



Wildlife Justice
Commission

Convergence of wildlife crime with other forms of organised crime:

A 2023 review

October 2023

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Acronyms

CIT	Cash-in-transit	MXN	Mexican peso
CITES	Convention on International Trade in Endangered Species of Wild Fauna and Flora	SAPS	South African Police Service
CCPCJ	Commission on Crime Prevention and Criminal Justice	UIF	Mexican Financial Intelligence Unit
DRC	Democratic Republic of Congo	UNODC	United Nations Office on Drugs and Crime
ELI	Earth League International	UNTOC	United Nations Convention against Transnational Organized Crime
GI-TOC	Global Initiative against Transnational Organized Crime	USD	United States Dollar
IUCN	International Union for Conservation of Nature	VND	Vietnamese Dong
		ZAR	South African Rand

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Executive Summary

As wildlife trafficking has grown to become a more serious and profitable crime type during the past two decades, there is also mounting evidence of the increased involvement of organised crime groups and cases where wildlife crime is committed in conjunction with other forms of serious and organised crime.

In 2021, the Wildlife Justice Commission published its [first set of 12 case studies](#) illustrating a range of examples of criminal networks dealing in wildlife alongside other illicit commodities. It applied a framework of five key typologies to describe types of connection between the converging crimes: opportunistic, diversification, transactional, embedded, and career shift.

At that time, there were mostly anecdotal reports of the convergence of wildlife crime with other forms of organised crime, and limited data or analysis of the issue. The intention of our 2021 report was to document a series of concrete examples where convergence was known to have occurred, to analyse this important intersection. In the intervening two years, the body of evidence has grown with further research reports and case studies published on this topic and commitments to address wildlife crime convergence adopted in the international policy framework.

This report revisits the issue, building on the Wildlife Justice Commission's previous work on wildlife crime convergence by presenting additional analysis and insights from three in-depth case studies, based on open-source research and intelligence collected during Wildlife Justice Commission investigations. These three case studies add to the knowledge base on this issue, which will continue to develop globally as more cases are detected.

These cases continue to demonstrate that criminal groups may have a range of motivations to diversify their criminal activities and form new partnerships or alliances, infiltrate new markets, or exploit gaps, vulnerabilities, or opportunities. They also show that corruption, illicit financial flows, and money laundering are common underlying factors present in almost all organised wildlife crime cases.

Crime convergence must be addressed from an organised crime point of view, taking a comprehensive approach to identify, charge, and prosecute all crimes committed by an organised crime network. Intelligence analysis is an essential tool in this regard, to map the criminal networks, analyse patterns and links between criminal activities, understand modus operandi and criminal motivations, and assess the level of threat posed by the criminal network as a whole.

Joint investigations and multi-agency task forces can bring together the resources and expertise needed to target crime convergence. Special investigation techniques should be used to gather evidence against the extended organised criminal network and build a strong case for prosecution, and parallel financial investigations should be conducted to trace where and how money is moving into and out of the network and to identify the proceeds of crime.

Wildlife crime is a cross-cutting criminal activity which cannot be tackled in isolation from other crimes. By addressing convergence and removing the common nodes between criminal networks, law enforcement agencies can have a greater impact on disrupting organised crime and preventing networks from reforming.

Introduction

In May 2021, the Wildlife Justice Commission published the report *Convergence of Wildlife Crime with Other Forms of Organised Crime*, which presented 12 case studies to illustrate the varied ways that wildlife crime (including crimes related to terrestrial wild animals, fisheries, and timber) can overlap or intersect with other serious and organised crimes.

This report compiles three new case studies as an update to the 2021 report, to continue to build on this work and present additional analysis and insight into wildlife crime convergence. These three case studies are based on open-source research as well as intelligence collected during Wildlife Justice Commission investigations.

As with the previous report, the aim of these case studies is to contribute to and further develop the knowledge base on this issue through the identification of convergence typologies and strategies that may assist law enforcement and policy makers to address the transnational organised crime elements of wildlife crime.

This analysis applies the same framework of convergence typologies¹ used in the previous report to describe the nature of the convergence identified and indicate how loose or tight the connection between the crime types or criminal networks is:

- **Opportunistic convergence, which may occur on an ad hoc or irregular basis to take advantage of a business opportunity;**
- **Diversification of illicit commodities, where a criminal group with access to a key transport route diversifies into other types of smuggling using the same route, or a criminal group diversifies to maintain flexible operations across multiple commodities and income streams;**
- **Transactional convergence, where criminal groups operating in different markets purchase or exchange goods or services with each other;**
- **Embedded convergence, where the crime types are inextricably linked, and neither could take place without the support of the other;**
- **Career shift, where criminal groups may transform their business operations from one crime type to another in response to changing conditions (divergence).**

While some recent studies have defined convergence typologies in other ways, this classification approach puts the central focus on the dynamics of the criminal network and its activities, which can help with assessing the level of criminality of a group and prioritising law enforcement efforts on the groups that pose the greatest threat.

Research suggests that over the long term, “successful” organised crime networks often aim at diversification of their illegal (and legal) markets, as well as horizontal and vertical integration within these markets. This enables them to expand the scope of goods and services produced, while also increasing the stability and predictability of their supply chains. In this way, crime convergence could be a natural evolution for mature criminal networks as they seek to increase their financial and other material benefits, reduce law enforcement risk, and eliminate the threat of competition to their business operations.²

¹ The typology framework applied by the Wildlife Justice Commission was adapted from: van Uhm D.P. and Nijman R.C.C. (2020). The Convergence of environmental crime with other serious crimes: Subtypes within the environmental crime continuum. <https://journals.sagepub.com/doi/10.1177/1477370820904585>

² Buscaglia, E. (2017). The Vertical Integration of Organised Crime Linked to Political Corruption: An Economic Analysis of Asset Forfeitures and Human Rights. *Journal of Institutional Studies*, Vol. 3 Issue 2 (2017), pp.784-785.

Background review: Updated

At the time of writing the Wildlife Justice Commission's 2021 report on wildlife crime convergence, there were mostly anecdotal reports of the convergence of wildlife crime with other forms of organised crime, and limited data or analysis of the issue. The intention of our 2021 report was to document a series of concrete examples where convergence was known to have occurred, to analyse this important intersection. In the intervening two years, further research reports and case studies have been published on this topic, as well as commitments to address wildlife crime convergence adopted in the international policy framework.

In May 2021, an analysis of overlaps and synergies in wildlife and drug trafficking suggested that key motives for this type of convergence could include the advantages presented by cooperation or the perception of increased profits. The study found the convergence of wildlife and drug trafficking can manifest in the following ways: both forms of illicit contraband combined in a shared shipment; legal wildlife products used as a concealment for illicit drugs; the same criminal group running different businesses trading in both illicit commodities; both commodities smuggled via the same routes and transportation methods; barter trade or exchange of products or services by different criminal groups; and legal wildlife industries used as a cover to launder illicit drug proceeds.³

Research published in March 2022 documented how major drug trafficking networks such as the Sinaloa Cartel and to a lesser extent Cartel Jalisco Nueva Generación are systematically taking over the fisheries sector in Mexico. Examples of how this is playing out include forcing fishers to pay extortion fees, or forcing fishers to sell their harvest to the criminal groups and controlling the purchase price, then forcing processing plants to process their products and forcing restaurants to buy only from the cartels. The research also identifies the use of wildlife export businesses, particularly seafood businesses, as fronts for money laundering for the drug cartels.⁴

Similarly, another case study in May 2023 focused on the impact of Mexican organised crime groups operating in the Sea of Cortez region (Gulf of California), as drug trafficking networks engage in illegal fishing and trade in high-value marine species, monopolising fishing companies along the entire supply chain.⁵

Using a different approach, research analysing judicial data gathered from investigations of transnational organised crime networks has identified an increasing prevalence of crime convergence over the past 20 years. Specifically in Mexico, the research observed a 745% increase in the Sinaloa Cartel's involvement in other crimes in addition to drug trafficking, including wildlife crime and illegal fishing.

To address this type of convergence, the research recommends taking a more comprehensive approach to indicting all crimes committed by an organised crime network.⁶

A United Nations Office on Drugs and Crime

(UNODC) case study in 2023 highlighted that one of the most serious threats to the Amazon rainforest is narco-deforestation, involving the laundering of illicit drug trafficking profits into land speculation, the agricultural sector, cattle ranching, and related infrastructure. It cited growing evidence of drug traffickers financing illegal gold mining operations across the Amazon basin, expanding into illegal logging and wildlife trafficking, and routinely exploiting shipping vessels lawfully transporting timber or minerals to conceal cocaine consignments destined for foreign markets.⁷

In April 2023, the Global Initiative against Transnational Organized Crime (GI-TOC) published a report analysing the dynamics of crime convergence related to illegal wildlife trade in Eastern and Southern Africa. It found that when convergence occurred, it was mostly related to either the same broker or dealer moving or selling multiple types of illicit products, or the same broker or corrupt facilitator moving goods

through a key port or hub. However, it found that convergence in this region was seldom vertically integrated within the network, as wildlife crime networks are often structured as a horizontal set of connected business entities providing goods and services to each other.⁸

In June 2023, Earth League International (ELI) and John Jay College of Criminal Justice published a report with five case studies of wildlife crime convergence in Latin America. It defined four main types of convergence: criminal networks trafficking in multiple species of wildlife, engaging in multiple forms of environmental crime, engaging in multiple forms of serious crime, and cooperation between multiple transnational networks.⁹

In the international policy framework, the convergence of wildlife crime with other forms of organised crime is increasingly recognised. Most recently in August 2023, the United Nations General Assembly adopted its sixth resolution on tackling wildlife trafficking, noting that wildlife trafficking can be linked to other forms of transnational organised crime, and calling on UNODC and Member States to strengthen the collection of information on patterns and flows of wildlife trafficking.¹⁰

³ van Uhm, D., South, N. and Wyatt, T. (2021). Connections between trades and trafficking in wildlife and drugs. *Trends in Organized Crime*, Issue 24, pp.425-446. <https://doi.org/10.1007/s12117-021-09416-z>

⁴ Felbab-Brown, V. (2022). *China-Linked Wildlife Poaching and Trafficking in Mexico*. The Brookings Institution.

⁵ Cuamea, F. (2023). *Sea of Cortez: The social and environmental threats of organized crime*. Global Initiative against Transnational Organized Crime.

⁶ Prof. Dr. Edgardo Buscaglia, Senior Scholar in Law and Economics at Columbia University presented his research findings in a panel discussion on the convergence of environmental crimes during the 31st session of the UN CCPCJ. <https://wildlifejustice.org/ccpcj-panel-discussion-on-the-convergence-of-environmental-crimes-with-other-forms-of-organised-crime-recommendations-and-takeaways/>

⁷ UNODC (2023). World Drug Report. Chapter 4: The nexus between drugs and crimes that affect the environment and convergent crime in the Amazon Basin, pp.61-90.

⁸ Nelson, A. (2023). *Convergence of Wildlife Crime and Other Forms of Transnational Organized Crime in Eastern and Southern Africa*. Global Initiative against Transnational Organized Crime.

⁹ Earth League International and John Jay College of Criminal Justice (2023). *Launching an Environmental Crime Convergence Paradigm Through Investigation of Transnational Organized Crime Operations*.

¹⁰ <https://documents-dds-ny.un.org/doc/UNDOC/LTD/N23/243/89/PDF/N2324389.pdf?OpenElement>



The Commission on Crime Prevention and Criminal Justice (CCPCJ) adopted Resolution 28/3 in 2019, noting that wildlife trafficking may occur alongside or in conjunction with other crimes and illegal activities, such as money laundering and corruption. It also requested both UNODC and Member States to strengthen the collection of information on patterns and flows of illicit trafficking in wildlife.¹¹ Crime convergence was subsequently a key topic at the CCPCJ expert discussions in 2022 on crimes that affect the environment.¹²

Two resolutions adopted under the United Nations Convention against Transnational Organized Crime (UNTOC) have also acknowledged environmental crime convergence. In 2020, Resolution 10/6 noted that illicit financial flows related to crimes that affect the environment could contribute to the financing of other transnational organised crimes,¹³ while Resolution 11/3 adopted in 2022 requests UNODC to continue to research the possible nexus between crimes that affect the environment and other forms of organised crime.¹⁴



Illustrative case studies of convergence

This section presents three in-depth case studies of the convergence of wildlife crime with other forms of serious and organised crime. The cases were selected to represent different converging crime types, convergence typologies, and geographic regions, to

illustrate the diverse ways convergence can occur. The case studies are based on open-source research as well as intelligence collected during Wildlife Justice Commission investigations.

Case study	Commodities/ crimes involved	Convergence typology	Geographic region/s
1	Elephant ivory, pangolin scales, illegal sand mining, and protection rackets	Diversification of commodities	Southeast Asia and Africa
2	Rhino horn, cash-in-transit heists, extortion, and murder	Embedded convergence	Africa
3	Shark, sea cucumber, illicit drugs, tax evasion, money laundering, and corruption	Embedded and transactional convergence	Central America

¹¹ https://www.unodc.org/documents/commissions/CCPCJ/Crime_Resolutions/2010-2019/2019/Resolution_28_3.pdf
¹² https://www.unodc.org/unodc/en/commissions/CCPCJ/session/31_Session_2022/expert_discussions_statements.html
¹³ https://www.unodc.org/documents/treaties/UNTOC/COP/SESSION_10/Resolutions/Resolution_10_6_-_English.pdf
¹⁴ https://www.unodc.org/documents/treaties/UNTOC/COP/Session_11/Resolutions/English/Resolution_11_3.pdf



CASE STUDY

1

COMMODITIES/CRIMES INVOLVED

Elephant ivory, pangolin scales, illegal sand mining and protection rackets

CONVERGENCE TYPOLOGIES

Diversification of commodities

GEOGRAPHIC REGION

Southeast Asia and Africa



Subject D is a Vietnamese national and Level 5 wildlife trafficker¹⁵ who is linked to several major ivory and pangolin scale shipments and various legitimate and illicit business operations in Vietnam and Mozambique. He is a very wealthy individual with assets in Vietnam including a mansion alleged to have cost USD 12 million to build, multiple farms and other properties, and luxury cars.

Intelligence obtained by the Wildlife Justice Commission indicates that Subject D's early business operations in Vietnam included an import/export company and a wildlife trafficking business he operated in partnership with a major trader based in Lao PDR until a disagreement led them to part ways. By 2017, Subject D had established a business network in Mozambique, including a shipping company with a warehouse and workshop in Beira for cutting and packing timber in shipping containers. It is alleged that his criminal

activities are supported by a prominent Vietnamese businessman with an extensive portfolio in the minerals, energy, and construction sectors, who contributes finance and uses his network of associates to assist with clearing and moving consignments.

Subject D appears to have formed cooperative alliances with several other Level 5 Vietnamese wildlife traffickers operating in Africa, ranging from pooling resources and co-investing in shipments, to sharing information and contacts. Intelligence indicates that prior to the COVID-19 pandemic, he had co-invested on different occasions with two kingpins on large-scale consignments of wildlife products concealed with timber, thereby sharing transportation costs and lowering the risk and potential loss from seizures. In lower-level collaboration, in 2018 Subject D was also exchanging information with another Level 5 Vietnamese trafficker on pangolin scale and ivory prices, shipping methodologies and broker contact details in Nigeria.

Analysis of Chinese court records¹⁶ indicates that Subject D was the owner of 8.8 tonnes of ivory (equivalent to approximately 880 elephants) that was seized in a mixed shipment with 11.9 tonnes of pangolin scales in Singapore in July 2019.¹⁷ The consignment had been shipped from Matadi, Democratic Republic of Congo (DRC) by a Chinese trafficker based in Kinshasa, and it was seized while transiting Singapore en route to Vietnam. The prosecution of the case in Guangxi Zhuang Autonomous Region, China, was based on WeChat records, financial and travel records,

and confessions of the suspects involved. The court records indicate that while Subject D owned the ivory portion of the shipment, another Vietnamese and three Chinese investors owned differing proportions of pangolin scales. The Chinese trafficker had coordinated all investors to combine their stock in one shipment which would be divided for distribution upon arrival at the destination, demonstrating collaboration between Vietnamese and Chinese criminal networks rather than competition. Court documents indicate that Subject D was tipped off that Singapore Customs was planning to inspect the container the night before the inspection occurred, although the source of this tip-off is not known. In 2020, eight Chinese suspects were convicted in China based on the



Image 1: Singapore Customs seized a mixed shipment of 8.8 tonnes of ivory and 11.9 tonnes of pangolin scales in July 2019. Source: Jason Quah, Straits Times.

commodity seized abroad, including the DRC-based trafficker, three Chinese investors, and four others who assisted with the shipment, with sentences ranging from five to 15 years imprisonment. Subject D and the other Vietnamese suspect remained at large.

Intelligence also links Subject D as the suspected owner of a further two major seizures that occurred in Vietnam in March 2019: a shipment of 9.12 tonnes of ivory (equivalent to approximately 912 elephants) concealed in hollow logs exported from DRC and seized at the port in Danang,¹⁸ and 8.3 tonnes of pangolin scales concealed in a shipment of seed from Nigeria and seized at the port in Hai Phong.¹⁹ The 9.12 tonne ivory shipment is believed to be the world's largest



Image 2: Vietnamese Customs officers seized a shipment of 9.12 tonnes of ivory at Tien Sa port, Danang in March 2019. Source: Bao Da Nang.

¹⁵ The Wildlife Justice Commission has developed an internal risk rating system to assess a subject's level of criminality according to factors such as their role in the network, modus operandi, geographical range across which they operate, estimated environmental impact, among others. The system classifies subjects from Level 1 as the lowest level to Level 5 as the highest level.

¹⁶ Analysis was conducted on the published judgement relating to this case, accessed on China Judgements Online at: <https://wenshu.court.gov.cn/>

¹⁷ <https://www.customs.gov.sg/news-and-media/media-releases/2019-07-23-Media-Release.pdf>

¹⁸ <https://baodanang.vn/english/society/201903/over-91-tonnes-of-suspected-ivory-seized-3172084/>

¹⁹ <https://english.haiquanonline.com.vn/seizing-more-than-8-tonnes-of-pangolin-scales-in-hai-phong-10759.html>

ever seizure of ivory. Additional intelligence also identified Subject D as the owner of several other smaller and historic wildlife seizures in Vietnam.

According to intelligence, Subject D was arrested in December 2020 for his role in running a protection racket for a large-scale illegal sand mining operation in Hanoi. It was reported that a total of 32 people were arrested, including those involved in sand dredging activities on Sông Hồng (Red River) and the protection racket members who were collecting payments in exchange for providing onshore protection for the miners.²⁰ The Environmental Police cooperated with Hanoi Police to dismantle the operation, deploying multiple teams to conduct arrests on each dredging vessel as well as the onshore protection groups. Police seized 11 dredging vessels and a total of VND 6 billion cash (equivalent to approximately USD 250,000) that was held in safes at the protection racket's camps. The case was prosecuted, and 19 group members were convicted. Subject D was sentenced to prison for three years for his role in running the protection racket. He had been held in custody since his arrest, but intelligence has confirmed that he was released six months early on 31 July 2023.

Although sand is a vital material for construction, its extraction is often poorly regulated, unlike the wildlife products that Subject D was smuggling which are wholly illicit. It is not known how long Subject D had been providing protection services to facilitate illegal sand mining, but the size of the operation in terms of the number of people involved and volume of cash seized suggests that it was an organised and highly profitable enterprise. This case represents a convergence of environmental crimes and suggests Subject D's diversified business interests

across multiple commodities. There is also a convergence of licit and illicit markets and the use of legitimate companies to camouflage his criminal activities. Whether Subject D had any additional business connection to the sand is not known. It is also noted that the sand mining operation was co-located in the same district of Hanoi as Subject D's mansion.

If further investigation, and in particular financial investigation, had been conducted in this case it may have yielded more evidence of the sand mining supply chain, its related financial flows, and identified any other high-level actors who may have been involved in the network. The large volumes of cash payments being made to the protection racket and likely links to legitimate businesses in the supply chain could indicate the underlying presence of other financial crimes such as tax evasion, which may have been detectable through financial investigation. There is also a possibility that financial investigation into Subject D's business activities may have had the potential to uncover his parallel involvement in the illegal wildlife trade.



Image 3: Vietnamese Police with some of the suspects connected to the illegal sand mining operation in Hanoi in December 2020. Source: Tien Phong News.

²⁰ <https://tienphong.vn/bat-11-tau-hut-va-nhom-bao-ke-cat-tac-tren-song-hong-post1297969.tpo>

Illegal sand mining as an environmental crime

Sand is the key raw material in the concrete, asphalt and glass that build our infrastructure and is the second most used resource worldwide after water. An estimated 40-50 billion tonnes of sand resources are used globally each year, yet its extraction and management are poorly governed in many countries.²¹ Current extraction exceeds the replenishment rates of naturally occurring sand, and the intensifying demand for sand in a rapidly urbanising world is contributing to significant environmental, social, and economic impacts. The main threats stem from extraction in areas where sand plays an active role, such as rivers and coastal or marine ecosystems. Sand mining in these environments can cause erosion threatening communities and livelihoods at both the point of extraction and further downstream in the affected system, as well as the salination of aquifers and groundwater reserves, loss of protection against storm surges, land-use changes, shrinking deltas, and threats to freshwater and marine fisheries and biodiversity. Despite the scale of this issue, there are no global treaties governing sand extraction, its use or trade, or even to promote good practice.²²

Escalating demand for sand has led to the formation of illegal sand mining operations in some areas, run by organised and often violent sand mafias. In India for example, it was reported that at least 35 citizens, five

journalists and activists, and 13 government officials were killed by sand mafias between January 2019 and March 2022 for opposing or speaking out against illegal sand mining.

In addition to the murders, there are hundreds of deaths and injuries each year in India from road accidents, incidents during extraction, and drowning of children in pits connected with sand mining.²³ Sand-related killings have also been reported in South Africa, Mexico, Kenya, Gambia, and Indonesia.²⁴ In Vietnam, the government estimates that legally-sourced sand only meets 40-50% of the demand, and of 13,000 cases of illegal sand mining detected between 2018-2019, only seven cases were charged and prosecuted.²⁵



Image 4: Boats waiting to be loaded with illegally mined sand on the banks of the Sone River in Bihar, India. Source: Mohd Imran Khan via The Third Pole.

²¹ UNEP (2022). *Sand and Sustainability: 10 strategic recommendations to avert a crisis*. United Nations Environment Programme, Geneva, Switzerland, pp.2-3.

²² <https://e360.yale.edu/features/the-hidden-environmental-toll-of-mining-the-worlds-sand>

²³ https://www.lemonde.fr/en/environment/article/2022/09/12/in-india-sand-mafias-have-power-money-and-weapons_5996639_114.html;

https://www.voanews.com/a/press-freedom_illegal-sand-mining-deadly-beat-indias-journalists/6191761.html

²⁴ <https://www.abc.net.au/news/2020-01-11/illegal-sand-trade-india-mafia-murders-vince-beiser/11779570>

²⁵ <https://e.vnexpress.net/news/news/authorities-apatetic-as-red-river-is-sand-mined-to-death-3982914.html>

GOOD PRACTICE

- **Multi-agency investigation** enabled collaboration between law enforcement agencies and brought together the resources needed to arrest and dismantle the criminal network involved in illegal sand mining.

INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Financial investigation** is particularly important in complex cases where there are indications of financial crimes. Tracing the financial flows can help to identify the proceeds of crime, where and how money is moving in the criminal network, and other higher-level network members who may be removed from the day-to-day criminal operations. In the event that any funds or assets are recoverable, these could be used to pay for environmental restoration costs stemming either from this case or environmental damage from other cases.



CASE STUDY

2

COMMODITIES/CRIMES INVOLVED

Rhino horn, cash-in-transit heists, extortion, and murder

CONVERGENCE TYPOLOGIES

Embedded convergence

GEOGRAPHIC REGION

Africa



Extensive links have been reported between criminal networks involved in rhino poaching in South Africa's Kruger National Park and other violent and organised crime activities including cash-in-transit heists, murder, and extortion.

In September 2018, seven members of a rhino horn trafficking network based in Mpumalanga province were arrested as part of Project Broadbill. It was reported as the biggest operation of its kind in South Africa, involving 123 officers in a multi-agency taskforce led by the South African Police Service (SAPS) in cooperation with environmental authorities, customs, and prosecution authorities.²⁶ The seven suspects arrested included two notorious poaching kingpins: Subject P and former police officer Subject J, right-hand man Subject C, another two former police officers and two serving police officers, who were charged with theft, conspiracy to commit a crime, illegally buying and selling rhino horns, corruption, and money

laundering. Police also seized luxury vehicles and motorbikes, trucks, cash, animal skins, and other property estimated to be worth millions of rands.²⁷ They were alleged to have organised rhino poaching groups in Kruger National Park and coordinated a logistics, communications, and sales network to move rhino horns to Gauteng province for smuggling to Asia, with the support of corrupt police and other protected areas officials.²⁸

The arrests of three high-level poaching figures and other members of their network was an important result for law enforcement authorities, but it was not the first time Subject P or Subject J had been arrested for rhino-related crimes. Both men were already on bail in relation to other ongoing cases.



Image 5: Three of the seven suspects who were arrested in September 2018, during a court appearance. Source: Lowvelder.

²⁶ <https://lowvelder.co.za/451461/poaching-syndicates-video-seven-arrested-123-man-operation/>

²⁷ <https://www.saps.gov.za/newsroom/msspeechdetail.php?nid=17472>

²⁸ <https://www.news24.com/News24/these-are-the-guys-making-millions-hawks-after-busting-alleged-rhino-horn-syndicate-20180919>

Subject P had been arrested three months earlier in June 2018. At this time, police had raided three of his properties and seized firearms, high-calibre ammunition, identity documents, bank cards, and social security cards. Subject P and three co-accused were charged with rhino poaching offences as well as firearm offences, conspiracy to commit crime, and various offences of the Credit Act.²⁹ Subject P had been associated with rhino horn smuggling as far back as 2005 and prosecutors opposed bail, stating that he had the means to commit similar crimes if not kept in custody. Nonetheless, he was granted bail and subsequently rearrested in September.³⁰



Image 6: A cash-in-transit heist carried out in November 2017, Mpumalanga province. Source: Mpumalanga News.

Subject P was a wealthy and notorious crime boss in Hazyview district, Mpumalanga. His affidavit in June 2018 stated he had built his fortune through stokvel³¹ endeavours, the taxi industry, and money lending, while also running a pension paypoint and owning a trucking and plant hire business.³² He was well-respected within his community, alleged to own many houses in Hazyview, White River and Mbombela districts, and was renowned for his lavish lifestyle and wild parties.³³ However, he was also rumoured to be a key figure in the local organised crime scene in Mpumalanga, allegedly involved in cash-in-transit heists, murder, and said to be a bully in the taxi business and a loan shark who confiscated people's houses and cars.³⁴

Subject J on the other hand, was a former warrant officer at the White River police station with a longer criminal history. He had previously been arrested and granted bail in 2010 on kidnapping and murder charges,³⁵ and was arrested again in December 2011 on charges of illegal rhino hunting, dealing in and possession of rhino horn, racketeering, and money laundering.³⁶ At this time, SAPS had received intelligence that Subject J was transporting rhino horns to Gauteng and intercepted him on the return drive to Mpumalanga. On searching his car, police found more than ZAR 3 million (equivalent to approximately USD 400,000) cash and exhibits that were later established

to have DNA traces from a rhino that had been poached in Kruger National Park earlier that month. Subject J and an accomplice were arrested, and the cash and two vehicles were seized as the proceeds of crime.³⁷

Both men were granted bail, but the investigation continued, and Subject J was arrested for a third time in 2012 following a sting operation involving the alleged purchase of rhino horn from a police informant.³⁸ Searches of several properties owned by Subject J led to the seizure of over ZAR 5 million (equivalent to approximately USD 600,000) cash, more than 60 hunting knives and pangas, firearm accessories, other hunting-related equipment, and stolen electronic goods.³⁹ Following the raids, 12 other suspects were also arrested and charged including two Vietnamese alleged to have bought rhino horns from Subject J, four South Africans and six Mozambicans.⁴⁰ Subject J was again released on bail in March 2013.⁴¹

Subject C had not been arrested prior to September 2018, but was alleged to be working as Subject P's right-hand man in the rhino poaching network.⁴² A close affiliation was also reported between the families of Subject C and Subject J, with shared directorships in several shell companies dating back more than 10 years.⁴³

During the investigation, Subject J was found to owe ZAR 21 million (equivalent to approximately USD 1.5 million) in tax debts. One week after the September 2018 arrests, the South African Revenue Service and SAPS raided three of Subject J's Hazyview mansions to recover the debt, seizing all furniture and possessions believed to have been obtained from the commission of crimes.⁴⁴ However, one month later the High Court granted an application to cancel the planned auctions of the possessions.⁴⁵



Image 7: Still from aerial video footage of Police raid on one of Subject J's properties in 2018. Source: Lowvelder.

29 <https://www.saps.gov.za/newsroom/msspeechdetail.php?nid=16169>

30 <https://lowvelder.co.za/442182/breaking-news-mr-big-released-bail/>

31 Stokvels are a type of rotating credit union or savings club in which a group of people enter into an agreement to contribute a fixed amount of money to a common pool on a regular basis, with a view to access opportunities that will grow their pooled funds: <https://nasasa.co.za/about-stokvels/>

32 <https://lowvelder.co.za/438088/person-behind-mr-big/>

33 <https://www.news24.com/citypress/news/rhino-poaching-suspect-mr-big-killed-in-a-hit-20210618>

34 <https://rhinoreview.org/mabuzas-assassination-the-death-of-an-alleged-kingpin-and-the-complex-social-fabric-of-rhino-poaching/>

35 <https://www.citizen.co.za/news/south-africa/crime/suspect-hands-himself-over-to-cops-for-murder-committed-in-2010/>

36 <https://www.news24.com/News24/suspected-kingpin-11-others-in-court-for-rhino-poaching-20160121>

37 <https://www.gov.za/national-prosecuting-authority-mpa-seizes-assets-rhino-poaching-ring-leader-0>

38 <https://www.citizen.co.za/news/south-africa/crime/suspect-hands-himself-over-to-cops-for-murder-committed-in-2010/>

39 Rademeyer, J. (2023). *Landscape of Fear: Crime, corruption and murder in greater Kruger*. Research paper, Issue 36, ENACT, p.15.

40 <https://www.news24.com/News24/suspected-kingpin-11-others-in-court-for-rhino-poaching-20160121>

41 <https://lowvelder.co.za/451463/poaching-syndicates-big-joe-mr-bigs-run-ins-law/>

42 <https://www.news24.com/citypress/news/murdered-chiefs-links-to-murky-world-of-rhino-poaching-20230402>

43 Rademeyer, J. (2023). *Landscape of Fear: Crime, corruption and murder in greater Kruger*. Research paper, Issue 36, ENACT, p.7.

44 <https://lowvelder.co.za/451462/poaching-syndicates-look-inside-big-joes-multi-million-rand-homes/>

45 <https://lowvelder.co.za/456754/court-cancels-sale-big-joes-possessions/>

By November 2018, all seven suspects had been released on bail.⁴⁶ The trial was postponed numerous times over the ensuing years, and Subject P and Subject J continued to engage in criminal activities.

Media reports indicate that Subject P was arrested and granted bail a third time for rhino poaching in eMalahleni in 2019, and was facing a murder charge along with three other suspects for an alleged conspiracy to murder a man who owed him money and then dumping his body in a river in Bushbuckridge.⁴⁷ Subject J was also rearrested in July 2020 in connection with the previous 2010 kidnapping and murder case, which was never concluded and had been scrubbed from court records.⁴⁸

The violence surrounding this criminal network came to the fore with a series of high-profile killings, starting with the lead investigator working on the case, who was shot by gunmen with high calibre weapons as he was driving to work in Mpumalanga on 17 March 2020.⁴⁹ The investigator had previously testified in court to oppose the group's bail application and stated that all officers working on the case feared for their lives daily.⁵⁰

This was followed on 17 June 2021 with the fatal shooting of Subject P as he was sitting in his car outside a shopping centre in Hazyview town. According

to witnesses and CCTV footage, three men in a black car drove up and fired 17 bullets at Subject P, briefly checked his vehicle for cash and firearms, then fled the scene.^{51, 52}



Image 8: Subject P's car was found with 17 bullet holes following his fatal shooting in June 2021. Source: Mandla Khoza via Sowetan Live.

Subject C was alleged to have taken over the rhino poaching network after the death of Subject P, until he was also killed on 26 March 2023.⁵³ Subject C and his driver were waiting for help with a flat tyre near Kruger Mpumalanga International Airport, when it was reported that five men drove up, walked to the passenger side of the vehicle, and opened fire at

Subject C with high-calibre rifles. The driver was shot in the leg but survived.⁵⁴ Nine days later, Subject C's wife was also killed in a targeted assassination in her home.⁵⁵

In the latest turn of events, Subject J was arrested yet again on 27 May 2023 for his alleged involvement in a rhino poaching incident in Lydenburg, Mpumalanga. He led police on a high-speed car chase until he eventually crashed into another vehicle. When police searched Subject J's car they discovered a stack of cash hidden under the back seat, and found knives, a rifle and ammunition in a bag that had been discarded during the chase. This incident occurred while Subject J was out on bail in relation to at least four ongoing cases.⁵⁶

The layers of repeated criminality reflect the complexity of this case. The surviving five members of the group who were arrested in September 2018 are still awaiting trial five years later, while none of Subject J's cases stretching back 13 years have concluded. The long court delays and continual granting of bail despite recurring commission of crime create an environment where high-level criminals can act with virtual impunity and points to potential corruption in the criminal justice system.

This case suggests the embedded convergence between wildlife poaching, corruption, and money laundering. These crimes were deeply interconnected with the involvement of current and former police in facilitating the poaching and transportation of wildlife products, as well as possible corruption to continually evade justice in the courtroom, and money

laundering to hide illicit proceeds from the sale of rhino horns, making them difficult to trace.

Subject P's money lending business (or alleged loansharking and extortion) may have been linked with the wildlife poaching business, providing a means to launder the illicit profits gained from selling rhino horns through lending money to customers. In this way, illicit proceeds can be used to generate even more money (through charging exorbitant interest rates) and provide a lucrative business. His murder charge for killing a man who owed him money suggests that Subject P may have engaged in extortionate transaction activity, using threats and violence to recover the debts. However, Subject P's rumoured involvement in cash-in-transit heists may be more likely to represent a diversification of criminal activities and illicit income streams.



Image 9: Knives and ammunition found in a bag following the arrest of Subject J in May 2023. Source: SAPS via Lowvelder.

46 <https://lowvelder.co.za/466237/case-alleged-poachers-postponed-april/>

47 <https://www.sowetanlive.co.za/news/south-africa/2021-06-17-rhino-poaching-kingpin-gunned-down-in-hazyview/>

48 <https://lowvelder.co.za/629601/big-joe-and-co-murder-accused-released-on-bail/>

49 <https://www.sowetanlive.co.za/news/south-africa/2020-03-18-rhino-poaching-top-investigator-shot-dead-on-his-way-to-work/>

50 <https://lowvelder.co.za/454994/rhino-poaching-task-force-afraid-bail-application-continues/>

51 <https://www.sowetanlive.co.za/news/south-africa/2021-06-17-rhino-poaching-kingpin-gunned-down-in-hazyview/>

52 <https://rhinoreview.org/mabuzas-assassination-the-death-of-an-alleged-kingpin-and-the-complex-social-fabric-of-rhino-poaching/>

53 <https://sundayworld.co.za/news/politics/politics-politics/chiefs-murder-a-hit-amid-rhino-poaching-claims/>

54 <https://www.dailymaverick.co.za/article/2023-03-27-alleged-rhino-poaching-kingpin-gunned-down-near-kruger-park/>

55 <https://www.dailymaverick.co.za/article/2023-04-04-widow-of-alleged-rhino-poaching-kingpin-chief-clyde-mnisi-gunned-down-in-cold-blood/>

56 <https://lowvelder.co.za/825835/alleged-rhino-poaching-kingpin-nabbed-again/>

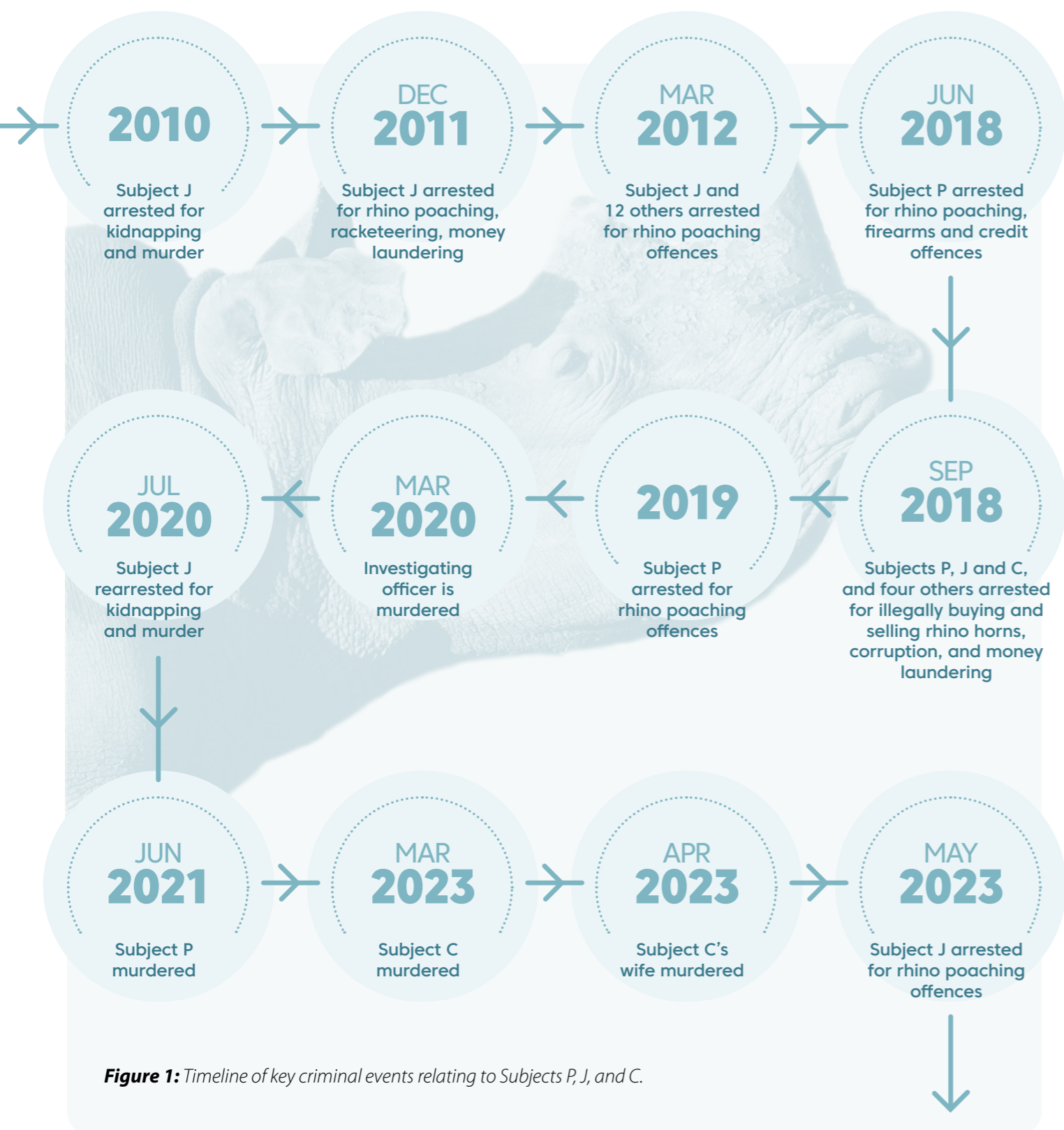


Figure 1: Timeline of key criminal events relating to Subjects P, J, and C.

Serious and organised crime in Mpumalanga

Across Mpumalanga, cash-in-transit heists, ATM bombings, illegal mining, pillaging of state infrastructure, car and truck hijackings, kidnappings, extortion, and wildlife crime are entrenched.⁵⁷ Violence and serious crimes reportedly occur at a much higher rate in Mpumalanga than other comparable rural provinces in South Africa such as Limpopo and North West. For example, the murder rate in Mpumalanga increased by 42% in the decade from 2012-2022, putting it on par with Gauteng (42% increase) and Western Cape (46% increase),⁵⁸ while the kidnapping rate in Mpumalanga increased by 76% in 2021-2022 (893 cases) compared to the previous year (507 cases).⁵⁹

Over the past decade, cash-in-transit heists in Mpumalanga peaked in 2017-2018 with 23 incidents, before dropping to 15 incidents in 2019-2020, then rising again to 21 incidents per year for the past two years.⁶⁰ Cash-in-transit heists generally involve armed groups of offenders who attack and rob armoured vehicles transporting money,⁶¹ usually forcing them off the road by means of a collision or through drive-by shootings.⁶²

Some of the most violent cash-in-transit heists involving the use of explosives have occurred in Mpumalanga, which is believed to be the result of gangs accessing explosives from local mines operating in the province.⁶³ It has also been reported that some of the main criminals involved in wildlife poaching are also involved in illegal mining and other forms of organised crime, using the proceeds generated by one crime to fund and commit other crimes.⁶⁴

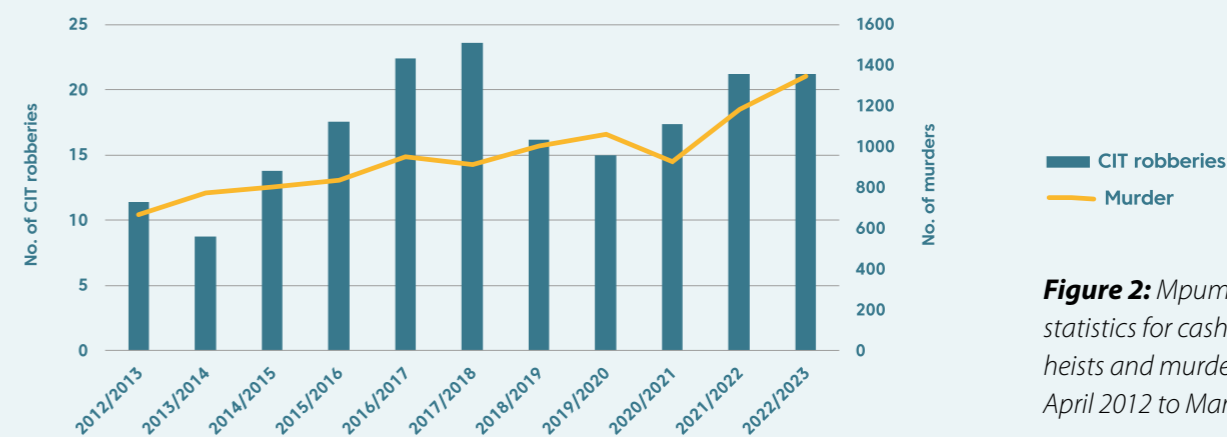


Figure 2: Mpumalanga crime statistics for cash-in-transit (CIT) heists and murder, reported from April 2012 to March 2023.⁶⁵

57 Rademeyer, J. (2023). *Landscape of Fear: Crime, corruption and murder in greater Kruger*. Research paper, Issue 36, ENACT, p.17.
 58 Ibid, p.13.
 59 South African Police Service. *Police Recorded Crime Statistics, April 2021 to March 2022*, p.50, accessed at: https://www.saps.gov.za/services/downloads/Annual-Crime-2021_2022-web.pdf
 60 South African Police Service crime statistics, accessed at: <https://www.saps.gov.za/services/crimestats.php>
 61 Koekemoer, H. (2015). *A Comprehensive Discussion on Cash-in-Transit Robbery: A contemporary crime phenomenon in the South African context*. https://www.academia.edu/10660937/A_Comprehensive_discussion_on_Cash_in_Transit_Robbery
 62 Smith, L. and Louis, E. (2010). *Cash in Transit Armed Robbery in Australia*. Trends & Issues in Crime and Criminal Justice, No. 397. Australian Institute of Criminology. Accessed at: <https://www.aic.gov.au/sites/default/files/2020-05/tandi397.pdf>
 63 Rademeyer, J. (2023). *Landscape of Fear: Crime, corruption and murder in greater Kruger*. Research paper, Issue 36, ENACT, p.17.
 64 Ibid, p.18.
 65 Compiled by Wildlife Justice Commission from South African Police Service crime statistics, accessed at: <https://www.saps.gov.za/services/crimestats.php>

GOOD PRACTICE

- **A multi-agency taskforce** enabled collaboration between specialised law enforcement agencies and other relevant authorities, bringing together the expertise and resources needed to conduct the large-scale arrest operation in September 2018.
- **Special investigation techniques** such as undercover operations are important to gather evidence of the full criminal scenario and build a strong case for prosecution.

INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Anti-corruption:** Indications of corruption in the criminal justice system indicate the need for a systemic approach to identify and mitigate corruption vulnerabilities in this sector, to ensure that high-level criminals can be brought to justice in a timely manner.



CASE STUDY

3

COMMODITIES/CRIMES INVOLVED

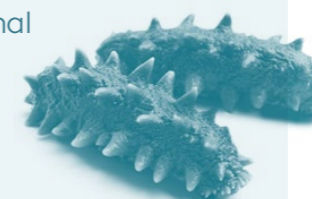
Shark, sea cucumber, illicit drugs, tax evasion, money laundering, and corruption

CONVERGENCE TYPOLOGIES

Embedded and transactional convergence

GEOGRAPHIC REGION

Central America



Recent research has highlighted the increasing convergence of drug trafficking and crimes in the fisheries sector in Mexico, as organised criminal groups such as the Sinaloa Cartel are systematically taking control of the fishing industry in some locations.⁶⁶ This case study focuses on reported links between the fishing industry in Mexico's Yucatán Peninsula — particularly the sea cucumber trade — with drug trafficking and other crimes including tax evasion, money laundering, and corruption.

On 16 June 2009, Mexican naval officers discovered 893 kg of cocaine concealed inside 97 frozen shark carcasses, which had been smuggled via container ship from Costa Rica to Puerto Progreso in the Yucatán Peninsula. The shipment was reportedly headed for Houston, United States with its final destination in Guadalajara, Mexico. Investigations in Costa Rica identified that the smuggling operation

was organised by a Mexican businessman and drug trafficker who had rented a dock in Puntarenas, Costa Rica where the cocaine was packed inside the sharks. The sharks had been supplied by a Costa Rican businessman, who admitted to selling his Mexican client tens of thousands of sharks in multiple consignments since August 2008. Between November to December 2008 alone, he indicated he had supplied 45,000 kg of sharks to the Mexican businessman, pointing to the scale of the operation.^{67,68}



Image 10: Cocaine shipment concealed in frozen sharks, seized at Puerto Progreso, Mexico in June 2009. Source: *elmundo.es*

Although the June 2009 incident was the only publicly reported seizure linked to the “shark case”, Mexican authorities claimed the smuggling operation continued up to 2017, when prominent seafood businessman Subject M was arrested. Subject M was alleged to have used refrigerated warehouses in Puerto Progreso belonging to one of his seafood companies

⁶⁶ Felbab-Brown, V. (2022). *China-Linked Wildlife Poaching and Trafficking in Mexico*. The Brookings Institution, pp.11-16.

⁶⁷ http://www.aldia.cr/ad_ee/2009/junio/19/nacionales2000726.html

⁶⁸ http://www.aldia.cr/ad_ee/2009/agosto/03/nacionales2042408.html

to store the cocaine-filled sharks as they moved along the trafficking route. The overall operation was attributed to the Sinaloa Cartel.^{69,70}

Subject M and his family have owned and operated a group of companies in Puerto Progreso dedicated to fishing, processing, and trading seafood products for more than 30 years.⁷¹ The seafood companies specialise in octopus, lobster, sea cucumber, fish, conch meat, and shark, exporting high volumes of product internationally, particularly to Hong Kong SAR and the United States. Produce is sourced directly from his own fishing fleet as well as bought from independent fishers working off the Yucatán coast. Locally, Subject M is known as *el rey del pepino de mar* ("the sea cucumber king"),⁷² although after reports surfaced of his connection to the shark case, the media began referring to him as a "drug trafficker".⁷³

Subject M has frequently been linked to public reports and formal complaints of unlawful sourcing of seafood products, sea cucumber theft, and seafood trafficking since at least 2011, and is said to be connected to the *mafia pepinera* (sea cucumber mafia). Financial investigation of his business operations in 2020 suggested potential involvement in money laundering or tax evasion schemes and allegedly uncovered additional evidence of his connections to the Sinaloa Cartel. Despite these claims, no cases against Subject M have been fully investigated or prosecuted and he continues to operate his seafood businesses with impunity.



Image 11: Sea cucumber catch landed in Yucatán, Mexico. Source: Instituto Nacional de Pesca y Acuicultura (INAPESCA).

In June 2011, Subject M was accused of orchestrating the armed robbery of a refrigerated storage warehouse in Progreso belonging to another seafood businessman and the theft of several tonnes of sea cucumber. The stolen product was reportedly loaded into trucks that took different routes headed towards Mérida, where the sea cucumber would later be illegally traded. Police investigations captured and arrested six men involved in the robbery and recovered part of the stolen product. However, Subject M fled the authorities before they could arrest him, and an injunction granted by the court suspended the arrest warrant against him.^{74,75,76}

69 <https://www.eluniversal.com.mx/opinion/salvador-garcia-soto/el-cartel-de-sinaloa-y-el-caso-tiburon>

70 http://tiempo.com.mx/noticia/casos_mas_importantes_unidad_de_inteligencia_financiera_2020_uif_narco_trata_infonavit_corrupcion/

71 <http://mexico-seafood.com/>

72 <https://www.yucatan.com.mx/yucatan/2021/1/14/morena-tiene-cuatro-aspirantes-en-progreso-232142.html>

73 For example: <https://www.yucataninstante.com/arrestan-a-eduardo-guadalupe-beltran-gomez/>

74 <https://formalprision.com/2011/07/25/pide-amparo-el-empresario-pesquero/>

75 <http://revistaopcion.blogspot.com/2011/06/arraigado-por-robo-de-pepino-de-mar.html>

76 <https://www.revistayucatan.com/v1/noticias/capturan-a-ladrones-de-pepino-de-mar/>

It was noted that at first, 10 tonnes of sea cucumber were reportedly stolen, then 15.5 tonnes, and finally the official case file recorded 9.7 tonnes. The sea cucumber was also first reported to be the more expensive *Holothuria floridana* species, but later recorded as the cheaper species *Isostichopus badionotus* on the case file.⁷⁷ The contradictory reports could indicate corruption may have been at play to return the larger, more valuable product into illegal trade and replace the seized stock with a less significant tonnage of a cheaper species.

A few months after this incident, in August 2011, a fire in a warehouse in Progreso exposed the location of a clandestine sea cucumber processing operation. Seven butane gas cylinders, huge saucepans, stoves, and equipment for parboiling the sea cucumber were found onsite. Three people were arrested, and 500 kg of sea cucumber was seized. It was reported that the products belonged to Subject M.⁷⁸

Subject M was also implicated in a police operation in June 2013 that searched two warehouses in Mérida suspected to be used for storing and processing illegally harvested sea cucumbers. At the first property, a car owned by the Mérida City Council was seized along with more than one tonne of sea cucumber that was being processed. The car allegedly served the *mafia pepinera* for errands, allowing members to move easily between Mérida and various Yucatán ports to collect product from fishers and potentially pointing to the group's association with corrupt enablers in Mérida. At the second property, 700 kg of dried sea cucumber and 100 frozen sea cucumbers

77 <https://www.zocalo.com.mx/cifras-contradictorias-en-caso-de-millonario-robo-de-pepino-de-mar/>

78 <http://lomejordeprogreso.blogspot.com/2011/08/el-pepino-quemado-era-para-martin.html>

79 <https://yucatanahora.mx/traficante-vinculado-a-alta-funcionaria-de-la-pgr-en-yucatan/>

80 <https://www.yucataninstante.com/arrestan-a-eduardo-guadalupe-beltran-gomez/>

81 <https://visionpeninsular.com/mid/detienen-en-merida-a-familiar-los-beltran-leyva/>

82 <https://www.milenio.com/policia/pf-decomisa-cancun-17-toneladas-pepino-mar>

were seized. The product in both seizures reportedly belonged to Subject M and another seafood businessman, Subject E. Subject E and an associate were arrested during this operation, but reports suggest he evaded prosecution and any penalties. Subject E is also allegedly linked to the Beltrán-Leyva drug cartel, which he denies, although he was subsequently arrested in September 2017 in connection to smuggling drugs and firearms.^{79,80,81}



Image 12: 17 tonnes of sea cucumber were seized at Cancún International Airport in May 2015. Source: Noticaribe.com.mx

Mexico's largest reported seizure of sea cucumber occurred in May 2015, when the Federal Police seized a shipment of 17 tonnes of sea cucumber alleged to have falsified invoices and shipping documents at Cancún International Airport.⁸² Six years later in July 2021, Subject M's network was under investigation again in response to reports that the 17 tonne seizure

had allegedly been “irregularly” delivered to Subject M in May 2016 in collusion with the Federal Police and other officers handling the case. The investigation was initiated following a formal complaint to the Attorney General’s Office lodged by a Yucatán businessman who claimed to be the legitimate owner of the shipment. It was reported that the product was moved to Subject M’s warehouse in 2016 following an intervention by his lawyer with the officer handling the case. Meanwhile, the case against the Yucatán businessman continued for years with delaying tactics while he followed the legal process to prove the authenticity of the invoices and claim ownership of the product.⁸³

More recently, it appears that Subject M’s main business activities have shifted to the octopus and lobster fishing industries, and he has been publicly linked to poaching and illegal trade allegations in both high-value products. In July 2022, he was named by a fishing and aquaculture cooperative as being a key vessel owner engaging in illegal lobster harvesting, sending his boats to fish without having lobster capture permits and encouraging poaching.⁸⁴ At the same time, an association of fishing vessel owners highlighted the threats of rampant poaching and illegal capture now facing the octopus industry, and pointed to Subject M’s heavy involvement in this fishery as well as the now-collapsed shark and sea cucumber fisheries.⁸⁵



Image 13: A fisherman diving for sea cucumber off Progreso, Yucatán. Source: Noticias Telemundo.

⁸³ <https://estamosaqui.mx/2021/07/29/mafia-pepinera-de-martin-velazquez-a-la-vista-fiscalia-general-de-la-republica-atrae-caso/>

⁸⁴ <https://www.yucatan.com.mx/yucatan/2022/7/10/piratas-acechan-las-costas-yucatecas-por-langosta-332325.html>

⁸⁵ <https://www.yucatan.com.mx/yucatan/2022/7/7/baja-el-precio-del-pulpo-en-yucatan-esto-cuesta-el-kilo-en-progreso-331636.html>

Financial investigations conducted by the Mexican Financial Intelligence Unit (UIF) in 2020 allegedly found that between 2007 and 2019, Subject M’s seafood company had made bank deposits amounting to MXN 272 million and withdrawals of MXN 1,783 million, while its tax returns reported a cumulative income of MXN 6.4 million from 2014 to 2018. Additionally, the UIF allegedly identified financial transactions occurring in 2018 and 2019 between the company accounts and a subject identified as being connected to the Sinaloa Cartel.^{86,87}

Research by the Brookings Institution suggests that wildlife trade businesses can be ideal vehicles for money laundering and value transfer due to the huge markup of prices from source point to the final retail value. For example, a Mexican fisher may be paid USD 1 for a sea cucumber that could sell in Hong Kong for USD 70, providing ample margins in which to hide illicit money.⁸⁸ The research also highlights that Mexican drug cartels are increasingly using the trade in wildlife products as a value transfer mechanism to Chinese traders in exchange for the precursor chemicals to produce illegal drugs such as fentanyl and methamphetamine.⁸⁹

Given this, and Subject M’s suspected association with the Sinaloa Cartel, further investigation is warranted to ascertain whether he could be collaborating with the drug cartel in a money laundering scheme.

This case suggests an embedded convergence between fisheries-related crimes, corruption, tax evasion and/or money laundering. Subject M’s alleged connections to influential political figures and government officers appear to underpin his business operations such as by providing cover to source and transport illegally caught seafood and orchestrating stock thefts. The business may potentially be reliant on tax evasion and/or money laundering schemes to maintain its profitability against dwindling seafood stocks or to hide illicit proceeds from unreported or illegally sourced catches. The ability of Subject M to continually evade the criminal justice system despite several arrests and extensive public reports of criminality also indicates he may be protected by corrupt connections.

Meanwhile, based on available information, there could be a transactional convergence between Subject M’s seafood businesses and drug trafficking, with drug trafficking networks reportedly using fisheries infrastructure and products to conceal drug shipments between 2009 and 2017. Furthermore, if the networks are indeed collaborating to launder illicit drug proceeds through legitimate seafood businesses, this would also suggest a transactional convergence in the way these services are provided and exchanged. However, if Mexican organised crime continues to deepen its integration in the fisheries sector more broadly, this could potentially develop into an embedded convergence in the future.

⁸⁶ <https://www.eluniversal.com.mx/opinion/salvador-garcia-soto/el-cartel-de-sinaloa-y-el-caso-tiburon>

⁸⁷ http://tiempo.com.mx/noticia/casos_mas_importantes_unidad_de_inteligencia_financiera_2020_uif_narco_trata_infonavit_corrupcion/

⁸⁸ Felbab-Brown, V. (2022). *China-Linked Wildlife Poaching and Trafficking in Mexico*. The Brookings Institution, p.19.

⁸⁹ Ibid, p.1.

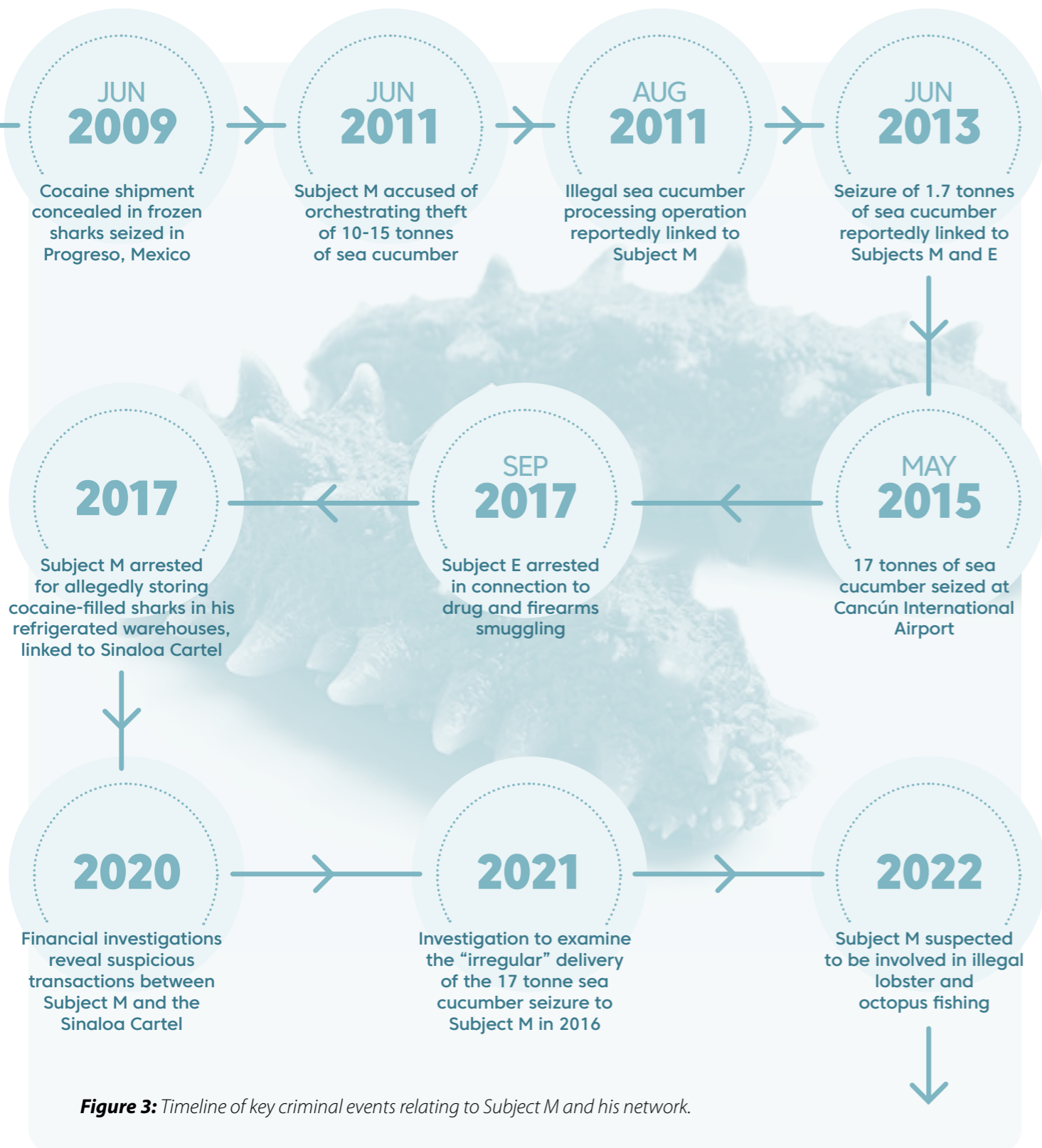


Figure 3: Timeline of key criminal events relating to Subject M and his network.



Sea cucumber trafficking

Sea cucumbers (class *Holothuroidea*) are soft-bodied, cylindrical-shaped marine invertebrates that can be found in all oceans worldwide. They are the earthworms of the sea and play a critical role in a healthy ocean ecosystem, keeping the sea floor clean by filtering organic matter from the sediment.⁹⁰ They are harvested for food and medicine, however, the most valuable part of the animal is the dried outer body wall known as *bêche-de-mer*, which is in high demand as a delicacy throughout Asia.⁹¹ This demand has led to the overexploitation of sea cucumber globally and seen them become targeted in illegal trade. Sixteen sea cucumber species are classified as threatened with extinction by the IUCN,⁹² with some populations of rarer species declining by over 60% in some regions.⁹³ Six sea cucumber species are listed on CITES Appendix II, three of which are new listings due to come into effect in May 2024.⁹⁴

The rise of the “mafia pepinera”

The Yucatán Peninsula and Baja California Peninsula are the two primary regions for sea cucumber fishing in Mexico. In the early 2000s, sea cucumber fishing was promoted by the Mexican government and development permits were issued to explore the potential of the fishery.⁹⁵ The first commercial permits were issued in 2013 and the industry took off, with Chinese brokers paying high prices for the sought-after species.⁹⁶ A harvesting frenzy ensued and despite attempts to manage the fishery with vessel permits, quotas, size limits and closed seasons, rampant poaching led to intense overexploitation and closure of the fishery in 2019.⁹⁷ The ban remains in place as sea cucumber populations have not yet recovered.⁹⁸

Sea cucumber was dubbed *oro negro* (black gold) due to its high value, and the booming industry

attracted the attention of organised crime, giving rise to the *mafia pepinera* (sea cucumber mafia).⁹⁹ Criminal operations attributed to this mafia include the use of violence and political influence to maintain impunity among the collaborators, and laundering illegal catches through legitimate seafood businesses. Illegally harvested sea cucumber is acquired through forceful purchase at low prices from local poachers during the closed season, or through the theft of legal stocks – which could have been harvested prior to the ban or from other locations where fishing is permitted. The integration of illegal sea cucumber in the supply chain is believed to be facilitated using fraudulent invoices, or by concealing the sea cucumber in shipments of other exported products.¹⁰⁰

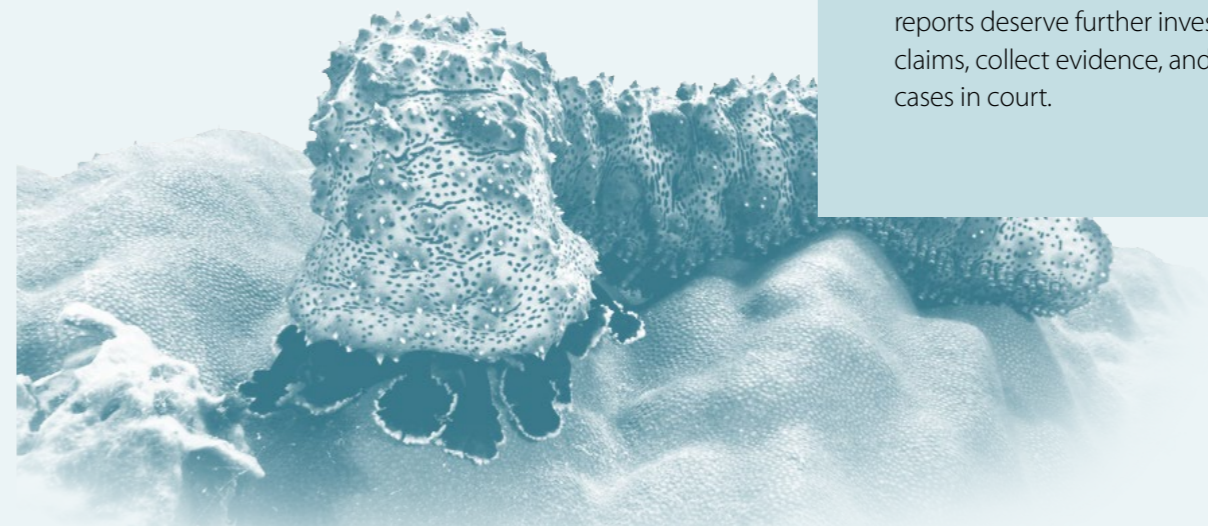
High levels of sea cucumber crime have been reported in Mexico, and a study of media reports published from 2011 to 2021 identified 97 such incidents involving 125 arrests and the seizure of more than 100 tonnes of sea cucumber valued at an estimated USD 29.5 million.¹⁰¹

GOOD PRACTICE

- **Conducting financial investigation** and following the money trail to trace where and how money is moving in the criminal network, detect potential money laundering offences, and identify connections with other higher-level network members who may be removed from the day-to-day criminal operations. Financial investigation in this case identified Subject M's potential involvement in financial crimes and suspicious financial transactions show a possible link to the Sinaloa Cartel.

INTERVENTION STRATEGY FOR FUTURE CONSIDERATION

- **Further and follow-up investigations** are essential to help uncover the full extent of criminality linked to the case. Public allegations point to Subject M's involvement in a range of criminal activities over more than a decade, including fisheries crimes, financial crimes, and links to drug trafficking. These reports deserve further investigation to assess the claims, collect evidence, and prosecute any legitimate cases in court.



⁹⁰ UQ News (11 February 2022), *Endangered delicacy: tropical sea cucumbers in trouble*, accessed at: <https://www.uq.edu.au/news/article/2022/02/endangered-delicacy-tropical-sea-cucumbers-trouble>

⁹¹ <https://www.nationalgeographic.com/animals/invertebrates/facts/sea-cucumbers>

⁹² <https://www.iucnredlist.org/search?taxonomies=180143&searchType=species> - seven species are classified as Endangered and nine species are classified as Vulnerable.

⁹³ <https://www.theguardian.com/environment/2021/apr/12/sea-cucumbers-organised-crime-smuggling-aphrodisiac-biodiversity-sri-lanka-india>

⁹⁴ <https://cites.org/eng/app/appendices.php> - in addition, *Isostichopus fuscus* is listed as a CITES Appendix III species in Ecuador.

⁹⁵ Phelps Bondaroff, T.N. et al, 'Characterizing Changes in a Decade of Mexican Sea Cucumber Crime (2011-2021) Using Media Reports', *Bêche-De-Mer (BDM) Information Bulletin*, Issue 42, March 2022, p.13.

⁹⁶ Felbab-Brown, V. (2022). *China-Linked Wildlife Poaching and Trafficking in Mexico*. The Brookings Institution, p.11.

⁹⁷ <https://sumarioyucatan.com/el-pepino-de-mar-gran-ausente-esta-temporada-y-con-motivos/>

⁹⁸ <https://www.porestone.net/yucatan/2021/2/5/captura-de-pepino-de-mar-sin-temporada-este-ano-en-yucatan-236212.html>; <https://mexiconewsdaily.com/news/endangered-sea-cucumber-finished-fishing/>

⁹⁹ <https://progresohoy.com/noticias/la-mafia-pepinera-grave-foco-rojo-para-la-seguridad-de-yucatan-advierten-directivos-pesqueros-10075368/>

¹⁰⁰ <https://www.yucatan.com.mx/yucatan/2018/3/3/escasez-de-pepino-por-los-furtivos-16562.html>

¹⁰¹ Phelps Bondaroff, T.N. et al, 'Characterizing Changes in a Decade of Mexican Sea Cucumber Crime (2011-2021) Using Media Reports', *Bêche-De-Mer (BDM) Information Bulletin*, Issue 42, March 2022, p.11.

Discussion

The three case studies presented in this report and the growing number of examples published in the grey literature, academia, and the media show that the convergence of wildlife crime with other forms of organised crime can manifest in different ways. Although convergence does not occur in every instance of wildlife crime, the examples suggest that when criminal groups do engage in multiple crime types or diversify their criminal activities, they may do so with varying motivations and degrees of sophistication.

The Wildlife Justice Commission applied a framework of five key typologies to describe the type of connection between the converging crimes: opportunistic, diversification, transactional, embedded, and career shift. Classifying convergence in this way can assist in understanding the relationship between the crime types and assessing the level of threat a criminal network poses, which can also help inform law enforcement strategies to address the problem from an organised crime point of view.

In case study 1, Subject D's involvement in large-scale wildlife trafficking and running protection rackets connected to illegal sand mining represents a diversification of criminal income streams in two

lucrative business ventures that operate independently from each other. This is a looser convergence connection that may pose a lower criminal threat.

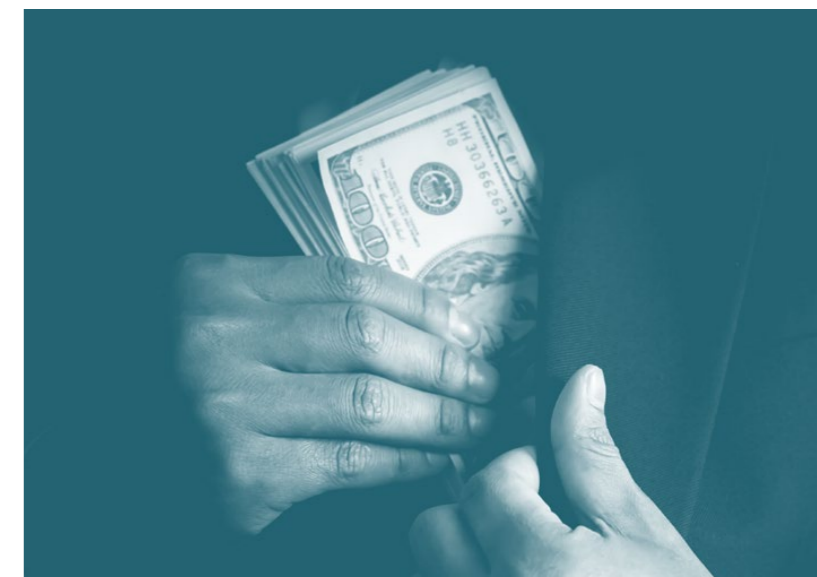
Case study 2 suggests an embedded convergence between wildlife poaching, corruption, and money laundering, where the involvement of current and former police officers to facilitate the poaching and safe transportation of wildlife products was a linchpin of the criminal network's modus operandi. Meanwhile, the separate money lending business may have provided the means to launder illicit profits gained from rhino horn sales, while further funds generated through inflated interest rates could be re-invested in poaching activities. The intertwined linkages between the crime types alludes to a high criminal threat level.

Case study 3 suggests a transactional convergence between the seafood businesses and drug trafficking networks, with fisheries infrastructure supporting both the illegal sourcing and smuggling of marine species and concealment of drug shipments, while illicit drug proceeds may also be laundered through the seafood businesses. This case indicates a close connection and high level of threat posed by these networks.

Bribery and corruption can be observed as common facilitating factors in all the case studies, being overtly present in case studies 2 and 3, but also likely covertly present in case study 1 to facilitate the movement of large-scale wildlife shipments from Africa to Asia. Similarly, money laundering is a common resulting crime directly linked to case studies 2 and 3, as criminal networks seek out ways to disguise the illegal origin of their criminal proceeds. There could also be potential money laundering links to case study 1 and the substantial volume of cash generated by the sand mining protection racket.

The frequency with which these crimes intersect was previously highlighted in the Wildlife Justice Commission's 2021 report, which described corruption and money laundering as common underlying factors present in most serious wildlife crime cases. Other studies have made similar findings, such as GI-TOC's 2023 crime convergence report, which suggested that corruption, illicit financial flows, and money laundering are almost ubiquitous in organised wildlife crime.¹⁰²

Several good practices can be identified from the three case studies presented in this report, including the use of joint investigations and multi-agency task forces to bring together the resources and expertise needed to target crime convergence, using special investigation techniques to gather evidence of the full criminal scenario and build a strong case for prosecution, and conducting financial investigations to trace where and how money is moving in the criminal network.



The cases also offer up law enforcement strategies that could be useful to combat certain aspects of crime convergence, such as conducting corruption investigations, implementing measures to mitigate corruption vulnerabilities in key sectors, and carrying out further and follow-up investigations to help uncover the full extent of criminality linked to a network.

Crime convergence is a complex phenomenon that cannot be identified through seizure analysis alone, as mixed commodity seizures (such as wildlife and drugs) are rarely observed in illegal trade. Intelligence analysis and further investigations play a critical role in mapping organised crime networks, identifying patterns, and establishing links between crimes to detect crime convergence. They are essential elements to assess the size of the threat posed by a criminal network and their means and motivations to commit crimes.

¹⁰² Nelson, A. (2023). *Convergence of Wildlife Crime and Other Forms of Transnational Organized Crime in Eastern and Southern Africa*. Global Initiative against Transnational Organized Crime, p.48.

Conclusion and recommendations

With more attention in recent years being given to the nexus between wildlife crime and other forms of organised crime, a growing body of evidence is emerging which will help to build a better understanding of this complex crime threat. The three case studies in this report add to the knowledge base on this issue, which will continue to develop globally as more cases are detected.

The apparently increasing prevalence of crime convergence in the past two decades, as suggested by some research,¹⁰³ could point to wildlife trafficking becoming more attractive to organised crime networks due to the profitability of high-value species and products and the perceived lower risk of law enforcement action against this type of crime. Such a scenario underlines concerns of the role that convergence could play in sustaining and expanding wildlife crime.

In any illicit market, the primary business of organised crime is to generate a profit, and controlling logistics and supply chains is the key. For this reason, it is often a criminal network's access to transport routes and their ability to move illicit shipments that is the most valuable asset, rather than the commodity itself. While convergence could begin as an

opportunistic partnership, if it proved to be a lucrative venture, it may develop to become a more embedded fixture in a criminal network's operations.

This highlights the importance of addressing the threat of organised crime and taking a comprehensive approach to identify, charge, and prosecute all crimes committed by an organised crime network. Mapping the criminal networks, analysing patterns and links between criminal activities, understanding modus operandi and criminal motivations, and assessing the level of threat of the criminal network as a whole, are fundamental components of a law enforcement response geared towards addressing organised crime and crime convergence.

The Wildlife Justice Commission's 2021 report suggested six recommendations to assist law enforcement authorities and policy makers in strengthening their focus on the intersection of wildlife crime with other serious and organised crimes. These recommendations remain relevant, particularly as the international policy framework increasingly recognises the need to research this nexus and strengthen the collection of information on wildlife trafficking patterns and flows.

(I) More consideration should be given to intelligence collection and governments developing their own comprehensive wildlife datasets. Linked to this, it is also important that frameworks and protocols are developed to facilitate the sharing of intelligence in a timely and secure manner – both interagency and cross-border. This would greatly contribute to improved global intelligence compilation, analysis, and sharing for wildlife crimes.

(II) Organised crime group mapping should be an essential intelligence tool to identify how and where convergence may be occurring, and to tackle wildlife crime from the point of view of organised crime. Crime should be assessed in terms of the size of the threat posed by a particular organised crime group and the means and motivations of that group to commit crimes, and law enforcement resources allocated accordingly.

(III) Multi-agency cooperation, joint investigations and task forces should be utilised where appropriate to bring the necessary law enforcement expertise to target convergence and explore all angles of the criminal scenario.

(IV) Consideration should be given to using alternative legislation relating to the convergent or ancillary offences where relevant and appropriate. This approach may enable strategic decision making relating to the use of alternative law enforcement powers or the application of higher penalties, for example.

(V) Financial and corruption investigations should be conducted in parallel or in response to wildlife crime cases to identify any associated money laundering or corruption offences, payment methods, and to identify the proceeds of crime to facilitate asset recovery.

(VI) Greater utilisation of specialised investigation techniques such as communications interception, undercover operations, the use of listening and tracking devices, and controlled deliveries would assist investigators to gain a better understanding of where crime convergence may exist between wildlife crime and other serious crime types, and to develop a coordinated law enforcement response if such crimes are identified.

¹⁰³ For example, research by Prof. Dr. Edgardo Buscaglia, Senior Scholar in Law and Economics at Columbia University, which found a 745% increase in the Sinaloa Cartel's involvement in other crimes in addition to drug trafficking, including wildlife crime and illegal fishing. <https://wildlifejustice.org/ccpcj-panel-discussion-on-the-convergence-of-environmental-crimes-with-other-forms-of-organised-crime-recommendations-and-takeaways/>

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