INFORMAL VALUE TRANSFER SYSTEMS AND THE IVORY TRADE

CINTOC

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CREATING AN ENVIRONMENT SAFE FROM TRAFFICKING

HOW, WHEN AND WHY IVORY CRIMINALS ENGAGE THESE SYSTEMS

A Report by Liberty Shared and The Center on Illicit Networks and Transnational Organized Crime (CINTOC)

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EXECUTIVE SUMMARY

This paper aims to pinpoint when and where ivory trafficking networks, and the points made herein can also be applied to the trafficking of other wildlife, engage informal value transfer systems (IVTS), and for what purposes. The lack of existing scholarship on this issue hinders law enforcement and conservationists from establishing practices and programs to disrupt illicit payments and proceeds related to ivory trafficking. This paper recommends various strategies to increase the disruption of illicit funds and prosecution of ivory traffickers via money laundering charges for the predicate offence of wildlife trafficking and related criminal activities.

Our surveys found that criminals engaged in the illegal ivory trade utilize IVTS in circumstances when these systems provide efficiencies, security and/or represent the only service available. African syndicates will tap into hawala networks, often run by Somalis, or ethnic South Asians in East and South Africa and by ethnic Hausa brokers in Central and West Africa. Meanwhile, Chinese and Vietnamese syndicates will utilize "flying money" brokers, which often operate from Chinese or Vietnamese shops. The Asian IVTS do not appear to intersect with the hawala system, and typically can't be utilized by other ethnicities. However non-Muslims can utilize the hawala network, in particular in places where it is the only service available. Law enforcement officials, NGOs and anti-poaching teams interviewed for this project believe that the majority of payments at the poaching level of the supply chain are made in cash, but say that traffickers moving money from one continent to another or one country to another will utilize IVTS, money service businesses like Western Union or bank transfers. Relatively few groups interviewed have investigated or studied the movement of money at the higher levels of the ivory supply chain – often believing money transfers were also based around cash couriers.

Because there was so little existing knowledge on the issue, it was impossible to estimate what percentage of the ivory trade gets financed through IVTS. In instances where IVTS were used, it was often because they were the quickest and most efficient way to send or receive money – or the only functioning system for transferring money to remote areas. Some criminal networks utilize IVTS that service a broad range of mainly benign activities, mainly migrant workers sending home remittances. However, in some cases, ivory exporters in Nigeria tapped into a hawala network that exclusively serviced illegal actors, including but not limited to timber, gold and drug traffickers and human smugglers.

The existing research and literature offers few indications that ivory dealers use IVTS to launder their illicit profits in Africa, or bothered to launder money at all. Currently, it is understood that Asian gangs sending money back home appear to utilize trade-based mispricing to launder profits from wildlife crime and IVTS systems tend to get utilized simply in order to send or receive payments. Since many ivory smugglers make little effort to launder the source of their income, it is likely that investigators could quickly piece together patterns of activity, and provide models that banks and law enforcement could use to disrupt and prosecute ivory traffickers and other wildlife criminals. It is also unclear how money moves between ivory product sales and retail distribution networks and smugglers.

This paper was intended as a first pass to compile existing knowledge, understanding that further investigative work will be necessary to map the issue thoroughly. Above all else, it will behoove donors, conservationists, law enforcement, anti-poaching units and academics that the ivory trade is – at the end of the day – a business, and the purpose of any business is to earn money. For too long, the financial aspect of the illegal ivory trade has been a sidebar, if the issue is even taken up. To save elephants, this approach must change. Following the ivory money – both in terms of studying IVTS and other financial mechanisms – will have powerful impact on mapping and disrupting the trade, and saving the species.

RECOMMENDATIONS

LAUNCH PROJECTS TO JOINTLY DRIVE MENTORING AND RESEARCH

The conservation community and law enforcement units probing wildlife crime would benefit from further technical training and focused mentoring about financial crime generally, with a special focus on IVTS in regions where they predominate. This training and mentoring could be combined with information-gathering operations, to get anti-poaching units and law enforcement in the habit of tracking financial activity as part of their routine investigations, and simultaneously build a body of evidence that can eventually drive law enforcement action. Ongoing mentoring should be provided to instruct on local legislation, so teams learn to broaden their options for charging wildlife criminals to include offenses including fraud, false claims, tax evasion and money laundering. Current UNODC-led efforts to train anti-poaching units about financial crime should be continued and expanded.

ANALYSIS

If donor nations or foundations were to fund more comprehensive training around financial crime linked to the ivory trade, there could also be spinoff research to measure the scale of financial activity within the various systems (hawala, fei chien, TBML, M-Pesa). Through this, financial analysts could potentially identify and build cases against major buyers. This analysis could also produce concrete data for law enforcement and policy-makers about the prevalence of IVTS in the ivory trade and the directional flows of money moving through IVTS. That analysis could produce recommendations for strategic intervention that could disrupt criminal activity while mitigating impact on benign financial flows.

TARGET CRIMINALS

Investigative teams should focus on IVTS brokers who deal exclusively in criminal activity, exposing them not just for ivory transfers, but also for facilitating other serious crimes including drug and human trafficking. This will raise the urgency for governments to interdict these criminal IVTS.

BUILD BRIDGES

Once the conservation community is better educated on the issues, there need to be stronger relationships and lines of communication between anti-poaching units, conservation groups, the financial industry, FIUs, law enforcement and other pertinent state agencies to encourage data sharing.

FORGE INDUSTRY PARTNERSHIPS

The financial industry has become an important partner to the conservation community. The conservation community could build on that important relationship by forging partnerships with M-Pesa, Dabashiil and other large hawaladars, asking them to pledge to push wildlife criminals off their platforms, and working with them collaboratively to weed out illegal wildlife activity.

BLOCK CRIMINAL IVTS FROM REGULATED BANKING SYSTEM

There is compelling evidence that the global AML/CFT infrastructure within the regulated banking system could be leveraged against IVTS brokers and criminal clients who are transferring ivory profits. Conservation groups can support the financial industry to reduce its exposure to the ivory trade by identifying patterns of activity that indicate ivory trafficking is occurring. To that end, there needs to be ongoing collection of data and intelligence about ivory networks and how they send and receive payments, collaboration with regional and local banks and Money Service Businesses to map transaction patterns along ivory supply chains, the identification of communities relying on and using IVTS that have an association with ivory trafficking, other trafficking activities and/or organised criminal activity, and an analysis of the relationship between IVTS hubs and the regulated banking sector. The banking sector can support this by filing more suspicious activity reports related to wildlife crime, and collaborating with law enforcement to support account suspension, asset seizure, arrest and prosecution of criminal actors tied to wildlife crime.

LITERATURE REVIEW

There are scant references in existing academic literature, NGO, international organization and media reports as to how and when ivory traffickers and other wildlife criminals engage IVTS such as hawala, or its Chinese counterpart fei-chien, to transfer or launder money. Indeed, on the few occasions where the subject is mentioned, it is typically in the context that more research is needed (GFI: 2019; UNODC/APG: 2017; Wilton Park: 2015; Potter: 2018; Keatinge & Haenlein: 2016). Existing literature does not identify why criminal networks moving ivory or other illegal wildlife products might choose to use an IVTS over available alternatives, nor does any existing research identify if those systems are primarily utilized in order to move funds, to launder funds or both.

The most extensive analysis appears in a joint study by the UN Office on Drugs and Crime and the Asia Pacific Group (2017) that surveyed law enforcement in 45 global jurisdictions. The survey found that only 26% of jurisdictions conducted any type of financial investigations when pursuing wildlife crime, and that a mere 1% of wildlife crime cases were reported to involve money laundering investigations, charges or prosecutions. The study concluded that the majority of wildlife crime cases "appear to start and end with the seizure of wildlife contraband," with just 11% of jurisdictions reporting that they conducted further investigations into wildlife crime networks beyond the poacher or courier. Respondents to the survey reported that that most poaching networks operate largely as cash businesses, but also surmised that transnational wildlife trafficking networks "appear to maintain multi-country accounts and conduct financial transfers across geographic boundaries." Respondents to the survey believed that cash couriers, IVTS, and money service businesses (MSBs) such as Western Union, PayPal and M-Pesa were commonly used to move funds internationally and make payments, however the report noted that, "due to lack of financial investigations, very little is known."

A handful of studies and publicly available typologies make reference to the use of IVTS, but provide few details and fail to establish scale. A report on the global illegal trade in live apes (GFI: 2018) notes that buyers typically pay half of the price of the animal up front, usually paying the seller via bank transfer, an MSB like Western Union, or a social media payment platform such as WeChat, in most cases transacting in U.S. dollars. The report added that some transactions "may also" engage the hawala system, but that "the pattern of the money flow is [typically] from a bank account or MSB in Asia or the Middle East to the seller's account in Africa." A 2017 typology by Namibian authorities (Namibia: 2017) also suggested that hawala "may be" used by some wildlife traffickers, but produced no hard evidence, saying only that the country's Financial Intelligence Center had identified transactional patterns between individuals located in different countries who also belong to communities with sizeable rhino and elephant populations. The individuals living outside Namibia were using IVTS to send large, often round number sums of money, with random or vague payment purposes, such as "for current expenses," or "for goods," without any evidence of goods being sent. A typology (2018) by Malawi's Financial Intelligence Authority, also suggested that "some funds" tied to the ivory trade were transferred using hawala, but said in the majority of ivory cases, the criminals were moving money through mispriced trade deals and/or shell companies.

The UNODC/APG (2017) study decried the chronic lack of knowledge about the financial aspects of wildlife crime, proposing that adopting financial investigation techniques could substantially enhance wildlife crime investigations. For a review of literature about IVTSs generally, please see Appendix C.

UNDERSTANDING HAWALA AND FEI-CHIEN

The world's two largest and oldest IVTS are hawala (which is known as havaleh in Persian, hundi in Hindi, and xawala in Somali) and China's fei-chien (or 'flying money'). These informal value transfer systems are global in scope. There are no reliable estimates as to their magnitude, but experts believe they each move hundreds of billions of dollars globally in unregulated and untaxed money transfers every year (Passas: 2003; Cassarra: 2017; Thompson: 2011). These systems all share certain common characteristics:

- They transfer money without physically moving it;
- They are ethnically based, and reliant on trust;
- They are convenient and cost considerably less than banks and other regulated systems; and
- Money brokers typically use trade as the mechanism to settle accounts and balance the books.

The way these systems work is simple: A customer needing to send money visits a local broker in his or her location. The brokers are typically located in markets, and often run shops. The customer will provide the broker with the amount of money to be transferred, a small commission (usually between 2-5% of value of the transaction) and the location and mobile phone number of the recipient. The broker will message his counterpart in that location with the amount, recipient name and phone number, and that broker will communicate to the recipient to say the money has been received. In some cases, the sender may need to text a code or password to the recipient to receive the funds. Either way, the deal takes just minutes to transact. As money moves back and forth between two brokers, they balance the books, occasionally conducting import-export deals or bank transfers in order to settle accounts. They typically keep simple accounting records, and these are often discarded after the brokers settle-up with one another. This means the paper trail is limited or entirely nonexistent, making transactions difficult to track or regulate using the mechanisms typically employed to regulate banks (Passas: 2003).

At their very essence, all informal value transaction systems represent "money transfer without money movement."

Because there has been a tremendous amount of literature demonizing underground systems, in particular in the years immediately after the 9-11 attacks, it's important to recognize that the vast majority of funds sent through these informal systems is benign, usually representing wages that migrant workers send home to their families.

Flying Money

Dating back to the T'ang Dynasty, the Chinese fei-chien or 'flying money' system evolved to meet the needs of both Chinese entrepreneurs and migrants around the world (Cassidy: 1990). Because it skirts official restrictions and regulations that impede commercial efficiency, fei-chien also facilitates capital flight, tax evasion, and other fraud. As China's economy grows, it's believed flying money systems – and the amount of illicit activity occurring inside them are growing rapidly.

According to the International Labor Organization (ILO), there are approximately 164 million migrant workers in the world, many of them from developing countries with limited rural banking systems. Remittances represent a critical source of income for their relatives back home. Although estimates vary, the World Bank estimates that global remittances reached approximately $529 billion in 2018. Multiple reports (OECD: 2015; Economist: 2015) have found that increased bank regulations implemented to fight money laundering and tax evasion caused a displacement of financial flows to unregulated value transfer systems. However, IVTS also appeal to criminals, terrorists and those evading tax, precisely because they are difficult to track, and since it's optimal for illicit actors to camouflage dirty money inside large existing financial flows (Wheatley: 2005).

Hawala

Dating back to the 8th Century, when it first emerged to facilitate Silk Road traders, the hawala system operates globally and follows Islamic banking precepts (Wheatley: 2005). Hawala means transfer in Arabic. The multilayered community of hawaladars that spans the globe is knit together by social connections, faith, and trust. The hawala system came under scrutiny after the 9-11 attacks for facilitating terror finance, spawning efforts to regulate some of the world's largest hawaladars.

GAUGING INFORMAL MONEY FLOWS IN AFRICA

There are no reliable estimates for how much money moves through informal channels across Africa. However, one in seven Africans (120 million people) receives remittances from friends and family abroad, representing an estimated US$60B annually, and comprising as much as a third of total GDP in some African markets (Scharwatt: 2015). Informal value transfer systems are popular across the African Continent, which has the lowest global rate of banks per capita, along with the world's highest bank transaction fees, particularly for regional and domestic remittances. There is evidence that the majority of remittances in many Sub-Saharan African countries are processed through informal channels, which include hawala systems and the use of transport companies to move cash (Scharwatt: 2015). For example, surveys in Burkina Faso and Senegal found that more than 60 percent of households receiving funds use informal channels for cross-border remittances (Scharwatt: 2015). Somalia, where less than 15% of the population has a bank account, is home to Africa's most extensive hawala network, as well as Africa's largest and most successful hawaladar, Dahabshiil. Amid growing competition from mobile-money providers and pressure from regulators, multinational Dahabshiil implemented substantial internal reforms in order to become more formalized so it can interact more smoothly with the global financial system. The firm has annual revenue topping $1B, and 24,000 outlets in 126 countries.

Mobile Money

Mobile money providers like M-Pesa have disrupted traditional IVTS like hawala in ways that conventional banks never could, and have provided hundreds of millions of unbanked people access to financial services at their fingertips. In Africa, more people today have mobile phone accounts than bank accounts. While mobile banking has taken off in some countries, notably Kenya, it has failed to take root in more developed economies such as South Africa where the majority of the population is banked. Although mobile phone banking systems remain vulnerable for use by money launderers and criminals, they inherently contain tracking mechanisms and transfer limits that restrict their utility for large-scale criminal activity. Experts say the best hope for countering illicit money transactions and IVTS is their replacement with regulated systems of equal cost and efficiency (Scharwatt: 2015).

THE ILLEGAL IVORY TRADE AND THE INFORMAL VALUE TRANSACTION SYSTEM

IVTS do not come into play at every phase of every ivory supply chain. Rather, sources interviewed for this project said criminals choose to use IVTS in circumstances when they provide efficiencies, security and/or represent the only money transfer service available. Law enforcement officials in sub-Saharan Africa who investigate crime networks engaging in the ivory, rhino horn and abalone trade all reported that the movement of money between wildlife crime syndicates is predominantly cash-based, but multiple sources cited instances in which ivory buyers in Asia used bank wires to transfer money to exporters in Africa. Investigators in Kenya, South Africa, Tanzania and Mozambique all reported that, if an Asian syndicate employs an African criminal syndicate to perpetrate poaching, the Asian syndicate will virtually always pay the African syndicate in cash. Once the illegal goods are in the hands of the Asian syndicate, many investigators believe cash couriers remained the predominant mechanism for moving money. Research for this report indicated that, in some occasions, investigators had not considered alternatives because they rarely examined how payments were made in the course of their wildlife investigations. Those investigators who did look into the financial aspects of wildlife crime said Asian syndicates do, at times, courier cash, but also utilize various other methods for sending and receiving payments. In no particular order, these include:

- Using the transfer quotas of friends and family members to move money across borders;
- Channeling funds through gaming, gambling and junkets;
- Using special financial ties with Hong Kong as a conduit to move money to other places;
- Having Chinese fishing vessels courier money and goods back to China;
- Paying off diplomats to carry cash or product in diplomatic pouches;
- Using fei chien brokers and correlated trade-based money laundering schemes; and
- Laundering money into real estate and through real estate development.

Investigators tracking Vietnamese gangs in South Africa and Mozambique say they operate distinct flying money systems, which are embedded in the Vietnamese expatriate business community.

Officials tracking the hawala trade in East, Central and West Africa reported similar patterns. African ivory distributors and poaching coordinators may send or receive money through hawaladars when it crosses borders or long distances, but they will normally pay poachers and porters in cash. Applying the 5-level supply chain model that some anti-poaching groups adopted to visualize the ivory supply chain, one can conclude that Level 1 actors (poachers and porters) rarely utilize IVTS, but actors in the other four levels will utilize them when convenient and/or optimal.

In West and Central Africa, where there seems to be less concern about disguising the origin of criminal proceeds, illicit ivory profits tend to get openly invested into real estate or the purchase of commercial businesses or hotels, without efforts to disguise their origins. Asian actors will be more likely to utilize fei chien systems to launder criminal proceeds, while also utilizing real estate and import-export deals to move, park or launder money. At the retail end of the ivory supply chain – located in East Asia – actors will use fei chien and its Southeast Asian corollaries. On the African end of the supply chain, fei chien only comes into play when Asian buyers are sending payments to Chinese exporters based in Africa.

According to investigators who have probed the issue in the wildlife trade and in general, fei chien brokers and hawaladars do not ever interact. It is assessed that this is the case since both networks are built on trust and shared culture.

THE 5-LEVEL IVORY SUPPLY CHAIN

01	**POACHING**	Payments made in cash, mobile money
02	**POACHING COORDINATOR**	May receive money via Hawala
03	**EXPORT**	May receive payments via Fei Chien, Hawala
04	**IMPORT**	May send money using Fei Chien
05	**RETAIL**	May make payment using Fei Chien

THE INTERSECTION BETWEEN HAWALA NETWORKS IN AFRICA AND THE IVORY TRADE

In some circumstances, Africa-based criminals involved in the ivory trade will utilize existing hawala networks that are not entirely criminal in nature, and which mainly handle remittances and other benign activity. Officials and investigators interviewed for this project described cases in which ivory criminals used reputable hawaladars like Somalia's Dahabshill and even mobile money systems like M-Pesa to send and receive payments for ivory shipments inside Africa. Since mobile money systems restrict the total amount that can be sent, payments sometimes had to be structured into multiple smaller transfers. One investigator in Mozambique described occasions when poaching coordinators sent funds to poaching teams using M-Pesa to pay for fuel and food during a poaching operation. Another investigator described a case in Tanzania in which authorities arrested two members of al-Shabab who were recruiting operatives from the Muslim community, and financing poaching operations to fund their activities.

Both al-Shabab operatives had access to large amounts of cash and used M-Pesa and hawala to pay couriers, poachers and bribes. In cases where distributors or exporters are moving larger amounts of money, they will tap into IVTS networks – either fei-chien or hawala – that only handle illegal money transfers. These criminal money brokers do not exist exclusively to service wildlife traffickers, but handle a broad range of illegal activity including but not limited to drug trafficking, gold and timber smuggling, tax evasion and paying bribes. In multiple cases in West and Central Africa, investigators interviewed for this report said key hawala networks were run by ethnic Hausas locally, and the Hausa networks tapped into Arab-run networks based in the United Arab Emirates and Kuwait. More work is needed to understand if these various ethnic networks ever intersect, and to determine if there are ever circumstances in which Asian fei-chien brokers will do trade-based money-laundering deals to settle accounts with hawaladars.

ASIAN ORGANIZED CRIME IN THE ILLEGAL WILDLIFE TRADE IN AFRICA

The steady growth in the number of Chinese citizens living in Africa has led to a correlated increase in Chinese-owned shops and trading houses that sometimes double as fei-chien brokerages. In some cases, these businesses are fronts for Chinese organized crime groups, known as Triads. These businesses provide critical finance services to Chinese entrepreneurs across Africa, whether their businesses are legal or illegal. In this regard, they make ordinary Chinese expatriates dependent on the Triads, and they also provide other Triad members with ways to move money undetected. Say a Chinese fei-chien broker in Mozambique receives money from a syndicate member who earned it illegally, and needs to send it back home outside normal banking channels. The broker, also a shop owner, can "import" goods at an overvalued price from a "seller" in China, using the illicit funds in order to repatriate that money back to China for use there.

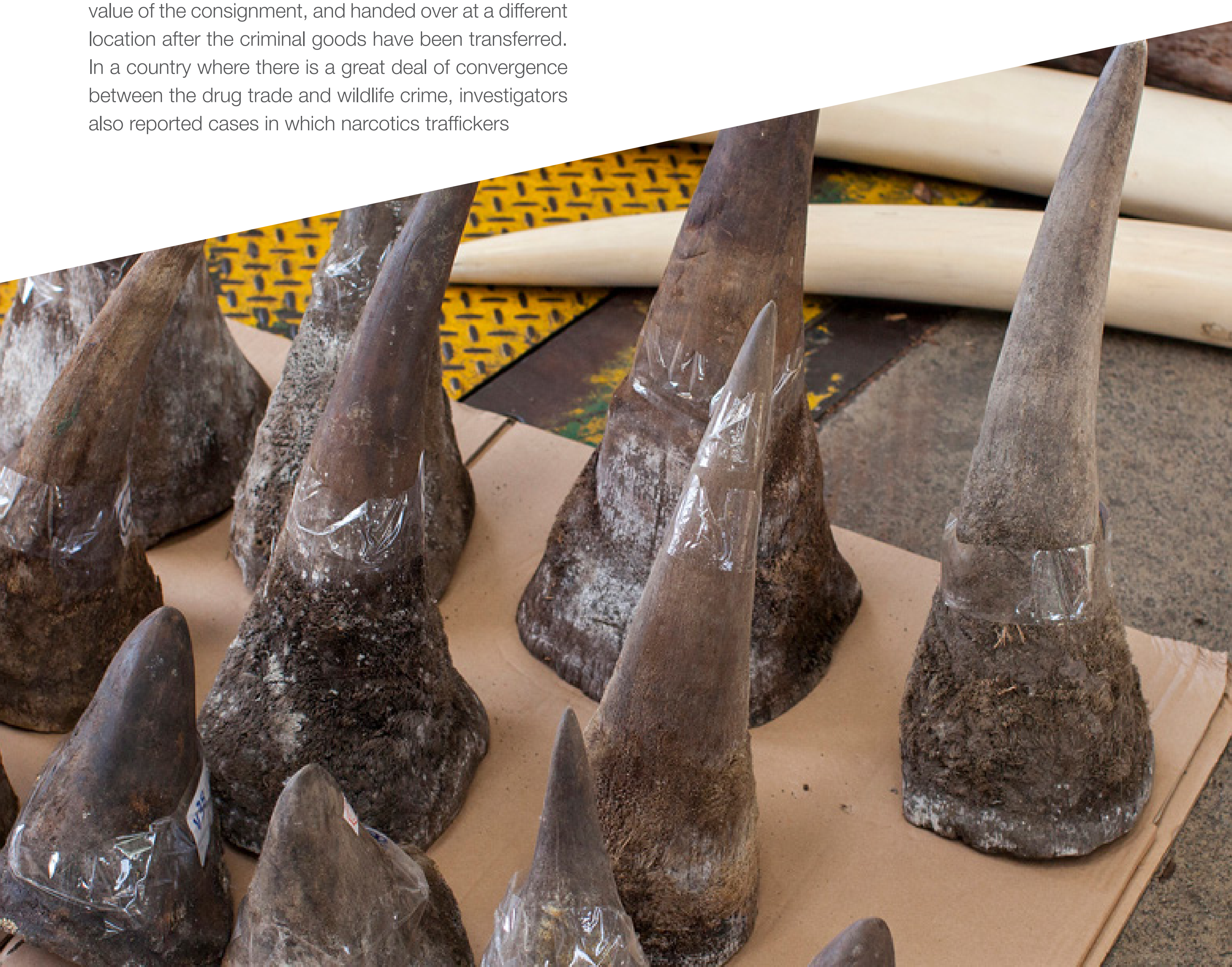
There is a tremendous amount of Chinese investment across Africa into real estate and infrastructure. South African law enforcement officials interviewed for this paper believe that much of the illicit Chinese in- and out-flows to their country – including some transfers used to purchase high-end real estate – are related to fei-chien and its corollary trade-based money laundering, but say not all of it is related to wildlife crime. Officials estimate that the value coming in and out of the country through these various schemes tops US$200 million annually. It is estimated that illicit financial outflows from China primarily in the form of trade mis-invoicing top $1 trillion over a ten-year period globally (GFI: 2019). The inflows of money have a corrupting impact.

African officials say Chinese and Vietnamese Triads pay bribes to build political alliances with ruling party officials and their family members through business deals, infrastructural investments and other partnerships. Officials say that IVTS remittances are used to finance "gifts," which can come in the form of property, luxury vehicles and shares in businesses. Triad members are also known for keeping large quantities of cash in storage. One policer official interviewed for this report described an arrest a decade ago in the Bruma Lake neighborhood of Johannesburg, where a high-ranking Chinese Triad member and real estate agent was found with ZAR42 million (US$3 million) stored in her home.

Money linked to wildlife crime also flows through informal channels in and out of South Asia and Southeast Asia, according to authorities in those regions interviewed for this project. An intelligence gathering organization in Indian confirmed that wildlife trafficking operating between southern India and Gulf countries, Malaysia, Singapore and Thailand almost exclusively utilized hawaladars to send and receive payments, and pay bribes. Cash from these transactions would often get laundered into real estate or commercial businesses. This confirms that hawala brokers are integrated into the region's regulated banking system and can execute transactions such as real estate purchases and business investments. Many conservation groups in Asia professed to be unaware of "flying money" systems, and their history, but were aware that buyers and sellers used IVTS to send and receive payments.

Case Study: Wildlife Syndicates in Mozambique

In Mozambique, Chinese and Vietnamese syndicates trafficking rhino horn and ivory have recruited workers at local courier firms, putting them on payroll to ensure safe passage for parcels containing cash and illegal goods being ferried across the country or abroad. Investigators note that money often travels along separate routes and is transferred at different times than the contraband, because criminals fear seizures by authorities. Asian gangs are known to pay in cash cards from local casinos, which get topped up with the agreed-upon value of the consignment, and handed over at a different location after the criminal goods have been transferred. In a country where there is a great deal of convergence between the drug trade and wildlife crime, investigators also reported cases in which narcotics traffickers who also smuggled wildlife products paid poaching coordinators in packages of heroin that were equal in value to the wildlife goods traded. Asian and South Asian syndicates have also invested in local businesses in order to provide cover for their large-scale criminal transactions. In particular, they have invested in construction firms, which provide a cover for sending out large sums of money – purportedly to import building equipment, which is then never delivered. The same trade-based money laundering schemes can be used in the other direction, on occasions when the syndicates need to receive payments in Africa.



CONCLUSION

Like any criminal activity, ivory trafficking is a business. At the end of the day, the objective is to earn profit. Despite this, many if not most investigators tracking the ivory trade and other wildlife crime across Africa and Asia know astonishingly little about how ivory criminals send, receive and store money. The overwhelming assumption that wildlife crime is a cash-based business stymies attempts to understand how money flows along ivory supply chains, and this complicates efforts to identify disruptive interventions. Conservation organizations, anti-poaching units and FIUs in key range and consumer states hold important data about wildlife crime networks, and many investigative units run source networks that could quickly build out further knowledge. But these same groups often lack technical knowledge about financial crime, money laundering legislation, and do not know how to produce nor securely distribute anti-money laundering and anti-corruption typologies to relevant local and international law enforcement partners who have authorities to take action.

Because the level of knowledge remains rudimentary, this first effort at examining the issue is inevitably incomplete. However, one can still make the following broad conclusions:

The majority of payments made at the poaching level – or Level 1 of the ivory supply chain – do appear to be made in cash. Since most investigators focus almost exclusively on this level of activity, it is understandable that they have little knowledge about money movements at the other phases of the ivory supply chain.

Regional and international distributors – Levels 2 - 4 of the ivory supply chain – do utilize IVTS on occasions when these systems provide convenience, security or when there are no other options for moving money;

For smaller transactions, Level 2 and at times Level 3 ivory criminals will tap into regulated money service businesses, such as Western Union or M-Pesa, or utilize major hawaladars that cater to migrant remittances;

Level 2 poaching coordinators – in East, Central and West Africa – appear to use IVTS simply as a means to transfer money, and do not appear to launder their proceeds;

Ivory exporters, who often Asian not Africa, will tap into IVTS used exclusively by criminal networks;

In these cases, ivory money will be comingled with other illicit money;

Criminals actors at the international appear to be more concerned about laundering the origin of the money, taking more care to disguise the transfers as trade deal or real estate purchases;

At every level of the supply chain, IVTS are also used to pay bribes.

At present, there are only a small number of anti-wildlife trafficking NGOs generating data and intelligence in a form that can be used by the regulated financial system to block proceeds from the ivory trade from moving through the global financial system. The 2018 creation of the Financial Taskforce is an important step towards increasing the flow of data reaching banks about ivory trafficking and other wildlife crime. In time, there must be an ongoing delivery of actionable data and intelligence that banks can analyze and use to reduce their exposure. Occasional reports, no matter how sesnational, will cause AML professionals to draw the conclusion that the risk from ivorty trafficking is just that, occasional, and therefore of low risk and low priority. To leverage the existing AML/CFT infrastructure, the anti-wildlife trafficking community must develop the capacity to regularly deliver timely and actionable data and analysis that will convince finance professionals that there is material risk and therefore the wildlife issue should be a priority.

A review of ivory trafficking routes would put focus on African countries of origin, ports of egress and ingress, and countries in Asia where products are received, crafted, wholesaled and distributed. These might give local and regional regulated banks and money service providers enough data and intelligence to identify transaction patterns showing settlement of IVTS broker balances. It is likely as, Passas and Vaccani point out, that patterns will emerge over a longer period of data analysis.

APPENDIX A:
WHY CRIMINALS LAUNDER MONEY

There are three main reasons why criminals running an ongoing transnational wildlife trafficking operation will engage in moving money that would constitute the crime of money laundering[1] (transacting the proceeds of a predicate crime):

- Moving monies to provide finance for their transnational trafficking operations;
- Transacting payments from the trade in illegal wildlife parts and derived products; and
- Laundering proceeds/profits from the trade in illegal wildlife parts and derived products into the regulated banking system for subsequent personal or further business use by traffickers.

FINANCING TRAFFICKING OPERATIONS:

The ongoing operation of transnational criminal activities requires continual financing. Extensive activities requiring the distribution of animal parts and the collection of illicit revenue require access to operating cash. As with any commercial business, financing sources arise from income generated from the sales of goods. A financial institution and/or Financial Intelligence Unit that can identify criminal proceeds will be able to charge the offence of money laundering.

REVENUE GENERATION FROM SALE OF ILLEGAL WILDLIFE PRODUCTS

To generate revenue to expand activities and derive income and profit for themselves, traffickers must be able to sell their products. Ivory is made into jewelry and other consumer items. Like any business value chain, raw materials and products must be distributed and proceeds captured and returned. Distribution of products will require a network of transactions, as is observed in all trafficking activities, with product moving out and money finding its way back. Mapping wildlife supply chains shows a trans-continental business model with product being shipped or flown across sea and land borders. These distances dictate that while cash proceeds may be collected locally, it will be risky and challenging to move large volumes of cash and so a structural system must be used, such as informal value transactions systems or the regulated banking system.

LAUNDERING PROCEEDS FROM A CRIME FOR PERSONAL USE:

The purpose of wildlife trafficking, like all trafficking, is to make money. Criminals committing the offences will at some point desire to be able to spend their profits in the legitimate marketplace, e.g. purchase of expensive luxury items, invest in businesses or purchase property. To do so, most criminals must launder the money. Laundering proceeds from a crime requires placement, layering and integration[2] so that the monies returned to them or eventually transferred to another are lawfully recognized, accounted for and available for expenditure.

The need by wildlife traffickers to use the banking system to move money to other parties within their group or to third parties for operational or trade reasons, and to clean proceeds for personal or alternative business use is crucial to their strategic operations and ultimate aims.

1. https://www.unodc.org/unodc/en/money-laundering/laundrycycle.html
2. https://www.unodc.org/unodc/en/money-laundering/laundrycycle.html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APPENDIX B:

WHERE IVTS INTERSECT WITH THE REGULATED BANKING SYSTEM

IVTS brokers provide a system for customers who don't have bank accounts or who don't want to use bank accounts to move money. But IVTS brokers themselves must occasionally settle up with each other, meaning that they sometimes use the regulated financial system. The settlement mechanism[3] is a primary focal point for those seeking to identify the use by brokers in the informal systems of the regulated system. Hawala researcher Nikos Passas examined these mechanisms closely to determine possible repeated transaction activities by ITVS brokers with the regulated bank accounts:

"Sometimes, a courier brings the cash from one party to another. This is common in the Middle East, where currency trades require the physical presence of money. Balances can also be evened out through postal orders, checks, official drafts, bearer instruments or wire transfers. If both parties have bank accounts, a bank-to-bank transfer is another option. A hawaladar in Pakistan or India may have accounts in the UAE, London, New York, or Hong Kong, for at least three reasons.

First, it is easier to settle positions with counterparts in one central place, thus consolidating accounts and reducing costs (whichever side of a given transaction has a cash surplus sends it to a clearing account for use by the other party).

Second, accounts in several jurisdictions make it possible for the hawaladar to serve his customers, even if he does not find a counterpart in a given country.

Third, having accounts in hard currency makes conversion from and into other currencies easier. Such accounts also provide stability for the whole business, as the rates are unlikely to fluctuate dramatically over short periods of time.

They also help hawaladars take their own profits out of the country in which they reside, and to diversify their financial resources. Most hawaladars settle up through centers like Dubai, New York, London, Hong Kong, Singapore and Switzerland, as this offers economies of scale and better rates for buying and selling currency."[4]

Passas in this passage has begun to identify transactional behavior that can lead to the development of indicators. These can be used by AML/CFT teams in regulated financial institutions to discover ITVS brokers abusing accounts in their institutions to launder proceeds of crimes such as wildlife trafficking or settle with other brokers who have been at the other end of trade relationships for trafficked wildlife parts and derived products. The joint UNODC and APC paper[5] also made cogent suggestions for indicators.

"One of the most consistent and valid indicators of hawala activity in investigations conducted in the United States is seen in bank accounts. A hawala bank account almost always shows significant deposit activity, usually in the forms of cash and checks, which are often from one or more ethnic communities (e.g. Afghan, Bangladeshi, Indian, Pakistani, Somali) associated with the hawaladar.

As has been discussed, certain businesses are also more likely than others to be involved in hawala. Once again, it is not possible to give an exhaustive list, but the following is a starting point: starting point:

Import/ Export
Rugs/ Carpets
Used Cars
Foreign Exchange
Telephones.
Travel and Related Services
Jewelry (gold, precious stones)
Car Rentals (usually non-chain or franchise)

3. http://files.acams.org/pdfs/2018/A_Guidance_to_Understanding_Hawala_G_Martis.pdf
4. Passas, Nikos, "Hawala and Other Informal Value Transfer Systems: How to Regulate Them?," Risk Management Vol 5, No 2. (2003) https://www.jstor.org/stable/3867818
5. https://www.treasury.gov/resource-center/terrorist-illicit-finance/Documents/FinCEN-Hawala-rpt.pdf

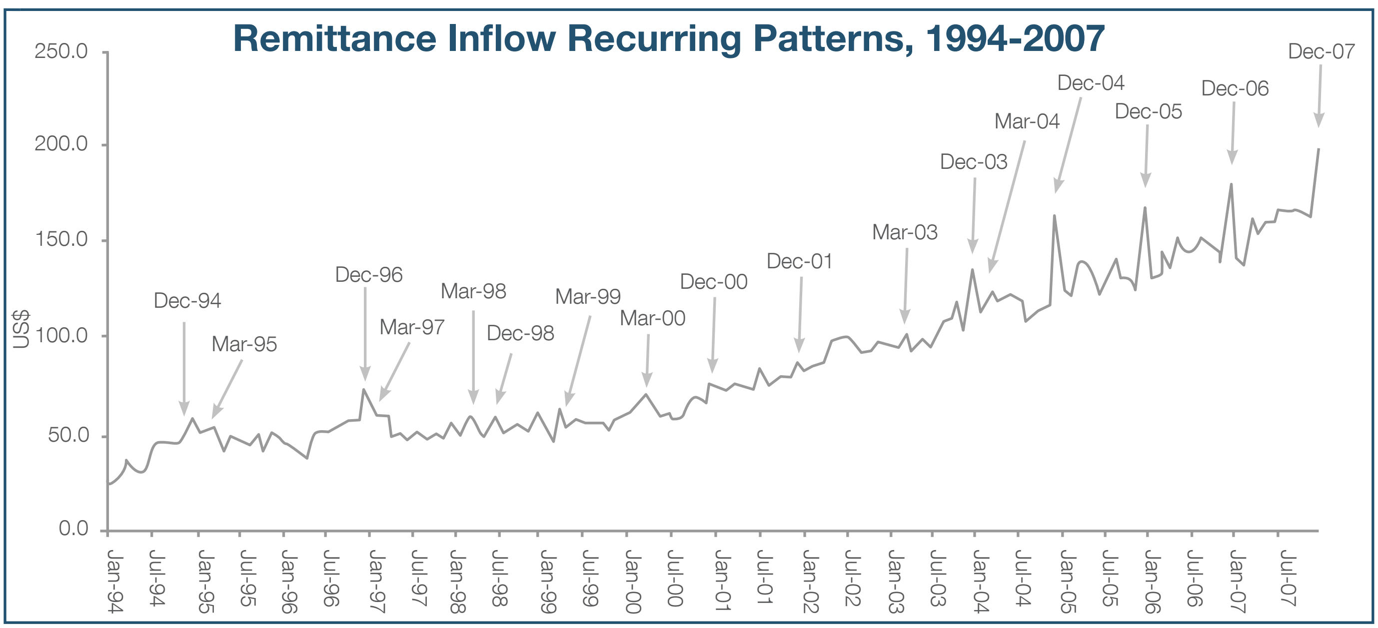
Compelling arguments for other indicators are suggested by Matteo Vaccani in his paper Alternative Remittance Systems and Terrorism Financing for the World Bank Paper series.

"The size of the flows passing through the account and the average account balance are inconsistent with the stated business run by the holder. In other words, whether the cash flow observed within the account matches its stated sources.

The direction and frequency of flows involved, especially with cross-border transactions, seem inconsistent with the actual needs of the stated business activities of the account holder.

The account shows frequent outgoing transfers to a major financial center known to be involved in hawala-type operations, such as United Kingdom, Switzerland, and Dubai.

The timing of sudden increases in cash deposits/ withdrawals seems to match known peaks in migrant remitting practices. Soaring cash withdrawals might signal the need for frequent disbursements on the recipient end of a remittance corridor, while sudden increases in cash deposits might indicate frequent originations of remittance transfers in sending countries. In both cases, if the timing of such phenomena coincides with religious holidays, the beginning of the school year, or other occasions when migrants typically remit more than usual to cover peaks in expenses or to send gifts (see figure 4.1 right), the account might be used for alternative remittance system (IVTS) purposes.[7] "



6. http://elibrary.worldbank.org/doi/book/10.1596/978-0-8213-8178-6
7. Alternative Remittance Systems and Terrorism Financing: Issues in Risk Management, http://elibrary.worldbank.org/doi/book/10.1596/978-0-8213-8178-6

Finally, indicators of transaction patterns often associated with IVTS suggested by ACAMS (Advancing Financial Crime Professionals Worldwide), include:

- Hawala bank accounts reflect a significant deposit activity, in forms of cash and checks. These checks may be from someone associated with the account;
- In some cases, the beneficiary countries of these transactions are countries that are known for hawala;
- Accounts are credited by businesses that do not have an apparent link with the other business;
- Different bookkeeping methods for customers;
- Large transactions are not recorded;
- Large volumes of transactions are received from one customer;
- High turnover in account of low-income earner;
- Bulk cash shipments;
- Cash couriers travelling to jurisdictions known for hawala;
- Physical movements of cash daily;
- Transfer to businesses that have no apparent connection with the originating party;
- Transactions that have no commercial or economic sense for a personal/business account;
- Fluctuations in commission rates/fees for the customers; and
- Grocery or other corner stores that move a large amount of cash.

APPENDIX C:
REVIEW OF RECENT GENERAL RESEARCH ON IVTS SYSTEMS

This is a selective, critical overview of the research literature on hawala and similar "informal"[8] value transfer systems (IVTSs), with a particular focus on the social production of trust relations. The contemporary literature on IVTSs emerged mainly as a problem-oriented, para-academic and policy research cottage industry out of post 9/11 anxieties around terrorist financing, then, in a familiar associative move, with global criminal financing. It drew initially on an earlier niche literature characterized by often crudely positivistic, culturalist assumptions. Subsequent research work involving "armchair" research approaches, limited fieldwork, and/or narrative based research, while often reifying categories such as "trust" and "ethnicity" (making them objects rather than negotiated processes) nonetheless challenges much of the more simplistic work on this topic by situating actors and networks within concrete social worlds. In-depth field research on IVTSs is still rare, but what has been done focuses in particular on their social constitution and self-regulation. This presents both a challenge and an opportunity. The social constitution of IVTSs means that they are not, as is widely recognized, generally amenable to the kinds of Western regulatory visibility-producing techniques that characterize formal financial systems. At the same time, this makes them very amenable to being traced and understood through other visibility-producing research techniques, namely ethnographic fieldwork.

Since 2001, a great deal has been written about hawala and similar "informal value transfer systems" (IVTSs). Yet, as Dr. Edwina Thompson, one of the few researchers to have done extensive field research on the subject, argues, much of this literature has been structured by crudely Manichaean assumptions, limited understanding of the social realities involved, and exoticizing stereotypes (2011). Nikos Passas, one of the few other leading authorities on the topic, says of the literature on hawala's affiliations with criminal activity that it "…lacks depth and is replete with inaccuracies (2003, p.6)," the re-circulation of which continues to misinform much of the literature. He notes that the terms used to describe IVTS are often incorrect, that the criminal extent of these systems is often exaggerated, and that these systems provide vital value exchange services for people who otherwise might be cut off from "formal" financial systems.

This presents unusual challenges for a literature review, which would normally be expected to situate strands of a body of research in relation to different methodological approaches, the quality, form, and implications of empirical claims, and competing social theories. Here instead is a literature that can best be understood as largely para-academic in nature, with a smaller literature that meets some of the basic standards of method, reasoning, and social theory required of empirically-oriented research. This review thus discusses the main literature briefly and mainly as a counter-point to the limited, selected work that meets reliable research and theoretical standards, the latter in relation to its still-nascent but developing understanding of IVTSs as socially-situated phenomena in relation especially to issues of trust, and both as negative and positive referents for future directions research might productively take.

Hawala became a focus of media and policy-oriented para-academic research particularly after 9/11, beginning with a reference by then President Bush that connected it to terrorist financing of the attacks. This claim was later proven false. As Keene argues of the funding for the terrorist attacks, "… all available evidence points to the use of formal banking services including bank wire transfers, credit card accounts and regulated remitters" (Keene 2007, p.8. Also see Keene 2005). Nonetheless, the issue of hawala and similar systems of informal value transfer spawned a substantial cottage industry of often newly-minted anti-terrorism and global crime experts.

8. While these systems are commonly referred to as "informal," that is only in relation to a narrow definition of formality offered by historically-recent, primarily Western-derived externally-imposed legal and regulatory frameworks. In other ways, the functioning of such systems meets basic anthropological definitions of formality as the product of regularized and understood social norms and sanctions, standardized practices, and agreed upon or shared semiotic frameworks.

This post 9-11 literature described hawala simply – and incorrectly – as a system for moving money "illicitly," illegally, or in "underground" fashion (See FinCen 2003; ANCA 1991).[9] It characterized it mainly as a "challenge" to be addressed in combatting global terror and international crime. In keeping with the cultural politics of the "war on terror," it also associated IVTSs with Islam and as a practice which works through religious and/or ethnic affiliation, grounded often in essentialist tropes of "honor" or "tribal" solidarity. Crudely culturalist assumptions calling up images of darkness and the underground exoticize a relatively simple money transfer system used by hundreds of millions of people around the globe. At the same time, these analyses also understated how complex can be to understand and intervene in the activities of specific, potentially dangerous elements that also make use of such systems.

A Reuters article exemplifies some of these issues, beginning with tales of chaotic, strange, and foreign marketplaces in which among "…shouted exchange rates, trilling mobiles and the clink-clink of tea glasses ricocheting around Kandahar's money market, there is a barely-audible backbeat: the electric purr of counting machines gobbling dollars, Afghanis and rupees…" (2012). Enter intrepid heroes. "With no map to guide them, a small circle of U.S. and European law enforcement and intelligence officials have ventured into this bewildering financial landscape, hoping to chart the ever-shifting pathways that keep the Taliban flush with cash." The article goes on to cite Edwina Thompson's extensive (uniquely so) fieldwork on hawala, in which she finds hawaladars in Kandahar handling up to $810 million of opium-related funds in 2005 (2011). While an accurate if narrow depiction of Thompson's findings, the article ignores completely her larger point, which is that while it is of course true that drug monies in the region work through such systems given their near-universality, this is a minor feature within the much larger world of regular, inexpensive, highly dependable, and indeed necessary IVTS transactions that comprise their ordinary day-to-day operation.

Similarly, a number of Council on Foreign Relations publications conflate the exotic with danger in ways that both mystify ordinary IVTS practices and cloud the analytical/discriminatory lenses by which to assess the elements within them that might indeed warrant concern. These emphasize images of shady and untraceable dealings, cash smuggling, phony charities, and primitive trust-based relations (See for example Kaplan 2006). Compare this with the more mundane finding of the Financial Action Task Force Report on Money Laundering, which found that "hawaladars" provide a legitimate and effective service"…."where access to the formal financial sector is difficult or prohibitively expensive" (2003, p.2).

Rather than mysterious webs of shady dealings, more careful, less baldly stereotyped research has shown these systems to be highly reliable and in-practice highly self-regulated, in which transparency is critical – but perhaps in not in ways amenable to Western financial oversight practices. Understanding the systems requires, much less of either the "armchair" or of the formal regulatory approach, and more on-the-ground work with actual people situated in real-world social-economic networks stretching across the Middle-East, Asia, Africa, and elsewhere.

More careful research has undermined or complicated many of the simplistic accounts above on both empirical and theoretical grounds. This work has had to do a great deal of debunking in addition to making positive claims about the forms, functions, and social realities of IVTS practices. Still making use of mainly "armchair" research methods, though with more rigor and theoretical sophistication, a few important pieces have also made use of field methods, working among the people who either use and/or are themselves brokers in IVTS systems.

As Viles (2008) argues, IVTSs are best understood as social and cultural systems involving the exchange of value, or consideration, rather than simply as money transfer systems. The term hawala, meaning "transfer" in Arabic, refers to systems by which multiple contracting parties in geographically remote areas, and/or who are geographically distant, can exchange value without the physical or electronic conveyance of tangible units of value such as money. In other words the transfer across hawaladars is of debt and responsibility. Rather than

9. For academic critiques of many of these assumptions, see for example El Qorchi et al 2003; Passas 2006; 2003; 1999; Keene 2005; Thompson 2011; Viles 2008)

always being "illicit" or "underground," hawala and similar systems may be quite ordinary and public features of life in many places around the world, and the formal legality of such practices varies by context (Viles 2008; Passas 2003).

Such systems of value transfer have been used throughout the world going back possibly as far as the Tang Dynasty in China, where it was used to move tax revenues between provinces (McCusker 2005), and as Malkin and Elzur argue, was used in Europe as late as the 19th century by large family banks like the Rothschild's for informal year-end account settlement (2002). These systems have been referred to as fei qian in China, or more contemporarily dixia qianzhuang, hui kwan in Thailand, hundi in India, padala in the Philippines. They have for centuries elegantly solved problems of geographic distance and security by eliminating the need for direct movement of tangible value by working through social systems which have acted as effective insurers through cultivated relations of trust, normativity, social sanctions, and other more direct consequences, making such systems both remarkably flexible and reliable (Viles 2008; Thompson 2011).

IVTSs thus encompass a broad array of similar systems not limited by geography, culture, or religion, and they are not limited to the Middle East or to Islamic practice. It is important to recognize the near-universality of such systems. Virtually all of the serious scholarship on these issues points to the near ubiquity of such forms of transaction, particularly in a vast array of contexts in which formal banking systems are difficult, more expensive, or considered, as if often the case, less reliable than so-called "informal" means of value transfer.

Adding to this complexity is the difficulty of tracing such systems using Western style audit-oriented approaches alone, although this too has been somewhat exaggerated. Transactions do work across both "formal" and "informal" systems, often involving banking systems as the places where money generally comes to rest (El Qorchi, 2003). Hawaladars generally do keep ledgers and other forms of documentation of transactions, though these may be coded or regularly disposed of in contexts where IVTSs are illegal (2007). This means that aspects of these systems are somewhat amenable to forms of regulatory oversight, but also that this would at a minimum require the buy-in of the participants themselves rather than relying on external procedures.

The issue of trust is a central feature in the IVTS research literature, though it is often not well-articulated or unpacked. Passas argues that "Trust, a defining element of hawala, makes the system extremely efficient. There are very few instances in which retail clients lost their money" (2006, p.52). Yet as anthropologists have long-argued and carefully documented in ethnographic fieldwork, trust does not emerge whole from pre-given reified relations (race; ethnicity; religion), although these may in ordinary practice act as rough referents along which trust relations can be assumed, cultivated, and re-affirmed. Researchers pointing to shared ethnicity, for example, as the already-given grounds of trust relations dispersed across geographic space and at least short temporal lags mistake a question for an answer. How is ethnicity a possible medium for the cultivation of trust? How is this negotiated in particular material circumstances? How might trust be cultivated across other kinds of social proximities, and how is it enforced by social and economic sanctions and norms?

The broader literature on issues of trust in informal value relations argues that it is best understood not as an irrational or pre-given faith in the other but rather as generally based on credible commitments and punitive consequences for failures to honor a given agreement (see Shapiro et al. 1992; Hardin 1991; Yamagishi and Yamagishi 1994).

In research on IVTSs in southern China, Varese et al. draw on limited but still-direct ethnographic style research and a more refined social-theoretical lens (2018). The result is a fruitful study of IVTS brokers focused on the issue of trust not as a given outcome of reified categories but as socially produced features of self-regulating systems. They find both ex ante forms of trustworthiness signaling that may include shared religion or ethnic affiliation but also critically include reputation, repeated dealings, and embeddedness in other identifiable social-economic relations. Reputation and dense social-economic relations also act as ex post consequences, which help ensure reliability, particularly as most brokers also have other economic interests which will also be negatively impacted by failures in trustworthiness. Trust is thus the product of tangible social relations which may be facilitated by some form of prior association, or linguistic, cultural, or religious affinity, but is primarily produced within empirically-identifiable conditions of reliability and consistency, including also durable physical locations and the mutual sharing of potentially compromising information. Notably, Varese et al find no cases of customers being cheated in their admittedly limited study, nor do they find the use of direct coercion. This matches with the conclusions of Passas and Thompson that levels of trust in IVTSs are considerably higher than those found among customers of highly regulated banking systems.

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