

Species of **Crime**

Typologies & Risk Metrics for Wildlife Trafficking

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I. EXECUTIVE SUMMARY

The recognition of wildlife crime as a global transnational crime threat has taken on new urgency since President Obama's 2013 Executive Order on Combating Wildlife Trafficking. Meanwhile, private transportation logistics and financial services companies have independently expressed concern due to their potential exposure to wildlife and environmental transnational organized crime (TOC) activity, and also a desire to take action. A key impediment to addressing their concerns has been a lack of information on both the types of supply chain abuse that may occur and the types of wildlife criminal networks that may be operating. Such information may help refine and strengthen compliance controls to ensure that funds and services reach their intended beneficiaries.

This paper begins to address this need by:

1. Outlining context;
2. Identifying red flag indicators, high-risk jurisdictions and container profiles;
3. Providing typologies with examples of wildlife TOC network activity.

We intend for our research to launch a more robust examination of wildlife TOC activity. We hope our efforts may begin to bridge a critical knowledge gap by disseminating information to help African and East Asian-linked private-sector transport and payments businesses better monitor their risk. We also recommend that organizations review the US Federal Government's "Implementation Plan" for the *National Strategy on Wildlife Trafficking*, along with the *Yearly Typologies Reports* released by Asia/Pacific Group on Money Laundering.^{1 2}

All information in this paper is available in open source. While it is far from exhaustive, we believe it may be broadly representative of the threats associated with wildlife TOC activity.

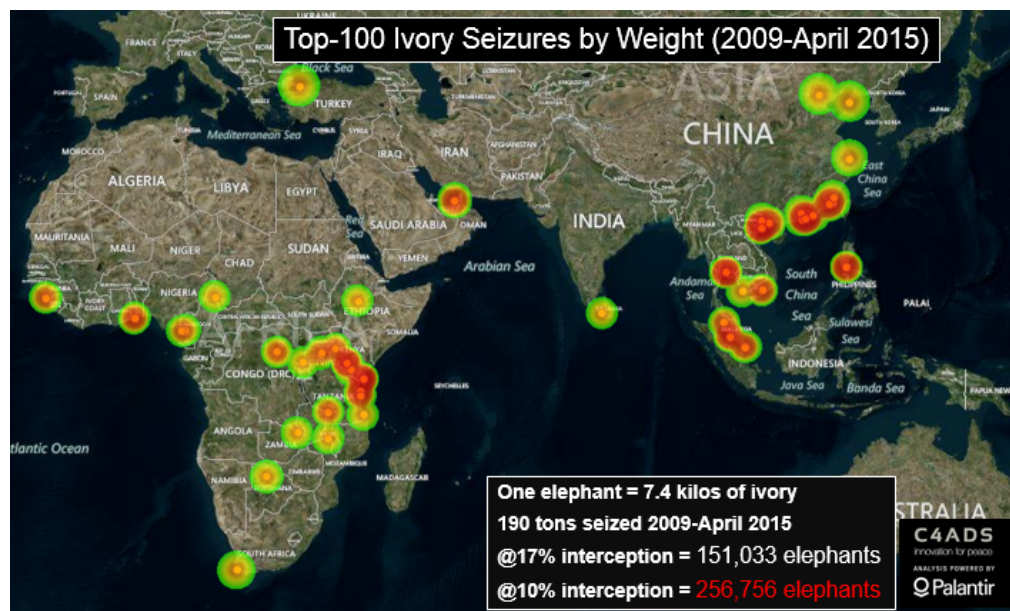
We identify 7 key typologies and conclude that wildlife trafficking networks:

1. Nest illicit activities within licit financial and transport systems;
2. Create complex means of physical obfuscation;
3. Obfuscate beneficial ownership, sources of contraband, and funds by establishing shell or front organizations, or by other strategies;
4. Manipulate multi-country accounts and payments schemes, including those that clear through Western Jurisdictions;
5. Demonstrate convergence with high-risk illicit activity;
6. Demonstrate convergence with bribery and exposure to politically exposed persons (PEPs);
7. And demonstrate beneficial, financial, or client relations with environmental product suppliers.

II. CONTEXT

Our analysis of the transnational ivory supply chain in *Ivory's Curse* and *Out of Africa* found an existential elephant-poaching crisis across sub-Saharan Africa, and considerable consumer demand in East Asia, woven together by a relatively narrow logistics and distribution chain. We estimated that the bulk of the illicit trade – perhaps 50-75% of the entire trade – is cumulatively represented in fewer than 250 containers that originate, transit, and terminate through less than 25 ports.³ We further estimated that the majority of the illicit trade utilizes fewer than 15 major shipping companies and five pre-shipment inspection (PSI) companies, with the bulk of illicit ivory originating from potentially two major elephant ecosystems.⁴ The level of consolidation along this supply chain suggests the collusion of transnational organized crime.

Figure 1.1: Top 100 Ivory Seizures by Volume (2009-April 2015)



Source: C4ADS Global Ivory Seizure Database hosted in Palantir

Some key statistics are included below, with particular focus on trends in ivory trafficking:

- **Source Zone:**

- Poaching constitutes an existential threat to the approximately 434,000 wild elephants estimated in Africa, almost two-thirds of which concentrated in Southern Africa, per the 2013 African Elephant Database (AED) census available online.^{5 6 7}
- Poaching patterns have changed with elephant depletion trends. Central Africa was the epicenter of the crisis from around 2000-2009, having lost potentially 76% or more of elephants during the past two decades.⁸ Poaching activity since 2009 has appeared to shift towards East Africa.
- Current poaching trends appear concentrated. DNA tracing efforts of seized ivory samples worldwide have identified two major elephant poaching ‘hotspots’ on the African continent – “the southern part of East Africa [primarily the Selous-Niassa corridor on the Tanzania-Mozambique border] and the western part of Central Africa [covering the TRIDOM (Tri-National Dja-Odzala-Minkébé) area in the Congo Basin].”⁹

- **Transit Zone:**

- Abnormally high profit margins exist for those able to source ivory from the African forest periphery to the East Asian wholesale market. Ivory is still locally traded for as little as \$30-150/kg, or 1-6% of its end-value in East Asia.^{10 11}
- Our wildlife crimes database counted about 190 tons of illicit ivory seized worldwide between 2009 and April 2015. At a rough seizure rate of 10% and an estimated average weight of 3.7 kg/tusk, this amounts to the equivalent of approximately 250,000 elephants trafficked over the period.
- Ivory trafficking rates have increased exponentially. 2013 marked a historic record for the amount of ivory seized in a single year: almost 42 tons, consolidated in as few as 18 shipments.¹² Preliminary 2014 figures appear to show a slight decline, but still 2-3 times more than annual volumes seized prior to 2009.¹³
- Seaborne containerized transport is the dominant mode of ivory trafficking, accounting for approximately 72% of weight trafficked between 2009-2013,¹⁴ but we observed an uptick in smaller airfreight and courier activity through 2014-15.¹⁵

▪ **Consumption Zone:**

- Ivory consumer demand appears to remain at record highs in East Asia, with the largest markets believed to be in China, Thailand, and Vietnam.
- End-market prices have increased substantially. (Market surveys across China, using near-identical methodology from 2010-2014, have recorded price increases from approximately \$450/kg to \$2,100/kg, i.e. over 450%).^{16 17}
- According to ivory market surveys conducted in China in 2011, the total volume of ivory products available increased by a potential margin of 170% from 2010.¹⁸
- NGO reporting from March 2013 estimates that 70% of ivory circulating China's markets may exist outside of the country's legal domestic markets, while 59.6% of Chinese State Forestry Administration-licensed ivory facilities may be laundering illegal products.¹⁹
- In Bangkok, Thailand, surveys in 2013 revealed that the number of ivory retail outlets almost doubled, while the number of ivory pieces for sale nearly tripled.²⁰
- Typical consumer profiles are believed to be mid-career professionals using ivory as form of status and influence.²¹

III. RED FLAG INDICATORS

There are several red flag indicators that may characterize shipments of illicit wildlife products to better inform regulatory, screening, and compliance authorities. Several of these are consistent with red flag indicators associated with broader trafficking and trade-based money laundering (TBML), but where appropriate, we aim to provide more nuanced analysis unique to modern wildlife criminal networks, especially those trafficking elephant ivory products.

There are very few illicit ivory consignments moving annually when measured against global container port throughput. Of over 600 million 20-foot equivalent units moving worldwide in 2013,²² there may be as few as 250 such units carrying large-scale illicit ivory consignments annually.²³ The need for effective targeting of trafficking routes and chokepoints is critical, perhaps even more so when considering the vital function of each of these containers in facilitating the illicit trade. Of 3,360 seizures recorded by TRAFFIC from 1996-2008, only 60 seizures included quantities that exceeded 500kg. This represents 1.8% of the total seizure instances recorded, but almost 60% of the total weight of seizures over these 12 years.²⁴ This share has likely remained constant, or may even have expanded, in more recent years.

The majority of the illegal ivory trade appears to pass through relatively few transshipment ports along the sub-Saharan Africa-East Asia axis, making these transshipment chokepoints extraordinarily important in disrupting the illicit trade. Consignment sizes are generally over 500kg, displaying the hallmarks of organized crime. The largest on record was a 7.2 ton seizure in Singapore in 2002. Despite increases in law enforcement activity, consignment sizes remain very large. For example, 4 tons of ivory were seized in one instance in Bangkok, Thailand, in April 2015;²⁵ approximately one week later, another 3 tons were seized in a nearby location.²⁶ However, even these large volumes of ivory only fill only a fraction of the volume of a single container, and are thus hidden in increasingly complex ways, rendering screening processes difficult. In October 2013, for example, a shipment originating from Abidjan port in the Ivory Coast split 769kg of ivory across three 40-foot containers, all from the same consignor. Each container carried only about 50-70 tusks each, or approximately 0.6% of the tare mass available within the container, hidden within soya bean sacks.^{27 28}

Modes of transportation designated as “high risk” for wildlife TOC:

- Sea cargo constituted approximately 73% of all large-scale (>500kg) seizures from 2009-2013, with a further 20% seized on land, possibly en route to a container port.²⁹
- Air cargo totaled only 12 large-scale (>500kg) seizures between 2009-2013. Though numbers have been declining, it remains a viable form of trafficking.³⁰
- Air couriers may be used extensively for rhino horn trafficking and increasingly by some ivory traffickers to spread risk, but shipments are often hidden in the noise of the much larger flow of tourists hand-carrying small trinkets of ivory for personal use.

Origin locations of wildlife product shipments, especially ivory, designated as “high risk” for wildlife TOC:

- Highest-activity countries for ivory trafficking include Kenya and Tanzania. Up to 80% of observed seizures from 2009-2013 may have originated from three ports: Mombasa (Kenya), Dar es Salaam (Tanzania) and Zanzibar (Tanzania).³¹
- Uganda, while land-locked, may serve as a logistics hub for “hotspot” poaching countries.³² Similarly, Mozambique may serve as a major trafficking channel for the land-locked elephant range states in Southern Africa.³³
- Although the elephant population in Central Africa’s Congo Basin has declined by 76% since 2002,³⁴ there are likely high levels of trafficking activity across the region, despite low seizure rates.
- Togo has no elephants and had virtually no ivory trafficking activity prior to 2013, but its port of Lomé has since been involved in 3 of the largest ivory seizures in 2013-14.³⁵

Transit locations designated as “high risk” for wildlife TOC:

- The ports of Jebel Ali (UAE), Colombo, (Sri Lanka), Klang (Malaysia), and Pasir Panjang (Singapore) are some of the highest-volume cargo transshipment hubs along major commercial shipping channels from Africa to East Asia.³⁶
- Vietnam serves as both a transit country and an end-market for elephant ivory. The ports of Hai Phong and Ho Chi Minh have hosted large-scale seizures, possibly en route to southern China.^{37 38}
- Other Southeast Asian countries known to have been used for transit of illicit wildlife product shipments include Cambodia,³⁹ Laos,⁴⁰ the Philippines,⁴¹ and Indonesia.⁴²

Termination locations designated as “high risk” for wildlife TOC:

- China may be the world’s largest consumer market for ivory, with significant trafficking activity observed in the Pearl River Delta region, particularly in Hong Kong, Macau, and Guangzhou, but also further up the Chinese littoral in Xiamen, Beijing, and Shanghai.^{43 44}
- Vietnam may be the world’s largest end-market for rhino horn, and likely a common end-destination for illicit ivory, as well as a land transit route into southern China.^{45 46}
- Thailand may be a major elephant ivory transit route and consumer retail market.⁴⁷

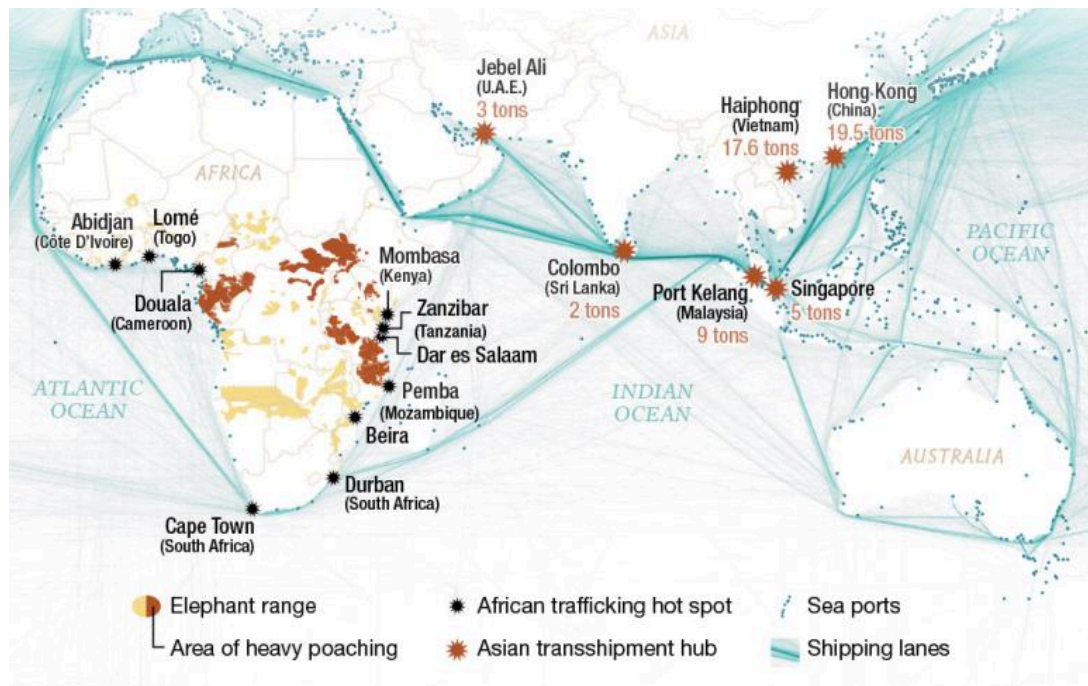
Obfuscation methods and products known to be used by wildlife TOC networks:

- It is difficult to generalize cover products used to conceal ivory shipments, but they can be broadly categorized as low-value bulk dry cargo exports. This is consistent with the claim that ivory consignments are small (1-3 tons) relative to container volumes (tare mass of 21.6 tons per 20-foot container) and thus require considerable amount of cover materials to avoid suspicion (which can be costly).
- Some observed materials and their origin countries have included:
 - Dry agricultural products: peanuts (Nigeria),⁴⁸ garlic (Tanzania),⁴⁹ seashells (Tanzania),⁵¹ flour (Gabon),⁵² soya (Ivory Coast),⁵³ ox leather (Mozambique)⁵⁴
 - Waste materials – plastic scrap (Tanzania),⁵⁵ used tires (Cameroon),⁵⁶ “waste paper” (Kenya)⁵⁷
 - Low-value commercial goods – cement (Malawi),⁵⁸ wooden crafts (D.R.C.),⁵⁹ mobile phone parts (Uganda)⁶⁰

Inadequate or incomplete shipment documentation:⁶¹

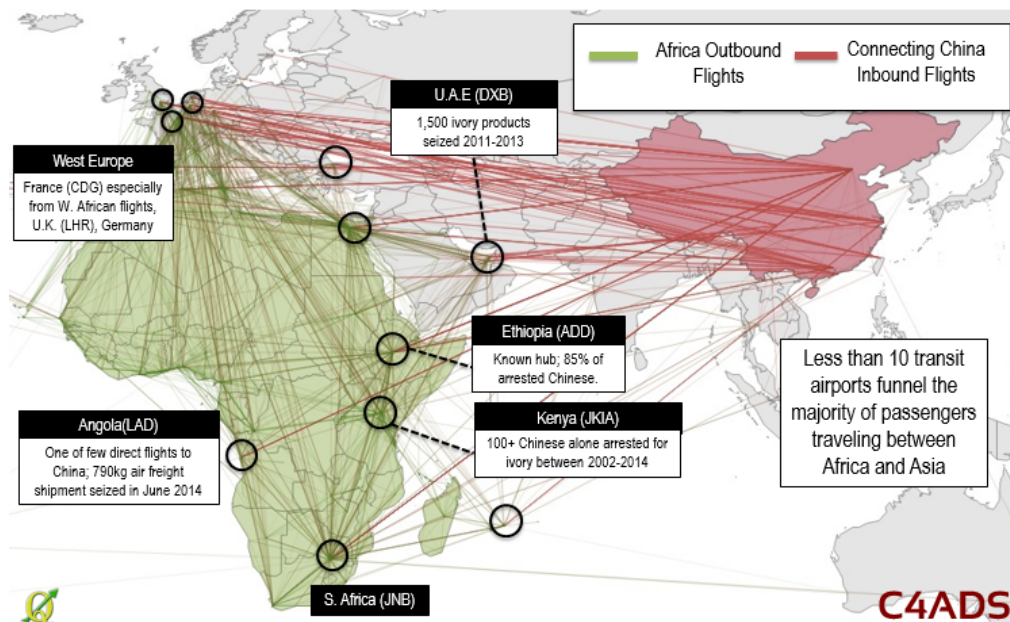
- The transaction fails to adequately disclose consignor, consignee, and ownership information
- The transaction includes significant discrepancies between the description or value of the commodity on the bill of lading and invoice relative to the actual goods shipped.
- The type of commodity being shipped appears inconsistent with the exporter or importer’s regular business activities.
- The transaction entails the receipt of cash (or other payments) from third party entities with no apparent connection to the transaction.
- The transaction does not appear to be economically viable.

Figure 1.2: MARITIME CHOKEPOINTS ON THE IVORY SUPPLY CHAIN



Source: National Geographic adapted from C4ADS "Out of Africa" report

Figure 1.3: AIRBORNE CHOKEPOINTS ON THE IVORY SUPPLY CHAIN



Source: Open Flights Data adapted by C4ADS to map flight hubs between Africa and major Chinese airports

IV. TYPOLOGIES OF WILDLIFE TRAFFICKING OPERATIONS

Transportation and financial services companies that clear transactions between Africa and East Asia face a particularly high risk of exposure to wildlife TOC networks. The following typologies include real-world examples of wildlife TOC network activity, with all information derived only from publicly available sources. We identified 7 key typologies:

1) Wildlife traffickers nest their illicit activities within licit financial and transport systems.

There is little evidence to suggest that the majority of wildlife TOC networks maintain their own parallel supply chains, i.e. use their own ships or planes to transport cargo. Rather, the relatively small size and low value of individual consignments means that traffickers must utilize the services of various licit transport logistics providers to fulfill core business functions, which may include: the use of major airlines as well as a broad range of freight logistics providers, including shipping, trucking, container-leasing, and warehousing companies, as well as ancillary service providers. In most cases, these companies are unaware of the abuse within their supply chains.

Example: One Guangzhou-based ivory and horn trafficking network may have executed at least 18 illicit transfers using couriers traveling on major airlines. A key node in the network was a former street-food seller from Fujian province, China, who had traveled to Nigeria in a failed attempt to set up a business dealing with crystals. While in Lagos, he met an alleged Taiwanese national, who had already fostered professional networks in Nigeria as part of an Asian TOC syndicate. The Taiwanese national had established a network of ivory buyers in Guangzhou, and would apparently pay couriers to travel to Lagos to pick up the contraband from his contacts and carry it back in their luggage on flights back to Guangzhou. Once the couriers arrived in Guangzhou Baiyun airport, other syndicate members would create diversions to distract airport security officials as the courier exited the airport. Payment would be transferred to Nigeria using “underground money farms and remittances.” The network was disrupted only when a nervous courier was caught at Guangzhou’s Baiyun airport with 31kg of rhino horn and 40kg of ivory on Qatar Airways flight QR874.⁶²

Example: A 2013 seizure of 3.8 tons of ivory was illustrative of the multinational range of entities used to service a single illicit transaction. The relevant container was seized in Mombasa, although it was due to transit through Indonesia and possibly Thailand.⁶³ The shipment may have involved a Kenyan consignor, trucking company, and freight forwarder, as well as Indonesian consignees, an Indian shipper, and a Japanese container leasing company.^{64 65 66}

^{67 68}

Example: Several wildlife product seizures in South Africa have involved traffickers stowing illicit goods in commercial storage units while awaiting onward transit. In one instance, a trafficker rented out two units at a locker in an urban residential neighborhood, while another allegedly rented a locker located within the Cape Town Airport industrial area. In both cases, Asian facilitators representing international trafficking networks were present on the ground to directly oversee operations. One arrested trafficker's phone contained pictures of the seized ivory being packaged at the storage unit.^{69 70}

2) Wildlife traffickers use complex means of physical obfuscation to transfer contraband across geographical boundaries and through licit supply chains.

Much like any other high-value contraband, wildlife TOC networks go to significant lengths to hide illicit products in ways that can evade law enforcement screening. These maneuvers have ranged from traffickers filling containers with pungent cover materials like fish maws or anchovies to disguise the smell of ivory from canine units, to modifying the containers themselves to create false backs and compartments to hide the ivory.

Example: A West Africa-based ivory trafficking network operating out of Cameroon employed a series of specially modified containers with false compartments cut into the back to hide illicit contraband. At least three such modified containers were uncovered and linked to a used tire business with a residential address in Yaoundé. Seized paperwork revealed the three containers had traveled at least 12 times along the Douala - Hong Kong route on which the seizure was made.^{71 72}

Example: A Philadelphia-based antiques salesman was sentenced in 2014 to 30 months in jail and a fine of \$7,500 for his role in one of the largest ivory seizures in the United States. The seizure involved the importation of approximately one ton of illicit ivory from West Africa in airfreight through JFK International Airport.⁷³ A smuggler based in West Africa would supposedly boil the ivory and soak it in resin to 'stain' it and make it appear more antiquated before exporting the contraband to the United States, thereby exploiting the CITES loophole that may permit trade in antique ivory.⁷⁴

Example: In 2013, Macau customs authorities intercepted two South African nationals attempting to smuggle 34kg of ivory in their hand luggage disguised as chocolate bars. The ivory had been cut up into smaller pieces, individually wrapped in fake packaging, and covered in a brown substance to create false 'chocolate bars.' The ruse was only uncovered due to a vigilant customs official who noted their unusual weight.⁷⁵

3) Wildlife trafficking networks obscure beneficial ownership, source of contraband, and funds by establishing shell organizations or proxies to launder the proceeds of illicit activities.

Wildlife TOC networks regularly disguise their associations with illicit transactions in sophisticated ways. Weak corporate transparency standards and company incorporation requirements in key trafficking countries enable wildlife TOC networks to disguise beneficial ownership and establish shell companies. One University of Texas at Austin study: *Global Shell Games: Testing Money Launderers' and Terrorist Financiers' Access to Shell Companies*, suggests that Kenya, the country with the potentially highest observed ivory trafficking activity, may also rank first globally in terms of the ease of establishing a company without supplying identifying documents.⁷⁶

Example: A consignee for three illicit ivory containers totaling over 9 tons, each of which arrived in either Manila and Hai Phong ports in early 2009, was later found to be associated only with a P.O. box in Tanzania, and was apparently not registered under any Tanzanian business, shipping, or trade registry. The company seemed to have filed no financial statements and allegedly had no apparent place of business or employees.^{77 78} Subsequent research efforts suggest the consignee may have been set up by an agent with a UAE registered shipping company operating in Tanzania that had potentially served as the shipping agent for two of the three ivory containers.^{79 80 81}

Example: In 2014, Vietnam's Tan Son Nhat airport in Ho Chi Minh City experienced a surge in smaller-scale ivory smuggling activity: at least three 40-110kg seizures occurred between June and September 2014.^{82 83 84} The associated airfreight packages were generally sent from Nigeria to Vietnam via Qatar. In each case, the documentation appeared to be either false or incomplete, distancing the beneficial owners from the cargo. On one airway bill, the consignor was marked simply as "L.J.J." and the consignee as "T.L.O."⁸⁵ On another airway bill, the consignor was labeled as "C.F." and the consignee "V.T.T.H."⁸⁶

Example: The apparent owner of an antiques business based out of Jinan, Shandong, China, was found guilty in a U.S. court for smuggling \$4.5 million of raw and carved rhino horn from the U.S. to China in 2014. The criminal employed various laundering strategies to traffic the horn, including paying others in China to wire money on his behalf to several bank accounts in the United States that were controlled by his proxies. In this way, he appeared able to both conceal his involvement in financial transactions, and circumvent China's currency controls on wiring more than \$50,000 out of China per year. The ledger for the illicit financial transactions was maintained in the U.S. and occasionally emailed to the criminal in China.⁸⁷

4) Wildlife traffickers maintain multi-country accounts and conduct financial transfers across geographical boundaries.

Wildlife poaching networks appear to largely operate as cash-courier businesses. In contrast, wildlife TOC trafficking networks utilize multinational financial service entities to carry out core business operations, such as transferring funds across geographic boundaries, securing trade financing arrangements, and layering illicit profits through multiple accounts and countries. U.S. and E.U. financial institutions are particularly exposed to this risk, as many African and Asian banking institutions denominate or clear in dollars or euros and maintain correspondent relationships with U.S. and E.U. banks, which suggests that illicit wildlife transactions may be clearing through the U.S. and European financial systems.

Example: Vixay Keosavang, director of the Xaysavang Trading Co. Ltd., is widely considered to be one of the world's most prolific wildlife traffickers and is the target of the U.S. government's only bounty against wildlife crime traffickers.⁸⁸ Xaysavang Trading Co. Ltd. is known to have held a bank account with the Paksan branch of the Lao Development Bank that was used for at least one recorded delivery of 110,000 animals (including snakes, turtles and water monitors) to a buyer in Vietnam who had an account at the Bank for Foreign Trade of Vietnam. The transaction was denominated in U.S. dollars and valued at \$860,000 on the sales contract.⁸⁹ Further details on the transaction are not publicly available, but the Lao Development Bank claims correspondent banking relationships with 15 international banks, including five major U.S. financial institutions.⁹⁰

Example: One wildlife trafficking organization spread throughout Southeast Asia is believed to have laundered as much as 118 million Thai baht (or roughly USD\$35 million) through as many as 28 separate financial accounts in Thailand, Vietnam, Malaysia and Laos. These accounts were used to service transactions for a diversified wildlife trafficking organization allegedly involved in smuggling ivory, pangolins, and illicit rosewood to China from Thailand, as well as tigers from Malaysia and Thailand into Vietnam via Laos. Other key assets within the network included a car dealership that may have been used as a front to launder illicit funds.⁹¹

Example: A major South Africa-based rhino horn trafficking network maintained a company that was incorporated in South Africa and doing business in the United States under another name. After investigation, as much as \$6.8 million was reported recovered in assets, including some funds held in a U.S. bank account in Autauga County, Alabama. The leaders of the network would arrange for U.S. hunters to travel to South Africa to hunt rhinos and other animals without the necessary permits, and would later traffic the rhino horn on the black market. The fees derived from the U.S. hunters would be collected in the Alabama bank account, and wired to bank accounts in Botswana and South Africa, including to the network members' personal bank accounts. The transactions were structured in increments of less than \$10,000 to avoid U.S. regulatory reporting requirements.^{92 93}

5) Wildlife trafficking converges with other illicit activities.

There is a growing body of evidence to suggest that wildlife trafficking converges with alternative forms of illicit activity, including narcotics, weapons and resource trafficking, money laundering, and various transnational threats.

Example: Many African wildlife trafficking hubs also correspond with high narcotics trafficking activity. In particular, expanding heroin and hashish pipelines running through Kenya, Tanzania, and Mozambique complement established cocaine and methamphetamine transit routes through West African countries, including Cameroon and Togo. The Mozambique country report in the 2014 *International Narcotics Control Strategy Report* released by the Department of State's Bureau of International Narcotics and Law Enforcement Affairs quotes from a local police contact, "narcotics shipments make use of the same transnational crime networks that facilitate trafficking in persons and wildlife products derived from poaching."⁹⁴

Example: The provision of weapons and ammunition may serve as a primary means by which organized poaching and trafficking networks exert control over lower-level poachers. A Vice Commander of the Congolese Army allegedly controlled major poaching networks in the eastern Democratic Republic of the Congo by buying hunting ammunition from factories in neighboring countries, and then dispersing it down his command chain, ultimately to local Mai Mai insurgents, in exchange for gold and ivory.^{95 96 97} In Mozambique, handlers may equip rhino poachers with high-end precision hunting rifles worth many years of their average income.^{98 99} In Zimbabwe, a Chinese national was arrested in Harare with ivory, gold, and 33,000 rounds of military-grade ammunition.¹⁰⁰

Example: Traffickers already working transnational portfolios find illicit wildlife products attractive due to their high value and the relatively low associated risk of capture. In 2014, convictions in Europe and the U.S. revealed that the so-called "Rathkeale Rovers," part of an Irish criminal network, may have facilitated as many as 67 rhino horn thefts across 15 European countries,¹⁰¹ as well as attempted to purchase rhino horn products in the United States.¹⁰² The Rovers were part of the broader 'Traveller' families who allegedly enable labor exploitation, contract fraud, and tobacco smuggling.¹⁰³ The Irish nationals arrested in the United States had access to proven smuggling techniques. They apparently hid the horn within the drawers of a shrink-wrapped antique chest bought specifically for this purpose.¹⁰⁴ The Rovers reportedly boasted to customers that they possessed a ready network of informants and paid off officials across European customs.^{105 106 107}

6) Wildlife trafficking demonstrates convergence with bribery and politically exposed persons (PEPs).

Corruption is inextricably tied to wildlife crime at all segments of the value chain. This includes illegal bribes to rangers or local forestry officials in protected wildlife areas; to port and customs officials to permit cargo to proceed through ports; or even to law enforcement and judicial officials to influence investigations and evade prosecution. There are persistent allegations of complicity among high-level officials' involvement in the trade.

Example: In 2009, three containers of ivory totaling over 9 tons, highlighted above, were sent from Tanzania. The three containers all appeared had the same consignor: a company that seemed to be unregistered in official business, shipping, or tax registries, and with no apparent business operations.¹⁰⁸ The shipping agent associated with the illicit contraband was a United Arab Emirates-registered shipping company allegedly owned by a senior Tanzanian politician and his wife.

Example: The owner of a Montreal-based art import and export company was sentenced to prison for importing 48 tusks of illegal ivory into the U.S. The criminal's father reportedly served as the General Manager for Ports of the Autonomous Port of Douala in Cameroon. From 2002-2003, the criminal reportedly acquired ivory from Cameroon and arranged its shipment to Canada. The trafficker allegedly hid the contraband inside terracotta pots and arranged for the consignment to be routed through marginal Canadian ports where security was relatively light. Reports on the subject allege that the criminal may have heavily relied on the father's standing to help arrange the shipment. The father was later sentenced to 30 years in prison for the embezzlement of \$85 million during his tenure as port manager at Douala.¹⁰⁹

Example: A Southeast Asia-based wildlife trafficker was arrested in 2010 for attempting to smuggle boa constrictors and other reptiles in his luggage from Malaysia's northern Penang state to Jakarta.¹¹⁰ Arrested at Kuala Lumpur airport, the trafficker pled guilty in 2001 to charges brought by a United States Fish and Wildlife Service investigation related to the trafficking of more than 300 protected reptiles from Africa to Asia.¹¹¹ Media reporting alleges that the that a network of corrupt officials, including customs officers in both Indonesia and Malaysia, may have aided the trafficker, despite his revoked animal vendor license.¹¹²

7) Wildlife trafficking demonstrates financial or controlling relationships with ancillary environmental product suppliers and distributors.

Several wildlife trafficking networks may have established financial relationships with environmental product suppliers and distributors, including forestry resource exporters, animal bone carvers, and exotic animal breeders and hunters. Such relationships can be seen as a form of 'vertical integration,' in other words: moving closer towards the source of ivory or rhino horn where the selling price may be near its lowest, as well as towards the final layer of processing and distribution within close proximity to the highest-paying end-market retail consumers.

Example: The manager of a then-licensed ivory carving retail store in Putian, Fujian Province, China, contracted the purchase and trafficking of approximately 7.68 tons of ivory across five separate containers, each with 500-750 tusks, shipped over a six-month period in 2011. The shop owner apparently commissioned the ivory from Africa-based Asian contacts, and sourced from Kenya, Tanzania, and Nigeria. The packing materials for the containers included cashew nuts, wood, copper ore, and metal scrap. The containers originated from different ports, but all terminated at the port city of Shishi near Xiamen, where the shop owner was reportedly arrested. He allegedly used an experienced facilitator to handle shipping and trafficking logistics. The facilitator owned a customs clearance business that reportedly exploited its valid credit record to avoid suspicion.^{113 114}

Example: A South Africa-based rhino horn trafficking network, in addition to illegally arranging canned hunts, also maintained a live rhino herd at a breeding farm in Musina, South Africa, in which the alleged network ringleader, maintained a 50% stake. In 2008, about 40 rhino were purchased and transferred to the farm before being de-horned and, in some cases, butchered. The horn products were then allegedly sold on the black market. In 2009, 59 rhinos were reportedly moved through the farm. And in 2010, that number may have reached 100. At least 40 of these rhinos were bought from Kruger National Park, despite an inspection finding that the farm lacked basic amenities like grass to feed the rhinos. At the time of their arrest, syndicate members were bidding on another 100 rhinos from Kruger.¹¹⁵

Example: In 2011, a single container with 126 ivory tusks, one rhino horn, and some pangolin scales was found hidden within a legitimate bulk shipment of 161 containers of unprocessed timber. The apparent owner of the containers was a major Chinese timber firm operating active concessions in Mozambique. Its managers later fled the country after Mozambican police issued warrants for their arrest.^{116 117 118}

ENDNOTES

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- ¹ “National Strategy for Combating Wildlife Trafficking: Implementation Plan.” 2015. <http://www.state.gov/documents/organization/237592.pdf>
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