Chinese tourists are scammed by wildlife sellers, who pressure them to buy very overpriced merchandise. By targeting these sellers, China has an opportunity to fight wildlife trafficking beyond its borders while ostensibly protecting its citizens from predation. It could warn consumers not to patronize these tours and establishments, which would simultaneously lower demand and deprive traffickers of a major source of revenue. As BRI projects such as high-speed trains to SE Asian destinations bring increasing numbers of Chinese tourists, the potential scale of both criminal enrichment and predation on consumers will only grow without effective deterrents.



A rhino horn for sale shown to ELI by a POI

X.

THE NEED FOR EXTERNAL ACTION IN PERVASIVELY CORRUPT COUNTRIES

Given the high impunity rates and in too many cases, active involvement of government officials in an array of criminal activities in Cambodia and its neighbors, it is essential to carefully analyze the IWT in the lower Mekong for potential levers of external influence and disruption. Barring significant political, financial, and law enforcement changes in operating environments such as Cambodia and Laos, focusing disruption outside of national boundaries will likely prove the most promising path. This includes a range of financial, diplomatic, business, and other levers with thoughtful analyses of where crime touches other nations and their financial systems, alongside international business sectors positioned for positive impact. Ideally, as outlined in the previous section, China could be persuaded to play a more positive role, at least in certain circumstances.

The entire spectrum of bad actors and enablers along illicit supply chains should be mapped for intervention opportunities, with particular attention to sectors and businesses providing services to both TCOs and the consumers of illicit goods. We need to understand the business needs of criminal networks, from specialized services to financial needs to material goods to transit requirements, and assess where there are actionable vulnerabilities. Underlying all of these is the need for more long-term intelligence collection that gathers details directly from criminals to gain actionable insights into what loopholes, gaps, and bribes they use.

To conclude with just one illustrative example of addressing criminals' business needs and the necessity of non-criminal stakeholders playing an actively constructive role, we will look at the role of online sales platforms. Reporting on North Korea's ability to sell wildlife products such as pills containing rhino horn via online platforms in the Lower Mekong calls into question the platforms' role as enablers in helping the country evade sanctions.¹ Previous ELI field work indicates that some wildlife products are smuggled into North Korea from Vietnamese TCOs, then the commercial products are smuggled back into the region when sold there, predominately to the Chinese diaspora.²

In countries where online platforms have traditionally had little to no accountability for what is sold via their websites but profit handsomely from contraband, including in the U.S., laws must catch up to ensure that those making money off endangered species, drugs

1 Global Initiative Against Transnational Organized Crime, & Global Illicit Flows Program. (November 2025). *Monitoring Online Illegal Wildlife Trade Featuring Rhino Horn Pills and Wildlife Substitutions*. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2025/11/Monitoring-illegal-wildlife-trade-Featuring-rhino-horn-pills-and-wildlife-substitutions-GI-TOC-November-2025.pdf> p. 13-16

2 Crosta, A., Sutherland, K., & Talerico, C. (2017). *Grinding Rhino: An undercover investigation on rhino horn trafficking in China and Vietnam*. Earth League International (formerly Elephant Action League). <https://earthleagueinternational.org/wp-content/uploads/2024/12/Grinding-Rhino-Report-July2017.pdf>

and trafficking victims can be held liable for doing so. In late 2025, Reuters reported extensively on how profitable illicit economies are for social media companies, showing that Meta's own internal assessment was that 10% of its 2024 revenue would come from scams and the sale of banned goods.^{3 4 5} There is a clearly stated exception to online platforms' lack of liability in the Communications Decency Act regarding criminal activities, but thus far exceptions have only been tested in human trafficking cases, where legal exception to Section 230 is explicit for this type of crime.

The sale of endangered species should never be part of business models, let alone accepted as a significant proportion of revenue. While there are collaborative efforts underway between NGOs and social media platforms to de-list endangered flora and fauna, it remains a problem. Algorithms that can suggest similar pages of items such as ivory products to potential buyers somehow continue to be less effective at flagging the same pages for removal. Multiple non-profits have flagged that in many cases, posts that are left up do not even attempt evasion via coded language.

The significant overlap of online IWT sales with physical locations in the lower Mekong countries⁶ suggests that a serious blow to online ads and sales platforms could impact much of the industry, depending on the platforms targeted. In light of the discussion in this paper on the impact of scam center crackdowns on depressing local IWT sales for domestic markets, a complementary successful effort to deplatform websites used for international sales and shipping could create truly meaningful disruption of the trade.

Similar analyses, opportunity spotting, and test cases can be done for other essential business needs of wildlife traffickers, from permitting to equipment controls to improved transit checks to illicit financial flows. Informed by long-term criminal network investigations such as ELI's work in Cambodia and elsewhere, we must continue to assess opportunities to deprive criminals of the services, materials, and finances they need to source, sell, and send illicit goods. Actioning intelligence to capitalize on key vulnerabilities and bottlenecks on as many fronts as possible will ultimately best disrupt criminal activities.

- 3 Horwitz, J. (2025, November 6). *Meta is earning a fortune on a deluge of fraudulent ads, documents show*. Reuters. <https://www.reuters.com/investigations/meta-is-earning-fortune-deluge-fraudulent-ads-documents-show-2025-11-06/>
- 4 Horwitz, J. and Tham, E. (2025, December 15). *Meta tolerates rampant ad fraud from China to safeguard billions in revenue*. Reuters. <https://www.reuters.com/investigations/meta-tolerates-rampant-ad-fraud-china-safeguard-billions-revenue-2025-12-15/>
- 5 Horwitz, J. (2025, December 31). *Meta created 'playbook' to fend off pressure to crack down on scammers, documents show*. Reuters. <https://www.reuters.com/investigations/meta-created-playbook-fend-off-pressure-crack-down-scammers-documents-show-2025-12-31/>
- 6 Clément, T., Inglis, S. (October 2022). *Vietnam's Virtual Landscape for Illicit Wildlife Trading*. Global Initiative Against Transnational Organized Crime. <https://globalinitiative.net/wp-content/uploads/2022/10/GITOC-MMFU-Vietnams-virtual-landscape-for-illicit-wildlife-trading-A-snapshot-of-e-commerce-and-social-media.pdf>



About EARTH LEAGUE INTERNATIONAL (ELI)

Earth League International (ELI) is the only NGO in the world dedicated exclusively to investigating and addressing Environmental Crime Convergence—the intersection of environmental and wildlife crime with other serious transnational crimes, including money laundering, corruption, human trafficking, and drug trafficking. A pioneer in applying professional intelligence methodologies to environmental crime, ELI identifies and investigates high-level environmental criminals and transnational wildlife trafficking networks worldwide, including how they move their money and their links to transnational organized crime and other serious offenses. ELI works in close collaboration with key government agencies in the United States and internationally.





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