



GLOBAL FINANCIAL INTEGRITY



AMERICAN UNIVERSITY  
WASHINGTON, DC

# SHADOW FIGURES

**The data of transnational crime**



October 2025

# ABOUT



This report was developed to provide the new U.S. Administration and its incoming policymakers a detailed analysis of key transnational crimes, including drug trafficking, counterfeiting, cybercrime, human trafficking, illegal logging and mining, illegal fishing, wildlife trafficking, oil theft, small arms trafficking, and cultural property trafficking. This report seeks to update the 2017 Global Financial Integrity (GFI) report on transnational crime, provide new insights to long-term trends, as well as address intelligence gaps in the US Government's understanding of specific crimes.

1. The revenues generated from the ten crimes covered in this report are estimated to range between US\$12.30 trillion to US\$16.21 trillion annually. Cybercrime is estimated to account for approximately 59% to 75% of the total revenue generated by the ten crimes analyzed in this report.
2. This estimate reflects a significant change compared to the 2017 Global Financial Integrity report, which estimated a total between US\$1.6 trillion to US\$2.2 trillion annually. Note that the earlier study did not include cybercrime in its analysis.

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# INTRODUCTION



**Transnational crime will likely continue to increase as exploitable populations and unmet consumer demands enable global illicit activities. Large profits and uneven regulatory enforcement continue to make crimes in this report attractive to Transnational Crime Organizations (TCOs).**

Collectively, these crimes damage national security, local and national economies, social institutions, public health, and the environment. As such, it is crucial to reevaluate the impact of these illicit crimes to prepare updated policies.



# Key Insights

## Global Crime-related Data is Often Inadequate and Single-Sourced

Much of the data on criminal activities comes from a limited number of sources, such as nation-level government or law enforcement bodies, which likely lack access to all relevant global information. International organizations, such as the United Nations Office on Drugs and Crime (UNODC) that collect and aggregate the data must rely on countries to independently report their data, leading to potential bias in the reporting.

- Many countries and regions do not have robust mechanisms for tracking crime-related financial data, leading to underreporting or misreporting.
- Single-source data likely does not accurately reflect the full scope of illicit activities, including those not detected or reported by authorities.
- There are certain assumptions that experts consistently make, such as that illicit activities are approximately 10-20% of a legal market (e.g. small arms sales or cultural property sales). We had little way to verify the accuracy of these claims.

## Criminal Activity is Typically Perpetrated by Secondary Actors

Many crimes, particularly large-scale or trans-national offenses, are often carried out by secondary actors who are not the main drivers of criminal enterprises. The role of intermediaries or facilitators is critical; focusing on primary actors may overlook the broader structure of criminal organizations.

## Terrorists Engage in Illicit Activities to Generate Revenue but Are Not Large-Scale Contributors to Crime Globally

While terrorist groups may engage in criminal activities such as drug trafficking, extortion, or human trafficking to finance operations, these activities typically do not represent a significant portion of the global criminal economy. Revenue generated by terrorists through illicit activities is minimal compared to the profits made by organized crime syndicates or illicit trade industries. Terrorist financing may also involve legitimate businesses or donations, making it difficult to fully isolate the economic impact of their criminal activities.



## Revenue Generated by Crime Does Not Equate to the Human Impact

High-revenue crimes like drug trafficking or human trafficking may cause significant social and psychological harm to victims, families, and communities, which is not always captured in financial estimates. The broader societal impacts, such as displacement, loss of life, trauma, and social instability often overshadow the financial aspects of crime.

## Borders Increase Value

The value of illicit goods and services often increases when borders are involved, due to the risks and challenges of smuggling, trafficking, or cross-border criminal operations. Cross-border criminal activities often involve higher costs and more complex logistics, which can raise the price of illicit goods (e.g., drugs, weapons, counterfeit products). International borders can also create opportunities for criminal groups to operate with greater impunity, taking advantage of jurisdictional gaps or conflicting laws between states, while also accessing markets with higher demand for their products.

## Global Flow

Although all regions of the world are affected by transnational crime, poorer and developing countries are where a majority of the criminal activity takes place. However, although most of the harmful parts of transnational crime happens in developing countries, the vast majority of goods goes to rich developed countries. Items of value are imported to rich countries, while harms are exported to poorer countries.



# Methodology

This report explores the challenges and limitations in acquiring reliable data on illegal activities, particularly in sectors where accurate, verifiable information is scarce or non-existent. Given the sensitive and illicit nature of these activities, obtaining concrete, hard data proves to be exceedingly difficult.

By combining quantitative data, qualitative interviews, and a critical assessment of historical reports, this methodology provides a robust framework for understanding the scope and challenges of gathering data on illegal activities. We acknowledge the inherent limitations and biases in our data sources but believe that our approach offers a reasonable and comprehensive understanding of these complex issues.

Below are the key methodologies employed in the collection and analysis of the data presented in this report:

1

## Data Sources

The most consistent and seemingly reliable data came from the United Nations Office on Drugs and Crime (UNODC). However, much of the data reported by the UNODC is self-reported by individual countries. These nations have significant incentives—political, economic, and social—to either overestimate or underestimate the extent of illegal activities when reporting numbers to the UN. As a result, we have tried to cross-reference the data with other available sources when possible.

2

## Evaluation of Secondary Data

A significant challenge faced in this report was the reliance on secondary data from various entities. Many figures initially cited in the literature related to illegal industries have been recycled over the past 15-20 years. These numbers lack verifiable methodologies, suggesting many figures are speculative or may even have been initially fabricated. We conducted an extensive review of these sources, identifying patterns in data and highlighting instances where numbers may have been used without rigorous validation.



3

## Primary Research

To supplement existing data and to obtain more nuanced insights, we conducted interviews with individuals across multiple geographic regions. We interviewed over 30 experts from five continents, ensuring a diverse range of perspectives from those with firsthand knowledge of the subject matter. These interviews were designed to provide qualitative insights that could contextualize the quantitative data.

4

## Report Review

In addition to primary interviews, we reviewed available reports on each topic, spanning academic articles, government studies, and non-governmental organization (NGO) reports. This helped us build a comprehensive understanding of the subject matter, while critically assessing the reliability of various reports.

5

## Adjustments for inflation

For financial data, we adjusted figures to account for inflation using US InflationCalculator.com. This ensured our comparisons over time remained accurate and relevant. This adjustment allows for a more accurate representation of the financial scope of illegal industries across different periods.

# 2024 TRANSNATIONAL ORGANIZED CRIME ESTIMATES

▸ Drug Trafficking	▸ \$840 Billion - \$1.44 trillion
▸ Counterfeiting	▸ \$1.7 Trillion - \$4.5 Trillion
▸ Cybercrime	▸ \$9.22 Trillion - \$9.5 Trillion
▸ Human Trafficking	▸ \$236 Billion
▸ Illegal Unreported and Unregulated Fishing	▸ \$66.4 Billion - \$100.3 Billion
▸ Illegal Logging and Mining	▸ \$83.7 Billion - \$262 Billion
▸ Wildlife Trafficking	▸ \$7.85 Billion - \$21.1 Billion
▸ Oil Theft	▸ \$145 Billion
▸ Small Arms and Light Weapons	▸ \$2.87 Billion - \$5.75 Billion
▸ Cultural Property Trafficking	▸ \$1 Billion - \$3 Billion

# MAIN CHAPTERS



The revenues generated from the ten crimes covered in this report are estimated to range between US\$12.30 trillion to US\$16.21 trillion annually. Cybercrime is estimated to account for approximately 59% to 75% of the total revenue generated by the ten crimes analyzed in this report.



# Drug Trafficking

*The United Nations Office on Drugs and Crime (UNODC) defines drug trafficking as the “global illicit trade involving the cultivation, manufacture, distribution and sale of substances which are subject to drug prohibition laws.”*

## Key Findings

- The total global drug trafficking market is estimated at **US\$1.44 trillion**, highlighting its massive impact on the global economy and organized crime networks. (This figure relies heavily on a single source, raising questions about its accuracy.)

## Key actors

- China which engages in the active production and distribution of fentanyl, targeting American populations as a strategic threat.
- Mexican cartels serving as primary conduits for illicit drugs, leveraging extensive networks to smuggle substances into the U.S.
- TCOs who operate in areas of low enforcement – governments that struggle with prosecution – are able to produce and transport illicit drugs with ease.
- The Golden Triangle, a region covering northeastern Myanmar, northwestern Thailand and northern Laos, is a region that has re-emerged as a significant hub for heroin and methamphetamine production and trafficking.

Drug trafficking weakens countries regardless of whether they are a source, processing, transit, and/or market country. Robust international criminal networks, as well as the significant revenue generated by drug trafficking, poses significant challenges for developing and developed nations. Even wealthy countries struggle to allocate sufficient resources and adapt their national strategies to effectively combat and prevent ongoing and future illegal activities related to drug trafficking.

## Value

Drug trafficking ranks as the third most lucrative illicit market in this report, accounting for **over 10 percent** of the transnational criminal value analyzed.



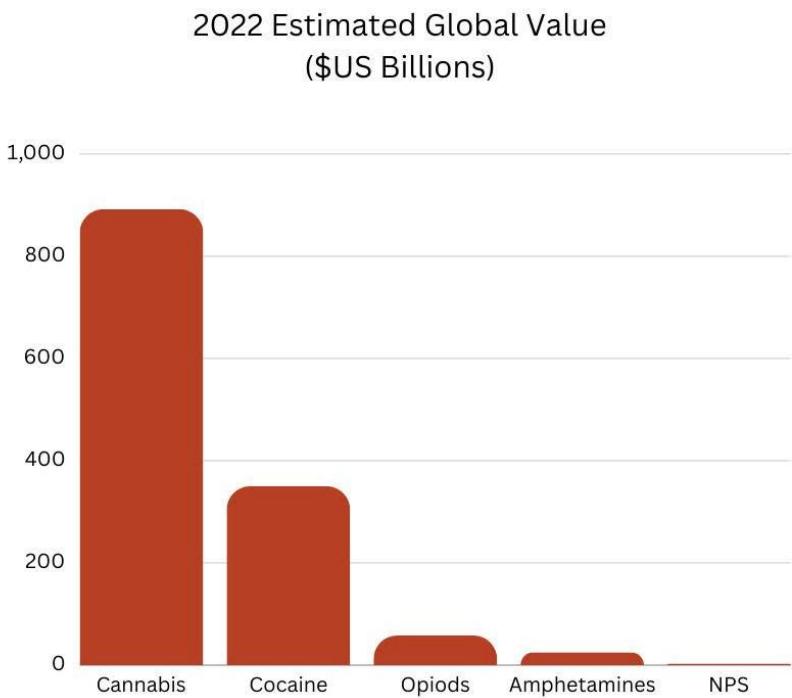
A precise and comprehensive assessment of the global market value of drug trafficking and other illegal activities is nearly impossible due to the clandestine nature of these operations. However, reliable data is most readily found in recorded and reported drug seizures. As such, the statistical data presented in this report relies heavily on seizure information provided by countries, which offers a partial view of the true extent of the revenue generated by drug trafficking.

**The global drug trafficking market is currently valued between US\$840 billion and \$1.44 trillion in 2024.** Figure 1 summarizes the global market values for overall drug trafficking and the four major submarkets.

The global market value of drug trafficking discussed here is based on the retail sale of five major categories: amphetamine-type stimulants (ATS), cannabis, cocaine, new psychoactive substances (NPS), and opioids.

- Notably, NPS is a new category, excluded from the 2017 GFI report. These substances were not covered under the 1961 Single Convention on Narcotic Drugs or the 1971 Convention on Psychotropic Substances. The rise of NPS has been unprecedented, surpassing several other drug categories globally some including Sedatives and Tranquillizers, Ecstasy, and Hallucinogens.

**Figure 1: Global Market Values for Major Submarkets of Drugs<sup>1</sup>**



Source: UNODC “Online World Drug Report 2024”

1 United Nations Office on Drugs and Crime (UNODC), “Online World Drug Report 2024 - Drug market patterns and trends,” accessed October 21, 2024, <https://www.unodc.org/unodc/en/data-and-analysis/wdr2024-drug-market-trends.html>.

Two methods were used to arrive at these market values, one working forward and the other backward. Both methods use simple economic techniques and do not consider market factors such as changes in demand and supply.

- Working forward, the rate of inflation was applied to the last submarket estimates produced by the UNODC, the sum of which provided the updated global market value.<sup>2</sup>
- Working backward, the value of the global illicit drug market to world gross domestic product (GDP) was used. The UNODC estimated that the global drug market was worth US\$320 billion in 2003, equivalent to approximately 0.8 percent of global GDP. If the global market still represents the same percentage of global GDP, the illicit global drug market would be worth about US\$840 billion in 2024.

**Cannabis** remains the most prevalent illicit drug globally, with its use increasing since 2017. It now comprises **67 percent** of the global market by value. In terms of quantity seized, cannabis accounts for **82 percent** of the total amount seized worldwide.

- The drug's ease of production and high sales reinforce its cycle. This, coupled with TCOs controlling large swaths of land in unregulated or unenforceable governments – the Golden Triangle, and the Colombian-Venezuelan border for example - allows the scale of production to remain unchallenged.
- There are an estimated 228 million cannabis users globally, which represents about 4.4 percent of the population aged 15-64.<sup>3</sup>



2 United Nations Office on Drugs and Crime (UNODC), "Statistical Annex," UNODC, accessed October 21, 2024, <https://www.unodc.org/unodc/en/data-and-analysis/wdr2024-annex.html>.

3 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024 - Drug market patterns and trends," accessed October 21, 2024, 84.



**Cocaine** is the second-largest illicit substance, making up **26 percent** of the global market by value. However, in terms of the quantity seized, cocaine accounts for **8 percent** of the total. An estimated 23.5 million users globally, representing 0.5 percent of the population aged 15-64.<sup>4</sup>



**Amphetamine-type stimulants** (including ecstasy and ecstasy-like substances) constitute 2 percent of the global market by value and 1 percent of the total amount seized. With an estimate of about 50 million global users, accounting for 1 percent of the population aged 15-64.<sup>5</sup>

**Opioids** represent **4 percent** of the global market by value and **3 percent** of the total amount seized. There are estimated to be about 60 million users globally accounting for a little over 1 percent of the population aged 15-64.<sup>6</sup>

New psychoactive stimulants account for the remainder of the global value market and 0.3 percent of the total amount seized. Though this category is small, its impacts are large. UNODC began analyzing NPS trends in 2007 but was only collecting the identification of such drugs as they can emerge and disappear rapidly.

4 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024 - Drug market patterns and trends," accessed October 21, 2024, 72.

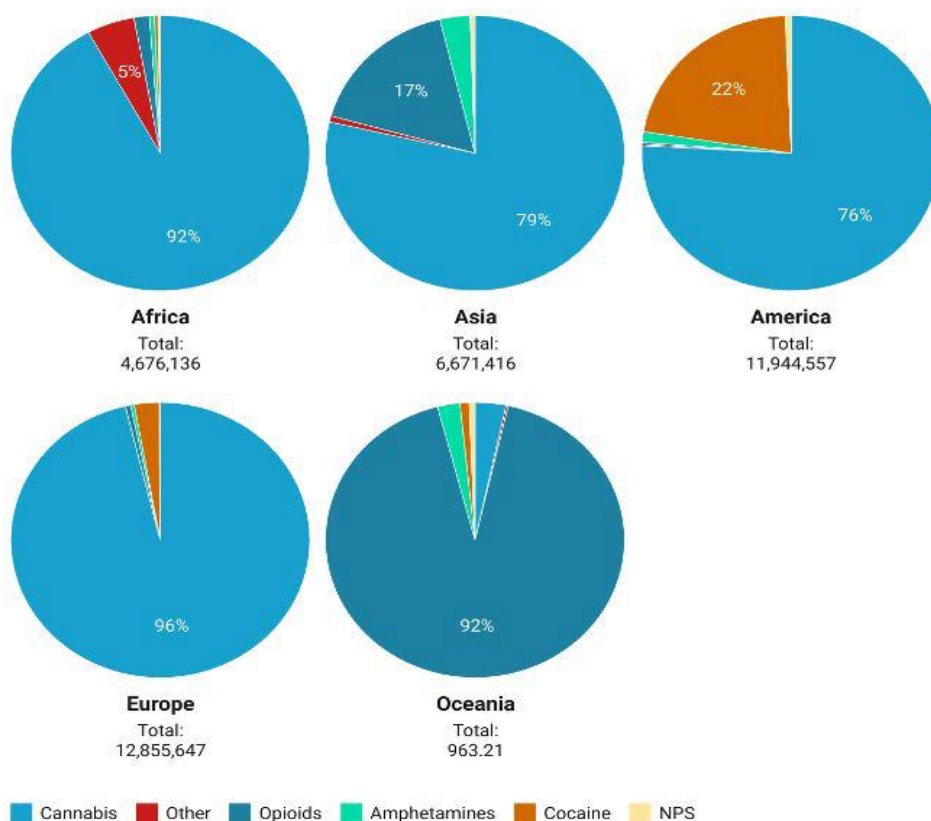
5 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024 - Drug market patterns and trends," accessed October 21, 2024, 48.

6 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024 - Drug market patterns and trends," accessed October 21, 2024, 92.

- By 2022, UNODC had identified 1,127 different NPS, 566 of which remain in the market and 44 of them were created less than a year before.
- A few common names listed under NPS which are not considered in the 1961 or 1971 conventions include hallucinogens, synthetic cannabinoids, and stimulants.

**Figure 2: Drug Seizures by Region**

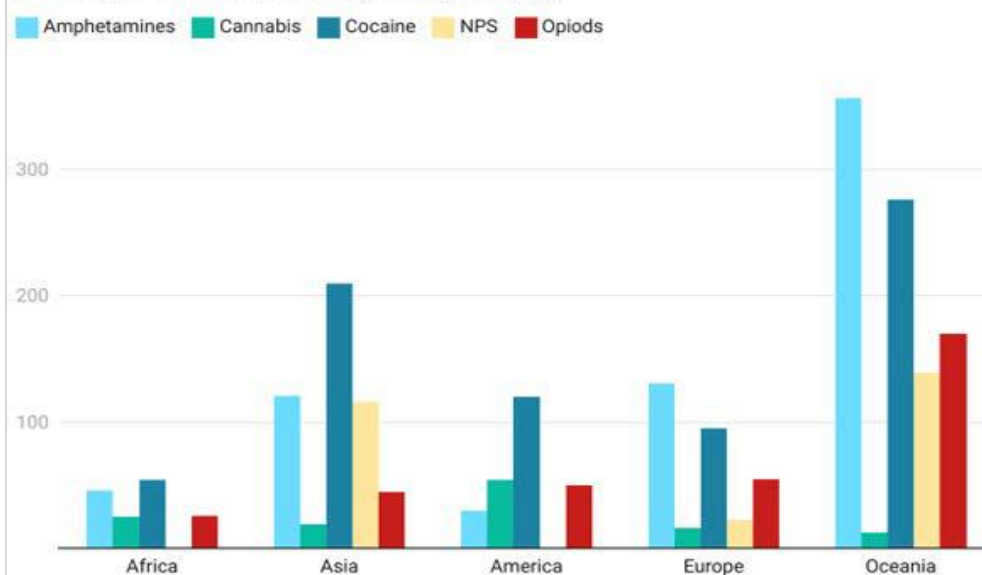
**Amount of Drug Seizure By Region**



Source: UNODC • Created with Datawrapper

**Figure 3: Price of Drugs**

**Average Price per Region (USD/g)**



Created with Datawrapper

## Dynamics

**Sedatives:** a drug that slows down the activity of the central nervous system to calm a person down, relieve anxiety, or help them sleep

**Dissociatives:** This class of drug causes people to feel separated or detached from their body or physical environment. They can also cause hallucinations and other changes in thoughts, emotions, and consciousness.

**Hallucinogens:** Drugs that alter human perception and mood. Under the influence, people see images, hear sounds, and feel things that seem real but are not.

Source: NIH, ADH

**ATS (amphetamine-type stimulants)** and **NPS (new psychoactive substances)** are synthetic drugs that can be produced more efficiently than plant-based drugs like cocaine and cannabis. Being lab-made, they avoid challenges such as weather conditions and harvest cycles. The seizure of ATS has steadily increased over the years, with 233.43 tons seized globally in 2017, rising to 366.67 tons in 2022.<sup>7</sup> Methamphetamine accounts for 95 percent of ATS seizures, with its largest markets in East and Southeast Asia.

- Since 2017, the demand for ATS has surged with major transnational organized crime groups (TOCs) like the Sinaloa Cartel and Cartel Jalisco Nueva Generación driving production.<sup>8</sup>

**NPS**, also known as “designer drugs” or “legal highs,” present unique trends.

- In 2022, of the 566 active NPS on the market, 46 percent were synthetic cannabinoid receptor agonists, 18 percent were stimulants, 14 percent were synthetic opioids, and the remaining 20 percent included sedatives, dissociatives, hallucinogens, and others.<sup>9</sup>
- Ketamine, a dissociative NPS, remains the most widely consumed, with 33.39 tons seized, followed by synthetic cathinone at 0.55 tons and synthetic cannabinoids with less than 0.25 tons seized.
- Though these drugs are not acknowledged in the 1961 or 1971 conventions, individual countries have their own laws prohibiting them. In the United States, the Controlled Substance Act categorizes the various forms of NPS as Schedule 1 narcotics.<sup>10</sup>

7 United Nations Office on Drugs and Crime (UNODC), “Online World Drug Report 2024 - Drug market patterns and trends,” accessed October 21, 2024, 48 <https://www.unodc.org/unodc/en/data-and-analysis/wdr2024-drug-market-trends.html>.

8 Drug Enforcement Administration, “National Drug Threat Assessment 2024,” DEA, 31, accessed October 21, 2024, <https://www.dea.gov/sites/default/files/2024-07/2024%20NDTA-updated%207.5.2024.pdf>.

9 United Nations Office on Drugs and Crime (UNODC), “Online World Drug Report 2024,” 108.

10 Drug Enforcement Administration, “National Drug Threat Assessment 2024,” 44.



**Opioids**, derived from or mimicking natural substances in opium poppies, thrive in dry, warm climates with well-drained soil. Historically cultivated in regions from Turkey to Burma, Afghanistan was a major producer until the Taliban's ban led to a 70 percent drop in cultivation and a 73 percent decrease in production, driving prices to a two-decade high.<sup>11</sup> Afghanistan remains a key producer alongside Mexico and Colombia. Heroin and fentanyl are dangerous illicit drugs that are widespread in the United States.

- From 2019 to 2023, U.S. heroin seizures decreased by almost 70 percent; meanwhile, fentanyl seizures increased by 451 percent.<sup>12</sup> This spike is due to fentanyl being a synthetic opioid, meaning it can be created rapidly and continuously, without relying on the opium poppy product (which is time-consuming and expensive to produce). As such, it is often sold as pure heroin laced with fentanyl. This increases the risk of overdosing and death.
- The cartels that stand to profit the most out of this endeavor are the Sinaloa and Jalisco Cartels.

Unlike the production of other illicit drugs, synthetics do not need a specific geographical region to thrive; the plant form of the drug is no longer needed. Chemists can synthesize drugs without concerns about temperature, weather, humidity, or other adverse environmental factors, with the only limitation on production being the availability of precursor materials. The production of synthetic drugs will continue to expand as the ease of access to precursor materials and the very low barrier of entry allow individuals to create these drugs.



## U.S. Schedule Narcotics

### Schedule I

Schedule I drugs, substances, or chemicals are defined as drugs with no currently accepted medical use and a high potential for abuse. (heroin, LSD, marijuana, ecstasy)

### Schedule II

Schedule II drugs, substances, or chemicals are defined as drugs with a high potential for abuse, with use potentially leading to severe psychological or physical dependence. (cocaine, methamphetamine, fentanyl)

### Schedule III

Schedule III drugs, substances, or chemicals are defined as drugs with a moderate to low potential for physical and psychological dependence. (products containing less than 90 milligrams of codeine per dosage unit (Tylenol with codeine), ketamine, anabolic steroids, testosterone)

### Schedule IV

Schedule IV drugs, substances, or chemicals are defined as drugs with a low potential for abuse and low risk of dependence. (Xanax, Valium, Ambien, Tramadol)

### Schedule V

Schedule V drugs, substances, or chemicals are defined as drugs with lower potential for abuse than Schedule IV and consist of preparations containing limited quantities of certain narcotics. (cough preparations with less

Source: DEA

11 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024," 92.

12 Drug Enforcement Administration, "National Drug Threat Assessment 2024," 29.

In the production of synthetic opioids, Insight Crime was consulted to provide expert knowledge. TOCs require several elements to create the full product such as pre-precursors, precursors, and essential chemicals.<sup>13</sup>

- ' Methamphetamine's precursor materials are 1-phenyl-2-propanone (P2P) and methylamine. As these two are heavily regulated, TOCs have started to create the "pre-precursors" for the pre-cursors.<sup>14</sup>
- ' These elements face their own unique regulatory challenges, requiring a broad and multifaceted approach to effectively mitigate their impact. This separation of products means that there is no one-size-fits-all solution to regulating these markets, and each part of the supply chain requires tailored strategies.<sup>15</sup>



The challenge of balancing these competing priorities has made it difficult for authorities to manage precursor substances effectively.

- ' Excessive regulation of these chemicals by governments may hinder business activities and commerce.<sup>16</sup>
- ' The essential chemicals are among the most widely produced and traded products worldwide, and any disruption to their flow can have severe consequences for legitimate industries that rely on them.<sup>17</sup>

13 Steven Dudley, "Precursors and Mexico's Synthetic Drug Trade: Summary and Major Findings," In-sight Crime, May 8, 2023, <https://insightcrime.org/investigations/chemical-precursors-mexico-synthetic-drug-trade/>.

14 Sara Garcia, "Making synthetic drugs: A primer," InSight Crime, May 8, 2023, <https://insightcrime.org/investigations/making-synthetic-drugs-a-primer>.

15 Steven Dudley, Insight Crime, interviewed by Luke Bieber, November 2024.

16 Garcia, "Making synthetic drugs: A primer."

17 Dudley, "Precursors and Mexico's Synthetic Drug Trade: Summary and Major Findings."

These efforts are often hindered by the absence of a unified international legal framework, inadequate information sharing and cooperation between countries, and a general lack of resources and training.

**Cocaine** is produced from the coca plant, primarily grown in Colombia, Peru, and Bolivia. Colombia leads with 65 percent of global cultivation, followed by Peru at 27 percent and Bolivia at 8 percent.<sup>18</sup>

- Despite eradication efforts dating back to the early 2000s, coca cultivation has consistently outpaced destruction. In 2020, 139,000 of the 234,000 hectares of cultivated coca were eradicated, but by 2022, only 100,800 hectares were cleared from 354,900 hectares under cultivation.<sup>19</sup>
- The United States and Western and Central Europe are the primary markets, while Ecuador, Mexico, Brazil, and the Netherlands are heavily impacted as transit countries. In Ecuador, a direct correlation exists between cocaine seizures and rising homicide rates since 2020. Mexican cartels are looking to cultivate their own product in the region; the Cartel Jalisco Nueva Generación (CJNG) has been the strongest proponent in this endeavor.<sup>20</sup>



**Cannabis**, one of the easiest plants to grow, can be cultivated both indoors and outdoors. However, global seizures of cannabis herb and resin have declined, particularly in North America, where seizures dropped from 1,110 tons in 2017 to 412 tons in 2022.<sup>21</sup>

- Legalization efforts in Canada and the U.S. have contributed to a reduced demand for illicit cannabis products. Meanwhile, in Africa and Oceania, cannabis is the primary drug for which people seek treatment, with 37 percent of those in Oceania and 36 percent in Africa seeking help for cannabis use, compared to 23 percent in the Americas, 15 percent in Europe, and 3 percent in Asia.<sup>22</sup>
- As of 2024, the following countries have legalized cannabis: Canada, Georgia, Germany, Luxembourg, Malta, Mexico, South Africa, Thailand, and Uruguay. In the United States, 23 states have legalized its recreational usage, and 38 states plus the District of Columbia have legalized its medical usage.<sup>23</sup>

18 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024," 73.

19 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024," 76.

20 Drug Enforcement Administration, "National Drug Threat Assessment 2024," p36.

21 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024," 85.

22 United Nations Office on Drugs and Crime (UNODC), "Online World Drug Report 2024," 91.

23 Drug Enforcement Administration, "National Drug Threat Assessment 2024," 37.



## Actors

China and its over **40,000 pharmaceutical companies** have facilitated the acquisition of the ingredients to make one of the most dangerous synthetic opioids, fentanyl.<sup>24</sup> The House Select Committee on the Strategic Competition Between the United States and the Chinese Communist Party released their findings earlier this year on China's participation in the production and distribution of fentanyl and its precursor materials.

- ' The **PRC**, through tax rebates, subsidizes the manufacturing and export of synthetic narcotic and fentanyl materials.<sup>25</sup> Several of which are listed under a United Nations Treaty as Schedule I controlled substances.<sup>26</sup>
- ' The PRC has provided monetary grants and awards to companies that are openly trafficking in illicit fentanyl materials. One such example is Shanghai Ruizheng Chemical Technology Co., Ltd., which received government support while openly selling fentanyl products online.<sup>27</sup>
- ' Despite being the most surveilled network in the world and requiring national IDs to sign into any website in the country, the PRC allows the open sale of fentanyl precursors and other materials.<sup>28</sup> This facilitates the **low barrier of entry and enables easy access** for traffickers.
- ' The PRC maintains relationships with Chinese transnational criminal groups. Chang An Le, a Taiwanese national, served a prison sentence for heroin trafficking in the United States. He is currently the head of a Chinese organized crime syndicate in Taiwan while also in charge of the Chinese Unity Promotion Party, known to be a PRC front.<sup>29</sup>



- 24 Committee on the CCP's Role in the Fentanyl Crisis, "The CCP's Role in the Fentanyl Crisis," Washington, DC: U.S. Government Publishing Office, 2024, accessed November 8, 2024.
- 25 Committee on the CCP's Role in the Fentanyl Crisis, "The CCP's Role in the Fentanyl Crisis."
- 26 United Nations. 2005. "FINAL ACT of the UNITED NATIONS CONFERENCE for the ADOPTION of a SINGLE CONVENTION on NARCOTIC DRUGS," [https://www.unodc.org/pdf/convention\\_1961\\_en.pdf](https://www.unodc.org/pdf/convention_1961_en.pdf), 26.
- 27 Committee on the CCP's Role in the Fentanyl Crisis, "The CCP's Role in the Fentanyl Crisis."
- 28 Committee on the CCP's Role in the Fentanyl Crisis, "The CCP's Role in the Fentanyl Crisis."
- 29 Committee on the CCP's Role in the Fentanyl Crisis, "The CCP's Role in the Fentanyl Crisis."

Two of the most dangerous transnational organized crime syndicates are the Sinaloa Cartel (CDS), and the CJNG. They have been the predominant drug cartels in Mexico for the past several decades.

- Mexico launched a campaign against drug cartels in 2006, achieving only modest results. The ongoing conflict claims thousands of Mexican lives annually, including those of politicians, students, and journalists. Since the war began, the nation has experienced over 431,000 intentional homicides with over half of them having an unknown association between the perpetrator and victim.<sup>30</sup> These drug cartels import and distribute cocaine, fentanyl, heroin, marijuana, and methamphetamine into the United States.<sup>31</sup>
- A few other notable cartels are the Beltrán-Leyva Organization, having strong ties with CDS and CJNG; Los Zetas, a paramilitary background known to be the most technologically advanced, sophisticated, and violent of the cartels<sup>32</sup>; Guerreros Unidos, mostly participating in heroin trafficking; and La Familia Michoacána, a cartel that President Obama specifically named when invoking the Foreign Narcotics Kingpin Designation Act.<sup>33</sup>
- These cartels are also involved in extortion, smuggling, oil and mineral theft, and weapons trade.

The cartel's strength gives them the ability to control the flow of nearly all the illicit drugs in the United States, with little opposition from other TCOs. The Mexican government and public institutions are not the only targets of their reach; they have also established a lucrative alliance with chemical suppliers based in China to secure the necessary components for manufacturing synthetic drugs. With this partnership, Chinese money laundering organizations (MLOs) provide the cartels with "clean" proceeds from their endeavors.<sup>34</sup>



- 30 "Intentional Homicide," United Nations Office on Drugs and Crime (UNODC), accessed October 26, 2024, <https://dataunodc.un.org/dp-intentional-homicide-victims>.
- 31 "Mexico's Long War: Drugs, Crime, and the Cartels," Council on Foreign Relations, August 5, 2024, <https://www.cfr.org/background/mexicos-long-war-drugs-crime-and-cartels>.
- 32 Drug Enforcement Administration, "Southwest Border Region--Drug Transportation and Home-land Security Issues," National Drug Threat Assessment 2008, October 2007. <https://www.justice.gov/archive/ndic/pubs25/25921/border.htm>.
- 33 "Fact Sheet: Overview of the Foreign Narcotics Kingpin Designation Act," The White House, 2016, <https://obamawhitehouse.archives.gov/realitycheck/the-press-office/fact-sheet-overview-foreign-narcotics-kingpin-designation-act>.
- 34 Drug Enforcement Administration, "National Drug Threat Assessment 2024."



Further south lies Colombia, where there are several paramilitary groups and cartels which focus on the cultivation and distribution of cocaine.

- The National Liberation Army (ELN), one of the oldest Colombian rebellion groups, has long controlled a known drug trafficking corridor in the state of Zulia, Venezuela. With political protection from the Venezuelan government, the ELN cultivates, produces, and distributes cocaine.<sup>35</sup>
- The Gaitanist Self-Defense Forces of Colombia (AGC), also known as the Gulf Clan or Urabeños, are the strongest and most dominant criminal organization in Colombia. Because of their strength, they have been able to create and maintain relationships with international organizations such as the Sinaloa Cartel, European contacts such as Italian mafia, Balkan criminal groups, and other European drug trafficking networks.<sup>36</sup>

The **“Golden Triangle”** (a region overlapping the countries of Myanmar, Laos, and Thailand) in the Eastern Hemisphere serves as the primary hub for illicit and uncontrolled production of heroin, methamphetamine, and amphetamine-based substances. According to a UNODC Regional Representative for Southeast Asia and the Pacific, Myanmar’s borders are easily penetrable, facilitating the movement of trafficked goods.<sup>37</sup> This region is also the leading producer of synthetic drugs, particularly methamphetamine.

- A significant shift occurred in 2013 when organized crime groups increased their activity in the Golden Triangle and shifted focus toward methamphetamine production. Following the Myanmar military takeover in 2021, economic decline led to a substantial increase in methamphetamine manufacturing and forced farmers to return to poppy cultivation as a reliable income source.<sup>38</sup> The region’s unstable governance has allowed international criminal organizations to seize control of various territories.
- Currently, the most prominent criminal syndicate operating in the area is the Sam Gor gang, which dominates the northeastern part of the triangle, specifically the Shan State in Myanmar.<sup>39</sup> This Chinese-based syndicate, comprising five triads, controls approximately 70 percent of the methamphetamine market and reportedly generated revenue of up to US\$17.7 billion in 2018.<sup>40</sup>

35 “ELN, Ex-FARC Mafia Drive Rising Cocaine Production in Zulia, Venezuela”, InSight Crime, February 15, 2024, <https://insightcrime.org/news/el-ex-farc-mafia-drive-rising-cocaine-production-zulia-venezuela/>.

36 Gaitanistas – Gulf Clan”, InSight Crime, December 5, 2023, <https://insightcrime.org/colombia-organized-crime-news/urabenos-profile/>.

37 Jeremy Douglas, “Policing one of the world’s ‘biggest drug trafficking corridors,’” Interview by UN News, United Nations Office on Drugs and Crime (UNODC), June 28, 2023.

38 Jeremy Douglas, “Q&A: The opium surge in Southeast Asia’s ‘Golden Triangle,’” Interview by Kevin Doyle, Al Jazeera, Feb 18, 2023. <https://www.aljazeera.com/news/2023/2/18/qa-un-rep-on-opium-boom-in-golden-triangle>.

39 “The Golden Triangle: Global Drugs Danger”, Global Strategic and Defense News, August 27, 2023, <https://gsdn.live/the-golden-triangle-global-drugs-danger/>.

40 Drugs investigators close in on Asian ‘El Chapo’ at centre of vast meth ring”, The Telegraph, October 14, 2019, <https://www.telegraph.co.uk/news/2019/10/14/drugs-investigators-close-asian-el-chapo-centre-vast-meth-ring/>.

# Case Study

The research paper “Interdicting International Drug Trafficking: a Network Approach for Coordinated and Targeted Interventions” published in the European Journal on Criminal Policy and Research journal, discusses a research-based method for interdicting transnational crime.<sup>41</sup>

- Interventions should focus on countries that have multiple incoming or outgoing trafficking connections, or those that serve as connections between producer, transit, and consumer countries. This strategic coordinated targeting, among countries, is more likely to disrupt drug trafficking networks compared to non-coordinated efforts that do not consider the specific roles of countries within the trafficking network.<sup>42</sup>

- The study highlights that interventions aimed at specific trafficking routes with several transitory countries are likely to be effective. This means that routes that are critical for connecting different parts of the trafficking network should be prioritized for interdiction efforts.<sup>43</sup>

This study highlights the necessity of working in collaboration with global partners to mitigate transnational drug trafficking. It also stresses the importance of shared intelligence, resources, and coordinated operations to effectively combat the complexities of international drug trafficking networks.

In a coordinated investigation between Colombia, Spain, and Belgium with the support of Europol, the dismantling of a transnational criminal organization was accomplished in November 2024. Thirty-two individuals were arrested in Colombia and Spain, and 5.8 tons of cocaine was seized in all three countries.<sup>44</sup> This was achieved through an understanding of which countries served as the producers, transit, and consumers. Spain is a transit country and by intercepting from there, authorities prevented the dispersal of 5.8 tons of cocaine into Europe.

In July 2024, Interpol collaborated with 31 countries to seize more than 615 tons of illicit drugs and precursor materials, with an overall estimated value of UD\$1.6 billion. 505 of those tons were precursor material, 56 tons were cocaine, and 52 tons were other drugs. Guyana seized 3 tons of cocaine and a narco-sub; Antwerp, Belgium, and Senegal seized 7.1 tons of cocaine which was traced traveling from Sierra Leone.<sup>45</sup>

In conclusion, the coordinated and targeted approach to interdicting international drug trafficking, as detailed in the European Journal research, demonstrates the critical importance of strategic collaborations and intelligence sharing. The results exemplified by Europol and Interpol illustrate the tangible successes that can be achieved when countries work together to disrupt trafficking networks at key transit points. By focusing on critical routes and leveraging collective resources, international partnerships can significantly impede the flow of illicit drugs, thereby enhancing global security.

41 “Trafficking: A Network Approach for Coordinated and Targeted Interventions,” European Journal on Criminal Policy and Research 28 (February), <https://doi.org/10.1007/s10610-020-09473-0>.

42 Targeted Interventions,” 556-557.

43 Giommoni, “Interdicting International Drug Trafficking: A Network Approach for Coordinated and Targeted Interventions,” 562.

44 “Drug Cartel Grind to a Halt with Six Major Arrests in Colombia | Europol.” Europol, 2024, <https://www.europol.europa.eu/media-press/newsroom/news/drug-cartel-grind-to-halt-six-major-arrests-in-colombia#impact>.

45 “Record Seizures in INTERPOL Operation against Drug Trafficking,” Interpol.int, 2024, <https://www.interpol.int/en/News-and-Events/News/2024/Record-seizures-in-INTERPOL-operation-against-drug-trafficking>.

## Connections to Foreign Terrorist Organizations (FTOs)

The revenue generated from drug trafficking increases relative to the number of borders crossed and the danger associated with each crossing. However, this profit does not constitute the primary revenue source for FTOs. Although drug trafficking provides a consistent source of income, the primary focus of FTOs remains on achieving ideological, political, or religious objectives. Drug trafficking profits serve merely as a means to an end rather than their principal focus. All known FTOs listed by the United States government engage in the activity of drug trafficking.

## Policy Recommendations

With the progress of global legalization of cannabis and cannabis products, the focus of U.S. decision-makers should shift toward the synthetic production of illicit drugs. The following recommendations are aimed at economic concerns, national safety, and international cooperation.

### Global scope:

- Allocate resources for additional studies to improve the monitoring of illegal drug trafficking, ensuring information is not sourced from a single entity and avoiding overreliance on one organization.
- Propose frameworks for international collaboration to prevent cross-border trafficking of opioid precursors.

### Cannabis:

- Develop federal programs to transition workers from the illicit drug trade into legitimate industries, including legal cannabis cultivation and manufacturing.

### Synthetic production:

- Develop policies requiring stricter tracking and reporting of precursor and pre-precursor chemicals used in manufacturing synthetic opioids.

### China:

- Implement stricter limits on Chinese investments in critical U.S. industries. This would help prevent undue foreign influence in strategic sectors and bolster national security.
- Increase scrutiny of goods imported from China to ensure compliance with U.S. regulations and prevent the entry of illicit items.

# Counterfeiting

## Overview and Analysis

Counterfeit goods and products are by far the largest and most lucrative of the crimes studied in this report. “A counterfeit is an item that uses someone else’s trademark without their permission. By making or selling a counterfeit, criminals seek to profit unfairly from the trademark owner’s reputation.”<sup>46</sup> Nearly every commodity, including apparel, food, shoes, electronics, jewelry, spare auto parts, and much more are counterfeited. The products are not exclusive to popular brands, such as Nike, Adidas, Hermes, or Yeezy.<sup>47</sup> While evaluating the value and scope of this crime, counterfeiting has significantly increased in the past seven years since the previous report. Counterfeiting is expected to increase in value and type of goods, as well as the regions and populations of the world this crime affects. Counterfeiting is estimated to total nearly half of all organized crime.<sup>48</sup>

### Key Findings

- The total value of global counterfeited goods is a **multi-trillion-dollar industry**, but the exact value is mostly unknown.
- Terrorism does not have a significant impact on the value of the counterfeiting industry, and do not rely on counterfeiting as a primary source of income.
- Goods that are produced fraudulently range from **luxury goods, branded apparel, and drugs and pharmaceuticals**.




### The International Anticounterfeiting Coalition

“A counterfeit is an item that uses someone else’s trademark without their permission. By making or selling a counterfeit, criminals seek to profit unfairly from the trademark owner’s reputation.”

46 “What Is Counterfeiting?,” International Anti Counterfeiting Coalition, September 23, 2021, <https://www.iacc.org/resources/about/what-is-counterfeiting>.

47 Edwina Fitzhugh Lindsey, “What Are the Most Faked Brands Online Today?,” Potter Clarkson, n.d., <https://www.potterclarkson.com/insights/what-are-the-most-faked-brands-online-today/>.

48 Organization for Economic Co-operation and Development (OECD) and the European Union Intellectual Property Office (EUIPO), “Why Do Countries Import Fakes? Linkages and Correlations with Main Socio-Economic Indicators,” accessed November 28, 2024, [https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document\\_library/observatory/documents/reports/2023\\_Why\\_do\\_countries\\_import\\_fakes/2023\\_Why\\_do\\_countries\\_import\\_fakes\\_Report\\_FullR\\_en.pdf](https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document_library/observatory/documents/reports/2023_Why_do_countries_import_fakes/2023_Why_do_countries_import_fakes_Report_FullR_en.pdf).



According to the U.N., counterfeiting is the largest criminal activity in the world and continues to be one of the highest income sources for criminals.<sup>49</sup> Counterfeiting harms both the consumers and buyers of fraudulent products due to lack of regulations and oversight of the manufacturing and production process. Many of the materials used to produce fake goods are not subject to quality assessments. The products are made with the cheapest available materials, while often sold with high markups.

## Value

Counterfeit goods continue to be very profitable for sellers due to being cheaply made and bypassing quality, safety, and authenticity checks. This allows the products to be produced at high quantities and reach buyers across the world. Types of counterfeits vary across industries and countries and stretch across all types of goods, products, merchandise, food, medicine, jewelry, currency, and more. Counterfeiting is estimated to be a multi-trillion-dollar business. **Estimates of the global counterfeit industry range from US \$1.7 trillion to \$4.5 trillion annually.** However, the exact values are estimated due to most sales happening on the black market or in unreported and undocumented transactions. This total value accounts for illegal sale and trade of goods ranging from cosmetics, pharmaceuticals, cigarettes, electronics, clothing, and more. Most counterfeit products are produced through independent or unregulated and unauthorized individuals or companies, making the number of counterfeit goods nearly impossible to count. The gross annual profit from manufacturing and selling counterfeit goods is largely unknown.

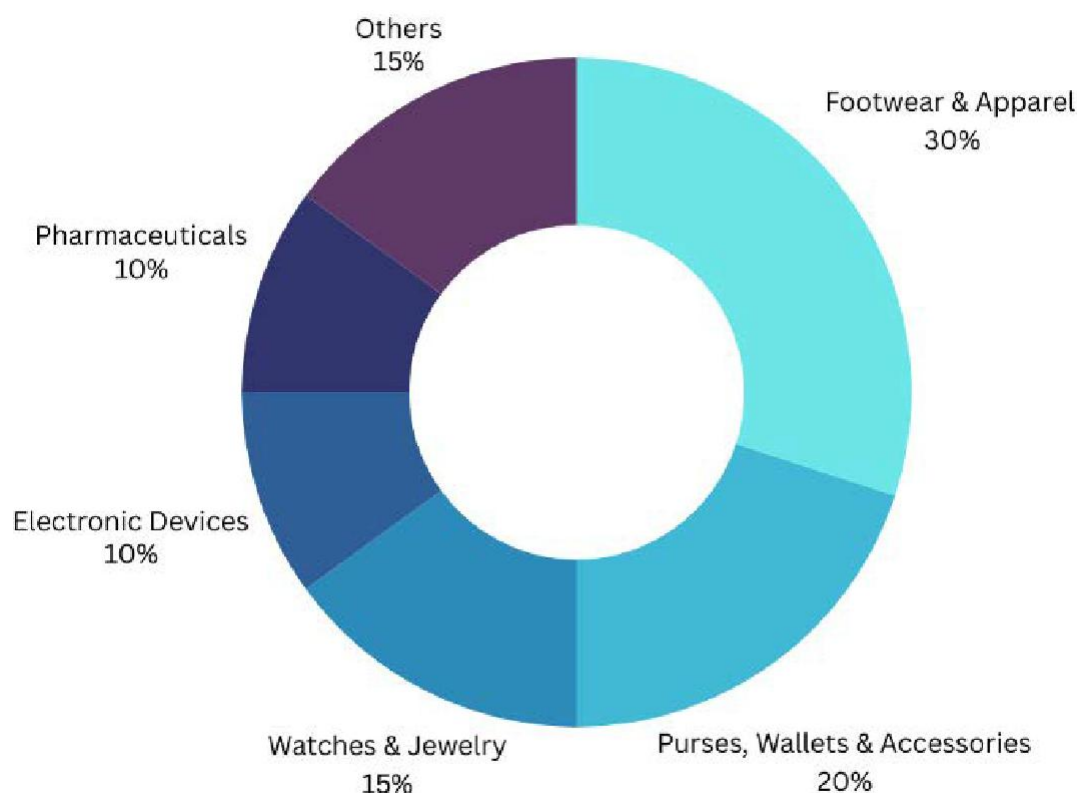
Revenue is estimated based on seizures from United States Customs and Border Protection at U.S. ports and entry points, then inflated to reach the estimated total global value.<sup>50</sup> The data is also reported based on estimates of sales of e-commerce, social media, independent sellers such as street vendors, and at small markets across the world. Experts use transactions and public interest on social media and other websites where consumers can buy unverified and inauthentic goods to predict how much of each product is being sold worldwide via the internet.

49 “Counterfeiting and Organized Crime,” United Nations Interregional Crime and Justice Research Institute (UNICRI), accessed November 27, 2024, <https://unicri.org/index.php/counterfeiting-and-organized-crime>.

50 Counterfeiting (Intended for a Non-Legal Audience),” International Trademark Association, November 14, 2024, <https://www.inta.org/fact-sheets/counterfeiting-intended-for-a-non-legal-audience/#:~:text=Unfortunately%2C%20counterfeits%20are%20sometimes%20found,individual%20sellers%20or%20via%20shopping>.



**Figure 4: Ratios of Types of Counterfeit Products Seized by US Customs and Border Protection<sup>51</sup>**



## Dynamics

**U.S. Customs and Border Protection (CBP)** estimates that due to increased internet use, the movement of illicit goods has increased significantly and will continue to do so across the world.<sup>52</sup> Similarly, the types of counterfeit goods range across all brands and types of products. In Fiscal Year 2023, CBP reported seizing high quantities of products that span nearly all industries and all regions of the world.<sup>53</sup> According to the Global Organized Crime 2023 Index, China was ranked as the top trader of illicit goods. When ranked by region, the Global Organized Crime Index ranked Southeast Asia as the top trader of illicit products, followed by South America and Western Asia.<sup>54</sup>

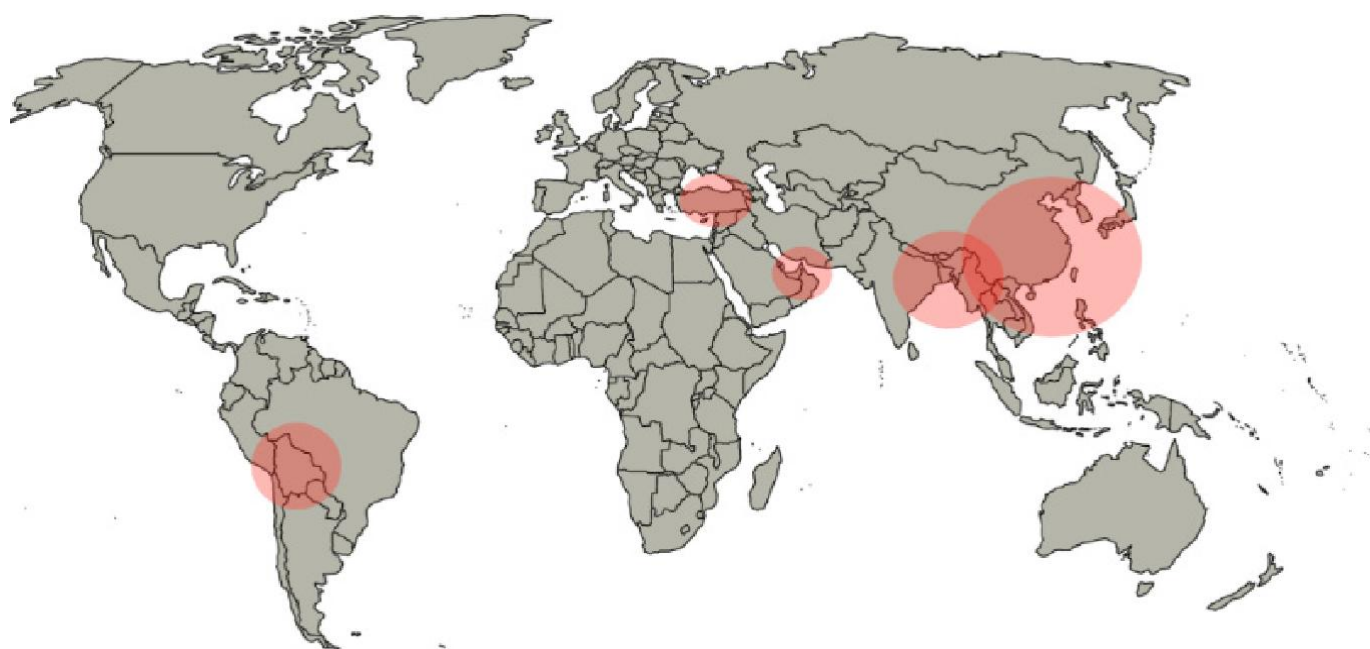
51 "The Truth behind Counterfeits," U.S. Customs and Border Protection, accessed October 14, 2024, <https://www.cbp.gov/trade/fakegoodsrealdangers>.

52 "Back-to-School: Business and Law Enforcement Team Up to Protect Students, Parents, and Teachers from Counterfeit Goods", U.S. Chamber of Commerce, August 11, 2022, <https://www.uschamber.com/intellectual-property/back-to-school-business-and-law-enforcement-team-up-to-protect-students-parents-and-teachers-from-counterfeit-goods>.

53 "The Truth behind Counterfeits," U.S. Customs and Border Protection, accessed October 14, 2024, <https://www.cbp.gov/trade/fakegoodsrealdangers>.

54 Global Organized Crime Index, "Regions with the Highest Trade in Counterfeit Goods Rate in the World - The Organized Crime Index," accessed October 14, 2024, [https://ocindex.net/rankings/trade\\_in\\_counterfeit\\_goods?f=rankings&group=Region&view=List](https://ocindex.net/rankings/trade_in_counterfeit_goods?f=rankings&group=Region&view=List).

**Figure 5: Regions Where Counterfeits Are Mostly Produced<sup>55</sup>**



## Actors

Most counterfeit goods originate from **China**<sup>56</sup>, and the country has consistently been source of transnational organized crime and remains the world's primary source for illicit goods. According to the OECD, China has consistently been the leading producer and distributor of counterfeit and pirated goods in the world, producing an estimated **75-80 percent** of counterfeit products.<sup>57</sup> Social media and e-commerce sites have created a thriving illicit trade market in China, along with the foreign actors that facilitate the global movement of falsely branded goods. Annually, the total value of counterfeit goods varies dramatically, though most sources claim the bulk are sourced from China.<sup>58</sup> China frequently sells and distributes counterfeit goods via e-commerce platforms. The majority of these online counterfeit sales include perfumery and cosmetics, pharmaceutical products, and sunglasses which make up about 70%-75% of counterfeit products sold online.<sup>59</sup>

55 Global Organized Crime Index, "Regions with the Highest Trade in Counterfeit Goods Rate in the World - The Organized Crime Index," accessed October 14, 2024, [https://ocindex.net/rankings/trade\\_in\\_counterfeit\\_goods?f=rankings&group=Region&view=List](https://ocindex.net/rankings/trade_in_counterfeit_goods?f=rankings&group=Region&view=List).

56 U.S. Customs and Border Protection, "The Truth Behind Counterfeits."

57 Vega Bharadwaj et al., "U.S. Intellectual Property and Counterfeit Goods-Landscape Review of Existing/Emerging Research," USPTO Economic Working Paper No. 2020-03, (2020), [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=3577710](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=3577710).

58 "USTR Releases 2022 Review of Notorious Markets for Counterfeiting and Piracy," United States Trade Representative, accessed October 14, 2024, <https://ustr.gov/about-us/policy-offices/press-office/press-releases/2023/january/ustr-releases-2022-review-notorious-markets-counterfeiting-and-piracy>.

59 European Union Intellectual Property Office, "Online commerce has become a major distribution channel for fake goods," news release, October 25, 2021, [https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document\\_library/observatory/documents/reports/misuse-e-commerce-trade-in-counterfeits/EUIPO\\_OECD\\_misuse-e-commerce-trade-in-counterfeits\\_PR\\_en.pdf](https://euipo.europa.eu/tunnel-web/secure/webdav/guest/document_library/observatory/documents/reports/misuse-e-commerce-trade-in-counterfeits/EUIPO_OECD_misuse-e-commerce-trade-in-counterfeits_PR_en.pdf).

According to the Global Organized Crime Index, **western Asian countries** have consistently been some of the leading producers and traffickers of illicit goods. Counterfeit medicines and pharmaceuticals are the top produced illicit product from this region and continue to endanger individuals across the world.<sup>60</sup> Illicit pills and medications remain the most pressing issue stemming from the western Asia region, as these drugs usually contain the same packaging and serial numbers as actual drugs that have been packaged and shipped. In 2009, 20 million pills, bottles, and sachets of counterfeit and illegal pharmaceuticals were reported by the INTERPOL, mostly traceable to south and western Asian countries.<sup>61</sup> According to a study conducted by the UNODC, roughly 47 percent of antimalarial drugs seized from Southeast Asia were found to be counterfeit. The trade and trafficking of counterfeit drugs in Southeast Asia is estimated to be roughly 10 to 15 times higher than other non-illicit narcotics.<sup>62</sup>

According to the Global Organized Crime Index<sup>63</sup>, **South America** ranked second as one of the top producers and traders of counterfeit products. Counterfeiting in South America closely mirrors the criminal activity observed in China due to the vast scope of products which are being manufactured and sold. The mission took place across the South American continent in over ten countries, suggesting that the trafficking and production of counterfeit goods are a continuously lucrative business.

The **tri-border area of Brazil, Argentina, and Paraguay** is a particularly lucrative hotspot for counterfeiting in South America. This region is well-known for its manufacturing and trafficking of electronics such as cell phones, DVDs, and CDs, among other items. The region is also used for pirating these goods to terrorist organizations, such as Hezbollah, who are a significant source of criminal activity in this area.<sup>64</sup>

- 60 “Fake Drugs, Real Impact: Western Asia’s Counterfeit Medicine Epidemic,” Global Initiative, September 8, 2023, <https://globalinitiative.net/analysis/western-asia-counterfeit-medicine/#:~:text=In%20addition%20to%20its%20role%20as%20a%20destination,attractive%20trafficking%20corridor%20for%20criminals%20operating%20in%20Asia>.
- 61 Victoria Rees, “The Impact of Counterfeit Drugs in South and South-East Asia,” European Pharmaceutical Review, July 12, 2019, <https://www.europeanpharmaceuticalreview.com/article/92194/the-impact-of-counterfeit-drugs-in-south-and-south-east-asia/>.
- 62 Global Initiative, “Fake Drugs, Real Impact: Western Asia’s Counterfeit Medicine Epidemic.”
- 63 Global Organized Crime Index, “Regions with the Highest Trade in Counterfeit Goods Rate in the World - The Organized Crime Index,” accessed October 14, 2024, [https://ocindex.net/rankings/trade\\_in\\_counterfeit\\_goods?f=rankings&group=Region&view=List](https://ocindex.net/rankings/trade_in_counterfeit_goods?f=rankings&group=Region&view=List).
- 64 Louise I. Shelley, “The Diverse Facilitators of Counterfeiting: A Regional Perspective.” *Journal of International Affairs* 66, no. 1 (2012): 19–37. <http://www.jstor.org/stable/24388249>.

# Case Study

On March 5, 2021, the U.S. Department of Justice sentenced a Florida woman for producing and selling fraudulent Ethicon Surgicel: Original Hemostat (“Surgicel”).<sup>65</sup> SURGICEL, a product sold to hospitals by Ethicon, is a sterile oxidized regenerated cellulose device used to control bleeding during surgical procedures.<sup>65</sup>

As a subsidiary of Johnson & Johnson, SURGICEL had become a target for counterfeiters producing illicit medical products due to its reliability and effectiveness of producing medical devices and surgical products to hospitals for over sixty years.

The product likely ended up in hospitals from independent sellers who were charging SURGICEL for cheaper prices than Ethicon.

When a neurosurgeon began conducting a routine surgery, the doctors noticed improper packaging of the device, as the product would not hold its shape after opening. The investigation, led by Global Brand Protection (GBP),<sup>66</sup> a Johnson & Johnson program, traced the products to an independent manufacturer based in Florida, who purchased the parts from a trader of illicit medical parts in Dubai.

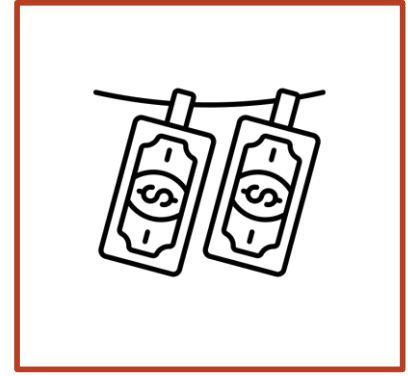
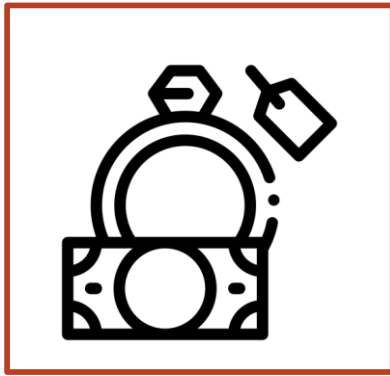
The perpetrator admitted to buying fraudulent SURGICEL parts from Dubai, United Arab Emirates and Delhi, India. The operation was selling illicit parts resulting in faulty products as traced to a larger, global operation. The fraudulent parts were found in nine additional countries after being discovered in the United States.

The GBP investigation found over 250,000 units of counterfeit SURGICEL parts from a single supplier in India. The parts were contaminated with bacteria and manufactured in unsanitary conditions, mainly in small apartments.

Counterfeiting SURGICEL devices can cause significant harm to patients, and even death given that the illicit device will not stop bleeding during surgeries, as the real drug should. GBP emphasizes that hospitals should verify all products are vetted by Ethicon, and the company employed an anti-counterfeiting plan which closely monitors the source of the SURGICEL product.

65 “Florida Woman Sentenced to Six Months for Selling Counterfeit Medical Devices,” U.S. Attorney’s Office, Eastern District of Kentucky, March 5, 2021, <https://www.justice.gov/usao-edky/pr/florida-woman-sentenced-six-months-selling-counterfeit-medical-devices#:~:text=%2D%20A%20Hollywood%2C%20Florida%2C%20woman,used%20to%20control%20bleeding%2C%20that>.

66 Roy Albiani, “Combating Counterfeit Medical Devices,” The Brand Protection Professional, n.d., <https://bpp.msu.edu/magazine/combating-counterfeit-medical-devices-a-case-study-march2021/>.



## Connections to Foreign Terrorist Organizations (FTOs)

The revenue from selling counterfeit and pirated goods is not a significant source of funding for foreign terrorist groups. Terrorist groups typically target developing countries to buy cheap materials and sell counterfeit goods for much greater profits. Selling these products provides an immediate and untraceable source of cash, which is then directly used to fund the group's activities. During an interview with a subject matter expert, counterfeit goods were described as easy, simple, and cheap means of production. The products are easy to sell, and products are usually small enough to transport easily. However, the scale of terrorist counterfeiting operations is likely marginal.

The magnitude of the financial benefit from selling counterfeit products is unclear. Reported data on how FTOs use revenue from counterfeit merchandise and garments, and how much revenue is generated annually, is very limited and sparsely researched. Terrorist groups do not appear to rely on counterfeit goods as a primary source of revenue.

## Policy Recommendations

Promoting and enacting effective laws could help mitigate the sale and purchase of counterfeit products globally. Policies combating counterfeits should be targeted toward foreign governments and law enforcement agencies. The main purpose of creating policy initiatives is to work cohesively to share information about seized counterfeit goods, especially the types and quantities of illicit products. Creating laws to stop counterfeiting would create a common language and practices used across many governments, significantly mitigating the sale of dangerous and fraudulent products. The U.S. Department of State should consider pursuing the following policies:



**Establish a list of publicly known websites and/or companies that produce counterfeit goods.**

- This list should be available to the public. This will allow common regulations and practices across governments and law enforcement agencies to stop the trafficking of fraudulent goods.

**Reduce differences in trade regulations by creating an official standard-setting organization.**

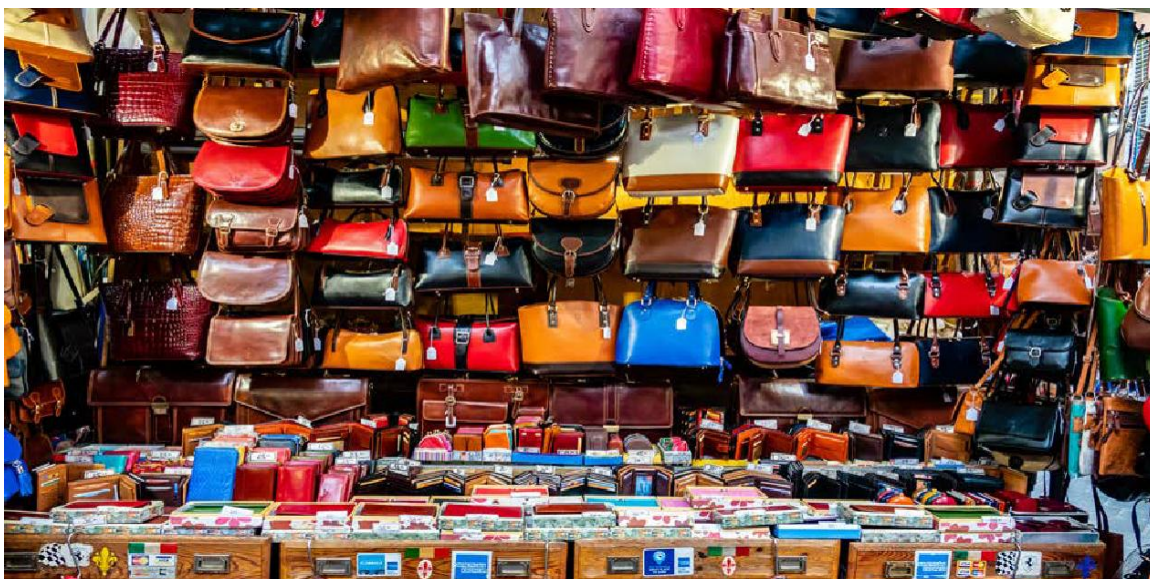
- Universal laws stop illegal material from traversing borders and entering countries in which the product could be illegal.
- Create a common standard for upholding anti-counterfeiting regulations similar to FATF (Financial Action Task Force.)

**Issue a warning when accessing websites where consumers are buying goods that may be counterfeit.**

- Before a consumer makes a purchase, a message should be shown either on the website or during checkout. This will notify the consumer of when the product they are purchasing could be fraudulent or contain fraudulent materials. The customer should be notified if a scam is suspected. This practice should be used when accessing websites owned or operated by Chinese companies or contain VPNs that can be traced to locations in China.

**The brand will be notified by the international organization if counterfeits are manufactured and look like the original product.**

- Transparency is crucial in preventing counterfeiting. Brands should be aware of when their product is being 'ripped off' or sold, or when the trademark is being utilized for profit illegally. This practice will be beneficial because customers and brand management will be aware of whether the brand is being used and sold illicitly.



# Cybercrime

## Overview

Interpol defines cybercrime as an offense targeting computer data, storage media, systems, and service providers.<sup>67</sup> This term broadly encompasses crimes such as unauthorized access, interference with data and systems, fraud, forgery, illegal data interception, the use of unauthorized devices, child exploitation, and intellectual property violations.<sup>68</sup> The UNODC emphasizes that the **borderless nature of cyberspace adds to the complexity of cybercrime**.<sup>69</sup> Furthermore, the fact that victims and perpetrators are often located in different jurisdictions with varying laws, regulations, and justice systems further complicates addressing this issue.

With 5.45 billion internet users, representing 67.1 percent of the global population<sup>70</sup>, real-world crimes are increasingly extending into cyberspace. This transnational nature poses significant challenges for both prevention and enforcement efforts. With advancements such as Generative AI and Internet of Things (IoT) technologies, the expansion of cybercrime and its integration with other transnational crimes could pose significant threats to infrastructure and public safety, necessitating robust **countermeasures and regulations**. The future of cybercrime will be shaped by the dual forces of technological innovation and criminal adaptation, requiring proactive, globally coordinated efforts to mitigate its impact.

## Key Findings

- Cybercrime is estimated to generate **US\$9.2 trillion to \$10 trillion**. If cybercrime results in US\$10 trillion in losses, and global GDP is estimated at approximately US\$100 trillion in 2022<sup>71</sup>, the worldwide cost of cybercrime is equivalent to 10 percent of the global GDP.
- Cybercrime actors range from hacktivists, insiders, and criminal organizations to cybersecurity firms, each contributing to the cybercrime landscape through diverse motives and actions, with insiders accounting for 20% of breaches and unethical practices or vulnerabilities further amplifying the impact.<sup>72</sup>
- Cybercrime, increasingly exploited by organized groups and terrorists, **facilitates traditional crimes like fraud and trafficking, with cryptocurrencies** enabling anonymous transactions and sophisticated money-laundering techniques.

67 INTERPOL, National Cyber Strategy Guidebook, April 2021, [https://www.interpol.int/content/download/16455/file/Cyber\\_Strategy\\_Guidebook.pdf](https://www.interpol.int/content/download/16455/file/Cyber_Strategy_Guidebook.pdf).

68 INTERPOL, National Cyber Strategy Guidebook.

69 "Cybercrime," United Nations: UNODC ROMENA, accessed October 4, 2024, <https://www.unodc.org/romena/en/cybercrime.html>.

70 "Digital around the World," DataReportal, accessed October 4, 2024. <https://datareportal.com/global-digital-overview>.

71 Statista, "Global Gross Domestic Product (GDP) from 2017 to 2027," Statista, accessed November 24, 2024, <https://www.statista.com/statistics/268750/global-gross-domestic-product-gdp/>.

72 "Threat Actor," IBM, accessed November 2, 2024, <https://www.ibm.com/topics/threat-actor>.

# Value

According to the FBI’s Internet Crime Complaint Center (IC3), there were 880,418 cybercrime complaints in the United States in 2023, with losses exceeding **\$12.5 billion**.<sup>73</sup> The global scale of cybercrime is likely far greater than anticipated, as these figures account only for reported crimes in the United States. Estimating the full extent of the damage remains extremely challenging due to unknown factors such as cryptocurrency, the dark web, false claims, and undetected counterfeit activities.

Cybersecurity Ventures, a cybersecurity firm, and Statista, a statistical portal, estimated the expected cost of cybercrime in 2024 at **US\$9.2 trillion to US\$9.5 trillion dollars**. Cybersecurity Ventures estimated cybercrime damage at **US\$9.5 trillion** in 2024, expected to rise to US\$10.5 trillion in 2025. This data was derived from historical cybercrime data, year-to-year growth trends, and the anticipated growth.<sup>74</sup> They included a wide range of cybercrime impacts, data damage and destruction, stolen funds, lost productivity, intellectual property theft, personal and financial data breaches, embezzlement, fraud, business disruption post-attack, forensic investigations, system restoration, reputational damage, legal expenses, and in some cases, regulatory fines.<sup>75</sup>

Through economic assessments of cyber incidents, historical cybercrime statistics, an aggregated data from FBI, IMF, and National Cyber Security Organizations, Statista expected the world- wide cost of cybercrime to be **US\$9.22 trillion** in 2024 and expected to grow to **US\$15.63 trillion** in 2029.<sup>76</sup>

**Table A. Estimated Annual Global Cost of Cybercrime by Year and Source<sup>77,78,79</sup>**

Source	Estimated Cost of Cybercrime (USD)	Year
CSIS <sup>78</sup>	>1 trillion	2020
Cybersecurity Ventures <sup>79</sup>	9.5 trillion	2024
Statista <sup>80</sup>	9.22 trillion	2024

73 Federal Bureau of Investigation Internet Crime Complaint Center (IC3), 2023 Internet Crime Complaint Center Report, accessed November 3, 2024, [https://www.ic3.gov/AnnualReport/Reports/2023\\_IC3Report.pdf](https://www.ic3.gov/AnnualReport/Reports/2023_IC3Report.pdf).

74 “Cybercrime to Cost the World \$9.5 Trillion USD Annually in 2024,” eSentire, accessed November 17, 2024, <https://www.esentire.com/web-native-pages/cybercrime-to-cost-the-world-9-5-trillion- usd-annually-in-2024>.

75 “Cybercrime to Cost the World \$9.5 Trillion USD Annually in 2024,” eSentire.

76 “Estimated cost of cybercrime worldwide 2018-2029 (in trillion U.S. dollars),” Statista, June 12, 2024, <https://www.statista.com/forecasts/1280009/cost-cybercrime-worldwide>.

77 “The Hidden Costs of Cybercrime,” Center for Strategic and International Studies (CSIS), December 9, 2020, <https://www.csis.org/analysis/hidden-costs-cybercrime>.

78 Steve Morgan, “Cybercrime to Cost the World \$10.5 Trillion Annually by 2025,” Cybercrime Magazine, 2020, <https://cybersecurityventures.com/cybercrime-damage-costs-10-trillion-by-2025/>.

79 Anna Fleck, “Cybercrime Expected to Skyrocket in Coming Years.” Statista Daily Data, February 22, 2024, <https://www.statista.com/chart/28878/expected-cost-of-cybercrime-until-2027/>.

In an interview with cybercrime professionals, additional insights highlighted the **limitations of accurately calculating the global cost of cybercrime**.

1

### CYBERCRIME EXPERT

• A cybercrime expert<sup>80</sup> explained, “As unsatisfying as this answer may be, I don’t think we truly know the ‘global cost of cybercrime,’ given that we’re **relying on self-reported estimates from different stakeholders**. As reliable as some companies seem to be (or portray to be), reporting the economic losses they encounter may go against their corporate objectives or agendas.”

2

### FOREIGN INTELLIGENCE AGENT

• A foreign intelligence agent<sup>81</sup> explained, “Even more ‘trusted’ sources, like the Verizon report, contain biases that may not give you a ‘real’ figure of the global cost of cybercrime.”

3

### UNODC EXPERT

• An expert from UNODC<sup>82</sup> emphasized that the wide range of cybercrime types contributes to its inherent complexity and difficulty in estimating costs.

Economic costs associated with technical cybercrimes, such as data breaches and malware, are often prioritized due to their clear monetary implications. In contrast, other forms of cybercrime, like cyberstalking, tend to be overlooked in official reports, as their financial impact is indirect, encompassing expenses like legal fees, lost productivity, or psychological treatment. This selective focus in reporting aligns with the specific interests of stakeholders, resulting in fragmented and inconsistent global cost estimates. While a definitive global figure remains elusive, the expert suggested relying on reporting sources that offer extensive coverage and rigorous analysis, ensuring the choice of source is justified by the data available.<sup>83</sup>



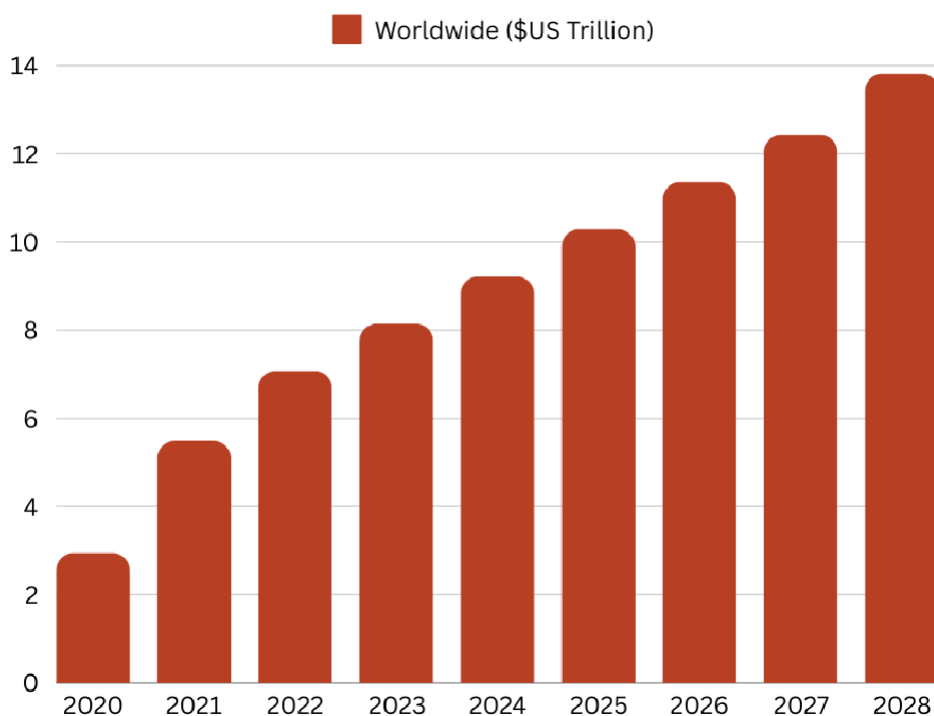
80 Dr. Jin R. Lee, Assistant Professor, George Mason University, interview by Kelsey Lee, email, November 2024.

81 Foreign Intelligence Officer (name and organization withheld by request), interview by Kelsey Lee, in person, November 2024.

82 UNODC Cybercrime Expert (name withheld by request), interview by Kelsey Lee, Microsoft Meet, November 2024.

83 Dr. Jin R. Lee, Assistant Professor, George Mason University, interview by Kelsey Lee, email, November 2024.



**Figure 6: Estimated Cost of Cybercrime<sup>84</sup>**

## Dynamics

### Economic Incentives

Nearly 70 percent of global internet users say they feel more vulnerable to identity theft. This shows the large population cyber criminals can easily target. According to IBM, the average cost of a data breach jumped to **US\$4.88 million from US\$4.45 million** in 2023.<sup>85</sup> The World Economic Forum describes cybercrime as the world's third-largest economy, after the US and China, illustrating the significant economic incentives it generates.<sup>86</sup>

Cybercriminals are drawn to the **high profitability, low risk, and relative anonymity** that cybercrime offers compared to traditional crimes. Unlike conventional criminal activities, cybercrime requires minimal equipment, logistics, or physical infrastructure to initiate operations. The rise of cryptocurrencies has further facilitated profit generation and money laundering, providing an untraceable financial pathway. Additionally, by using IP addresses from countries where certain activities are not explicitly illegal, cybercriminals can evade prosecution even if their actions are illegal in their own **jurisdiction**. This simplicity, accessibility, and low barrier to entry make cybercrime an appealing source of income for both individuals and organizations.

84 "Cybersecurity Outlook: Worldwide - Cybercrime," Statista, accessed November 17, 2024. [https:// www-statista-com.eu1.proxy.openathens.net/outlook/tmo/cybersecurity/worldwide#cybercrime](https://www-statista-com.eu1.proxy.openathens.net/outlook/tmo/cybersecurity/worldwide#cybercrime).

85 IBM, Cyber Resilience: Building a Robust Security Posture, accessed November 24, 2024, 5, [https:// www.ibm.com/downloads/documents/us-en/107a02e94948f4ec](https://www.ibm.com/downloads/documents/us-en/107a02e94948f4ec).

86 "Cybersecurity and Cybercrime: Ensuring System Safety," World Economic Forum, January 2024, <https://www.weforum.org/stories/2024/01/cybersecurity-cybercrime-system-safety/>.



According to Deloitte, the substantial financial gains from ransomware attacks create a powerful incentive for criminals across the spectrum.<sup>87</sup> Studies on **ransomware** reveal a clear **correlation** between the scale of ransom demands and the frequency of attacks. Ransomware operators are increasingly conducting reconnaissance to identify high-value targets. This leads to larger ransom demands, which are often tailored to the victim's size and industry.<sup>88</sup> The greater the financial rewards, the more frequent and widespread the attacks become. Moreover, organized cybercriminal groups often reinvest their illegally **acquired profits into advanced technologies**, enabling them to expand and globalize their operations further.<sup>89</sup>

Compared to reporting a cybercrime incident to **law enforcement**, paying a ransom is often seen as a faster solution for resolving operational disruptions caused by hackers. For large firms, the cost of operational downtime can exceed the ransom demanded, making the payment seem like a more practical option.<sup>90</sup> These dynamics drive the high financial returns that continue to fuel cybercriminal activities.



## Regulations

One of the key challenges in defining cybercrime lies in the absence of international standards or regulations. During an interview with an author of this report, a UNODC cybercrime expert highlighted the difficulties and opposition associated with implementing a unified framework.<sup>91</sup> The differences in legal standards and jurisdictions make it **challenging for investigative agencies to collect and share digital evidence**. Furthermore, major tech companies, which hold significant amounts of digital evidence, often resist the passage of related legislation due to concerns about potential changes, increased financial burdens, and expanded legal

- 87 Deloitte, "Cyberattacks on Critical Infrastructure: Strengthening Cybersecurity," Deloitte Insights, accessed November 24, 2024, <https://www2.deloitte.com/us/en/insights/industry/public-sector/cyberattack-critical-infrastructure-cybersecurity.html>.
- 88 Fortinet, 2023 Ransomware Global Research Report, 2023, <https://www.fortinet.com/content/dam/fortinet/assets/reports/report-2023-ransomware-global-research.pdf>.
- 89 United Nations Office on Drugs and Crime (UNODC), The Convergence of Cybercrime and Organized Crime, 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 90 Sycamore Institute, "The Economic Implications of Cybercrime," Sycamore Institute, accessed November 24, 2024, <https://www.sycamoreinstitute.org/post/the-economic-implications-of-cybercrime>.
- 91 UNODC Cybercrime Expert (name withheld by request), interview by Kelsey Lee, Microsoft Meet, November 2024.

about potential changes, increased financial burdens, and expanded legal responsibilities.

Unlike traditional crimes that punish perpetrators, cybercrime involves elements such as cyber warfare and terrorism, which can have catastrophic impacts if platforms or data centers are compromised. As digital life becomes widespread, experts are concerned about the potential misuse of the framework, especially by state actors such as Russia and China who have been linked to cybercrime sponsorship.<sup>92</sup> This adds a layer of geopolitical complexity to the regulation of cyber threats.

**The United Nations Convention against Transnational Organized Crime** is significant as it represents a global effort to define and address the amorphous nature of **transnational cybercrime**. It emphasizes international cooperation in tackling cybercrime, establishing clear definitions, and provides international jurisdiction for prevention and containment. The extensive discussions leading to this treaty reflect the diverse perspectives and intentions of various countries, making it a well-rounded document that aims to unite global efforts in combating this evolving threat. The challenge now is that the rapidly evolving nature of cybercrime outpaces these efforts to establish global regulations. The World Economic Forum assessed that the current situation is worsened by a lack of cybersecurity expertise, inadequate reporting practices, and the absence of global agreements on regulating cyber threats.<sup>93</sup>

The United States enacted the “Cyber Incident Reporting for Critical Infrastructure Act of 2022 (CIRCIA),” which will require organizations across all 16 critical infrastructure sectors to report significant cyber incidents within 72 hours and ransomware payments within 24 hours.<sup>94</sup> Similarly, the European Union’s Directive (EU) 2016/1148 on Security of Network and Information Systems (NIS Directive) mandates incident reporting from telecom providers, payment services, medical device manufacturers, and critical infrastructure operators.<sup>95</sup> Japan, Singapore, and South Korea also have laws mandating the reporting of cyber incidents, focusing on personal information breaches and telecommunication guidelines.<sup>96</sup>

92 Maggie Miller, “White House Agonizes Over UN Cybercrime Treaty,” PoliticoPro, September 26, 2024, <https://subscriber.politicopro.com/article/2024/09/white-house-agonizes-over-un-cyber-crime-treaty-00181271>.

93 “Global Rules Could Crack Down on Cybercrime, but Enforcement Will Be Key,” World Economic Forum, January 17, 2023, <https://www.weforum.org/stories/2023/01/global-rules-crack-down-cybercrime/>.

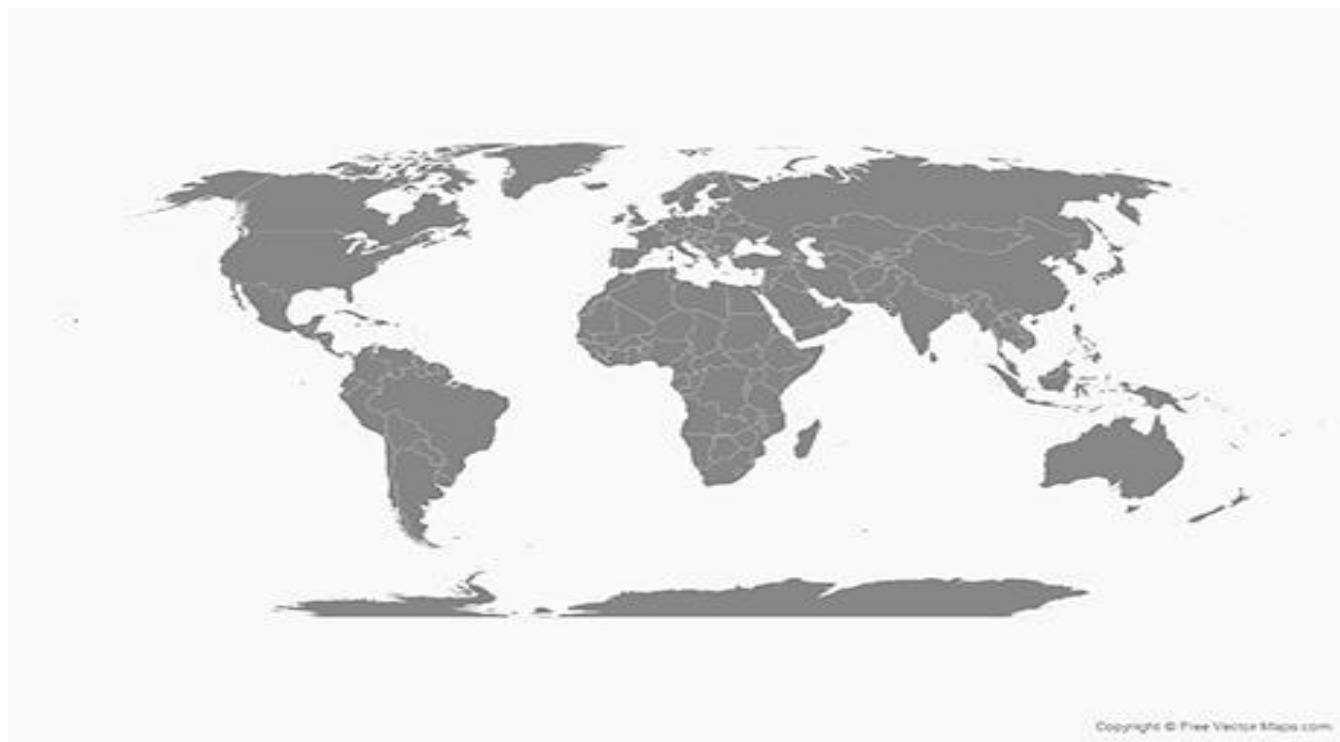
94 “Cyber Incident Reporting for Critical Infrastructure Act of 2022 (CIRCIA),” Cybersecurity and Infrastructure Security Agency (CISA), accessed November 24, 2024, <https://www.cisa.gov/top-ics/cyber-threats-and-advisories/information-sharing/cyber-incident-reporting-critical-infrastructure-act-2022-circia>.

95 “NIS 2 Directive Preamble 101 to 110,” NIS 2 Directive, accessed November 24, 2024, [https://www.nis-2-directive.com/NIS\\_2\\_Directive\\_Preamble\\_101\\_to\\_110.html](https://www.nis-2-directive.com/NIS_2_Directive_Preamble_101_to_110.html).

96 “A Select List of Global Cyber Incidents Reporting Requirements,” Center for Strategic and International Studies (CSIS), accessed November 24, 2024, <https://www.csis.org/blogs/strategic-tech-nologies-blog/select-list-global-cyber-incidents-reporting-requirements>.

However, despite these advancements, it is likely difficult to fully comprehend the scope of cyber-crime or develop effective solutions until global regulations are standardized and a unified definition of cybercrime is established. This underscores the need for greater attention, continued research in this area, and support for the forthcoming UN Framework.

## Regional Trends



According to the INTERPOL Global Financial Fraud Assessment, certain regional trends in cyber-crime are apparent.

In **Africa**, as mobile banking and digital transactions grow rapidly, **online fraud and phishing** are becoming major concerns.<sup>97</sup> The surge in internet access outpaces the region's digital literacy and cybersecurity infrastructure, leaving many users vulnerable to cybercrime. The **lack of cybersecurity capabilities** that can keep up with the rapid digital transformation exacerbates the issue, highlighting the need for stronger digital education and more robust cybersecurity measures. According to Interpol's Africa Cyberthreat Assessment Report, the financial impact of the region in 2021 exceeded US\$4 billion, approximately 10 percent of Africa's total GDP.<sup>98</sup> Although the African Union is strengthening investigation capabilities on virtual assets and cybercrime,<sup>99</sup> the threat of

97 "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology," INTERPOL, March 11, 2024, <https://www.interpol.int/News-and-Events/News/2024/INTERPOL-Financial-Fraud-assessment-A-global-threat-boosted-by-technology>.

98 "INTERPOL African Cyberthreat Assessment Report 2021," INTERPOL, April 2024, [https://www.interpol.int/content/download/21048/file/24COM005030-AJFOC\\_Africa%20Cyberthreat%20Assessment%20Report\\_2024\\_complet\\_EN%20v4.pdf](https://www.interpol.int/content/download/21048/file/24COM005030-AJFOC_Africa%20Cyberthreat%20Assessment%20Report_2024_complet_EN%20v4.pdf).

99 "African Union Strengthens Investigation Capabilities on Virtual Assets and Cybercrime," press release, African Union, May 22, 2024, <https://au.int/en/pressreleases/20240522/african-union-strengthens-investigation-capabilities-virtual-assets-and>.

cybercrime in Africa is anticipated to escalate significantly due to the continent's insufficient cybersecurity infrastructure and the absence of independent agencies dedicated to cyber defense.

Following global trends, cybercrime in **America** surged during COVID-19, resulting in significant financial losses from **online fraud** and heightening the threat of money laundering. The report highlights an increase in investment fraud, romance scams, and social media-based phishing originating from Southeast Asia, which has affected hundreds of victims.<sup>100</sup> These activities are not isolated but are interconnected with other transnational crimes, such as human trafficking, creating a cycle in which different forms of crime fuel and reinforce each other. As the **most targeted country** for cybercrime in the world, **the United States** is likely to see an increase and diversification in the methods and targets of cybercriminals. This is largely due to the ongoing digitalization of many government organizations and industries, which house valuable intellectual property and intelligence resources.

In recent years, **Asia** has experienced a rise in “voice-phishing,” a type of telecommunication fraud in which individuals use local and international lines from regional hubs to impersonate law enforcement officers or financial officials to trick victims.”<sup>101</sup> **Business Email Compromise (BEC), E-commerce fraud, and phishing** are also significant threats to Asia. Singapore alone lost over **US\$500 million** to fraud in 2023; paradoxically, the region's neighboring countries are one of the biggest hubs of scams, as Cambodia, Laos and Myanmar steal about **US\$43.8 billion** each year through scams.<sup>102</sup> This is about **40 percent** of the three nations' combined GDP<sup>103</sup> and demonstrates the interconnected nature of cybercrime in the region. This shows **how localized threats exploit cross-border trust**. Crypto investment fraud, targeting victims worldwide, is also being orchestrated from boiler rooms in Southeast Asia.<sup>104</sup> The financial effects of these cybercrimes are anticipated to **harm regional economies by eroding confidence** in financial systems. If effective measures are not implemented, the economic losses and societal impacts caused by cybercrime are expected to worsen, deepening the existing disparities in the region.

**Organized crime** is particularly prominent in Asia, with a growing number of cybercrimes committed by large-scale criminal organizations.<sup>105</sup> This trend highlights the urgent need for fo-

- 100 “INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology.”
- 101 “Vishing in Singapore,” EC-Council – Aware, accessed October 21, 2024, <https://aware.eccouncil.org/vishing-in-singapore.html>.
- 102 “Statistics,” Singapore Police Force, accessed October 21, 2024, <https://www.police.gov.sg/Media-Room/Statistics?filter=19AA9819C28548B9B6138DC8B9E373B0>.
- 103 James Reddick, “Southeast Asian Scam Syndicates Stealing \$64 Billion Annually, Researchers Find,” The Record, May 13, 2024, <https://therecord.media/southeast-asian-scam-syndicates-stealing-billions-annually>.
- 104 INTERPOL, “INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology.”
- 105 “Transnational Crime in Southeast Asia: A Growing Threat to Global Peace and Security,” United States Institute of Peace, accessed December 2, 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.



cused investigations into cybercrime perpetrated by TCOs in the future. Moreover, the lack of significant penalties or regulations for cybercrime, combined with a high concentration of both perpetrators and victims, creates a challenging environment. As cybersecurity technology evolves rapidly, economic inequalities, varying rates of internet penetration, and differing perceptions of personal information complicate predictions regarding cybercrime.<sup>106</sup> However, countries with notable economic development and digitalization, such as Taiwan, South Korea, China, Japan, and the Philippines, are anticipated to be primary targets. Highly digitalized and economically advanced nations face a paradox where their sophisticated digital infrastructure and interconnected systems make them more vulnerable to cybercrime, even with strong cybersecurity measures in place.

Transnational cybercriminals exploit major crises, such as the conflict in Ukraine and the Turkey earthquake, to perpetrate fraud.<sup>107</sup> INTERPOL's analysis reported cooperation between Europe- an organized crime groups and Middle Eastern crime groups specialized in impersonation, foreign currency, telecom, and romance fraud.<sup>108</sup> These transnational cyber fraud networks have developed complex protocols, routing stolen funds from mainstream banks to online banks, cryptocurrency platforms, money transfer apps, and gift cards. The process often ends in juris- dictions like West Africa and Southeast Asia, making law enforcement efforts and legal prosecution challenging due to the **difficulties of cross-border cooperation and jurisdictional limits**.<sup>109</sup>

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- 106 World Economic Forum, Global Cybersecurity Outlook 2024: Insight Report, January 2024, [https://www3.weforum.org/docs/WEF\\_Global\\_Cybersecurity\\_Outlook\\_2024.pdf](https://www3.weforum.org/docs/WEF_Global_Cybersecurity_Outlook_2024.pdf).
- 107 Europol, Online Fraud Schemes: A Web of Deceit (IOCTA 2023), December 20, 2023, <https://www.europol.europa.eu/publication-events/main-reports/spotlight-report-online-fraud-iocta-2023>.
- 108 INTERPOL, "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology."
- 109 INTERPOL, "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology."





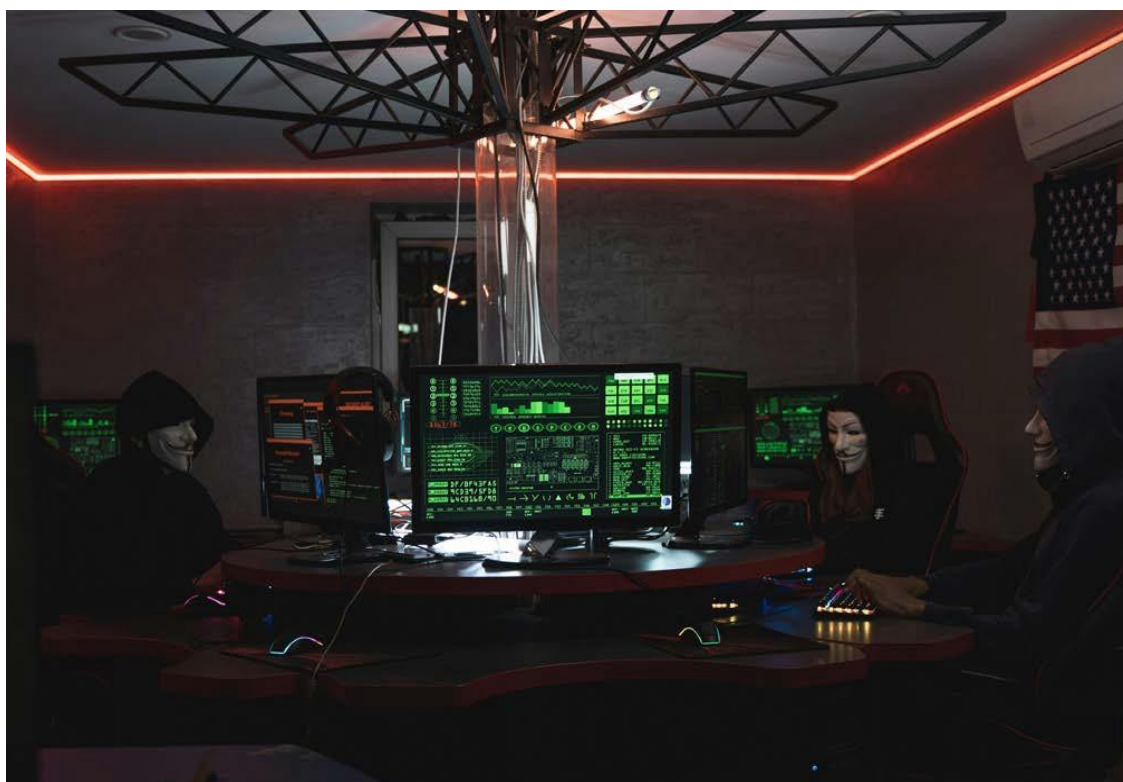
## Actors

The actors involved in cybercrime encompass a wide range of categories, including hacktivists (hacker activists), insiders, targets (individuals, organizations, governments), cybersecurity firms, and criminal organizations. Hacktivists, often referred to as hackers, operate with diverse motives such as financial gain, ideological expression, reputation building, or pursuing justice. However, their actions are classified as illegal under the umbrella of cybercrime.<sup>110</sup>

- ' Insiders, referring to individuals within the targeted organization, present a unique challenge as their activities are harder to detect and prevent. According to the Verizon Data Breach Investigations Report, insider threats account for 20 percent of all data breaches.<sup>111</sup>

**Criminal organizations** are intertwined with cybercrime, utilizing cyberspace as a platform and tool for their operations. Within organizations that systematically plan and operate cyber- crime, the roles of key members and factors involved in cybercrime are divided: programmers, intrusion specialists, technical experts, data miners, and money specialists.<sup>112</sup> These groups engage in activities such as money laundering, victim exploitation, illegal trading, and erasing digital traces. Cyberspace itself often becomes both the medium and the stage for their crimes, amplifying the scope and impact of their illicit activities.

- 110 Bart Lenarts-Bergmans, "Threat Actor," CrowdStrike, February 27, 2023, <https://www.crowd-strike.com/en-us/cybersecurity-101/threat-intelligence/threat-actor/>.
- 111 Verizon, 2024 Data Breach Investigations Report (DBIR), accessed November 24, 2024, <https://www.verizon.com/business/resources/reports/dbir/>.
- 112 "Criminal Groups Engaging in Cyber-Organized Crime," United Nations Office on Drugs and Crime (UNODC), accessed November 27, 2024, <https://www.unodc.org/e4j/zh/cybercrime/module-13/key-issues/criminal-groups-engaging-in-cyber-organized-crime.html>.



# Case Study

The Colonial Pipeline attack marked a significant nationwide crisis, severely disrupting fuel supplies along the U.S. East Coast and highlighting vulnerabilities in critical infrastructure. The Texas-based company, which transports 100 million gallons of fuel daily from along the East Coast to New York City, was targeted in a ransomware attack on May 6, 2021.<sup>113</sup> The FBI identified the DarkSide ransomware gang as the group responsible for the attack. This case showed the transnational nature of cybercrime, especially foreign actors targeting U.S. critical infrastructure.

Darkside encrypted the pipeline's data and demanded payment for the recovery key, threatening to leak the stolen data if their demands were not met. Colonial Pipeline initially paid \$4.4 million in cryptocurrency to mitigate the crisis. However, the FBI later recovered most of the ransom by accessing the gang's crypto wallet, rendering the attackers' financial gain minimal.<sup>114</sup> Still, the disruption lasted approximately seven days, leading to widespread fuel shortages across several eastern states and a sharp rise in gasoline prices. In response to the crisis, U.S. President Joe Biden declared a state of emergency on May 9, 2021,<sup>115</sup> elevating the issue of cybercrime to national prominence and driving the development of a robust cybersecurity framework.

The attack also revealed gaps in communication during the investigation. It was later disclosed that neither the Department of Homeland Security nor the Department of Justice had shared information about the ransom demands or threats, sparking public controversy and debate over the government's response to cybercrime.<sup>116</sup>

At the federal level, the attack prompted several critical measures to strengthen cybersecurity defenses. The Cybersecurity and Infrastructure Security Agency (CISA) launched StopRansomware.gov, a centralized platform offering resources and guidance to combat ransomware.<sup>117</sup> A joint task force was also established between CISA and the FBI to improve coordination in responding to cyber threats. Additionally, the Joint Cyber Defense Collaborative (JCDC), an initiative rooted in the recommendations of the U.S. Cyberspace Solarium Commission, was introduced to enhance collaboration and develop strategic responses to evolving cybersecurity challenges.<sup>118</sup>

113 Justin Ling, "Colonial Pipeline Hackers Behind \$5 Million Ransom Attack," Politico, May 8, 2021, <https://www.politico.com/news/2021/05/08/colonial-pipeline-cyber-attack-485984>.

114 Jarrett Renshaw and Raphael Satter, "U.S. to Announce Recovery of Millions from Colonial Pipeline Ransomware Attack," Reuters, June 7, 2021, <https://www.reuters.com/business/energy/us-announce-recovery-millions-colonial-pipeline-ransomware-attack-2021-06-07/>.

115 "Cyber Attack Disrupts Major US Fuel Pipeline," BBC News, May 8, 2021, <https://www.bbc.com/news/business-57050690>.

116 Megan Eckstein, "Lawmakers Grill Pentagon, Homeland Security Officials on How to Prevent Another Colonial Pipeline-Style Attack," USNI News, May 18, 2021, <https://news.usni.org/2021/05/18/lawmakers-grill-pentagon-homeland-security-officials-on-how-to-prevent-another-colonial-pipeline-style-attack>.

117 Cybersecurity and Infrastructure Security Agency (CISA), "Attack on Colonial Pipeline: What We've Learned and What We've Done Over the Past Two Years," CISA, May 7, 2023, <https://www.cisa.gov/news-events/news/attack-colonial-pipeline-what-weve-learned-what-weve-done-over-past-two-years>.

118 Cybersecurity and Infrastructure Security Agency (CISA), "Attack on Colonial Pipeline: What We've Learned and What We've Done Over the Past Two Years."

## Connections to Foreign Terrorist Organizations (FTOs)

Cybercrime has become one of the most accessible forms of criminal activity, and evidence suggests that terrorists and international criminal groups increasingly exploit cyber tools to facilitate their operations.<sup>119</sup> Cyberspace and ICT is used for all other crimes in this report: human trafficking, illicit trade, narcotics, and counterfeiting.

UNODC has shown that traditional organized criminal groups have engaged in cybercrime by exploiting new online criminal markets, sometimes to facilitate offline organized crime activities.<sup>120</sup> Organizations involved in cybercrime can be categorized as those exclusively targeting cybercrime, those operating in both cyber and physical spaces, and those leveraging cyberspace to expand or facilitate offline criminal activities.<sup>121</sup>

Rather than specific criminal organizations dominating the cybercrime landscape, various groups utilize cyber capabilities as tools to support a range of illicit activities. Crimes that once relied on traditional methods—such as counterfeiting, fraud, and illicit trading—have evolved into more organized and planned cybercriminal operations.

According to the UNODC, cyber-organized criminals engage in activities such as providing bulletproof hosting services for illegal content, facilitating escrow services, trading illicit goods and services using cryptocurrency, and laundering illicit funds.<sup>122</sup>

The rise of virtual currencies has significantly accelerated this trend, as cryptocurrencies are now commonly used for money laundering. Due to their anonymity and decentralization, cryptocurrencies enable criminal organizations to obscure financial transactions at various stages of their operations, integrating them with increasingly sophisticated money-laundering techniques.<sup>123</sup>

119 “Transnational Crime Threat,” The White House, accessed November 24, 2024, <https://obamawhitehouse.archives.gov/administration/eop/nsc/transnational-crime/threat>.

120 “Criminal Groups Engaging in Cyber-Organized Crime,” United Nations Office on Drugs and Crime (UNODC), accessed November 27, 2024, <https://www.unodc.org/e4j/zh/cybercrime/module-13/key-issues/criminal-groups-engaging-in-cyber-organized-crime.html>.

121 “Criminal Groups Engaging in Cyber-Organized Crime,” United Nations Office on Drugs and Crime (UNODC).

122 “Cyber-Organized Crime Activities,” United Nations Office on Drugs and Crime (UNODC), accessed November 27, 2024, <https://www.unodc.org/e4j/en/cybercrime/module-13/key-issues/cyber-organized-crime-activities.html>.

123 United Nations Office on Drugs and Crime (UNODC), *The Convergence of Cybercrime and Organized Crime*, 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).

## Policy Recommendations

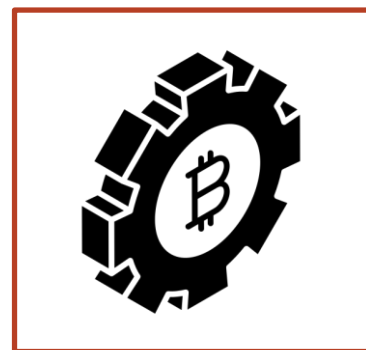
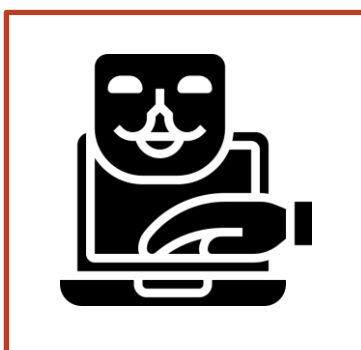
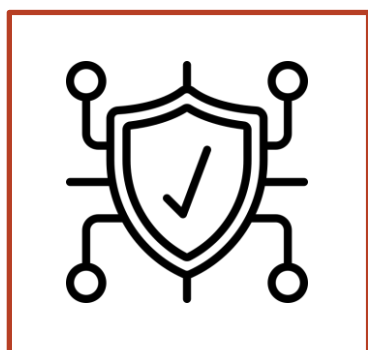
To address the threats posed by transnational cyber criminals, the U.S. government should consider the following:

### **Organizations and agencies should put more effort into defining and handling cybercrime.**

- Private companies should equip security managers in all companies and organizations must also be able to understand cyber-related security and develop their capabilities to address cyber security challenges.
- The Cybersecurity and Infrastructure Security Agency, FBI, National Institute of Standards and Technology (NIST) and cybersecurity organizations should offer hands-on guidance on cyber risk management to private companies and individuals, including by providing practical training and tools for risk management, rather than one-time evaluations.
- FBI's Internet Crime Complaint Center, U.S. Department of Justice, U.S. Department of Homeland Security and U.S. Department of State should advance research and data collection on global cybercrime to address the lack of comprehensive statistics.

### **International cooperation and unifying perspectives on cybercrime should be prioritized.**

- CISA should support cybercrime agencies in developing countries and facilitate the establishment of specialized cybercrime agencies in nations that are vulnerable to cyber criminals or that lack existing cybercrime management frameworks. CISA should also train vulnerable nations like Nigeria and Kenya.
- INTERPOL and UNODC should develop standardized international criteria for collecting and analyzing cybercrime data, enabling cross-border studies under consistent conditions.
- The U.S. Department of State should strengthen international cooperation and intergovernmental coordination, education and seminars for advanced countries with independent cybercrime agencies. U.S. government agencies should work to enhance collaboration and co-ordination among countries to combat cybercrime effectively.



# Human Trafficking

## Overview

Human trafficking is a rapidly growing form of transnational organized crime driven by the desire for profit maximization. It is an extensive and adaptable crime, with a devastating impact on, and harm to, individuals. Human trafficking can occur anytime and anywhere, and victims can be of any age, race, gender, or nationality. There are two categories that define human trafficking: sex trafficking and labor trafficking or forced labor. They are defined as<sup>124</sup>:

- **Sex trafficking** is the recruitment, harboring, transportation, provision, obtaining, patronizing, or soliciting of a person for the purpose of a commercial sex act in which a commercial sex act is induced by force, fraud, or coercion, or in which the person induced to perform such act has not attained 18 years of age.
- **Forced labor** is the recruitment, harboring, transportation, provision, or obtaining of a person for labor or services, with the use of force, fraud, or coercion for the purpose of subjection to involuntary servitude, peonage, debt bondage, or slavery.

This report presents the estimated illegal profits acquired from forced labor and commercial sex at global level.

## Key findings

- The value of the global human trafficking industry is challenging to quantify accurately due to limited and fragmented data. Many estimates rely on a single source of data, as well as incomplete reporting or inconsistent definitions of trafficking across regions. Existing research estimates that human trafficking generates at least **US\$236 billion**. This figure includes profits from forced labor and sexual exploitation from the privately imposed forced labor, not including state-sponsored forced labor.
- There is no single group or individual that is more significant in this type of crime.
- The money earned by the perpetrators pales in comparison to the immeasurable psychological, emotional, and physical suffering endured by the victims and their families.
- An individual does not have to cross the borders to become a victim of human trafficking, however, **the more borders crossed** - the more likely it is for the revenue per victim to be higher.

124 Polaris. In Harm's Way How Systems Fail Human Trafficking Survivors, 2023, <https://polarisproject.org/wp-content/uploads/2023/06/In-Harms-Way-How-Systems-Fail-Human-Trafficking-Survivors-by-Polaris.pdf>.

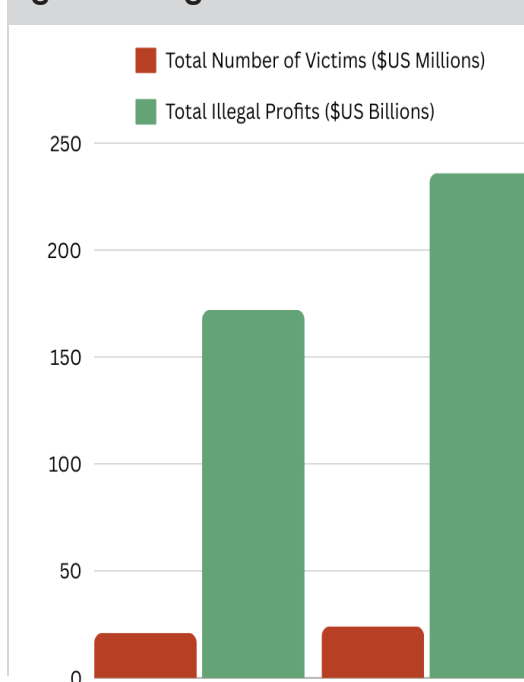


## Value

As of 2021, the total illegal profits generated globally from forced labor amount to an estimated **US\$236 billion** annually.<sup>125</sup>

- According to the 2017 Global Financial Integrity report, the 2014 global estimated value of forced labor was US\$172 billion, adjusted for inflation.<sup>126</sup>
- The 2021 estimate of illegal profits is based on a total of 23.7 million individuals in forced labor in the private economy, while the 2014 estimate was based on almost 21 million individuals. This represents an increase of approximately 13 percent in people in forced labor in the private economy in the last seven years.

**Figure 7: Illegal Annual Profits from Forced Labor<sup>127</sup>**



Illegal profits from forced labor also differ by region. Figure 8 reflects the total 2021 profits indicated by region. The highest number is in Europe and Central Asia (**US\$84.2 billion**) followed by Asia and the Pacific (**US\$62.4 billion**), the Americas (**US\$52.1 billion**), Africa (**US\$19.8 billion**), and finally the Arab States (**US\$18.0 billion**).<sup>128</sup> Compared to the 2014 data, there is little change in regional distribution of profits from human trafficking; the two leading regions are still Europe and Central Asia and the Asia Pacific. Among contributing factors are weak legal frameworks and enforcement, which allow traffickers to operate with relative impunity.

125 International Labour Organization, Profits and Poverty: The Economics of Forced Labour, 2024, <https://www.ilo.org/media/520201/download>.

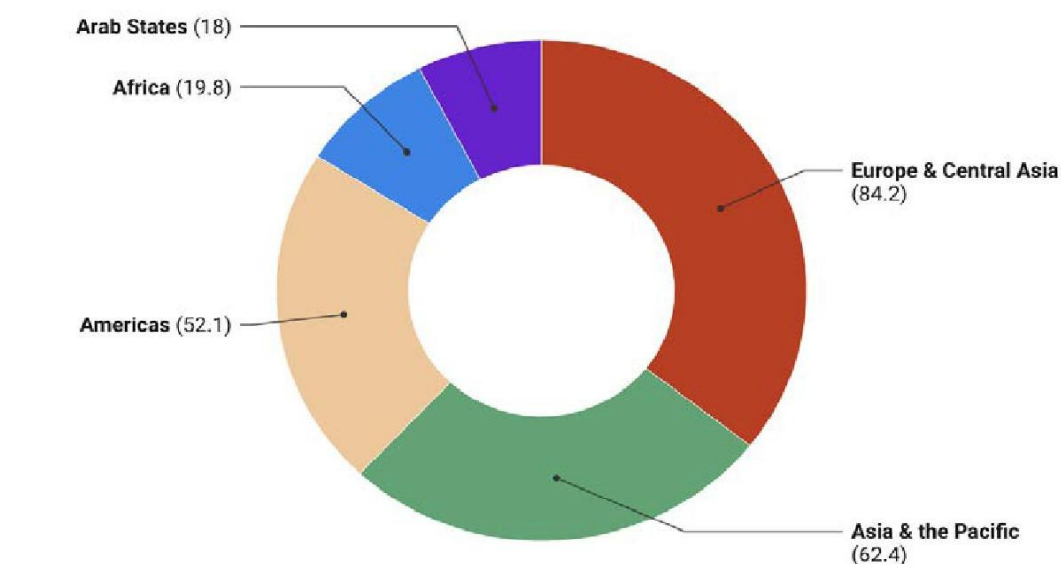
126 Channing May, Transnational Crime and the Developing World, Global Financial Integrity, 2017, [https://gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017\\_final.pdf](https://gfintegrity.org/wp-content/uploads/2017/05/GFI-IFF-Report-2017_final.pdf), 21.

127 International Labour Organization, Profits and Poverty: The Economics of Forced Labour.

128 International Labour Organization, Profits and Poverty: The Economics of Forced Labour.

- Additionally, cultural and economic vulnerabilities contribute to the exploitation of individuals through forced marriages and illegal adoptions, which are significant forms of trafficking in Asia.
- In Europe, profits are driven by exploitation through forced criminality, which later is used for pickpocketing, drug trafficking, or fraud schemes.

**Figure 8: Total Profits, 2021 (US\$ Billion)<sup>129</sup>**



Created with Datawrapper

There is also a significant division among types of forced labor. The largest share of total illegal profits comes from forced commercial sexual exploitation.

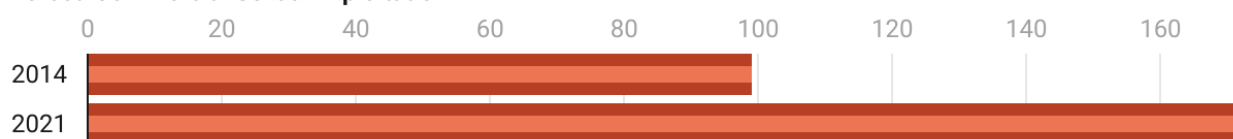
- In 2021 the estimates of illegal profits from forced labor exploitation was US\$63.9 billion and estimated profits from forced commercial sexual exploitation were US\$172.6 billion.<sup>130</sup>
- Compared to 2014 data, forced labor increased by approximately 25 percent and forced commercial sexual exploitation increased by almost 75 percent.

**Figure 9: Illegal Annual Profits by Category of Forced Labor<sup>131</sup>**

#### Forced Labor



#### Forced Commercial Sexual Exploitation



Created with Datawrapper

129 International Labour Organization, Profits and Poverty: The Economics of Forced Labour.

130 International Labour Organization, Profits and Poverty: The Economics of Forced Labour.

131 International Labour Organization, Profits and Poverty: The Economics of Forced Labour.

## Dynamics

Total illegal gains from forced labor appear to have risen dramatically over the last decade. A comparison with the previous estimates of illegal profits published in 2014 (adjusted for inflation) indicates a **US\$64 billion rise** in revenues from forced labor since that time.<sup>132</sup> This increase is not only a reflection of higher exploitation rates but also signals a rise in the profitability of individual cases, driven by global demand for cheap labor, armed conflicts, and systemic vulnerabilities exacerbated by crises such as the COVID-19 pandemic and climate change. The increase in illegal profits from forced labor highlights a disturbing trend in the exploitation of vulnerable populations globally. The rise in profits represented in this report, which amounts to a nearly 37 percent increase, suggests that the demand for forced labor has outpaced inflation adjustments alone, indicating both a rise in the number of people exploited and potentially the profitability per trafficked individual.

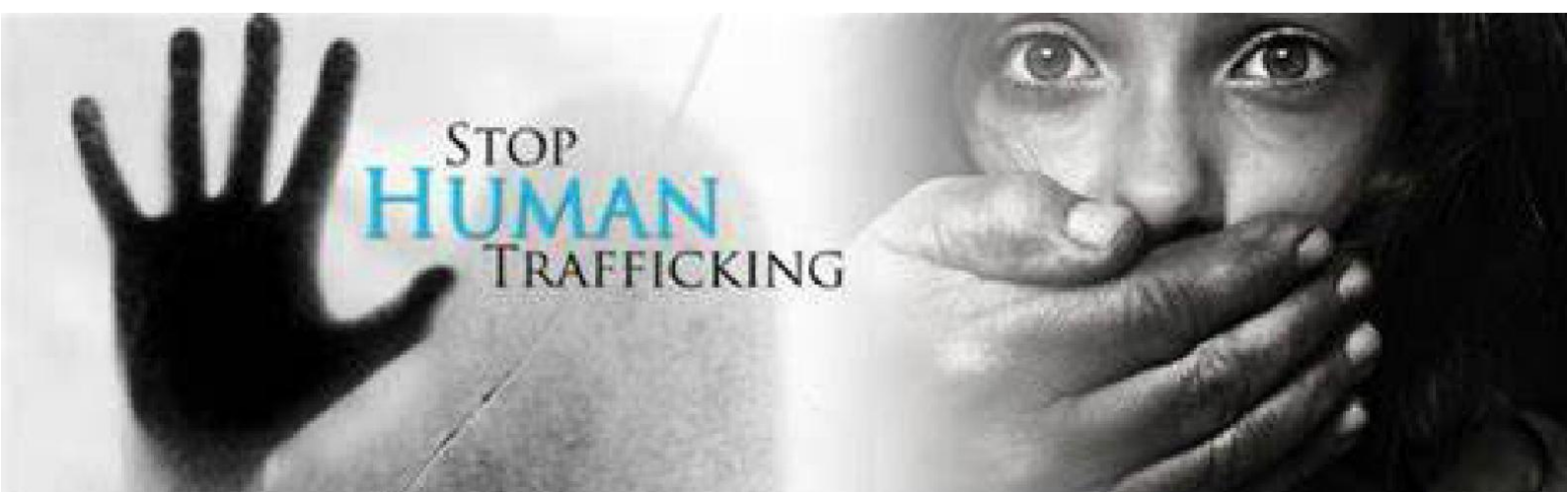
The 13 percent increase in the number of people subjected to forced labor in the private sector, from 21 million to 23.7 million, speaks to a complex interplay of economic, political, and social factors.

- The COVID-19 pandemic, global supply chain vulnerabilities, armed conflicts, climate change, and demand for low-cost goods have caused an unprecedented disruption to employment and education, increasing extreme poverty, causing unsafe and forced migration, and prompting a surge in gender-based violence.
- Those most impacted are individuals already in vulnerable situations, such as the poor, socially marginalized, informal economy workers, irregular or unprotected migrants, and people facing discrimination who bear the brunt of these compounded crises.<sup>133</sup> A global pandemic and shutdown did not stop or impede trafficking and, with a few exceptions, did not seem to change how it happens or to whom it happens.<sup>134</sup>

132 International Labour Organization, *Profits and Poverty: The Economics of Forced Labour*.

133 ILO, Walk Free and IOM. *Global Estimates of Modern Slavery: Forced Labour and Forced Marriage, 2022*, <https://www.ilo.org/publications/major-publications/global-estimates-modern-slavery-forced-labour-and-forced-marriage>.

134 Polaris, *Human Trafficking During the COVID and Post-COVID Era*, accessed December 2, 2024, <https://polarisproject.org/wp-content/uploads/2020/07/Hotline-Trends-Report-2023.pdf>.



## Actors

**Weak penalties and strong financial incentives** have attracted a wide range of criminal actors, from organized crime groups to terrorist organizations. Human traffickers come from a wide variety of backgrounds and demographic categories and may be relatives, friends, individuals who are politically connected in their country of origin, individuals operating alone, or members of gangs, transnational criminal organizations, or loosely affiliated groups. Human trafficking networks are often linked to other criminal activities, such as kidnapping, extortion, racketeering, foreign corrupt practices, production of counterfeit goods, prostitution, drug trafficking, money laundering, document fraud, visa fraud, immigration-related crimes, and public corruption. Some examples of human trafficking organizations include:<sup>135</sup>

- **Transnational criminal organizations** engaged in human trafficking, frequently in conjunction with other criminal activities.
- **The Zhao Wei drug trafficking organization** engages in human trafficking to generate funds to further its other criminal activities.<sup>136</sup>
- **MS-13** engages in human trafficking both domestically and transnationally.<sup>137</sup>
- Transnational criminal organizations from **Mexico** engage in sex trafficking to facilitate other illicit activity.<sup>138</sup>
- Multiple **European** countries have documented transnational organized crime operations that exploit both European nationals and migrants in sex and labor trafficking, including forced criminality such as pickpocketing and the distribution of narcotics.<sup>139</sup>
- **State actors** such as Afghanistan, Burma, Cuba, Democratic People's Republic of Korea, Eritrea, Iran, the People's Republic of China, Russia, South Sudan, Syria, and Turkmenistan engage in state-sponsored forced labor or sex trafficking. Officials exploit their nationals through forced labor in public works, military, key sectors, or government missions abroad, and through sexual slavery on government compounds. They use threats such as withholding public benefits, salaries, or services, manipulating stateless or minority groups, or coercing family members to extract labor or sex.<sup>140</sup>

135 The White House, The National Action Plan To Combat Human Trafficking, 2021, <https://www.whitehouse.gov/wp-content/uploads/2021/12/National-Action-Plan-to-Combat-Human-Trafficking.pdf>.

136 Treasury Sanctions the Zhao Wei Transnational Criminal Organization," press release, United States Department of the Treasury, January 30, 2018, <https://home.treasury.gov/news/press-releases/sm0272>.

137 "MS-13 Members and Associates Arrested for Sex Trafficking a Minor," United States Department of Justice, August 5, 2020, <https://www.justice.gov/usao-edva/pr/ms-13-members-and-associates-arrested-sex-trafficking-minor>.

138 Guadalupe Correa-Cabrera, "Trafficking in Persons Along Mexico's Eastern Migration Routes: The Role of Transnational Criminal Organizations," The Wilson Center, March 2017, <https://www.wilsoncenter.org/article/trafficking-persons-along-mexicos-eastern-migration-routes>.

139 United States Department of State, Trafficking in Persons Report, 2021, (144), [https://www.state.gov/wp-content/uploads/2021/07/TIP\\_Report\\_Final\\_20210701.pdf](https://www.state.gov/wp-content/uploads/2021/07/TIP_Report_Final_20210701.pdf).

140 United States Department of State, Trafficking in Persons Report, 2023 (66); United States Department of State et al., Xinjiang Supply Chain Business Advisory Addendum, September 26, 2023, <https://www.state.gov/xinjiang-supply-chain-business-advisory>.

# Case Study

The global fishing industry serves as a case study into the main dynamics behind human trafficking.<sup>141</sup> Within the industry, Southeast Asian migrant workers, especially from Myanmar, Cambodia, and Thailand, are coerced into working on fishing boats under brutal conditions. These “sea slaves” endure long hours, physical abuse, little or no pay, and are often held captive for years. The fish caught by these exploited workers is processed into seafood and animal feed, entering supply chains that provide food for pets and livestock globally. Various industries and governments fail to regulate or address these issues and are thus complicit in these human rights abuses. Despite some international awareness and pressure, the issue persists due to the vast and opaque nature of the fishing industry. Indentured servitude, a labor system where individuals work to pay off a debt usually incurred for receiving free passage to another country, is prevalent in the developing world, particularly in sectors like construction, agriculture, manufacturing, and the sex industry. Human rights experts note that this practice is even more widespread and exploitative at sea due to the extreme isolation faced by maritime workers.

## Connections to Foreign Terrorist Organizations (FTOs)

Human trafficking has been linked to FTOs as a strategy for funding and operational support. FTOs exploit vulnerable populations in conflict zones, leveraging trafficking to generate revenue, recruit fighters, and enforce control over territories. Women and children are the most common targets and are often subjected to forced marriages, sexual exploitation, and servitude to further ideological objectives. For instance, groups like ISIS, Boko Haram, and al-Shabaab have infamously used human trafficking as a means of terrorizing communities and financing their activities.<sup>142</sup>



141 Ian Urbina, “‘Sea Slaves’: The Human Misery that Feeds Pets and Livestock,” The Outlaw Ocean Project, July 27, 2015, <https://www.theoutlawocean.com/reporting/thailand-sea-slavery/>.

142 Financial Action Task Force (FATF), Financial Flows of Human Trafficking Report July 2018, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Human-Trafficking-2018.pdf.coredownload.inline.pdf>.



## Policy Recommendations

Human trafficking remains a persistent global issue, driven by criminal networks and enabled by economic and social factors. To effectively combat this crime, there must be a shift in education, raising awareness about the crime and the consequences of financially supporting trafficking-related industries which perpetuate exploitation and suffering. Targeted public awareness efforts to increase knowledge of the problem, promote cultural change, and help victims come forward are also needed.<sup>143</sup> The increase in profits from forced labor under- scores the need for enhanced global policy and enforcement mechanisms. To better address the crime of global human trafficking, the U.S. government should consider the following actions.

### **Pursue dialogue with key partners to harmonize laws and policies related to human trafficking.**

- This is essential in ensuring that legal frameworks are aligned to effectively prosecute traffickers and protect victims. Enhanced information sharing between governments, law enforcement, and NGOs can improve transparency and uncover hidden trafficking operations.
- This approach includes establishing a shared definition of human trafficking, covering all forms such as labor, sexual exploitation, and organ trafficking, which ensures that countries are aligned on what constitutes the crime.
- Developing uniform immigration policies for victims of trafficking, with the possibility for temporary or permanent residency options and protection against deportation will encourage victims to seek help. Additionally, harmonizing jurisdiction on the international level will help to eliminate challenges that arise when it comes to investigations and prosecutions of traffickers.

### **Raise awareness to highlight the issue of human trafficking and encourage community involvement in prevention and reporting. Introducing human trafficking education in schools can foster early understanding.**

- As digital technology evolves, it is crucial to raise awareness about the risks of social media, which traffickers use to recruit victims.
- Changing harmful social norms, like the marginalization of vulnerable groups, can reduce exploitation. For example, changing perceptions of migrant workers from “cheap labor” to valued members of society can reduce the likelihood that these groups will be trafficked. Support systems, such as safe housing and comprehensive medical care for survivors, are vital. In the U.S., programs like CAST LA provide legal, housing, and counseling support and offer a model that could be replicated. Scaling such programs requires funding from governments, international organizations, foundations, and private sector.

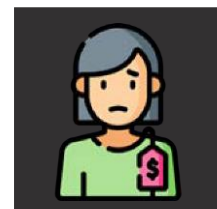
143 United States Department of State, Trafficking in Persons Report June 2023, [https://www.state.gov/wp-content/uploads/2023/05/Trafficking-in-Persons-Report-2023\\_Introduction-Additional-Pagesv4\\_FINAL.pdf](https://www.state.gov/wp-content/uploads/2023/05/Trafficking-in-Persons-Report-2023_Introduction-Additional-Pagesv4_FINAL.pdf).

- In a conflict zone, raising awareness could be done by leveraging local networks and leaders such as community services and religious organizations to strengthen trust within the community.

**The Department of State can allocate funds and grants to support law enforcement units in foreign countries, enabling them to enhance training programs, improve response capabilities, and access advanced technology and infrastructure.**

This is particularly critical in regions with limited internet connectivity and technological resources, where such upgrades can significantly improve investigative and operational efficiency.

- Additionally, resources can be directed towards training judges and prosecutors, equipping them to apply harmonized international anti-trafficking laws effectively and ensuring consistent legal interpretations and enforcement across jurisdictions.



# Illegal Logging and Mining

## Overview

**Artisanal Small-Scale Mining (ASM):** Formal or informal mining operations with predominantly simplified forms of exploration, extraction, processing, and transportation.

Organization for Economic Co-operation and Development (OECD), "Interconnected supply chains: A comprehensive look at due diligence challenges and opportunities sourcing cobalt and copper from the Democratic Republic of the Congo," (OECD, 2019),13.

Illegal logging and illegal mining are lucrative natural resource crimes in developing countries that flourish in remote environments where little government oversight exists. As of 2024, illegal logging continues to be the most profitable natural resource crime, generating approximately half of all illegal environmental crime profits per year.<sup>144</sup> These crimes are enabled by ineffective and corrupt governance as well as porous borders, often thriving in remote locations where there is little government oversight.

Illegal mining can range from informal mining practices, which include **artisanal small-scale mining (ASM)**, to criminal mining done by **organized criminal groups (OCGs)**, as seen below in Figure 10. Artisanal mining is highly decentralized as it frequently occurs in regions with weak governing oversight. The vast majority of ASM miners operate outside the law because they often do not have necessary registration or permit documentation to extract minerals. Not all informal or artisanal mining is criminal; however, OCGs often exploit the sector's low government oversight.

Figure 10: Legal and Illegal Mining<sup>145</sup>



144 Channing May, "Transnational Crime and the Developing World"; U.S Customs and Border Protection, "Illegal Logging," accessed December 2, 2024, <https://www.cbp.gov/trade/programs-administration/natural-resources-protection/illegal-logging>.

145 U.S Customs and Border Protection, "Illegal Logging."

## Key Findings

- In 2024, the annual value of illegal mining and logging is estimated to be between **US\$83.7 billion to US\$262 billion** per year.
- These crimes are primarily perpetrated by **domestic and foreign artisanal workers**, as well as industrial companies. Transnational criminal groups and terrorist organizations operate in the shadows of these crimes by exploiting local workers in need of money and bribing them to extract, transport, and export these resources.
- Al-Qaeda affiliate JNIM capitalizes on the Sahel's rich gold deposits as a source of revenue while simultaneously utilizing them to drive recruitment and further entrench themselves with the local communities. The Islamic State-Central Africa Province (ISCAP) in Mozambique also reportedly generates significant revenue from illegal ruby mining activities and illegal logging. In South America, the National Liberation Army (ELN) in Colombia and the Brazilian Crime syndicates Comando Vermelho (CV) and Primeiro Comando da Capital (PCC) are involved in the timber and gold mining industries.
- Illicit gold poses a significant threat as this mineral's dual role as a commodity and currency enables TCOs and terrorist groups to finance other illicit activities including drug, arms, and human trafficking.

## Value

Currently, the global value of illegal mineral trade is estimated to be between **US\$15.7 billion and US\$63 billion annually**.<sup>146</sup> As noted in the 2017 GFI report, while the ambiguous definition of illegal mining has resulted in gaps in the global illegal mineral trade, more information is available at the country and mine levels.

### Illegal gold mining

Due to the rising price of gold on the global market, the value and volume of illegal mining activity in countries with large gold resources has likely increased in recent years due to the potential high profits.



146 (Adjusted to account for inflation in 2024); Channing May, Transnational Crime and the Developing World; World Bank Group, Illegal Logging, Fishing, and Wildlife Trade: The Costs and How to Combat It, (World Bank Group, 2019), <https://thedocs.worldbank.org/en/doc/482771571323560234-0120022019/original/WBGReport1017Digital.pdf>; United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report - Trafficking in protected species, 2020 (UNODC, 2021), [https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World\\_Wildlife\\_Report\\_2020\\_9July.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/2020/World_Wildlife_Report_2020_9July.pdf).



Figure 11: Annual Price of Gold (2000 - 2024)<sup>147</sup>

- Illegal gold extraction rates are the highest in Latin America and Africa, and in 2022, gold originating from Africa accounted for **27 percent** of the global supply, making it the top gold producing region.<sup>148</sup>
- Peru is the largest producer of gold in Latin America and sixth globally, yet in 2022, 45 percent of its gold production was illegally exported.<sup>149</sup> Furthermore, illegal mining is estimated to cost the country between **US\$3 billion to \$6 billion** each year, equal to 2.5 percent of their GDP.<sup>150</sup> In Colombia, the UNODC estimates that **72 percent of gold mining activity** was illegal the same year, and Venezuelan officials believe that 75 tons of gold, amounting to US\$4.8 billion, is extracted illegally in the country each year.<sup>151</sup>

147 "Gold Prices - Historical Annual Data," Macrotrends, <https://www.macrotrends.net/1333/historical-gold-prices-100-year-chart>.

148 INTERPOL. The Devastating Impact of Illegal Gold Mining; World Gold Council, "The Evolving Picture of Global Gold Production", June 2023, <https://www.gold.org/goldhub/gold-fo-cus/2023/06/evolving-picture-global-gold-production>.

149 "Illegal gold mining eats into Peruvian Amazon," France 24, June 18, 2024, <https://www.france24.com/en/video/20240618-illegal-gold-mining-eats-into-peruvian-amazon>.

150 Marco Aquino, "Peru's Deadly Gold Mine Attack Highlights Growing Security Risk, Costs," Reuters, December 4, 2023, <https://www.reuters.com/world/americas/perus-deadly-gold-mine-attack-highlights-growing-security-risk-costs-2023-12-04/>.

151 Maria Luisa Valencia. "Gold Mining in Colombia Increasingly Tied to Organized Crime: Report."



## Diamonds and Gemstones

- The global diamond production was valued at approximately US\$16 billion in 2022; however, illegally mined diamonds account for about **20 percent** of the global production total, or approximately US\$3.2 billion in 2022.<sup>152</sup>
- In 2018 the United States Geological Survey estimated that approximately 80 percent of the 330,000 carats of diamonds mined annually in the Central African Republic are smuggled or illegally exported from areas not under the central government's control.<sup>153</sup>
- Currently, there are no statistics regarding the amount of illegally mined colored gemstones in the global mineral trade. However, due to the growing demand of gold, global production and exportation of both illegal gemstones and diamonds has likely decreased in recent years. In countries with both gold and gemstone resources, artisanal and small-scale mining operations will likely pivot away from gemstone mining due to gold's higher profitability. This is likely the case in Colombia, Venezuela, and the Central African Republic. Additionally, because gemstone production has likely decreased, the illegal gemstones on the market likely sell for less money due to lower demand. Thus, gold now likely accounts for the bulk of the illegally mined and traded minerals.

## Timber

The trade of illegal timber products continues to generate more profits than illegal fishing, mining, and oil theft, making it the **most profitable natural resource crime** in the world.

- Annually, the global value of this sector is estimated to be valued between **US\$68 to \$199 billion** per year.<sup>154</sup> In Africa alone, illegal logging costs countries approximately US\$17 billion each year.<sup>155</sup>
- Rosewood, a term for a variety of tropical hardwoods, is considered the highest traded wildlife product, both in volume and value, and in 2018, global imports were worth more than US\$3 billion.<sup>156</sup> According to the United Nations Food and Agriculture Organization (FAO), global demand for unprocessed wood (roundwood) is projected to increase as much as 49 percent between 2020 and 2050.<sup>157</sup>



152 "Annual Summary Charts - 2016," Kimberley Process Rough Diamond Statistics, accessed December 3, 2024, [https://kimberleyprocessstatistics.org/public\\_statistics](https://kimberleyprocessstatistics.org/public_statistics).

153 United States Geological Survey. "USGS Scientists Help Address Conflict Mining", June 27 2022, <https://www.usgs.gov/news/featured-story/usgs-scientists-help-address-conflict-mining>.

154 (Adjusted for inflation in 2024), Channing May. Transnational Crime and the Developing World; INTERPOL. "Illegal logging in Latin America and the Caribbean inflicting irreversible damage," April 21, 2022. <https://www.interpol.int/en/News-and-Events/News/2022/Illegal-logging-in-Latin-America-and-Caribbean-inflicting-irreversible-damage-INTERPOL>.

155 "Stripping Africa's Forests." ADF Magazine. March 2020. <https://adf-magazine.com/2020/03/stripping-africas-forests/>.

156 United Nations Office on Drugs and Crime (UNODC). World Wildlife Crime Report, 37.

157 Food & Agriculture Organization of the United Nations (FAO), The State of the World's Forests 2024, last updated August 18, 2024, <https://openknowledge.fao.org/items/9c056c59-fa14-4887-967f-f64e460be56d>.

## Dynamics

Illegal logging primarily occurs in the **remote forest areas** of Central and West Africa, Latin America, and Southeast Asia.

- According to Chatham House, the top importers of illegally sourced **timber include China, the United States, India, and Japan**.<sup>158</sup>
- China is the top destination for illegal timber products from Africa and in 2018, 90 percent of Africa's rosewood exports were to China.<sup>159</sup> In 2021, Mali and Sierra Leone alone accounted for nearly two-thirds of China's rosewood imports by volume, and in 2023, Mozambique became China's top rosewood supplier, with an estimated US\$11.7 million.<sup>160</sup>
- This shift towards Mozambique may indicate dwindling supplies of this tropical hardwood in West Africa, as China has traditionally sourced its rosewood from the region since 2015.

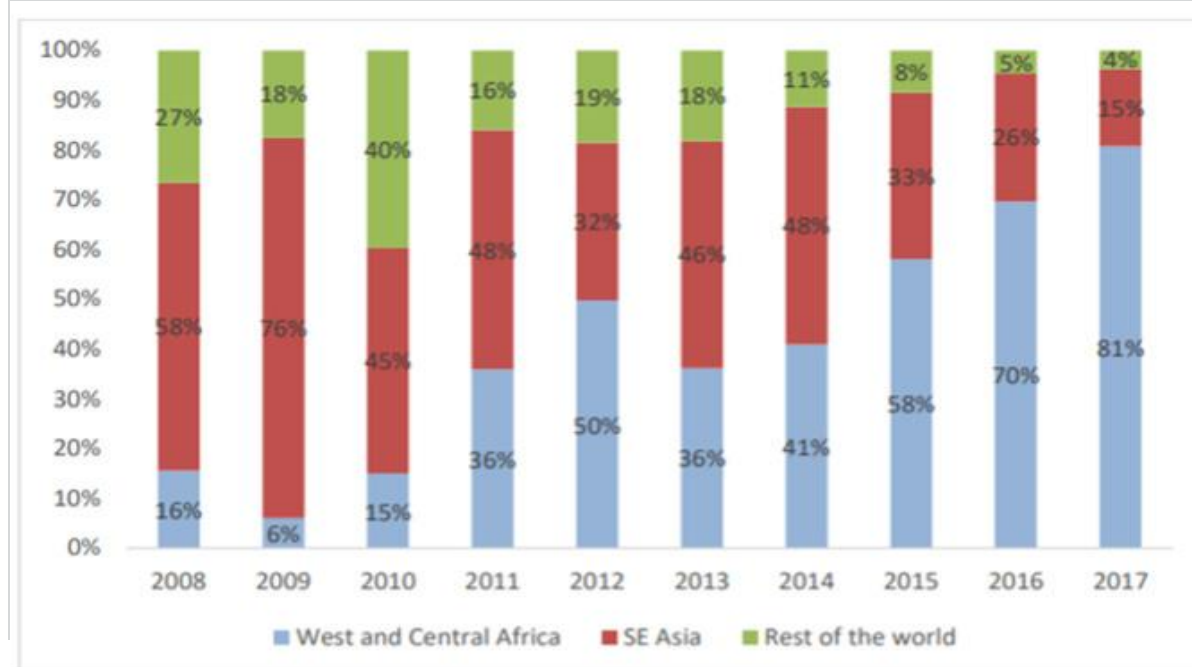
**Rosewood, mahogany, and red sanders** (also known as red sandalwood) are among the most highly sought after timber products, resulting in a growth in the illegal market for these goods. Rosewood commonly refers to a wide variety of tropical hardwoods; however, there is no universal definition of this type of timber, which hinders research on global rosewood statistics.

- According to the UNODC, China is the main driver of the demand for rosewood, as it is used to make an antique style of furniture which is highly sought-after in Asia.<sup>161</sup>
- Beginning in 2015, Central and West Africa overtook Central America and Southeast Asia as the primary exporters of rosewood due to over extraction, and by 2017, this region of Africa was responsible for exporting more than 80 percent of global rosewood logs.<sup>162</sup>
- The trade of all African Rosewood was suspended under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) in June 2022, yet West African countries continue to export this endangered species, thus illustrating how illicit markets thrive under little government oversight.<sup>163</sup>

- 158 Allison Hoare, Tackling Illegal Logging and the Related Trade: What Progress and Where Next?, Chatham House, July 2015, <https://www.chathamhouse.org/sites/default/files/publications/research/20150715IllegalLoggingHoareFinal.pdf>.
- 159 C. Browne, Catherine Lena Kelly, & Carl Pilgram. "Illegal Logging in Africa and Its Security Implications", August 12, 2022, <https://africacenter.org/spotlight/illegal-logging-in-africa-and-its-security-implications/>.
- 160 Naomi Basik Treanor, "CITES takes unprecedented steps to stop the illegal African rosewood trade". Forest Trends, June 8, 2022, <https://www.forest-trends.org/blog/cites-takes-unprecedented-steps-to-stop-the-illegal-african-rosewood-trade/>; "Mozambique Becomes China's Top Source of Rosewood as Illicit Trade Funds Terror". African Defense Forum. August, 20, 2024, <https://adf-magazine.com/2024/08/mozambique-becomes-chinas-top-source-of-rosewood-as-illicit-trade-funds-terror/>.
- 161 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report, 38.
- 162 United Nations Office on Drugs and Crime (UNODC), "West & Central Africa: Wildlife Crime Threat Assessment," 80.
- 163 Environmental Protection Agency. Opening the Rosewood Pandora's Box. Environmental Investigation Agency. October 2023. [https://www.ciel.org/wp-content/uploads/2023/11/EIA\\_US\\_Rosewood\\_Report\\_Briefing\\_1123\\_FINAL.pdf](https://www.ciel.org/wp-content/uploads/2023/11/EIA_US_Rosewood_Report_Briefing_1123_FINAL.pdf).

Red sanders is also a lucrative timber product as top-quality logs can fetch wholesale prices between **US\$160,000 to 246,000 per ton**, and furniture pieces made of red sanders can be sold for millions of dollars. Illegal red sanders trade is especially prominent in India, where an estimated 200 tons of it are seized annually.

**Figure 12: Share of Rosewood Log Supply by Exporting Region<sup>164</sup>**



In the mineral sector, illegal gold production frequently occurs in Peru, Brazil, Colombia, Bolivia, and Ecuador. In Africa, gold is illegally mined in Mali, Niger, Burkina Faso, Guinea, The Gambia, Ghana, and South Africa. **Cameroon** serves as the primary port for exporting timber, gold, diamonds, and gemstones sourced from its landlocked neighbors to the international market.<sup>165</sup>

- Mozambique is home to an estimated 50 to 70 percent of the world's rubies; however, the illicit gemstone market generates between **US \$80 to US \$128 million annually**, according to the Global Initiative Against Transnational Crime. While most mining activity is done by commercial companies, local miners will bribe security officials for access to these mining sites at night, and then sell the gemstones to local brokers.<sup>166</sup>

164 United Nations Office on Drugs and Crime (UNODC). West and Central Africa - Wildlife Crime Threat Assessment, <https://cites.org/sites/default/files/eng/prog/enforcement/E-CoP18-034-Threat-Assessment.pdf>.

165 Julia Stanyard, Eleanor Beevor, and Thierry Vircoulon. Port of Call - Regional Illicit Flows Through Douala, Cameroon, May 2024, Global Initiative Against Transnational Crime. May 2024. <https://globalinitiative.net/wp-content/uploads/2024/05/Julia-Stanyard-Eleanor-Beevor-and-Thierry-Vircoulon-Port-of-call-Regional-illicit-flows-through-Douala-Cameroon-GI-TOC-May-2024-1.pdf>.

166 Kristina Amerhauser and Robin Cartwright. Hidden in Plain Sight - Counting the Cost of Environmental Crime. Global Initiative Against Transnational Crime, November 2023. <https://globalinitiative.net/wp-content/uploads/2023/11/Kristina-Amerhauser-Robin-Cartwright-Hidden-in-plain-sight-Counting-the-cost-of-environmental-crime-GI-TOC-October-2023.pdf>.

Once minerals are extracted, they are typically exported to the United Arab Emirates, Switzerland, and India for refinement.<sup>167</sup> The UAE, in particular, is known as the “largest global hub for the global black-market gold trade.”<sup>168</sup> In 2020, **US\$246.9 billion** worth of gold was imported into the UAE and 25 percent of the world’s gold trade occurred in Dubai, primarily in Free Trade Zones.<sup>169</sup> Venezuela, Colombia, Mali, and even North Korea are also known to use Dubai for gold smuggling.<sup>170</sup> India also serves as one the biggest hubs for gold smuggling. Due to the lower taxation rates for manufactured jewelry, domestically mined and imported unrefined gold is often transformed into simple jewelry, such as gold chains, before being exported to its final destination.<sup>171</sup>

- Latin American and African countries likely export to the UAE to hide the minerals’ true origins, as it loses all traceability during the refinement stage, or to Switzerland to increase the mineral’s value. Once gold passes through a Swiss refinery it can be certified as Swiss gold, consequently fetching a higher price on the international market because these refineries are known for their high quality and purity standards.<sup>172</sup>

In the Democratic Republic of Congo, gold is often smuggled into Uganda before being exported to the UAE.<sup>173</sup> Additionally, shipping ports Doula, Cameroon and in the capital cities of Guinea-Bissau and Central African Republic are hotspots for illegally smuggled timber.<sup>174</sup>

Illegal mining and logging both occur in remote locations where the state’s presence is negligible, thereby making it **difficult to monitor and detect** criminal activity. This is especially true for timber extraction given the vast size of forest areas, particularly in Latin America and Central Africa. Illegal practices can occur at any stage in the mineral and timber supply chains and both resources share common methods used during their respective extraction, production, and exportation stages. Some of the most common methods include:<sup>175</sup>

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- 167 Richard H. Gleen. “Illicit Mining: Threats to U.S. National Security and International Human Rights.” U.S. Department of State. Accessed December 4, 2024.
- 168 Yulia Kylova, Dubai: A Global Hub for Illicit Trade and Sanctions Evasion. Transnational Crime and Corruption Center, May 2023, 5, <https://traccc.gmu.edu/wp-content/uploads/2024/11/Dubai-report-Updated.pdf>.
- 169 Yulia Kylova, Dubai: A Global Hub for Illicit Trade and Sanctions Evasion.
- 170 Yulia Kylova, Dubai: A Global Hub for Illicit Trade and Sanctions Evasion.
- 171 Peter Chirico, U.S Geological Service, interviewed by Grace Gainer, November 2, 2024.
- 172 Nino Schon-Blume et al, The Impact of Gold - Sustainability Aspects in the Gold-Supply Chains and Switzerland’s Role as a Gold Hub. World Wildlife Fund. 2021, <https://www.wwf.ch/en/unsere-ziele/the-downside-of-gold#:~:text=Switzerland’s%20role%20in%20the%20international%20gold%20trade&text=33PN00%20tonnes%20of%20gold%20are,deplorable%20social%20and%20ecological%20conditions>.
- 173 United Nations Conference on Trade & Development, Economic Development in Africa Report 2020 - Tackling Illicit Financial Flows for Sustainable Development in Africa, 2020, 66, [https://unctad.org/system/files/official-document/aldcafrica2020\\_en.pdf](https://unctad.org/system/files/official-document/aldcafrica2020_en.pdf).
- 174 “Mapping illicit hubs”, Global Initiative Against Transnational Crime, 2024, <https://wea.globalinitiative.net/illicit-hub-mapping/>.
- 175 Channing May, Transnational Crime and the Developing World, 71; Basel Institute on Governance. Forest Crime and the Illegal Timber Trade. 10-14.



- Mining and logging in protected areas such as Indigenous lands and natural parks
  - Mining and logging without permits
  - Forging or using old permits and registration documents
  - Bribing officials for permits
  - Trade mis-invoicing to hide the origin, quantity, value, or quality of illegal timber and minerals
  - Mixing illegal minerals and timber into the legal shipments
  - Exporting timber and minerals without permits or using fraudulent documents
-



## Actors

Illegal mining and logging extraction is primarily done through domestic and foreign artisanal miners, and industrial companies.

- As of 2020, **44.75 million people** across the world are employed in the ASM sector.<sup>176</sup>
- Artisanal and small-scale mining production also constitutes 25 percent of the world's diamond supply, 20 percent of the global gold supply, and between 18 and 30 percent of global cobalt mining.<sup>177</sup>

While both industries have ties to **transnational criminal organizations and terrorist groups**, these actors are more likely to be involved in the mining sector (particularly gold mining), as gold serves as both a commodity and currency. As a result, the mineral sector is also often highly intertwined with other transnational crimes such as human trafficking, drug trafficking, and arms trading.

Chinese logging and mining companies are also the primary actors in many of the countries with a high-risk of illegal extraction and trading practices, such as Cameroon, the Central African Republic, Senegal, Guinea-Bissau, Gabon, and Mozambique.<sup>178</sup>

- According to Interpol, only five to 10 percent of gold in Cameroon is legally extracted and traded. In 2017, 95 percent of mining companies in Cameroon were foreign owned and primarily Chinese.<sup>179</sup>

In Latin America, illegal mining and logging are deeply intertwined with the operations of powerful criminal organizations, who either use minerals and timber to launder their drug proceeds or engage in the crimes as a source of revenue. There is evidence of this in Colombia and Venezuela, through the National Liberation Army (ELN) and former members of the Revolutionary Armed Forces of Colombia (FARC). In Brazil, Comando Vermelho (CV) and Primeiro Comando da Capital (PCC), the country's two largest crime syndicates, also collaborate with loggers and miners' to harvest and sell illegal timber as well as gold from Amazon rainforest.<sup>180</sup>

While these sectors can be lucrative money-making opportunities, not everyone involved reaps the benefits. Typically, the illegal loggers and miners usually make the smallest profits while the exporters and those leading the illegal operations receive the most money.<sup>181</sup>

176 World Bank. 2020 State of the Artisanal and Small-Scale Mining Sector, 2020, 1, <https://documents1.worldbank.org/curated/en/884541630559615834/pdf/Delve-2020-State-of-the-Artisanal-and-Small-Scale-Mining-Sector.pdf>.

177 World Bank. 2020 State of the Artisanal and Small-Scale Mining Sector.

178 "Mapping Illicit Hubs", Global Initiative Against Transnational Crime.

179 Claude Hyepdo Simo. and Justin Chekoua. Mapping of integrity deficits in the mining value chain in Cameroon. Transparency International Cameroon - FODER, 7. 2020. [https://ti-cameroun.org/wp-content/uploads/2020/10/VFEN\\_Etude\\_Cartographie\\_d%C3%A9ficit-din.pdf](https://ti-cameroun.org/wp-content/uploads/2020/10/VFEN_Etude_Cartographie_d%C3%A9ficit-din.pdf).

180 International Crisis Group, "A Three Border Problem: Holding Back the Amazon's Criminal Frontiers," July 17 2024, <https://www.crisisgroup.org/latin-america-caribbean/south-america/brazil-colombia-peru/b51-three-border-problem>.

181 Channing May, Transnational Crime and the Developing World. Global Financial Integrity, 2017.

# Case Study

Chile has faced significant challenges with illegal logging, particularly in its southern regions such as La Araucanía and Biobío. Since 2018, revenues generated from illegal logging have steadily increased, with wood theft valued at approximately US\$67.8 million in 2020.<sup>182</sup> These illegal timber operations are often carried out by well-organized criminal networks, such as timber mafias, that exploit weak governance, corruption, and inadequate enforcement of environmental regulations.<sup>183</sup> These networks use sophisticated methods to extract and transport timber, including falsifying documentation, stealing wood from sawmills, and bribing officials to facilitate the movement of illegally harvested resources.<sup>184</sup>

The lucrative profits from illegal logging are used to fund other illicit activities, including drug trafficking and money laundering. These mafias are also known for their violent tactics, which include hijacking truckloads of legally felled timber and intimidating or attacking those who oppose their operations. Additionally, factions of the Mapuche Indigenous community have been involved in illegal logging to finance their political goals, further complicating the situation.<sup>185</sup> This multifaceted issue underscores the need for stronger governance, enhanced law enforcement capabilities, and sustainable forest management practices to combat illegal logging and its associated criminal activities.

182 Carolina Pizzaro, “El Millonario Negocio del Robo de la Madera,” *La Tercera*, March 6, 2021, <https://www.latercera.com/pulso/noticia/el-millonario-negocio-del-robo-de-la-madera/74TM76Q3IZEMBEGAJD22OXP5M/>.

183 Buse Egin, “Illicit Activity in Chile’s Timber Sector,” *Global Financial Integrity*, May 2, 2023, <https://gfintegrity.org/illicit-activity-in-chiles-timber-sector/>.

184 Buse Egin, “Illicit Activity in Chile’s Timber Sector.”

185 Buse Egin, “Illicit Activity in Chile’s Timber Sector.”



## Connections to Foreign Terrorist Organizations (FTOs)

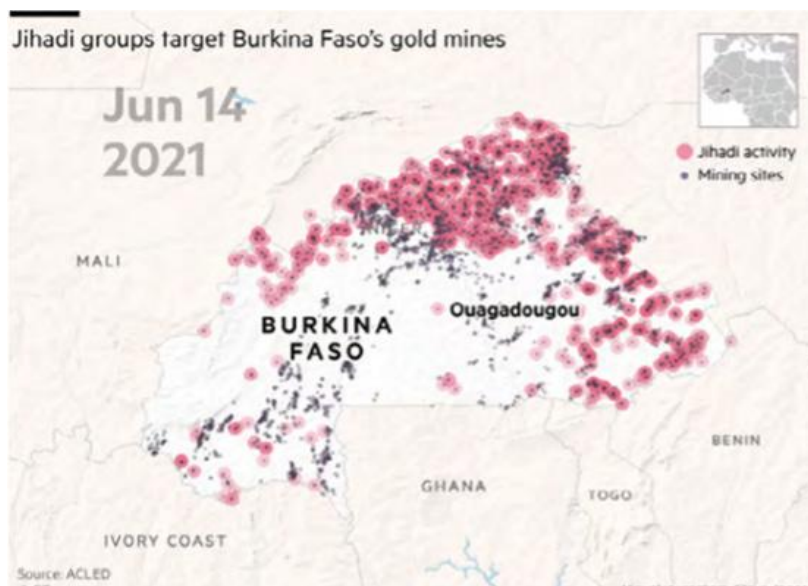
Illegal logging and mining have deep ties to terrorist and insurgency groups in Latin America, as well as West Africa and Central Africa. In **Colombia and Venezuela**, illegal gold mining has become a primary source of financing for ex-FARC dissidents and the National Liberation Army (ELN) in recent years.

- According to a 2019 American Enterprise Institute report, both groups are known to extort mining operations by forcing miners to pay them a percentage of their earnings.<sup>186</sup>

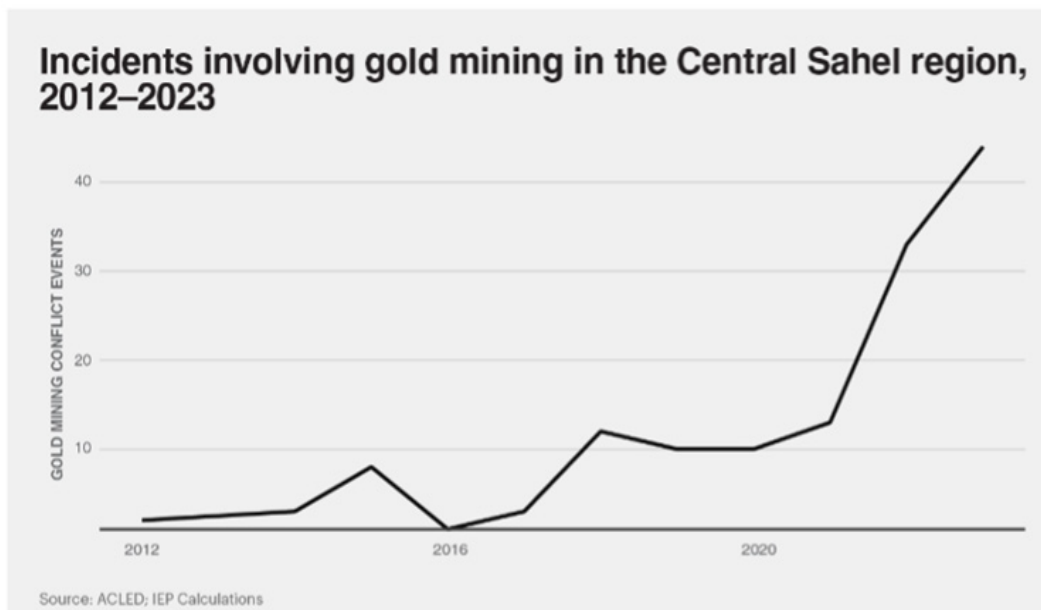
In the Sahelian states of Mali, Niger, and Burkina Faso, al-Qaeda affiliate Jama'at Nasr al-Islam wal-Muslimin (JNIM) has turned to the **artisanal gold mining sector** as a significant source of funding.

- Since 2017, terrorism associated with these two groups has steadily increased in the Sahel, and in 2022, the region recorded more terrorism-related incidents than the Middle East and South Asia regions combined, making the tri-border region of these three countries the new global epicenter of terrorism.
- The artisanal gold mining sector in Burkina Faso reportedly generates up to US\$1.5 billion annually, and in Mali, trade reports indicate that approximately US\$6.3 billion worth of gold was smuggled into the UAE in 2021.<sup>187</sup> These numbers may be even higher given the under-reported nature of artisanal mining, thus providing a lucrative source of funding for armed groups in the Sahel theater.

**Figure 13: Illicit Financial Flows and Conflict in Artisanal and Small-Scale Gold Mining**<sup>188</sup>



- 186 Andres Martinez-Fernandez, The National Liberation Army in Colombia and Venezuela (American Enterprise Institute 2019), 3, <https://www.aei.org/research-products/report/the-national-liberation-army-in-colombia-and-venezuela-illicit-finance-challenges-stemming-from-illegal-mining/>.
- 187 Institute for Economics & Peace, Global Terrorism Index 2024: Measuring the Impact of Terrorism, February 2024, 56, <https://www.visionofhumanity.org/wp-content/uploads/2024/02/GTI-2024-web-290224.pdf>; "Terrorists Target the Sahel's Gold Mines as a Source of Financing", African Defense Forum, October 17, 2023, <https://adf-magazine.com/2023/10/terrorists-target-the-sahels-gold-mines-as-a-source-of-financing/>.
- 188 International Institute for Sustainable Development, Illicit Financial Flows and Conflict in Artisanal and Small Scale Gold Mining: Burkina Faso, Mali, and Niger, September 2022, 33, <https://www.iisd.org/system/files/2022-09/illicit-financial-flows-conflict-artisanal-small-scale-gold-mining.pdf>.

**Figure 14: How Illicit Economies Fund Terrorism<sup>189</sup>**

Additionally, Islamic State in Mozambique reportedly earns income from the timber and ruby mining industries. According to the Environmental Investigation Agency, an estimated 30 per cent of tropical timber from Cabo Delgado originates from forests controlled by the group.<sup>190</sup> The group has been accused of bribing local miners to infiltrate mining sites and frequently at-tack commercial mining sites in the Montepuez district.

- In October 2022, and February 2023 they attacked a ruby mine owned by Gemfields Group, the largest commercial mining company in Mozambique, forcing them to temporarily suspend operations.<sup>191</sup>

189 Jamison O'Brien, "How illicit economies fund terrorism", Vision of Humanity, accessed December 3, 2024, <https://www.visionofhumanity.org/how-illicit-economies-fund-terrorism/>.

190 Environmental Investigation Agency, "Shipping the Forest", 2024, [https://eia.org/wp-content/uploads/2024/06/EIA\\_US\\_Mozambique\\_Timber\\_Report\\_0424\\_FINAL\\_SINGLES-5-13.pdf](https://eia.org/wp-content/uploads/2024/06/EIA_US_Mozambique_Timber_Report_0424_FINAL_SINGLES-5-13.pdf), 6.

191 "Gemfields evacuates Mozambique exploration camp after attack", Reuters, February 14 2023, <https://www.reuters.com/world/africa/gemfields-evacuates-mozambique-exploration-camp-after-at-tack-2023-02-14/>.





## Policy Recommendations

While formalizing the artisanal mining and logging sectors may initially appear to be a logical first step in reducing illegal activities—especially considering that artisanal workers contribute significantly to the illicit behavior—this approach would ultimately serve as a temporary solution. It fails to address the fundamental issue that sustains these illicit economies: corruption. Illegal logging is heavily reliant on high-level government collusion, as large equipment is required to extract and transport timber. In many cases, officials either facilitate the procurement of this equipment or turn a blind eye to its use. In exchange, they often receive bribes or a share of the profits from illegal mining and logging operations. As such, combating corruption within both national and local governments should be prioritized, as these officials lack any incentive to implement policies that would reduce or formalize these sectors, given that they profit from their continuation.

Moreover, while increasing the state's presence in remote areas where illegal mining and logging occur may seem like an effective solution, this has proven to be an insufficient and short-term measure. Miners and loggers often find ways to circumvent law enforcement or simply return to these sites once government oversight diminishes. For example, in 2019, Peruvian authorities launched a large-scale operation aimed at curbing illegal gold mining in La Pampa province. Although the operation initially led to a temporary 70 to 90 percent reduction in illegal mining activity, these operations resumed as government attention waned and enforcement efforts were relaxed.<sup>192</sup>

192 Dan Collyns. "Peru's crackdown on illegal gold mining a success, but only briefly, study shows", Mongabay, December 5, 2023, <https://news.mongabay.com/2023/12/perus-crackdown-on-illegal-gold-mining-a-success-but-only-briefly-study-shows/>.



# IUU FISHING

## Overview

Illegal, Unreported, and Unregulated (IUU) fishing is an inherently global crime, happening in all the world's oceans. Ships fish in the **Exclusive Economic Zones (EEZ)** of countries that lack the capabilities to enforce their own laws, robbing these countries of income, overfishing vulnerable species, and hurting local food security. The violation of fishing laws and regulations only adds more pressure on the already overexploited global fish populations, threatening to collapse the fish populations which billions of people rely on as a primary source of protein. The high demand for seafood in both developing and developed countries, the uneven and poorly enforced fishing laws and regulations, and decreasing fish stocks drives rising value for illegal fishing. However, global attention, gains in enforcement capabilities, and emerging technologies will allow for more pressure to be put on illegal fishers.



IUU fishing is made up of three distinct, sometimes connected, activities: illegal, unregulated, and unreported fishing. They were defined in the International Plan of Action to Prevent, Deter, and Eliminate Illegal, Unreported, and Unregulated Fishing (IPOA-IUU) set down in Rome 2001. Simplified definitions of each are as follows.

### Illegal:

- Ships fishing in countries Exclusive Economic Zone (EEZ) in which they do not have license to fish
- Fishing in specified marine protection areas
- Using fishing gear or techniques outlawed in the country in whose EEZ they are fishing
- Or, breaking other specified laws of the countries in whose EEZ they are fishing, or of the country in which they are flagged

### Unreported:

- Caught fish has not been reported, or has been misreported, to the relevant national or international authorities

### Unregulated:

- Fishing a type of marine animal, or in an area, to which no national laws or regulations on fishing activities apply

The definitions of these activities are broad, and not mutually exclusive, making them difficult to separate. Not all IUU fishing is, by definition, illegal, but all is harmful.



## Key Findings

- The annual value of IUU fishing is **US\$66.4 billion to \$100.3 billion** in 2024.
- Reported data on both licit and illicit fishing is incomplete, but insights can still be gleaned from it.
- IUU fishing can be done by local small-scale fishers, but the biggest effects come from industrial fishing, especially that done by the Chinese distant waters fishing fleet.
- There is **no known connection** between illegal fishing and **terrorist financing**.
- The economic and human effects of this crime is significant and is compounding as damage done to ecosystems and security snowballs out of control.
- Differences in enforcement, the health of fish stocks in different EEZs, and high demand for seafood provides easy profits, economic drivers, and low risk for IUU fishing.

## Value

It is estimated that the current value of IUU fishing has increased since the last time it was assessed at a global scale, reaching a total of **US\$66.4 billion to \$100.3 billion** in 2024. This is a significantly higher number compared to previous assessments, largely due to the inclusion of reconstructed unreported catch numbers and an approximation of unregulated fishing. This value is at first sale (the price the operator of the fishing vessel gets after “landing” the catch in port); the final sale value depends on where it is sold due to regional variations in the market price of seafood.

These activities bring in about **41–61 million tons of fish**, or about 46 percent to 70 percent of reported wild caught fish and 48 percent to 33 percent of total wild caught fish. This assessment relies on several large assumptions and has several likely methodological issues that could contribute to significant error, **therefore this is assessed at a low confidence**.



Figure 15: Values of Different IUU Sub-Type

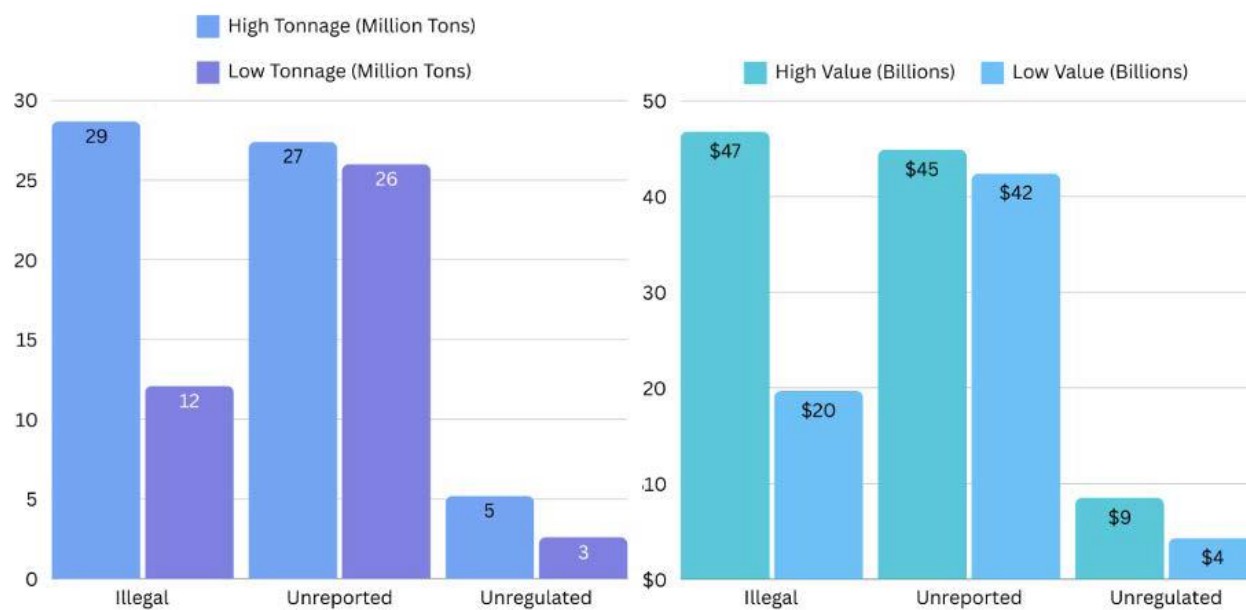
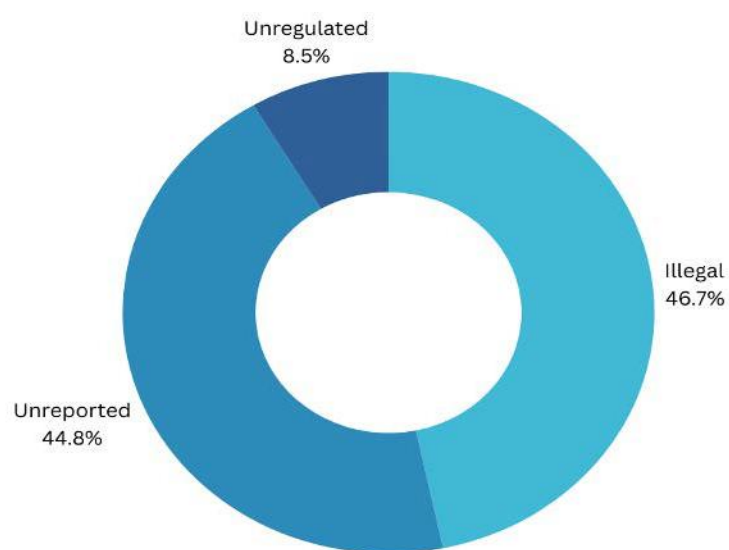
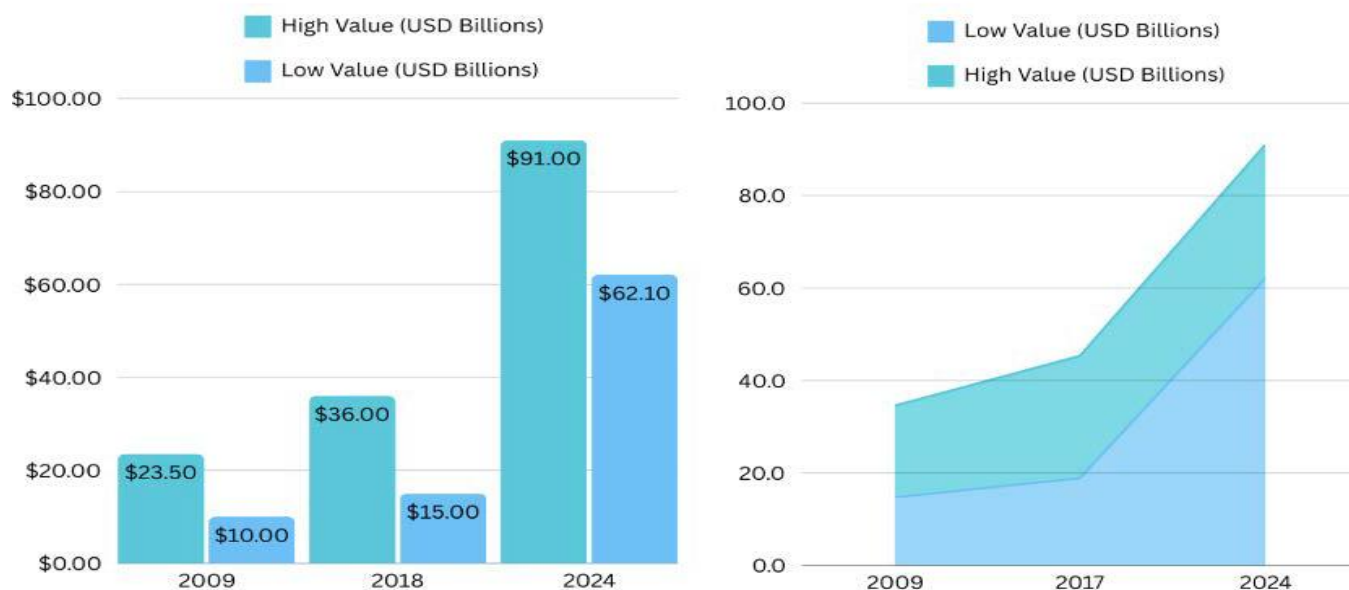


Figure 16: The Relative Size of IUU Sub-Types



**Figure 17: Value of IUU compared to previous estimates<sup>193194</sup>**

(Excluding unregulated fishing. adjusted for inflation)



The comparison to previous estimates and change over time is assessed with low confidence, as this estimate uses a different data source that is believed to be more representative. More information on how this estimate was made **can be found in the methodology index**.

The value for IUU fishing is affected not only by the changes in the **illegal industry**, but also by the overall growth in and changes to the seafood industry at large. Over the past half century, both the U.S. and the world have had an increasing appetite for seafood.<sup>195</sup> However, most of the growth in the seafood industry is happening in the aquaculture sector.<sup>196</sup>

- In 2022, aquaculture produced 144 tons of seafood, compared to capture fisheries which generated 101 tons of seafood.<sup>197</sup>
- Capture fisheries (wild caught fish) have been relatively stable since the turn of the century.<sup>198</sup> This makes it hard to glimpse trends in IUU fishing by looking at reported fishing data.

193 David J. Agnew et al., "Estimating the Worldwide Extent of Illegal Fishing," PLoS ONE, 2009.

194 Channing May, Transnational Crime and the Developing World. Global Financial Integrity, 2017

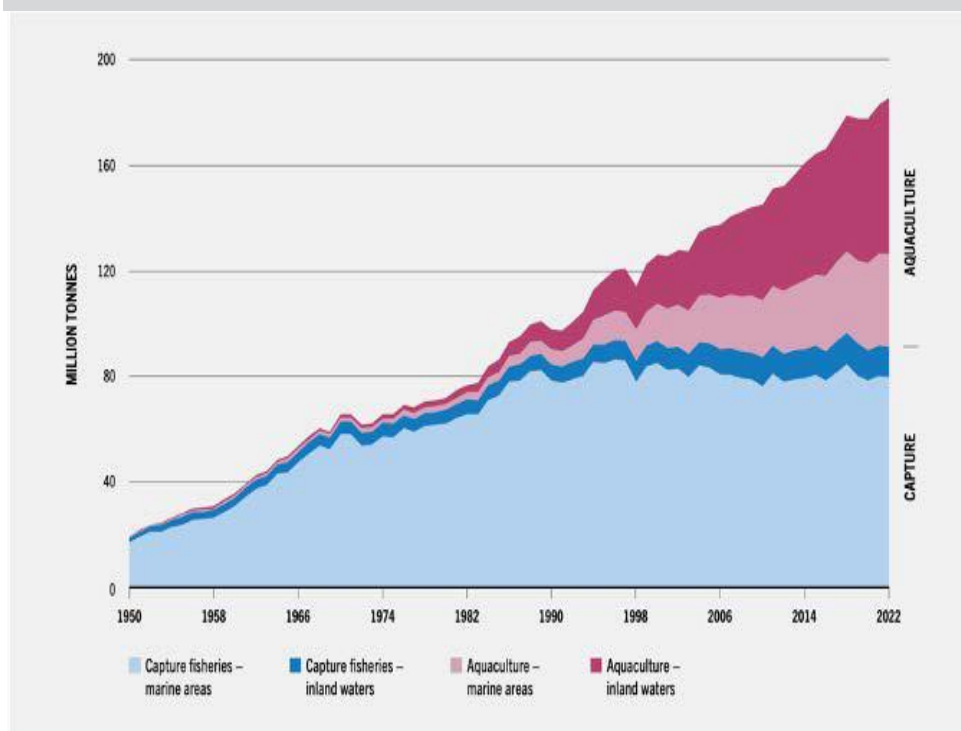
195 Eric Abaidoo, Max Maelstrom, & Trey Malone, "Growth of Imports in U.S. Seafood Markets," Choices, 2021.

196 "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, xxii.

197 "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, xxii.

198 "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, xxii.



Figure 18: Global Fishing Levels: Capture Fisheries vs Aquaculture, 1950-2022<sup>199</sup>

Demand for seafood will likely continue to increase, especially for wild caught seafood which is favored in places like the U.S. Additionally, the increasing depletion of fish stocks means wild caught fish will be both more valuable and more difficult to catch legally. Thus, illegal fishing will likely increase. At the same time, the increasing demand will largely be met by growth in the aquaculture sector. Increasing international attention and regulations will make IUU fishing harder and more costly,<sup>200</sup> while decreasing fish stocks will make all capture fisheries more difficult.

There is functionally very little research into the total scale or macro trends of IUU fishing, and certain areas, such as unregulated fishing, get almost no attention at all. As a result, all value and scale estimates presented in this report should be assessed as approximate representations or a best guess based on previous best estimates. However, this soon may not be the case, as emerging technologies could provide a more timely, complete, and accurate understanding of the state of illegal fishing.<sup>201</sup> Further discussion on the limits of the data presented in this report can be found in the methodology section.



199 "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, 5.

200 "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, xxii.

201 "Government of Canada Launches International Program to Track Illegal Fishing Using Satellites," Fisheries and Ocean Canada, February 24, 2021.



## Dynamics

IUU fishing is inherently driven by profits, both by people who lack opportunities and those who own large companies. The profits are facilitated by the differences in the fishing environment across the oceans. Some countries' EEZs have more plentiful fish stocks compared to others (often because of the latter countries having large, long-established, and unrestrained industrial fishing industries the former lack), while also having little ability to enforce their fishing laws. This creates an opportunity to exploit a plentiful, unguarded natural resource at the expense of the victim country and communities. The profitability of this crime is contingent on the tools IUU fishers use to exploit international and national structures to avoid enforcement.

- Ships engaged in IUU fishing are generally flagged in states that offer flags of convenience (FOCs); this refers to vessel registration that implies limited oversight and compliance enforcement, allowing for illegal activity.<sup>202</sup>
- A common technique to avoid legal consequences that flagging countries allow is the regular changing of ship names and appearance to avoid identification.<sup>203</sup> Twenty-five percent of identified IUU ships were flagged in more than four flag of convenience (FOC) countries during their lifespan.<sup>204</sup>
- IUU ships also engage in Automatic Identification System (AIS) spoofing, the practice of disabling, jamming, or tampering with the GPS tracking device that ships use to avoid collisions.<sup>205</sup> Doing this allows ships to fish in restricted waters or EEZs in which they do not have legal permission to do so, without having their movements automatically tracked.
- Another problem is transshipment, in which a vessel known to be engaging in IUU activities will transfer their catch to a vessel with a clean record to launder illegally caught fish.<sup>206</sup>

The issue of distant water fishing (DWF) further exacerbates the problem of IUU fishing. DWF occurs when ships and fishing companies based in one country fish in another country's Exclusive Economic Zone (EEZ), often in another region entirely. This practice often enables IUU activities whereby fishers will voyage to regions and EEZs where the country in question lacks the ability to enforce their fishing laws, and the fish are more plentiful than their home waters.

- 202 Emily Benson and Cathrine Puga, "Flagging the Issue: Maritime Governance, Forced Labor, and Illegal Fishing," Center for Strategic and International Studies (CSIS), August 9, 2021.
- 203 Park et al., "Tracking Elusive and Shifting Identities of the Global Fishing Fleet," *Science*, January 18, 2023.
- 204 Emily Benson and Cathrine Puga, "Flagging the Issue: Maritime Governance, Forced Labor, and Illegal Fishing," Center for Strategic and International Studies (CSIS), August 9, 2021.
- 205 "Automatic Identification System Spoofing," OCEANIA, 2021.
- 206 Scott Edwards, "Transshipment: An Introduction," *Safe Seas*, 2020.

Aside from transshipment and disguising ships, methods of obscuring the owner and operations of companies involved in IUU are widespread. Often, the final beneficiary owner is hidden behind shell companies and phony boards of directors.<sup>207</sup> Once a fish is landed there is effectively no way to trace its origin and legality, as there is no seafood authentication scheme. Due diligence relies on peer-to-peer trust relationships; however, there are severe limits to how far down the supply chain any actor can see. Due to the contextual nature of fishing laws and the realities of working on the ocean, the true origins and legality of a fish are known only to the ship that catches it. Conversely, being caught red-handed is the only way to effectively prove criminality.

The aggregating nature of the seafood supply chain (with transshipment vessels, processors, and wholesalers) makes it difficult to identify specific suppliers as liabilities, leaving most of the seafood at risk. Since fish is counted as coming from the country where it is caught, and is mixed with other catches, shrimp from Greece might for example include illegally caught fish from Liberia. Even fishing vessels from companies approved by the U.S. Department of State to import seafood to the U.S. for their sustainable fishing standards have been caught fishing illegally.<sup>208</sup>

If the illegally caught fish can be sold in a high value market like the United States or the European Union, profit margins can increase significantly. A fish that would be worth US\$0.77 per pound where it is landed could earn US\$5.40 per pound at final sale, a price increase of 600%.<sup>209</sup>



207 “Strings Attacked: Exploring the Onshore Networks Behind Illegal, Unreported, and Unregulated Fishing,” C4ADS, 2019.

208 Peter Hammerstedt, “Sea Shepard Helps Arrest ‘Sustainable’ Shrimp Trawler for Illegal Fishing Liberian Waters,” *The Ecologist*, May 26, 2017.

209 “US Fish Prices”, Selina Wamuchii, accessed December 2, 2024.

### Damage and Connections to Other Crimes:

IUU fishing also has strong connections to other crimes. Of particular importance is the prevalence of human trafficking on IUU ships. These connections lead to IUU fishing having a degrading effect on human security all around the world.

- Individuals, often from Southeast Asia, are often trapped onto illegal fishing ships with violence, debt, and the promise of legal work, where they face brutal and dangerous working conditions (a practice also prevalent in the fishing industry).<sup>210</sup>
- DWF vessels have also been known to commit violence against local fishermen as they compete for access to fishing stocks.<sup>211</sup>
- There is also evidence to suggest that overfishing resulting from IUU fishing can lead to local subsistence fishers turning to piracy and other forms of violent crime to survive.<sup>212</sup>

IUU fishing contributes to overfishing and the depletion of global fish stocks, dispossessing local communities, degrading food security, and leading to potentially cataclysmic biodiversity and ecological effects.

- Thirty-eight percent of global fishing stocks are at biologically unsustainable levels,<sup>213</sup> but IUU fishing circumvents the tools used to try and protect them.<sup>214</sup> IUU fishing makes it harder for law-abiding fishermen to make a living, meet demand, and compete with IUU fisheries by reducing global fish stocks.
- IUU fishing will often target endangered or threatened species during times when fish are breeding, target fish that have not yet reached reproductive size, or fish in areas set apart for fish populations to recover.
- Additionally, criminals often use fishing techniques and gear that is destructive or overly effective compared to legal methods. This causes a chain reaction in which legitimate fishers may be forced into IUU fishing to compete, further depleting fish populations. Ecologists warn of the disastrous effects on humans if damage to biodiversity continues.<sup>215</sup>

210 John C. Van, "Illegal Fishing is a Global Security Threat. Here's How to Combat it," Council on Foreign Relations, June 4, 2021.

211 Ian Urbina, *The Outlaw Ocean* (Knopf Doubleday Publishing Group, 2019), p1-39.

212 John C. Van, "Illegal Fishing is a Global Security Threat. Here's How to Combat it." Council on Foreign Relations, June 4, 2021.

213 Graham Edgar, "Investigation Reveals Global Fisheries are Worse Off – and Many Have Already Collapsed," Global Investigative Journalism Network, September 2024.

214 "The State of World Fishers," Food and Agriculture Organization of the United Nations. 2024, xxii.

215 Worm et al., "Impacts of Biodiversity Loss on Ocean Ecosystem Services," *Science*, November 3, 2006.

## Actors

IUU fishing is performed by all types of fishers using many types of craft. A large amount of industrial IUU fishing is not independently undertaken by independent fishing boats, but rather is done by companies who operate multiple vessels:

- Only **10 companies own 23.7 percent of identified IUU ships.**<sup>216</sup>
- Due to opaque vessel and corporate registering systems, it can be difficult to identify the entities behind IUU fishing, but a large percentage of the top IUU fishing companies are Chinese. Spanish and Colombian companies also engage in IUU fishing.<sup>217</sup>

These predatory companies can operate because certain countries choose to allow their illegal activities and do not enforce fishing laws when they can do so. Some countries likely encourage the IUU industry in their country, both for economic profit and geopolitical gains. China specifically is disproportionately represented as the home of IUU vessels.

- Most transshipment ships, used to launder illegal fish and resupply IUU vessels at sea, have been found to be owned by companies concentrated in **Russia (26 percent), China (20 percent), South Korea (10 percent), Greece (7 percent), and Japan (7 percent).**<sup>218</sup>
- The PRC is well known for its “Dark Fleet”, an armada of hundreds to thousands of DWF vessels which swarm the waters of developing countries to capture vast sums of fish and which are often implicated in IUU activities.<sup>219</sup> This activity is at least tacitly allowed by the Chinese government, as the DWF fleet brings in much needed protein to the PRC, whose increasingly affluent population demands higher quantities of fish, after the country decimated the fish population in its EEZ.<sup>220</sup>

## Connections to Foreign Terrorist Organizations (FTOs)

We were unable to find evidence linking IUU fishing to any known Foreign Terrorist Organizations (FTOs).

216 Financial Transparency Coalition, *Fishy Networks: Uncovering the Companies and Individuals Behind Illegal Fishing Globally*, 2022.

217 Financial Transparency Coalition, *Fishy Networks: Uncovering the Companies and Individuals Behind Illegal Fishing Globally*, 2022.

218 Bengsston et al., “Who Owns Refer Vessels? Uncovering the Ecosystem of Transshipment in Fisheries,” *Science*, October 11, 2024.

219 Ian Urbina, *The Outlaw Ocean* (Knopf Doubleday Publishing Group, 2019), 1-39.

220 Gutierrez et al., “China’s Distant-Water Fishing Fleet: Scale, Impact and Governance,” *Overseas Development Institute*, June 2020.

## Policy Recommendations

There are several axes of policy in which IUU fishing can be slowed, deterred, or prevented. In particular, the following policy options should be considered:

### **Establish a global, public beneficial ownership registry for commercial shipping.**

- ' Some 130 governments have committed to creating a beneficial ownership registry on a national level, meaning the concept of requiring firms to provide beneficial ownership information is a firmly established global norm.
- ' Studies have shown that some 12 percent of commercial vessels do not even have a company name attached to the ship, let alone more stringent beneficial ownership information.
- ' Since commercial vessels operate on an international basis it is logical to require owners to report their identities to a global Registry which will assist law enforcement to address issues of illicit trade.

### **Reduce the root causes that lead individuals to engage in IUU fishing.**

- Many small-scale IUU fishers are forced to engage in the crime due to food insecurities and a lack of economic opportunities. Many who work on industrial IUU fishing vessels also lack economic opportunities or are human trafficking victims. By creating more economic opportunities and improving overall security, fewer individuals will need to resort to illegal fishing to survive.
- On the other hand, demand for illegal fish can be reduced by further investing in sustainable aquaculture and educating consumers about the harms of IUU fishing, reducing consumer acceptance of IUU sourced fish. This will reduce the profits illegal fishers earn.

### **Increase the capability and capacity of under-resourced countries.**

- There are several NGOs and government programs that assist in enforcement by supplying vessels, technology, training, and entire crews to aid underdeveloped countries in maritime law enforcement. These do not need to be expensive or sophisticated assets; Cote D'Ivoire's 173,764 sq km EEZ is patrolled by only 6 craft (several of which were built before 1980), leading to 60 percent of their total fishing going unreported in 2019.<sup>221</sup> Given such a significant lack of equipment, even small increases of resources and skills will have a substantial positive impact.
- Portugal's Atlantic Initiative is an excellent framework to facilitate the sharing of best practices and skills with countries along the Atlantic basin that may be at risk of IUU fishing.

### **Send enforcement assets from the U.S. and other well-resourced countries abroad to help protect strategic fish populations.**

- Due to discrepancies of resources, Coast Guard vessels from wealthy countries can have an outsized effect in areas where illegal fishers are expecting chronically under-equipped enforcement. The conservation group Sea Shepherd sends ships to ferry coast guard crews to inspect fishing ships, and as of 2024, has helped detain 98 ships.<sup>222</sup>
- Multinational enforcement operations such as this can help protect fish populations that multiple countries rely on (particularly in the underenforced open ocean), help reduce insecurity in developing countries and serve as a tool to build strong relations.

221 "Catches by Reporting status in the waters of Côte d'Ivoire," Sea Around Us, 2019.

222 "Behind the Scenes: How Sea Shepherd Combats Illegal Fishing," Sea Shepherd, June 5, 2024.



**Invest in ISR tools specifically designed for maritime security.**

- Multiple NGOs and governments are developing unique technological solutions to detect IUU fishing (including C4ADS's Triton, OCEANIA's IUU Vessel Tracker, Ai2's Skylight, the Global Fishing Watch Map, and the Canadian government's Dark Vessel Detection Program) but these technologies still need to be provided to those who have the capability, capacity and authority to interdict offending vessels. These technologies would also be useful in other maritime security issues, such as piracy, smuggling, and USVs.

**Fund additional research into the scope of IUU fishing.**

- Despite multiple projects being undertaken to develop actionable intelligence on IUU fishing, there are still no regular worldwide estimates of the crime's scale, or a more complete index of IUU offending vessels, organizations, individuals or incidents; an aggregated list of all ships identified to engage in IUU fishing by Regional Fishing Management Organizations (RMFOs) is under 200 entries long, an incomplete list.<sup>223</sup> More research should also be done into how illegally caught fish fit into the global market, where these fish mix with the licit supply, and who profits.

**Strengthen global and national governance to reduce the ability to legally cover and hide IUU fishing.**

- Governments should coordinate to boycott seafood products from countries that fail to enforce fishing laws on flagged ships or that do not meet minimum seafood transparency standards. They should also work to make it harder to trade fish internationally without meeting certain standards of transparency and due diligence. RMFOs are notably inconsistent in their effectiveness and transparency.



223 "Combined IUU Vessel List," TMT, accessed December 2, 2024.

# Wildlife Trafficking

## Overview

Wildlife trafficking involves a large network of actors that capitalize on areas of conflict with rich biodiversity. Not only is this activity harmful to animals and plants, but it severely impacts ecosystems, driving species to extinction. The loss of key species and the destruction of ecosystems can accelerate climate change, further de-stabilizing carbon storage and threatening environmental sustainability.

Beyond the environmental impact, there are stark economic consequences resulting in the loss of billions in government revenue. A 2019 report from the World Bank estimates that governments forgo an estimated US\$7-12 billion each year in potential fiscal revenues due to illegal logging, fishing, and wildlife trade.<sup>224</sup>

Corruption and minimal enforcement have contributed to market accessibility, driving the continued demand for illegal goods. While Asia and Africa remain dominant regions for wildlife trafficking, there is a global network that expands across continents, involving source, trade, and end-market countries in almost every part of the world.<sup>225</sup> This network connects poachers, smugglers, and consumers, with wildlife products often ending up in markets in Europe, North America, and beyond.

Wildlife trafficking is defined as the illegal trade, smuggling, poaching, capture, or collection of endangered species, protected wildlife (including animals or plants that are subject to quotas and regulated by permits), derivatives (flora and fauna), or products.

United Nations Office on Drugs and Crime (UNODC) and Education for Justice, "Wildlife, Forest & Fisheries Crime Module 3 Key Issues: Criminalization of Wildlife Trafficking,"



224 World Bank, *Illegal Logging, Fishing, and Wildlife Trade: The Costs and How to Combat It*, 2019, 21, <https://thedocs.worldbank.org/en/doc/482771571323560234-0120022019/original/WBGReport-1017Digital.pdf>.

225 United Nations Office on Drugs and Crime (UNODC), *World Wildlife Crime Report 2024: Trafficking in Protected Species*, [https://www.unodc.org/documents/data-and-analysis/wildlife/2024/Wildlife2024\\_Final.pdf](https://www.unodc.org/documents/data-and-analysis/wildlife/2024/Wildlife2024_Final.pdf).



## Key Findings

- Much of the data on the value of wildlife trafficking has been recirculated for the past decade, reflecting an inaccurate portrayal of the crime. Based on this data, however, the global value of wildlife trafficking is between **US\$7.85 billion and \$21.1 billion**.
- There are several contributing actors of wildlife trafficking. Poachers are primarily reliant on the activity for income, while other actors (consolidators, wholesalers, and OCGs) capitalize on the sale of commodities.
- Wildlife trafficking is not considered a major source of financing for known terrorist organizations; however, it has been associated with several FTOs and militia groups that utilize poaching to fund operations and defense.

## Value

Estimates from 2017-2024 place the annual value of wildlife trafficking between US\$7.85 billion and \$21.1 billion.<sup>226</sup> These numbers, however, seem to originate from the same source, lacking proper attribution and context on various websites. This makes it difficult to estimate the true value of wildlife trafficking.

Two of the biggest products driving the market are elephant ivory and horns, totaling approximately US\$630 million a year.<sup>227</sup> These commodities combined make up approximately 20 percent of reported wildlife seizures.



226 Data from more than a dozen sources were combined to create this estimate. See Table B for a complete list of sources.

227 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

Table B: Current Estimates, Value of Wildlife Trafficking

Source	Year	Value
Wildlife Conservation Society <sup>228</sup>	2024	\$7.8 billion to \$10 billion
African Wildlife Foundation <sup>229</sup>	2022	\$7 billion to \$23 billion
Worldwide Fund For Nature (Formerly World Wildlife Fund) <sup>230</sup>	2017	\$15 billion to \$20 billion
UN <sup>231</sup>	2015	\$7 billion to 23 billion
UNEP, CITES <sup>232</sup>	2024	\$7 billion to \$23 billion
INTERPOL <sup>233</sup>	2022	\$20 billion
Congressional Research Service <sup>234</sup>	2021	\$7 billion to \$20 billion
Harvard Review (Sharon Guynup) <sup>235</sup>	2023	\$23 billion
TRAFFIC <sup>236</sup>	2022	\$23 billion
EIA <sup>237</sup>	2020	\$20 billion
USAID <sup>238</sup>	2022	\$23 billion
Stimson Center <sup>239</sup>	2020	\$5 billion to \$23 billion
Defenders of Wildlife <sup>240</sup>	2018	\$7 billion to \$23 billion

- 228 “Wildlife Trafficking: Why Battling This Illicit Trade Is Crucial,” U.S. Immigration and Customs Enforcement, September 30, 2024, [https://www.ice.gov/features/wildlife#:~:text=Illicit%20wildlife%20trafficking%20is%20estimated,as%20\\$7%20billion%20per%20year](https://www.ice.gov/features/wildlife#:~:text=Illicit%20wildlife%20trafficking%20is%20estimated,as%20$7%20billion%20per%20year).
- 229 “Counter Wildlife Trafficking,” African Wildlife Foundation, 2022, <https://www.awf.org/caring-for-wildlife/counter-wildlife-trafficking>.
- 230 Dalberg Global Development Advisors, Halting The Illegal Trade of Cities Species From World Heritage Sites, World Wildlife Fund, 2017, 13. [https://files.worldwildlife.org/wwfprod/files/Publication/file/5hei86izjg\\_CITES\\_FINAL\\_ENG.pdf](https://files.worldwildlife.org/wwfprod/files/Publication/file/5hei86izjg_CITES_FINAL_ENG.pdf).
- 231 United Nations Environment Programme, “The Rise of Environmental Crime: A Growing Threat to Natural Resources Peace, Development and Security,” May 27, 2016.
- 232 “Despite Two Decades of Concerted Action, Wildlife Trafficking Persists Worldwide with More than 4,000 Species Affected, Says New UNODC World Wildlife Crime Report,” press release, United Nations Office on Drugs and Crime (UNODC), May 13, 2024, <https://www.unodc.org/unodc/en/press/releases/2024/May/despite-two-decades-of-concerted-action--wildlife-trafficking-persists-worldwide-with-more-than-4-000-species-affected--says-new-unodc-world-wildlife-crime-report.html>.
- 233 Wildlife Crime,” INTERPOL, accessed October 21, 2024, <https://www.interpol.int/en/Crimes/Environmental-crime/Wildlife-crime>.
- 234 Congressional Research Service, Wildlife Trade, COVID-19, and Other Zoonotic Diseases, February 19, 2021, 1-3, <https://crsreports.congress.gov/product/pdf/IF/IF11494>.
- 235 Sharon Guynup, “The Growing Latin America-To-Asia Wildlife Crisis: Can Targeted Action Stop Illegal Trade in Time to Prevent Widespread Losses?” *ReVista*, 2023, <https://revista.drclas.harvard.edu/the-growing-latin-america-to-asia-wildlife-crisis-can-targeted-action-stop-illegal-trade-in-time-to-prevent-widespread-losses/>.
- 236 A Planet in Crisis,” TRAFFIC, the Wildlife Trade Monitoring Network, accessed October 21, 2024, <https://www.traffic.org/what-we-do/the-trade-in-wild-species/>.
- 237 “Wildlife Crime,” Environmental Investigation Agency, accessed October 21, 2024, <https://eia-international.org/wildlife/wildlife-crime/>.
- 238 USAID, Africa Reducing Maritime Trafficking of Wildlife Between Africa and Asia, 2022, [https://www.usaid.gov/sites/default/files/2022-05/Reducing\\_Maritime\\_Trafficking\\_of\\_Wildlife\\_Between\\_Africa\\_and\\_Asia\\_2022.pdf](https://www.usaid.gov/sites/default/files/2022-05/Reducing_Maritime_Trafficking_of_Wildlife_Between_Africa_and_Asia_2022.pdf).
- 239 “Wildlife and Natural Resources Security,” Stimson Center, accessed October 21, 2024, <https://www.stimson.org/project/wildlife-and-natural-resources/>.
- 240 Defenders of Wildlife, “Combating Wildlife Trafficking from Latin America to the United States,” accessed October 21, 2024, 1-6, <https://defenders.org/sites/default/files/publications/combating-wildlife-trafficking-from-latin-america-to-the-united-states.pdf>.





The demand for **elephant ivory** has been driven by economic, cultural, medicinal, and aesthetic reasons.

- Although raw ivory prices declined between 2014 and 2017, there was a sharp resurgence in wholesale prices in China, rising from US\$340 per pound in 2017 to nearly double that amount by 2020.<sup>241</sup>
- Similarly, the price in Vietnam increased from an average of US\$285 per pound in 2018 to US\$312 per pound in 2020.<sup>242</sup>
- Experts in wildlife crime speculate that the rise is likely due to the lift of COVID-19 import restrictions. This has been a common pattern experienced by countries with high levels of wildlife trafficking.

South Africa contains the majority of the world's rhinos and has been the most affected by poachers. Over the past decade, rhino poaching has significantly declined, driven by reduced regional conflict, strengthened law enforcement, and more effective conservation strategies. However, from 2022 to 2023, there appeared to be a 10 percent increase in rhino deaths from poaching.<sup>243</sup>

- This significant increase can be attributed to expanded accessibility in the market since the COVID-19 pandemic. During the pandemic, lockdown curfew laws made it difficult for poachers to access reserves, kill rhinos, and smuggle horns out of the country without drawing attention.<sup>244</sup>
- As the lockdown curfews have subsided, the potential opportunities for poaching have increased. Furthermore, the economic hardships triggered by the pandemic have limited conservation efforts and financial investment to prevent poaching.<sup>245</sup> In contrast to previous research, where the pangolin was once the most trafficked animal in the world, this is no longer the case. Currently, rhinos account for 29 percent of wildlife trafficking, while pangolins make up 28 percent of the most trafficked animal.<sup>246</sup>

Based on international wildlife seizure records from 2015-2021, the most reported item in the illegal wildlife trade was coral, followed by live specimens (such as parts of an animal and ornamental plants), medicines, meat, shells, and small leather products.<sup>247</sup>

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- 241 Daniel Stiles, African Elephant Ivory, Global Initiative Against Transnational Organized Crime, August 2021, 10-25, <https://globalinitiative.net/wp-content/uploads/2021/08/Illegal-Wildlife-Trade-Elephant-Ivory.v3-web.pdf>.
- 242 Daniel Stiles, African Elephant Ivory, 10-25.
- 243 "Poaching Statistics," Save the Rhino, accessed September 20, 2024, <https://www.savether-rhino.org/rhino-info/poaching-stats/>.
- 244 Daniel Stiles, African Elephant Ivory, 10-25.
- 245 "The Impact of COVID-19 on Rhinos," Save the Rhino, May 1, 2020, <https://www.savether-rhino.org/thorny-issues/the-impact-of-covid-19-on-rhinos/>.
- 246 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.
- 247 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

The share of live specimens dramatically increased during this time. This is directly linked to organized crime which requires the export, import, brokering, storage, keeping, and breeding of live specimens.<sup>248</sup> Organized crime groups rely on their connections with businesses and officials to facilitate transactions and ensure the transport of live specimens.

## Dynamics

There are complex drivers motivating and influencing wildlife trafficking at the source, in transit, and at the end of the market. Compared to other illicit markets, the primary damage and harm occur at the beginning stage of the trade when an animal or derivative is either confiscated or killed.<sup>249</sup>

- Oftentimes, the offenders who capture the product are driven by financial gain; however, this is not the sole motivation. Poverty, lack of opportunities, cultural beliefs, and weak law enforcement are among the primary factors driving participation in the illegal market.
- For example, a UNODC study of prisoners in Nepal was conducted, revealing that 56 percent of prisoners convicted for wildlife trafficking were poor and 75 percent came from indigenous communities.<sup>250</sup>

Gender is a crucial dynamic in wildlife trafficking, influencing participation and engagement. A study by the UNODC found that men have been the primary poaching offenders while women engaged more as sellers in the market.<sup>251</sup>

- Most women also served as caretakers for live animals as they awaited transit to their next location.
- Lastly, indigenous women have taken on the role as defenders of land, environment, and wildlife throughout many regions where wildlife trafficking exists.<sup>252</sup>
- The gender disparity in wildlife trafficking has created significant challenges, complicating efforts to develop targeted interventions that address the motivations and roles of both men and women.

248 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

249 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

250 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

251 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

252 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

Culture and identity also drive involvement in the wildlife trade. Research conducted in the Central African Republic reveals that individuals involved in elephant hunting considered it as part of their cultural identity, a mark of bravery and manhood, and a tradition passed between the generations.<sup>253</sup>

Overall, the supply chain is supported by a network of transportation channels, intermediaries, and corrupt officials who facilitate the movement of illegal wildlife products across borders. These parties disguise their actions within legal trade routes to evade detection. Illegal traders are the primary mediators between the suppliers and demanders, utilizing maritime containers, air freight, air passengers, and border crossings to transport desired goods.<sup>254</sup>

## Actors

The primary actors of the illegal wildlife trade are OCGs, hunters/poachers, local dealers, facilitators of transport, and retailers. Other supporting actors are businesses (legitimate and illegitimate), public officials, and logistics and shipping companies.<sup>255</sup>

At the ground level, poachers are locals who hunt wildlife without legal authority while some professional hunters may have licenses to procure animals or derivatives. This group is often reliant on wildlife for primary income in their communities. The local dealers work accordingly with the poachers and hunters to collect wildlife and are often hired by OCGs and other consolidators.<sup>256</sup>

Consolidators arrange the sale or export of items and are usually linked with OCGs, ensuring the flow of communication and logistics of the trade. When seizure operations occur, illegal firearms drugs, gold, counterfeit medication, and cash are often found with wildlife, revealing a linkage among other illicit goods.

The consolidator role also often overlaps with facilitators of transport that are focused on ensuring delivery by land, air, water, and postal services.<sup>257</sup> Wholesalers and retailers engage at the final stop of the trade, procuring and coordinating a large supply and commodity of wildlife.

253 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

254 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

255 United Nations Office on Drugs and Crime (UNODC), Wildlife Crime: Key Actors, Organizational Structures, and Business Models, 2024, [https://www.unodc.org/documents/Wildlife/Business\\_Models.pdf](https://www.unodc.org/documents/Wildlife/Business_Models.pdf).

256 United Nations Office on Drugs and Crime (UNODC), Wildlife Crime: Key Actors, Organizational Structures, and Business Models.

257 United Nations Office on Drugs and Crime (UNODC), Wildlife Crime: Key Actors, Organizational Structures, and Business Models.

- Many of these wholesalers and retailers focus on one product, however, they are not limited to a single type of species or derivative. At the end of the supply-demand chain are the consumers, who may be unaware if the commodity is illegal. Customers range from low-level to high-level buyers, often driven by purchases for aesthetics, wealth, culture, and status.

As commodities are moved from source countries to consumer countries, they often stop at multiple transit points. Therefore, an item can travel through several regions before reaching the destination of purchase. It is difficult to determine which regions experience the most wild-life trafficking as seizures can occur at any point along the trade.

- Sub-Saharan Africa accounted for 19 percent of wildlife trafficking seizures, while the remaining 56 percent was either unidentified or distributed across various other regions.<sup>258</sup>
- In Asia, a large share of seizures involved pangolin items while Oceania seized crocodiles, Costus root, snakes, ginsengs, and cacti.<sup>259</sup>

Public and private actors are also facilitators of wildlife trafficking, often interrupting seizures. Corrupt public officials have turned a blind eye during inspections, interfered with investigations and prosecutions, issued permits without proper approval, and overlooked border transactions in exchange for bribes.<sup>260</sup> Each of these actions disrupt the process of compiling a comprehensive estimate of wildlife trafficking, making it difficult to accurately assess the full scope of the issue.

258 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

259 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

260 United Nations Office on Drugs and Crime (UNODC), World Wildlife Crime Report 2024: Trafficking in Protected Species.

## Case Study

In August 2024, Don Church pleaded guilty to violating the Endangered Species Act by illegally importing 165 protected Australian reptiles into the U.S. for a fraudulent entity he called the “Austin Reptile Center.” Originally from Texas, Church misled both Australian and U.S. authorities by submitting false documents that misrepresented the non-existent facility, including fabricated floor plans and employee information.<sup>261</sup>

Among the imported animals were three Rusty Monitor lizards, which are internationally protected under the Convention on International Trade in Endangered Species (CITES). The U.S., along with 183 other nations, implements CITES regulations to prevent the over-exploitation of endangered species through the Endangered Species Act, enforced by the U.S. Fish and Wildlife Service (USFWS).

- Church will face up to one year in prison, supervised release, and a US\$50,000 fine. The case is being investigated by the USFWS and prosecuted by the Justice Department’s Environmental Crimes Section.
- This example highlights how a single actor can engage in wildlife trafficking by exploiting loopholes and using false documentation to import protected species. Such cases emphasize the importance of stringent enforcement and international cooperation to uphold conventions like CITES, which aim to prevent the over-exploitation of endangered and threatened species.

## Connections to Foreign Terrorist Organizations (FTOs)

Terrorist organizations such as Boko Haram and Al-Shabaab have been associated with wildlife trafficking through activities like poaching and forced labor. However, a direct correlation between these groups and such trafficking remains unconfirmed. Overall, there appears to be an overlap between wildlife trafficking and regions affected by conflict. It is estimated that 80 percent of major armed conflicts have occurred within biodiversity hotspots.<sup>262</sup> In countries with intensive conflict, the illegal wildlife trade is often overlooked as governments prioritize more immediate human rights crises. Animals and other derivatives are often neglected when human lives are at risk. The weaponization of wildlife resources poses a threat to global security, as funds derived from wildlife trafficking are used to finance operations and expand influence.

- 261 U.S. Department of Justice, Office of Public Affairs, “Texas Man Pleads Guilty to Unlawfully Importing Internationally Protected Reptiles from Australia,” August 1, 2024, <https://www.justice.gov/opa/pr/texas-man-pleads-guilty-unlawfully-importing-internationally-protected-reptiles-australia>.
- 262 Vanda Felbab-Brown, “Wildlife and Drug Trafficking, Terrorism, and Human Security” Brookings, November 8, 2018, <https://www.brookings.edu/articles/wildlife-and-drug-trafficking-terrorism-and-human-security/>.



## Policy Recommendations

Eliminating the network that supports wildlife trafficking requires a local, regional, and international approach. Policy recommendations include improving cross-border cooperation, increasing public awareness of the issue, and encouraging economic alternatives to disrupt both supply and demand chains. The U.S. Department of State should consider pursuing the following strategies:

### **Provide support to regions where conflict exacerbates wildlife trafficking.**

- Regional stability is crucial for maintaining effective conservation efforts and reducing the vulnerabilities that allow trafficking networks to thrive. By fostering peace and development, affected areas can strengthen their capacity for wildlife protection, promote sustainable livelihoods, and curb the exploitation of both human and natural resources.

### **Combat corruption resulting from bribery at borders.**

- Increasing transparency in the government requires passing more stringent laws and devising creative solutions to circumvent perpetrators. For example, establishing a specialized police unit to investigate the most prolific wildlife crimes could help counteract the existing corruption within law enforcement.
- This can be accomplished by leveraging investigative technology such as AI for enhanced tracking, monitoring, and disrupting trafficking networks. Greater tracking increases the capacity to conduct seizures, which provides a tool of analysis for determining the value of wildlife trafficking.

### **Introduce new alternatives to eco-economies.**

- As local poachers and hunters rely on the illegal wildlife trade as their primary income, it is crucial to introduce new alternatives to eco-economies.<sup>263</sup> Creating job guarantee programs in areas of vulnerability would incentivize alternative occupations. These jobs can be in the eco-tourism and the conservation sectors, allowing individuals that are familiar with wildlife to find new opportunities and invest in their local ecosystems.<sup>264</sup>

263 Michael J. Lynch et al., "Wildlife Trafficking, Smuggling, and Poaching," in *Green Criminology: Crime, Justice, and the Environment*, 1st ed., 161–88, (University of California Press, 2017), <http://www.jstor.org/stable/10.1525/j.ctv1xxsm0.13>.

264 Michael J. Lynch et al., "Wildlife Trafficking, Smuggling, and Poaching," in *Green Criminology: Crime, Justice, and the Environment*, 1st ed., 161–88, (University of California Press, 2017), <http://www.jstor.org/stable/10.1525/j.ctv1xxsm0.13>.

# Oil Theft

Illicit trade in oil encompasses a variety of illegal conduct and practices aimed at misappropriation of either crude or refined oil. Illicit oil trade occurs in several ways which depend on local and international factors, the geopolitics of affected countries and oil distribution channels.

## Overview

Global oil theft is estimated at nearly US\$145 billion per year, indicating that oil may be one of the world's most stolen natural resources.<sup>265</sup> However, the limited research available derives this value from a 2021 estimate by accounting firm Ernst & Young. A report on this estimate is not publicly available and the methodology used to determine this number has not been released.

## Key Findings

- Global oil theft is estimated at nearly **US\$145 billion** per year.
- Oil theft can be carried out by lone actors on small scales. But low risks, high profit margins, and opportunities to upscale thefts and combine multiple elements of the oil supply chain could motivate criminals to expand and professionalize their activities and networks.<sup>266</sup>
- Current and former employees and senior officers of **legitimate oil companies** may be involved in oil theft. In some circumstances organized crime groups diversify their criminal activities to include oil theft. Local community members may also become involved in or complicit with oil theft in their area if they receive benefits or employment by larger crime groups who run oil theft operations.
- Oil theft has several economic and financial impacts, but also has significant implications on societal and environmental conditions and plays a role in the commission of other types of crime.
- Organized crime, terrorism, corruption, and money laundering are all other crimes which could be financed or carried out from the funds and methods used to steal and sell oil. Often, organized crime syndicates engaging in oil theft are involved in several criminal operations and the proceeds of oil theft finance other criminal activities.<sup>267</sup>
- **Terrorist groups, particularly Hezbollah**, use funds from oil theft and its illicit trade to fund their operations. ISIS was identified as engaging in this activity, but this was more common in the early- to mid-2010s and there is little recent evidence that their activity is still widespread.

265 Etienne Romsom, Countering global oil theft: responses and solutions, United Nations University (UNU-WIDER), March 2022, 49-50, <https://www.wider.unu.edu/sites/default/files/Publications/Working-paper/PDF/wp2022-35-countering-global-oil-theft-responses-solutions.pdf>.

266 Etienne Romsom, Global oil theft: Impact and policy responses, 2.

267 The Transnational Alliance to Combat Illicit Trade, Exposing Supply Chain Vulnerabilities to Illicit Trade, 209.

## Value

As noted above, global oil theft is estimated at nearly US\$145 billion per year. The overwhelming majority of oil theft occurs in Africa.

- The African Development Bank (ADB) estimates the value of the illicit oil trade in Africa as worth nearly US\$131.6 billion a year<sup>268</sup>, but there appears to be no existing data (aside from estimated losses in Nigeria) which communicates how much a given country in Africa loses each year, nor which regions are hot spots for oil theft. It remains unclear how the ADB generated this estimate.
- Other major oil producers in Africa include Algeria, Angola, Egypt, Namibia, and Equatorial Guinea, but there are very few reported incidences. One of the exceptions comes from the National Petroleum Corporation of Namibia (NAMCOR), which discovered that the equivalent of \$55,266 worth of fuel (about one to two tanker trucks worth) was stolen while in transport to major bulk clients in February 2024.<sup>269</sup>
- Nigeria and Equatorial Guinea have recently planned to strengthen defense cooperation to tackle oil theft via joint patrols, but no numbers have been recently shared on the value of oil theft in the latter country.

Russia is vulnerable to oil theft, but the full scope of losses to oil companies in the country is unclear. State-owned investment bank VTB Capital estimated in 2013 that oil companies at the time were losing \$1.8 billion to \$3.5 billion annually due to oil theft.<sup>270</sup> In Colombia, oil theft has cost Ecopetrol, the state-run oil company, \$936 million since 2019.<sup>271</sup> Costs to Mexico's state-run oil enterprise, Pemex, exceeded \$3.7 billion in 2018.<sup>272</sup>



- 268 African Development Bank, *Illicit trade in natural resources in Africa* — A forthcoming report from the African Natural Resources Center, October 2016, [https://www.afdb.org/fileadmin/uploads/afdb/Documents/Events/IFF/Documents\\_IFF/ANRC\\_ILLICIT\\_TRADE\\_IN\\_NATURAL\\_RESOURCES.pdf](https://www.afdb.org/fileadmin/uploads/afdb/Documents/Events/IFF/Documents_IFF/ANRC_ILLICIT_TRADE_IN_NATURAL_RESOURCES.pdf).
- 269 "Theft of an Estimated N\$1 Million of Fuel at NOSF," National Petroleum Corporation of Namibia (NAMCOR), February 15, 2024, <https://www.namcor.com.na/2024/02/15/theft-of-an-estimated-n1-million-of-fuel-at-nosf/>.
- 270 Sergei Khazov-Cassia, "The Great Russian Oil Heist," RFE/RL, March 22, 2021, <https://www.rferl.org/a/russia-oil-pipeline-theft-transneft/31163179.html>.
- 271 Adriaan Alsema, "Colombia's state-run oil company lost more than 5M barrels to thieves since 2019," Colombia Reports, May 31, 2024, <https://colombiareports.com/colombias-state-run-oil-company-lost-more-than-5m-barrels-to-thieves-since-2019/>.
- 272 Lydia Stead, "The Fuel Theft Epidemic and its Consequences in Mexico," Another Day, September 2023, <https://www.another-day.com/resources/the-fuel-theft-epidemic-and-its-consequences-in-mexico>.

## Dynamics

Examples of methods employed to steal crude oil can also be specific to a country or region.

- In Mexico, pipeline tapping is the most common method used to steal oil. In 2018, fuel theft cost PEMEX, the state-owned oil company, an estimated US \$3 billion in losses.<sup>273</sup>

Governments and corporations lose billions of dollars per year in revenue to oil theft which is carried out through the following methods:

- **Illegal tapping:** By installing illicit taps, traffickers divert oil or other refined products from pipelines.
- **Illegal bunkering:** Stolen oil is pumped onto small barges, which subsequently go to the sea to load tankers.
- **Ship-to-ship transfer:** Stolen oil is transferred from vessels that may raise “red flags” to more reputable ships, which increases the chances of the ship’s cargo passing off as legitimate.
- **Piracy/hijacking:** Theft of cargo using threats of violence.
- **Origin laundering and smuggling:** Oil’s illicit origin can be obfuscated by exploiting oil infrastructure for making illicit cargoes appear clean. Smuggling oil products into another jurisdiction can help to enable a profitable and less traceable sale.
- **Misappropriation through volume over- and under-declarations:** Illegal profits from oil transactions are made by “overstating a fuel bunker by recording a higher volume of fuel delivered than was actually the case [...]. Conversely, understating the fuel-in tank volume before the bunker operation commences allows the bunker company to sell more ship fuel; this excess can then be sold by the ship crew at sea to fuel traders in illegal fuel.

Criminal groups are reported to **intimidate PEMEX employees** into giving them information on transport routes, timelines, and the number of people working at refineries.<sup>274</sup>

- In Nigeria, illegal oil bunkering is a sophisticated operation. Traffickers tap directly into pipelines in the vicinity of oil company facilities and siphon oil to barges that are hidden in small creeks in mangrove forests. In many cases, police and military personnel are involved in the operation or are bribed to turn a blind eye.<sup>275</sup>

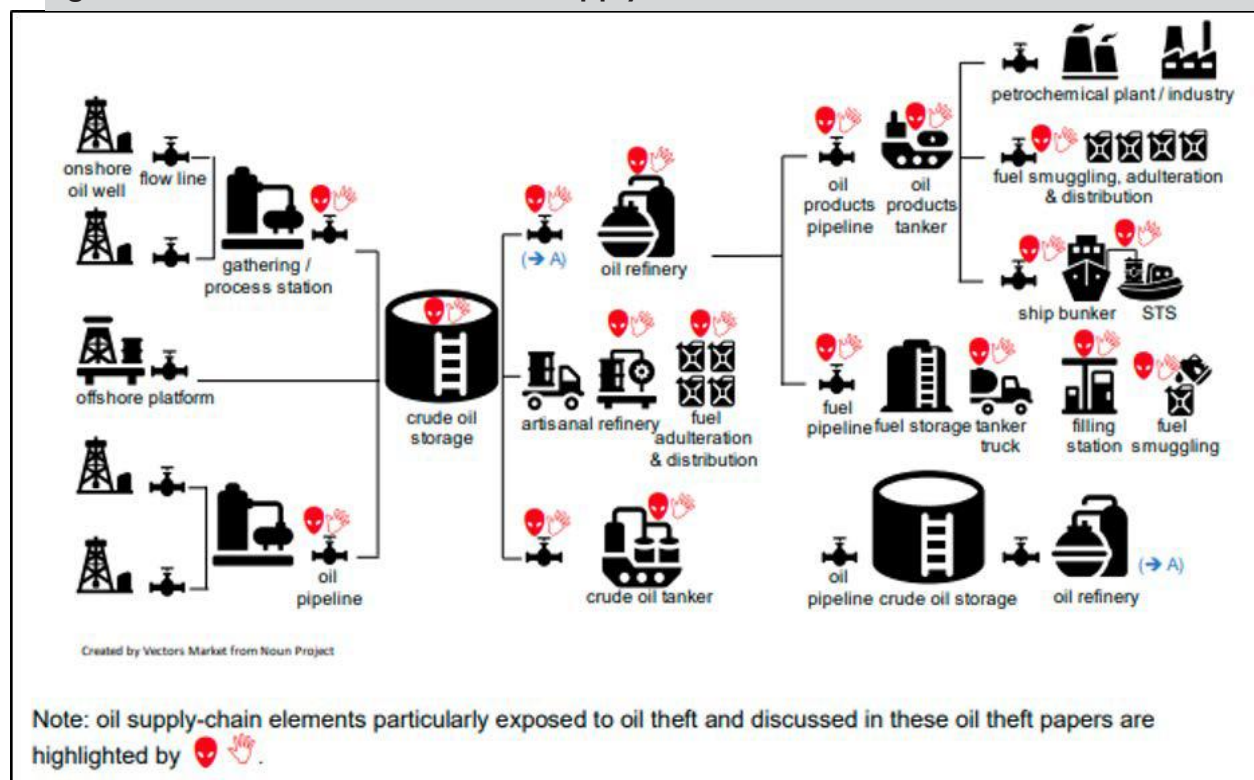
273 The Transnational Alliance to Combat Illicit Trade, Exposing Supply Chain Vulnerabilities to Illicit Trade, 207.

274 Arantza Alonso Berbotto et al., “Theft of oil from pipelines: an examination of its crime commission in Mexico using crime script analysis,” *Global Crime*, 22(4), 2021, 275, <https://doi.org/10.1080/17440572.2021.1925552>.

275 The Transnational Alliance to Combat Illicit Trade, Exposing Supply Chain Vulnerabilities to Illicit Trade, 207.

Oil theft can occur at several points in the total supply chain, as depicted below.

Figure 20: Vulnerabilities in the Oil Supply Chain<sup>276</sup>



Source: Etienne Romsom, Global oil theft: Impact and policy responses, 2; icons created by Vectors Market from the Noun Project: <https://thenounproject.com>.

Corruption practices like bribery, misappropriation of funds, and loyalty payments **involving** state officials are significant enablers of the illicit oil trade. Security guards, law enforcement officials, and military personnel may be actively involved in oil theft, working with traffickers to ensure they operate under the radar.

- In Nigeria, members of the armed forces may have accepted bribes in exchange for turning a blind eye to illegal activity or protecting oil traffickers' access to extraction points.<sup>277</sup>
- Employees of oil companies also sometimes collude with traffickers to provide technical knowledge of oil stations and the location of pipelines. The proceeds of oil theft are laundered to help traffickers disguise the origins of these proceeds.

<sup>276</sup> Etienne Romsom, "Countering Global Oil Theft: Responses and Solutions," United Nations University WIDER, March 2022.

<sup>277</sup> Transnational Alliance to Combat Illicit Trade, Exposing Supply Chain Vulnerabilities to Illicit Trade, 210.



Even though oil is produced in many areas of the world, several factors can explain why developing countries are especially vulnerable to oil theft.

- **Economic disproportion:** The oil sector is central to the wealth of several countries which have high levels of oil theft, and this wealth usually contrasts sharply with the widespread poverty in these countries. The disparity in wealth may serve as a motivation for people who engage in oil theft operations.
- **Corruption:** In some countries, collusion between security forces, government officials, and those stealing oil is common, allowing for significant levels of theft and the illegal sale of oil, as well as the erosion of government integrity and weakened public trust.
- **Issues with transparency:** The lack of transparency, oversight, and accountability measures surrounding oil sector-related activities can breed misconduct and exploitation and foster illicit activity. The lack of openness weakens attempts to combat oil theft and erodes public trust in the integrity of the oil business and the institutions overseeing it.

Aside from the significant monetary losses associated with oil theft, there are several socioeconomic, environmental, and ethical implications which are important to consider. Generally, the impact of oil theft on people and the economy is significant and wide-ranging.

- Oil spills from **pipeline sabotage** have increased pollution levels and destruction of farmlands, mangrove forests, and surface and underground water sources.<sup>278</sup> The effects of pollution impact communities which rely on farmland and water to support occupations like farming and fishing. Pipeline tampering, sabotage, and theft have resulted in deaths, burn victims, and destruction of property, as explosions and fires have heavily impacted communities.
- Artisanal refineries use open ground and waterways to transport and distill product and dispose of waste, causing **environmental damage**. These refineries are not efficient, so partially processed crude seeps into the ground and contaminates waterways<sup>279</sup>, and they have increased air pollution and the emission of toxic soot, impacting the health of local community members.<sup>280</sup>

Many communities feel they are entitled to the oil that is extracted from their land, and that they are being exploited by large oil companies or the government who profit from the oil while they see little of the benefits. This can be a driver of oil theft, especially when tied with secessionist or nationalist movements, such as the Movement for the Emancipation of the Niger Delta (MEND) militant group in Nigeria.

278 Murtala Abdullahi. "We Have a Crude Oil Theft Problem." Veriv Africa, May 20, 2024. <https://www.verivafrica.com/insights/we-have-a-crude-oil-theft-problem>.

279 Etienne Romsom, Global oil theft: Impact and policy responses, 24.

280 Murtala Abdullahi, "We Have A Crude Oil Theft Problem."

As highlighted earlier, oil theft has several connections to other types of crime, including violence, organized crime, terrorism, corruption, and money laundering. In oil-rich regions, organized crime syndicates involved in the illicit oil business have skills, smuggling methodologies, and routes in common with other criminal groups. Often, these groups are involved in several criminal operations and the proceeds of oil theft finance other criminal activities.<sup>281</sup>

- In 2015, ISIS generated the equivalent of over US\$53 million a month from selling crude oil to brokers, some of which was refined into low-grade fuel for smuggling into Turkey. This supported the funding of their operations.<sup>282</sup>
- Patterns of oil theft give rise to other organized crimes. Funds from oil theft may fund other criminal activities like illegal arms trafficking, kidnapping, drug trafficking, and human trafficking.<sup>283</sup> Some skills associated with oil theft operations can align with those needed for other crimes, like building tunnel systems, smuggling methods and routes, and illegal money flows.<sup>284</sup>
- Oil theft often coincides with acts of violence, including those between law enforcement and organized crime groups, between multiple organized crime groups, and between organized crime groups and community members. In some cases, criminal gangs and organized crime groups attack each other to gain market share and increase their profits.<sup>285</sup>

In Central America, illicit oil trafficking helps **narco-cartels** to diversify their portfolio of activities without engaging in crimes with higher risk, like drug trafficking. Los Zetas is widely believed to be at the forefront of fuel theft, but several other cartels and terrorist groups of varying sizes and organizational levels may be involved based on how widespread the illicit oil business has become.

- Criminal syndicates can tap into flourishing black markets and prop up their finances, which had been damaged by supply chain interruptions driven by the COVID-19 pandemic global lockdown.



281 The Transnational Alliance to Combat Illicit Trade, Exposing Supply Chain Vulnerabilities to Illicit Trade, 209.

282 Etienne Romsom, Global oil theft: Impact and policy responses, United Nations University (UNU-WIDER), 3.

283 Etienne Romsom, Global oil theft: Impact and policy responses, 29.

284 Etienne Romsom, Global oil theft: Impact and policy responses, 2.

285 Etienne Romsom, Global oil theft: Impact and policy responses, 28-29.

## Actors

Generally, individual acts of oil theft start on a small scale and are carried out locally and opportunistically. However, relatively low risks, high profit margins, and opportunities to upscale thefts and combine multiple elements of the oil supply chain could motivate criminals to expand and professionalize their activities and networks.<sup>286</sup> Because of these incentives, legitimate oil companies, their senior officers, and employees are at an increased risk of participating in oil theft. Thieves may sometimes use information given by oil company personnel to tap into pipelines that are under maintenance. The technical knowledge for tapping into pipelines is specialized and may sometimes be done by former oil company technical staff.<sup>287</sup> In some circumstances, like that of Mexico (noted below), organized crime groups diversify their criminal activities to include oil theft.

Local communities may become involved in or complicit with oil theft in their area if they share in the oil theft spoils or engage in theft operations and related employment opportunities (technical work, security, operations in artisanal refineries, illicit sales, etc.) In some cases, it is possible that thieves and communities have an understanding in which thieves will illegally tap a pipeline and community members will siphon the tap for local use. The locations of these taps are kept as a local secret and thieves can return many times to siphon more oil.<sup>288</sup> Corruption also takes place during the fuel smuggling phase of oil theft, with smugglers paying authorities with whom they have agreements for unhindered passage through controlled border posts.<sup>289</sup>

To hide oil theft, lines are blurred between legal and illegal oil supplies and related activities. It is unclear who is involved in the theft, facilitation, financing, transporting, processing, trading, or sales of stolen oil, versus legal, legitimate oil operations.<sup>290</sup>



- 286 Etienne Romsom, *Global oil theft: Impact and policy responses*, 2.
- 287 Etienne Romsom, *Global oil theft: Impact and policy responses*, 25-26.
- 288 Etienne Romsom, *Global oil theft: Impact and policy responses*, 25.
- 289 Etienne Romsom, *Global oil theft: Impact and policy responses*, 37.
- 290 Etienne Romsom, *Global oil theft: Impact and policy responses*, 15.

## Mexico

According to a 2017 report from the Atlantic Council Global Energy Center, the illicit oil business in Mexico is heavily dominated by the Zetas, allegedly controlling 38.88 percent of the illicit oil market.<sup>291</sup>

- The Zetas tap pipelines for crude and refined oil products, hijack road tankers, and sell in the wholesale and retail markets, making an estimated US\$480 million annually for their operations in this business.<sup>292</sup>
- The Jalisco New Generation Cartel and the Gulf Cartel hold the next most significant stakes in the illicit oil market, followed by smaller market players and other small groups with more limited scopes of impact.

## Nigeria

Nigeria's illicit oil market gained global attention when militant groups began tapping pipe- lines and selling the oil to finance their operations. Some groups engaged in oil theft may be controlled by high-ranking political figures with significant influence over security forces. Collusion among various players, including government officials, law enforcement, multinational corporations, and even ship captains, makes it possible to steal oil while it is being lifted from bunkering facilities into ships.<sup>293</sup>

Small-scale illegal refining is a common type of oil theft in Nigeria. Operators refine stolen crude using local technology, and the products are consumed in local markets. Actors who typically operate in illegal local refineries are local gangs, militants, and host community youths.<sup>294</sup>

On a larger scale, criminals engage in illegal bunkering, through which oil is stolen from oil wells and pipelines, siphoned directly into tankers, canoes, and barges, and transferred to larger vessels which are owned by foreign oil traders and communities.<sup>295</sup> Collaboration between host community youths and militants, who provide manpower; oil company personnel who provide the technology and knowledge to open the oil wells and pipelines; security personnel who provide security for operations; and foreign partners who provide the markets, makes this larger scale theft possible.<sup>296</sup>

291 Ian M. Ralby, Downstream Oil Theft: Global Modalities, Trends, and Remedies, January 2017, 9, [https://www.atlanticcouncil.org/wp-content/uploads/2017/01/Downstream\\_Oil\\_Theft\\_web\\_0327.pdf](https://www.atlanticcouncil.org/wp-content/uploads/2017/01/Downstream_Oil_Theft_web_0327.pdf).

292 Ian M. Ralby, Downstream Oil Theft: Global Modalities, Trends, and Remedies, 9.

293 Ian M. Ralby, Downstream Oil Theft: Global Modalities, Trends, and Remedies, 17.

294 Goddey Wilson, "The Nigerian State and Oil Theft in the Niger Delta Region of Nigeria," *Journal of Sustainable Development in Africa*, 2014, 73-74, <https://jsd-africa.com/Jsda/Vol16No1-Spring2014A/PDF/The%20Nigerian%20State%20and%20Oil%20Theft.pdf>.

295 Wilson, "The Nigerian State and Oil Theft in the Niger Delta Region of Nigeria," 74.

296 Wilson, "The Nigerian State and Oil Theft in the Niger Delta Region of Nigeria," 74.



## Russia

According to a 2021 study by Radio Free Europe/Radio Liberty's Russian Service, Russian law enforcement officers play a key role in the industrial-scale theft of oil from the country's network of pipelines.<sup>297</sup>

- Organized crime groups siphon oil using illegal taps and hoses to pump the oil from pipelines into tanker trucks or river barges while police and security officers provide protection and logistical assistance in exchange for a cut of the illicit profits.<sup>298</sup>
- A 2020 study by Russian energy-sector analysts found that in numerous regions powerful criminal groups form strong ties to the Interior Ministry, prosecutors, and courts, allowing them to conduct theft operations without prosecution.<sup>299</sup>

## Colombia

Crude stolen in Colombia is taken to clandestine refineries where it is converted into a bootleg fuel and is then used in cocaine production or illegal mining.<sup>300</sup> The illicit oil trade is a major revenue stream for illegal armed groups like the ELN and the AGC, as well as a network of companies that launder the oil for foreign buyers.<sup>301</sup>



297 Sergei Khazov-Cassia, "The Great Russian Oil Heist."

298 Sergei Khazov-Cassia, "The Great Russian Oil Heist."

299 Sergei Khazov-Cassia, "The Great Russian Oil Heist."

300 Isabel Stagg, "Colombia Trasandino oil pipeline likely to stay offline through 2024," World Pipelines, May 16, 2024, <https://www.worldpipelines.com/business-news/16052024/colombia-trasandino-oil-pipeline-likely-to-stay-offline-through-2024/#:~:text=Thousands%20of%20barrels%20of%20oil,cocaine%20production%20or%20illegal%20mining.>

301 Adriaan Alsema, "Colombia's state-run oil company lost more than 5M barrels to thieves since 2019."



## Case Study

Saudi Arabia is one of the top oil producers in the world, producing around 8.95 million barrels a day, but the Saudi Arabian Oil Company (Saudi Aramco), the country's national oil company, does not fall victim to oil theft like Nigeria, Mexico, or other vulnerable countries do. Its tight tracking of the oil extracted from its wells and drilling sites, leaving little room for theft.

- To achieve this, Saudi Aramco employs several measures, including real-time monitoring systems which track drilling operations continuously. These systems include smart sensors and meters installed at wells and drilling sites that continuously measure the flow rate and pressure of the oil being extracted.
- Using smart sensors, cloud computing, and designated standard IoT devices while extracting crude oil has helped Aramco enhance data gathering and boost operational efficiency and has proven to be effective in monitoring extraction in Saudi Arabia's oil fields.<sup>302</sup>

Saudi Aramco also uses automated drilling technologies which can precisely measure and control the drilling process. The software calculates the volume of oil extracted based on real-time data from the automated systems. Combined with the use of data analytics which process the information collected by these sensors and meters, Saudi Aramco can generate reports on daily production volumes and centralizing and managing data from different drilling sites.<sup>303</sup>

In addition to these systems, sensors, and meters which provide a comprehensive overview of production activities and keep an accurate account of exactly how much oil is being drilled, Aramco also regularly audits the production data and assesses its accuracy. These audits help Aramco align with industry standards and improve operational efficiency, but they also allow for transparency and production tracking which makes theft difficult. Historically, there is little to no oil theft and bunkering in Saudi Arabia because of these systems and regulations, so other countries who produce oil and are highly vulnerable to theft could develop these types of technologies to lower their risk and maintain regulatory authority over their supply.

302 Back In History, In Saudi Arabia, no one Steals Oil: The Story of How Aramco Uses Technology to Monitor its Oil Wells. Youtube. October 25, 2024, <https://www.youtube.com/watch?v=wCZcwWk0jfs>.

303 Back in History. "In Saudi Arabia, no one Steals Oil."

## Connections to Foreign Terrorist Organizations (FTOs)

According to the Treasury Department's 2024 National Terrorist Financing Risk Assessment, Hezbollah engages in various commercial activities to supplement its income, including oil smuggling and shipping.<sup>304</sup> Hezbollah and Iran's Islamic Revolutionary Guard Corps (IRGC) have orchestrated and benefitted from several complex illicit oil smuggling schemes.

According to the World Atlas of Illicit Flows (a 2018 report compiled by INTERPOL, RHIPTO, and the Global Initiative Against Transnational Organized Crime), illegally supplied oil, gas, gasoline, and diesel sales account for 20 percent of the income of non-state armed groups in conflict.<sup>305</sup>



304 U.S. Department of the Treasury, 2024 National Terrorist Financing Risk Assessment (NTFRA), February 2024, 12, <https://home.treasury.gov/system/files/136/2024-National-Terrorist-Financing-Risk-Assessment.pdf>.

305 Mark Shaw, Christian Nelleman, Jürgen Stock. World Atlas of Illicit Flows, Global Initiative Against Transnational Organized Crime, September 26, 2018, 8, <https://globalinitiative.net/analysis/world-atlas-of-illicit-flows/>.

## Policy Recommendations

To better address the threats posed by oil theft, the U.S. government should consider the following policy actions:

### **Encourage collaboration with other countries to address gaps in oil theft information and research.**

- Partner with developing countries to prioritize the gathering, analysis, and sharing of intelligence related to oil theft and develop a monitoring system to track cross-border illicit oil trading.
- Facilitate and support widespread collaboration between developed and developing countries, along with several other agencies and institutions, to support capacity building and mobilize international action against oil theft. Non-government organizations could include the United Nations Office on Drugs and Crime (UNODC) along with several other UN organizations, the Transnational Alliance to Combat Illicit Trade (TRACIT), the Extractive Industries Transparency Initiative (EITI), and regional organizations like the Gulf of Guinea Commission (GCC), along with the several maritime and economic unions of African regions.

### **Work with the governments of countries where oil theft is common to increase the transparency in oil sector operations through methods such as public disclosure of contracts, revenues, and payments to government agencies.**

- Collaborate on policy which would prevent collusion between security personnel, government officials, law enforcement, and oil company contacts by tightening anti-corruption measures and introducing more oversight procedures and processes for addressing corrupt conduct in the oil industry. This will increase public trust and decrease the opportunity for backroom transactions.
- Collaborate with countries where oil theft and organized crime is socially acceptable to create and disseminate messaging which communicates that the perceived benefits and social acceptability of these crimes is outweighed by their significant economic, social, and environmental impacts.

# Trafficking of Small Arms and Light Weapons

## Overview

Arms trafficking is often considered one of the more consequential and pervasive crime categories as it is directly related to the loss of human lives, and it was one of the few crime categories included within the United Nations Convention Against Transnational Organized Crime in 2000, alongside human trafficking and migrant smuggling.<sup>306</sup>

Additional sources of diversion include forgery of licenses, certificates, or other documentation for an arm or accessory, violent capture of a firearm on the battlefield, leakage from private actors, illicit manufacture, and the illicit conversion and imitation of weapons.<sup>307</sup>

### Key findings

- Much of the data on the value of the illicit small arms trade is based around a single point of failure, and more in-depth field research needs to be conducted. Based on this data, however, the global illicit trade of SALW is **US\$2.87billion to US\$5.75billion**.
- There is a **lack of centralization** with the illicit trade of SALW. While there are some significant individuals in this crime category, the overall infrastructure is not reliant on any one group or individual.
- Arms trafficking is a major source of financing for known **terrorist organizations** and is very likely a prerequisite offense to many terrorist attacks.

Small arms and light weapons (SALW) trafficking is defined as the unauthorized or illegal transfer of firearms, their parts, components, or ammunition.

Trafficking is traditionally defined as a transfer or diversion (causing a good to become illicit when it was previously licit) that takes place where arms embargoes imposed by the United Nations Security Council are violated, the state retransfers goods without authorization, or legally owned arms are diverted to the illicit realm through movement across borders without appropriate authorization.

"Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition, supplementing the United Nations Convention against Transnational Organized Crime" in *United Nations Convention Against Transnational Organized Crime*.

United Nations General Assembly, "The illicit trade in small arms and light weapons in all its aspects and assistance to States for curbing the illicit traffic in small arms and light weapons and collecting them," 3.

306 "United Nations Convention Against Transnational Organized Crime," United Nations Office on Drugs and Crime, <https://www.unodc.org/unodc/en/organized-crime/intro/UNTOC.html>.

307 United Nations General Assembly, "The illicit trade in small arms and light weapons in all its aspects and assistance to States for curbing the illicit traffic in small arms and light weapons and collecting them," 3.



Table C: Definitions of SALW Terms

**Firearm/Small arms**

Weapons intended for use by individual members of armed or security forces. They include revolvers and self loading pistols; rifles and carbines; sub-machine guns; assault rifles; and light machine guns.

**Light weapons**

Weapons intended for use by several members of armed or security forces serving as a crew. They include heavy machine guns; hand-held under-barrel and mounted grenade launchers; portable anti-aircraft guns; portable anti-tank guns; recoilless rifles; portable launchers of anti-tank missile and rocket systems; portable launchers of anti-aircraft missile systems; and mortars of calibers less than 100 mm.

**Parts and components**

Any element or replacement element specifically designed for a firearm and essential to its operation, including a barrel, frame or receiver, slide or cylinder, bolt or breech block, and any device designed or adapted to diminish the sound caused by firing a firearm.

**Ammunition**

The complete round or its components, including cartridge cases, primers, propellant powder, bullets or projectiles, that are used in a firearm.

"Protocol against the Illicit Manufacturing of and Trafficking in Firearms, Their Parts and Components and Ammunition," 72-73. And "OSCE Document on Small Arms and Light Weapons," Organization for Security and Co-operation in Europe. June 20,





## Value

Many scholars in the field accept that 80-90 percent of arms transfers are legal, indicating that the illicit arms trade is valued at roughly 10-20 percent of the global arms market.<sup>308</sup> This number originally comes from Small Arms Survey's 2001 report, and has continued to circulate as the accepted ratio, even as recently as 2023.

- Based on UN Comtrade data, the value of the global arms trade in 2023 was **US\$28.74 billion**,<sup>309</sup> though this is based on voluntary country reporting to the United Nations which likely omits most illicit or illegal arms transfers.
- Based on this number, the global illicit trade of small arms and light weapons, as well as parts, components, and ammunition is at least **US\$2.87 billion to US\$5.75 billion**.
- It is possible the annual revenue from arms trafficking is much higher, particularly due to the illicit manufacture of arms which then remain within their countries of origin.

A major issue with the body of research on SALW trafficking is that proper data on global market value is sparse and centered around a single point of failure: the Small Arms Survey's 2001 number, a number lacking clear methodology behind it.

- During an interview, a senior expert in SALW trafficking concluded that further research focused on value should include more field research and more cross-correspondence with national databases, but ultimately argued that this debate is too focused on the national level and needs to be more community-based.<sup>310</sup>
- However, while the estimate given here is one of low confidence, it also serves as a basis of continuity in the research and a demonstration of growth in the illicit market.

The calculated value reflects a growth in both the legal and illegal arms trade, by USD, when compared with similarly calculated values from 2017.<sup>311</sup> The previous report from Global Financial Integrity valued SALW trafficking at an annual revenue of US\$1.7 billion to US\$3.5 billion.<sup>312</sup>

When adjusted for inflation, this is equivalent to between **\$2.2 billion and \$4.5 billion in 2023**,<sup>313</sup> less than the current calculated value. Sections below will seek to explain this potential growth in arms trafficking.

- 308 United Nations Office on Drugs and Crime, and Education for Justice, *The Illicit Market in Firearms*, 2019. And Amber Darwish, "Illicit Arms Trade," *The Palgrave Encyclopedia of Global Security Studies* (2023): 770-8, [https://doi.org/10.1007/978-3-319-74319-6\\_64](https://doi.org/10.1007/978-3-319-74319-6_64). And "Chapter 5. Crime, Conflict, Corruption: Global Illicit Small Arms Transfers" in *Small Arms Survey 2001: Profiling the Problem*, Small Arms Survey, June 2001, <https://www.smallarmssurvey.org/resource/small-arms-survey-2001-profiling-problem>.
- 309 "Trade Data," UN Comtrade Database, data from FY 2023, <https://comtradeplus.un.org/Trade-Flow>.
- 310 Paddy Ginn, Global Initiative against Transnational Organized Crime, interviewed by Boone Jarvis, November 2024.
- 311 Channing May, *Transnational Crime and the Developing World*, p13-14.
- 312 May, *Transnational Crime and the Developing World*. Global Financial Integrity, 2017.
- 313 "Inflation Calculator," US Inflation Calculator, <https://www.usinflationcalculator.com/>.

## Dynamics

Understanding how illicit arms are transported, where illicit flows occur, and the logistics of arms trafficking is critical to this issue. As has been repeated throughout this report, crime is elusive and difficult to fully capture through data, but illicit arms seizures can provide insight into these questions.

- Cross-border firearm trafficking can take many forms, but the three key methods are sea trafficking, in which large quantities of arms are trafficked by boat; land trafficking, in which smaller quantities of arms are trafficked by cars, trucks, or other land vehicles; and air trafficking, in which many individual traffickers carry small amounts (even singular) of arms.<sup>314</sup>
- Of the seizures in 2017 that involved cross-border transfers, 75 percent of SALWs seized were in land vehicles, followed by trafficking by mail, then aircraft, then maritime vessels, and finally those seized from pedestrian crossings.<sup>315</sup>
- Additional reports also found that land crossings or weapons seizures in cars or trucks were the most common,<sup>316</sup> but this could simply be because land borders are more secure or have more thorough investigation methods, or because cars do not conceal arms as well as other transport methods.

As of 2021, 10 countries provided 90 percent of the global arms supply, with nearly 60 percent provided by the United States and Russia.<sup>317</sup> While it is far more difficult to identify the exact sources for illicit arms, these arms producers in the legal market form the foundation; illicit arms are most often diverted legal firearms, while illicitly manufactured arms likely make up a smaller portion of the market.



314 United Nations Office on Drugs and Crime, *Global Study on Firearms Trafficking 2020*, 2020, p63.

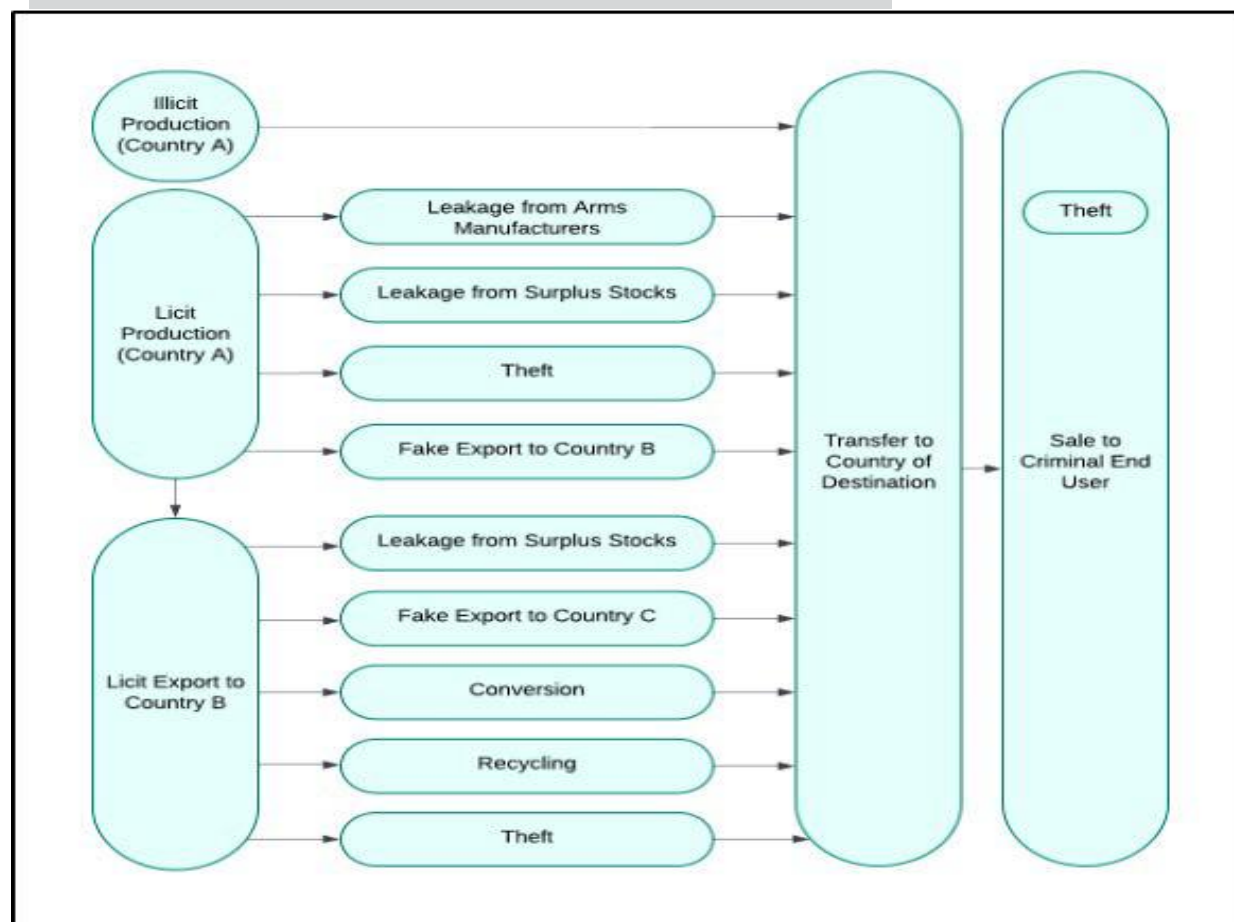
315 United Nations Office on Drugs and Crime, *Global Study on Firearms Trafficking 2020*, p62.

316 Fiona Langlois et al, "International weapons trafficking from the United States of America: a crime script analysis of the means of transportation," *Global Crime* 23, no. 3 (2022): p298, <https://doi.org/10.1080/17440572.2022.2067847>.

317 Khadija Sharife, "Investigating Arms Trafficking," *Global Investigative Journalism Network*, October 4, 2021, <https://gijn.org/stories/investigating-arms-trafficking/>.

The following diagram from UNODC demonstrates the various sources of illicit firearms and the many possible paths of diversion:

Figure 21: Logistical process of the trade in illicit firearms<sup>318</sup>



The dark web plays a new and significant role in arms trafficking. RAND conducted a study in 2017 that found that, of all arms trade-related listings on the dark web, firearms listings were the **most common (42 percent)**, followed by **arms-related digital products (27 percent)**<sup>319</sup>, and other accessories **including ammunition (22 percent)**.<sup>320</sup>

- This finding alone is significant; however, the study also found that the US is the most common source country for arms sold on the dark web, with almost 60 percent of firearms listings associated with products originating from the U.S.<sup>321</sup>

318 UNODC and Education for Justice, *The Illicit Market in Firearms*, 10.

319 A broad category including 3D models of firearms, tutorials on building a weapon, and more.

320 Giacomo Persi Paoli et al, "Behind the curtain: The illicit trade of firearms, explosives and ammunition on the dark web," RAND, July 19, 2017, [https://www.rand.org/pubs/research\\_reports/RR2091.html#:~:text=The%20US%20appears%20to%20be%20the%20most%20common,are%20around%20five%20times%20higher%20than%20the%20US.](https://www.rand.org/pubs/research_reports/RR2091.html#:~:text=The%20US%20appears%20to%20be%20the%20most%20common,are%20around%20five%20times%20higher%20than%20the%20US.)

321 Giacomo Persi Paoli et al, "Behind the curtain: The illicit trade of firearms, explosives and ammunition on the dark web."

UNODC lists the most prominent demand factors for **arms trafficking** as:<sup>322</sup>

- High levels of crime, violence, or civil unrest
- Instances of large-scale armed conflict (local, national, regional, or international)
- Weak security forces unable to provide security to citizens
- Lack of trust in a country or region's security sector, judiciary, and rule of law
- Human rights violations, especially those perpetrated by state security forces
- Limited or complete lack of civilian participation in decision-making processes
- Gang cultures, civil conflict, racial and ethnic tensions, terrorist radicalization, and loopholes in firearms control.

The case study section below will further explore Mali and the Sahel region, but it is important to emphasize this case as a perfect example of demand drivers in action. Experts at the Institute for Security Studies point to the rise of violent extremist groups and other armed groups in the Sahel as a major precipitation point for arms trafficking in the region because of the further enhanced demand for small arms and light weapons.<sup>323</sup>

One need only examine the individual areas where arms trafficking is most pervasive to see the drivers of demand proven true. The Global Organized Crime Index ranks the regions with the highest arms trafficking rates as East Africa, followed closely by Western Asia.<sup>324</sup> The highest rates by country include Yemen, Sudan, Afghanistan, Myanmar, Somalia, and most notably, Ukraine.<sup>325</sup> All of these countries are characterized by **extremism, political instability, or armed conflict**.



322 UNODC and Education for Justice, *The Illicit Market in Firearms*, 9.

323 "Instability Drives Proliferation of Small Arms, Light Weapons in Sahel Region," Africa Defense Forum, November 7, 2023, <https://adf-magazine.com/2023/11/instability-drives-proliferation-of-small-arms-light-weapons-in-sahel-region/>.

324 "Arms Trafficking," Global Organized Crime Index, 2023, [https://ocindex.net/rankings/arms\\_trafficking?f=rankings&view=Cards&group=Country&order=DESC&criminality-range=0%2C10&state-range=0%2C10](https://ocindex.net/rankings/arms_trafficking?f=rankings&view=Cards&group=Country&order=DESC&criminality-range=0%2C10&state-range=0%2C10).

325 Global Organized Crime Index, "Arms Trafficking."



## Actors

Arms trafficking is a relatively widespread transnational crime, with offenses across the world and in **various conflict zones**. Due to the nature of the crime, in which arms can be diverted from legal to illegal markets at any step of the process, identifying a handful of key actors is near impossible.

Actors within the legal market for firearms include authorized manufacturers who produce the types and number of arms specified under a valid license; transfer authorities who oversee the movement of these arms; importers, exporters and transit countries who abide by clear rules that link the respective processes to one another in order to prevent and reduce the risk of diversion; authorized dealers who sell the items to authorized persons or entities; and final end users who have purchased the firearms for a lawful and legitimate purpose in full respect of the normative requirements.<sup>326</sup>

- Because firearms can be diverted at any point (**illicit manufacture, improper authorization, illegal transfer, sanctioned or criminal end-users**), there are no significant cases of vertical integration in the illicit arms trade.
- A subject matter expert concurred that there is a lack of clear centralization in the field of SALW trafficking, but he noted that there are certain individuals or small groups that act as linchpins.<sup>327</sup> High-profile individuals in this field include arms dealers like Viktor Bout and Karl Lee.

Despite a **lack of ‘key’ arms trafficking groups**, it is still important to identify what types of criminal actors can be involved and where.

- Regionally, arms trafficking is most prevalent in the Persian Gulf, the Balkans, Central America, the Sahel, the tri-border area between Paraguay, Brazil, and Argentina, and most notably the US-Mexico border.<sup>328</sup>
- Illicit actors can include anyone from illegal arms manufacturers to brokers to ‘straw-purchasers’ (a legal stand-in who purchases on behalf of a group or person who cannot legally purchase the arms or items).<sup>329</sup>

326 UNODC and Education for Justice, *The Illicit Market in Firearms*, 14.

327 Paddy Ginn, Global Initiative against Transnational Organized Crime, interviewed by Boone Jarvis, November 2024.

328 Office of the Director of National Intelligence, “Transnational Organized Crime,” [https://www.dni.gov/files/documents/NIC\\_toc\\_foldout.pdf](https://www.dni.gov/files/documents/NIC_toc_foldout.pdf).

329 UNODC and Education for Justice, *The Illicit Market in Firearms*, 15.

## Case Study

The following case study is based on the report “Continuity and Change: Extremist-Used Arms in Mali,” by Holger Anders from the Small Arms Survey.<sup>330</sup> The report chose to examine Mali because of its history of armed violence perpetrated by violent extremists, and sought to answer the question of where extremists within Mali are sourcing their arms, ammunition, and explosives; whether these sources are changing; and if the material sourcing identified any extremist network connections based on an assessment of 800 arms and 12,000 ammunition casings recovered by national and international authorities.<sup>331</sup>

The report found that extremists, particularly al-Qaeda and Islamic State-linked extremist groups, continue to gain access to arms and other materiel through violent capture from armed forces and through illicit trafficking from the subregion (Sahara and Sahel).<sup>332</sup> The most prominent source for illicitly trafficked arms and ammunition is Libya to the northeast, particularly for improvised explosive device (IED) components, heavy machine guns, anti-tank grenades, and mortar rounds.<sup>333</sup> Additionally, there is a cyclical relationship between extremism and arms trafficking in the region, with extremism fueling arms trafficking, and trafficked arms supporting the creation of new extremist cells.<sup>334</sup>

Beyond just the Small Arms Survey’s Report, UNODC examined greater firearms trafficking flows across the Sahel, particularly looking at Mauritania, Mali, Burkina Faso, Niger, and Chad. The report discovered similarly that Libya was the main source of trafficked firearms for the entire Sahel, and that there were direct links between arms trafficking from Libya to Mali and the massive uptick in fatalities in Mali in recent years, especially 2022.<sup>335</sup>

330 Holger Anders, “Continuity and Change: Extremist-used Arms in Mali,” Small Arms Survey, January 2024, <https://www.smallarmssurvey.org/sites/default/files/resources/SAS-SANA-BP-2024-Mali-Extremist-EN.pdf>.

331 Anders, 3.

332 Anders, 10.

333 Anders, 10.

334 Anders, 11.

335 United Nations Office on Drugs and Crime, *Firearms Trafficking in the Sahel*, 2022, 12, [https://www.unodc.org/documents/data-and-analysis/tocta\\_sahel/TOCTA\\_Sahel\\_firearms\\_2023.pdf](https://www.unodc.org/documents/data-and-analysis/tocta_sahel/TOCTA_Sahel_firearms_2023.pdf).

Figure 22: Firearms trafficking flows in the Sahel<sup>336</sup>



Figure 22 shows a significant concentration of violent extremist groups<sup>337</sup> in Southern Mali, with clear flows of firearms from Libya to Mali, as well as from Libya to other parts of the Sahel, directly or indirectly. A separate map from UNODC's report shows fatalities associated with non-state armed groups in the Sahel countries that almost perfectly overlaps with the distribution of violent extremist groups in Figure 22.<sup>338</sup>

Ultimately the case of Mali best demonstrates that **weak enforcement practices and major demand factors like armed conflict and extremism drive arms trafficking.**



<sup>336</sup> United Nations Office on Drugs and Crime, Firearms Trafficking in the Sahel, 18.

<sup>337</sup> Including Al Qaida branch Jama'at Nusrat ul-Islam wa al-Muslimin (JNIM), Islamic State in the Greater Sahara (ISGS), and small militia groups affiliated to Coordination of Movements of Azawad (CMA).

<sup>338</sup> United Nations Office on Drugs and Crime, Firearms Trafficking in the Sahel, 10.

## Connections to Foreign Terrorist Organizations

Online information on the links between arms trafficking and terrorist financing is sparse, and the most valuable information on the subject is confidential. However, several key points stand out in the information that is publicly accessible: arms trafficking is certainly a prerequisite offense for most terrorist attacks, and **arms trafficking is a major source of financing for known terrorist organizations.**

For one, terrorist groups use illicitly obtained arms for their operations, with small arms and light weapons increasingly becoming the weapon of choice as they are cheap and easy to access, transfer, hide, and use.<sup>339</sup> Even for legal arms sales, there is concern that purchased arms have made and will continue to make their way into the black market and to terrorists.<sup>340</sup> Particular groups which likely use arms trafficking to finance their operations include Hezbollah in Lebanon and al-Shabaab in Somalia.<sup>341</sup>

The Financial Action Task Force (FATF) completed a report on terrorist financing sourced from illicit arms trafficking in 2020-2021. While that report is confidential, FATF's annual review from that year explains several key findings: terrorist attacks often use illegally trafficked weapons, and illicit arms trafficking also provides a lucrative source of funding for terrorists and terrorist groups, allowing them to strengthen their operations and increasing their threat to societies and innocent lives.<sup>342</sup>

Collectively, most research organizations recognize that there is a need for a better understanding of the links between arms trafficking and terrorist financing. The link is almost certainly present, but not fully researched or understood, even by the UN.

- 339 "Opening Remarks by Mr. Vladimir Voronkov Under-Secretary-General, UN Office of Counter-Terrorism Launching event Project on Addressing the terrorism-arms-crime nexus: Preventing and combatting the illicit trafficking of Small Arms and Light Weapons (SALW) and their illicit supply to terrorists - Supporting the implementation of UNSCR 2370(2017) and the Madrid Guiding Principles," 2, [https://www.un.org/counterterrorism/sites/www.un.org.counterterrorism/files/statement\\_voronkov\\_launch\\_salw.pdf](https://www.un.org/counterterrorism/sites/www.un.org.counterterrorism/files/statement_voronkov_launch_salw.pdf).
- 340 Gordon Hook, "Terrorist financing: global policy challenges and initiatives in 2020," in *Counterterrorism Yearbook* 2021, 46, <https://www.jstor.org/stable/resrep31258.12>.
- 341 United States Department of the Treasury, "2024 National Terrorist Financing Risk Assessment," February 2024, 10-12, <https://home.treasury.gov/system/files/136/2024-National-Terrorist-Financing-Risk-Assessment.pdf>.
- 342 Financial Action Task Force, "Annual Report 2020-2021," 2021, 20, <https://www.fatf-gafi.org/content/dam/fatf-gafi/annual-reports/Annual-Report-2020-2021.pdf.coredownload.pdf>.



## Policy Recommendations

Policy to fight the illicit arms trade should be built around two key pillars: promoting stronger government and enforcement, and lowering demand by decreasing the spread of international conflict and extremism.

**The nature of arms trafficking makes enforcement difficult, but a core aspect of governments' policies should be stronger enforcement against arms trafficking.**

- The Arms Trade Treaty (ATT) is currently not sufficient, particularly on the issues of domestic arms trades and regulations.
- There is not enough transparency in the legal arms trade.
- Border control technologies like scanners and surveillance require updating.
- Stricter sanctions on states or companies that are in some way complicit in the arms trafficking process could reduce incentive for arms traffickers.

**The U.S. government should support international infrastructure and economic development, alongside public diplomacy programs in high-risk areas.**

- Governments need to seek methods for countering international conflict and extremism, which are two of the main drivers of arms trafficking demand.
- Non-military solutions, like investing in diplomatic efforts to resolve ongoing conflicts, could also effectively slow arms trafficking.
- Public diplomacy programs should focus on education and deradicalization.

Above all else, however, the first step to understanding this issue further is to invest in more in-depth research of SALW trafficking. This includes more field research as well as support for new tools like OSINT models and AI large-language-models to scrape for base data and correspond with national or regional databases of SALW trafficking data.



# The Illicit Trade in Cultural Property

## Overview

While the illicit trade in cultural property may initially be regarded as less damaging than other forms of transnational crime, its negative impact should not be underestimated. Cultural property trafficking is not a stand-alone crime. It is often closely linked to other forms of criminal activity, including drugs, arms, and human smuggling, as well as money laundering, and the actors involved in these other illegal enterprises often engage in cultural property trafficking as one component of a broader criminal strategy.

The damage caused by the illicit trade in cultural property extends beyond the trafficked items' monetary value. Besides fueling other illegal activities, cultural property trafficking is fundamentally the act of stealing a culture's history and identity. Director-General of UNESCO, Audrey Azoulay, refers to illicit cultural property trafficking as "a blatant theft of the memory of peoples."<sup>343</sup>

As regions facing conflict (one of the main drivers of this illicit trade) have grown by two-thirds since 2021,<sup>344</sup> the prevalence of cultural property trafficking has likely increased and will remain a key issue until the instability is addressed. Confronting this challenge through close international cooperation and precise policy remains essential.

**Cultural property/object:** Property which, on religious or secular grounds, is specifically designated by each State as being of importance for archaeology, prehistory, history, literature, art or science.

Article 1, UNESCO Convention on the Means of Prohibiting and Preventing the Illicit Import, Export, and Transfer of Ownership of Cultural Property



<sup>343</sup> "The Real Price of Art: International UNESCO campaign reveals the hidden face of art trafficking," UNESCO, 17 October 2023, <https://www.unesco.org/en/articles/real-price-art-international-unesco-campaign-reveals-hidden-face-art-trafficking?hub=66764>.

<sup>344</sup> Hugo Brennan and Mucahid Durmaz, "Global conflict zones grow by two thirds since 2021, topping 6 million km2," Verisk Maplecroft, 2024.

## Key findings

- The 2024 annual value of cultural property trafficking is estimated between **US\$1 billion to 3 billion**.
- Evidence suggests that **larger, well-established TOC groups** are involved in illicit cultural property trafficking. However, most TOC actors involved in this crime are likely less well-established and part of smaller, more loosely organized crime groups. TCOs that engage in cultural property trafficking almost always engage in other types of illicit trafficking as well; cultural property alone does not generate enough revenue to sustain a large criminal organization.
- Illicit cultural property trafficking is a source of funding for FTOs, including ISIS and Hezbollah, though it is likely not the dominant source of revenue for these groups.
- While the estimated dollar value of illicit cultural property trafficking is lower than that of other crimes, illegal proceeds from this crime may be used to fund other criminal enterprises, including drug, arms, and human trafficking. Thus, the extent to which cultural property trafficking facilitates transnational organized crime and terrorist activities may go beyond its immediate dollar value.

Broadly, the illicit trade of cultural property is defined as the illegal trafficking of art, ancient artifacts, archeological and paleontological objects, rare books and manuscripts, and other historical antiquities.

According to Europol, cultural property crime can be divided into three categories:<sup>345</sup>

- **Theft - the robbery of cultural goods from their rightful owners**
- **Looting - the illegal removal of ancient relics**
- **Forgery - the illegal imitation of cultural goods**

The most frequently stolen cultural property objects include paintings, sculptures, statues, religious items, books, furniture, coins, weapons and gold and silverware. Museums, private homes, places of worship, and archeological sites of historical importance are frequently targeted for illegal looting and excavation.<sup>346</sup>

As a legal market for cultural goods exists, determining whether a cultural good can be defined as illicit depends solely on its owner and the way in which the object was acquired. Typically, cultural goods are legally owned either by a state (which can claim ownership of otherwise unclaimed goods, including items not yet excavated), or an institution, company, or individual who can prove legal ownership of the goods (via appropriate legal titles and documentation).<sup>347</sup>

345 “Cultural Goods Crime,” EUROPOL, accessed November 25, 2024, <https://www.europol.europa.eu/crime-areas-and-statistics/crime-areas/illicit-trafficking-in-cultural-goods-including-antiquities-and-works-of-art>.

346 The issues - cultural property,” INTERPOL, accessed November 25, 2024, <https://www.interpol.int/en/Crimes/Cultural-heritage-crime/The-issues-cultural-property>.

347 “What is Illicit Traffic?” ICOM International Observatory on Illicit Trade in Cultural Goods, accessed November 25, 2024, <https://www.obs-traffic.museum/what-illicit-traffic>.

## Value

Very little methodologically-sound data exists on the overall scope of the illicit cultural property market. However, based on the single empirically sourced report identified on the subject and limited data collected from law enforcement seizures, it can be estimated with low confidence that the overall market for illicit cultural property is valued at **between US\$1 billion to 3 billion annually.**

- This value is derived from a series of interviews with subject-matter experts and statistics on recent cultural property seizures from the Manhattan District Attorney's Office. For full data, refer to section XIV: Methodology.
- Overall, the subject matter experts interviewed for this research were hesitant to place a value estimate on the global market for illicit cultural property trafficking and reiterated that no known figure exists.
- However, when directly asked to estimate the global value of the illicit cultural property market, the few subject matter experts who were willing to provide a number quoted a range of values from US\$2 million to "several billion." The US\$2 million value is omitted from the range presented in this report as well-substantiated seizure data from law enforcement agencies contradicts this estimate.

Previous estimates of the size of the illicit market of cultural property range from hundreds of millions to over 7 billion dollars annually (see Table 12). However, these figures remain un-substantiated by concrete data or sound research methods.<sup>348</sup>

Additionally, many sources on cultural heritage trafficking cite the often-repeated statement that this type of trafficking is the third largest in the world by volume, behind only drugs and arms. However, this statistic has circulated, unchanged, since the 1970s and has been debunked by researchers.<sup>349</sup> Thus, the figures presented below should be interpreted with skepticism.



348 Morag Kersel and Patty Gerstenblith, "Cultural Heritage and Security Policy," University of Chicago Legal Forum [Forthcoming], 7.

349 Donna Yates and Neil Brodie, "The illicit trade in antiquities is not the world's third largest illicit trade: a critical evaluation of a factoid," *Antiquity*, vol. 97 (394), (2023): 993, 996-998, <https://doi.org/10.15184/aqy.2023.90>.



Figure 23: Current Estimates, Value of the Global Illicit Cultural Property Market

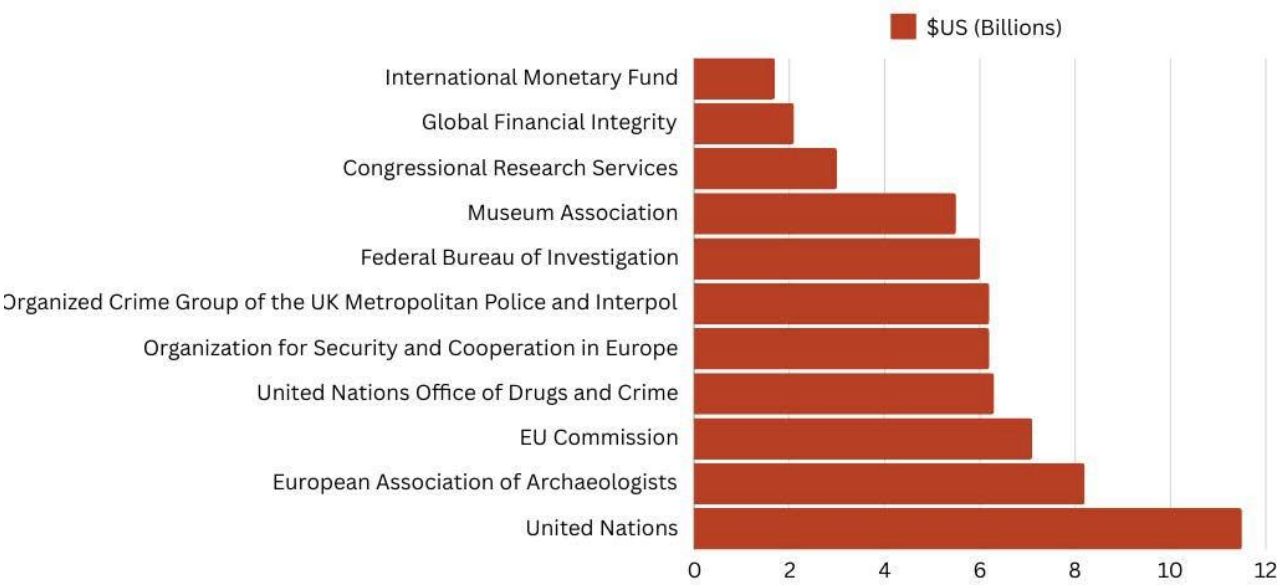


Table D: Current Estimates, Value of the Global Illicit Cultural Property Market<sup>350,351,352,353</sup>

Organization	Estimate, USD	Year	Estimate Adjusted for 2024 Inflation, USD <sup>350</sup>
Congressional Research Service <sup>351</sup>	Several hundred million to billions	2021	Several hundred million to billions
EU Commission <sup>352</sup>	2.7-5.5 billion	2017	3.5-7.1 billion
European Association of Archaeologists <sup>353</sup>	4.5 billion	2000	8.2 billion
Federal Bureau of Investigation <sup>354</sup>	4-6 billion	No date	4-6 billion
Global Financial Integrity <sup>355</sup>	1.2-1.6 billion	2017	1.5-2.1 billion
International Monetary Fund <sup>356</sup>	1.6 billion	2023	1.7 billion
Museum Association <sup>357</sup>	225 million-3 billion	2000	412 million-5.5 billion
Organized Crime Group of the Metropolitan Police (London) and Interpol <sup>358</sup>	300 million to 6 billion	2023	310 million-6.2 billion
Organization for Security and Cooperation in Europe <sup>359</sup>	2-6 billion	2023	2.1-6.2 billion
United Nations <sup>360</sup>	7.8 billion	2009	11.5 billion
United Nations Office of Drugs and Crime <sup>361</sup>	3.4-6.3 billion	No date	3.4-6.3 billion

350 Estimates with no initial years provided are not adjusted for 2024 inflation. 2024 adjusted estimates were calculated via USInflationCalculator.com.

351 Congressional Research Service, "Transnational Crime Issues: Arts and Antiquities Trafficking," (Congressional Research Service, 2021), 1, <https://crsreports.congress.gov/product/pdf/IF/IF11776>.

352 European Commission, "Questions and Answers on the illegal import of cultural goods used to finance terrorism," (European Commission, 2017), [https://ec.europa.eu/commission/presscorner/detail/en/memo\\_17\\_1954](https://ec.europa.eu/commission/presscorner/detail/en/memo_17_1954).

353 Parliament of the United Kingdom, "The Problem of Illicit Trade," in Select Committee on Culture, Media, and Sport Seventh Report, (U.K. Parliament, 2000), section 9, <https://publications.parliament.uk/pa/cm199900/cmselect/cmcumeds/371/37104.htm#note21>.

- 354 Federal Bureau of Investigation, "FBI Art Theft Program," accessed November 25, 2024, <https://www.fbi.gov/video-repository/newss-fbi-art-theft-program/view>.
- 355 Channing May, *Transnational Crime and the Developing World*, p35.
- 356 UNESCO, "The illicit trafficking of cultural goods shall be recognized as a security issue," UNESCO, November 23, 2023, <https://www.unesco.org/en/articles/illicit-trafficking-cultural-goods- shall-be-recognized-security-issue#:~:text=The%20Museum%20Association%20estimates%20that,million%20and%20%246%20billion%20annually>.
- 357 U.K. Parliament, "The Problem of Illicit Trade," section 9.
- 358 UNESCO, "The illicit trafficking of cultural goods shall be recognized as a security issue," UNESCO, November 23, 2023, <https://www.unesco.org/en/articles/illicit-trafficking-cultural-goods- shall-be-recognized-security-issue#:~:text=The%20Museum%20Association%20estimates%20that,million%20and%20%246%20billion%20annually>.
- 359 Organization for Security and Co-operation in Europe, "Cracking down on illicit art trade to improve security – The OSCE's critical role," OSCE, April 13, 2023, <https://www.osce.org/stories/crack- ing-down-on-illicit-art-trade-to-improve-security>.
- 360 Alex Barker, "Looting, the Antiquities Trade, and Competing Valuations of the Past," *Annual Review of Anthropology* 47 (2018): 456, <https://www.jstor.org/stable/48550917>.
- 361 Organization for Security and Co-operation in Europe, "Combating illicit cross-border trafficking in cultural property in the OSCE area," accessed November 25, 2024, <https://www.osce.org/project/ combating-illicit-cross-border-trafficking-in-cultural-property-in-the-OSCE-area#:~:text=The%20illicit%20trafficking%20in%20cultural,art%20and%20cultural%20property%20are>.





While assessing the global value of any transnational crime is difficult, several unique characteristics of cultural property make it exceptionally challenging to quantify.

- Cultural property stands out from other types of illicit trafficking in that a legal market for such goods also exists. This complicates efforts to determine which objects being sold on the open market can truly be considered part of the illicit trade, as the only defining feature of an illicit cultural good is the legality of its acquisition.
- Cultural goods are often bought and sold on the open market with little to no official documentation, which presents a challenge to researchers, governments, or law enforcement agencies attempting to distinguish between legally and illegally acquired goods.<sup>362</sup>
- Even the legal market for art and antiquities is characterized by a high degree of secrecy and self-regulation, in which dishonest actors can buy and sell goods with plausible deniability.<sup>363</sup> This feature of the cultural property market makes illicit trafficking in such objects attractive to criminals, but also difficult to track.
- Illegally acquired items (particularly antiquities) are increasingly sold online and tend to be small, portable, easy to conceal, and often too low in value to require regulatory reporting.<sup>364</sup>
- While organizations such as Interpol and the World Customs Organization collect data on the total number of cultural property objects seized during law enforcement operations, there is little data on the value of objects seized. Even if provided with the resources to determine the monetary value of all objects seized, the number would be at best an imperfect and incomplete estimate of the full scope of illicit cultural property trafficking.

Due to the complex nature of illicit cultural trafficking, even organizations dedicated to combating it have been unable to calculate its estimated market value.

- The DC-based NGO Antiquities Coalition has stated that “There are serious problems of data availability and accessibility. Extremely large numbers of cultural objects are sold rapidly by retailers, and it would require a major, multidisciplinary research effort to record them all. At the same time, an unknown number of high value objects are sold invisibly through private transactions and the results are not available for statistical analysis.”<sup>365</sup>
- A 2019 European Commission report stated, “Reliable statistical descriptions of the material volume and monetary value of the illicit trade in antiquities and other cultural goods do not exist.”<sup>366</sup>

362 Antiquities Coalition, *Safeguarding Cultural Heritage in Conflict Zones: A Roadmap for the G20 to Combat the Illicit Trade*, (Antiquities Coalition, 2021), p6. <https://theantiquitiescoalition.org/developing-implementing-solutions/a-roadmap-for-the-g20/>.

363 Antiquities Coalition, *Safeguarding Cultural Heritage in Conflict Zones: A Roadmap for the G20 to Combat the Illicit Trade*, 6.

364 Antiquities Coalition, *Safeguarding Cultural Heritage in Conflict Zones: A Roadmap for the G20 to Combat the Illicit Trade*, 7.

365 Antiquities Coalition, *Safeguarding Cultural Heritage in Conflict Zones: A Roadmap for the G20 to Combat the Illicit Trade*, 8.

366 Brodie and Yates, *Illicit Trade in Cultural Goods in Europe*, (EU Commission, 2019), 78.



- The International Council of Museums has stated that no organization has gathered global data on the illicit trafficking of cultural goods, current estimates are not supported with empirical data, and that “it remains impossible, to this day, to precisely rank illicit traffic in cultural objects so as to measure it to other types of transnational crimes.”<sup>367</sup>

## Dynamics

The illicit cultural property trade is driven by a variety of factors, most notably the low risk associated with trafficking these items, the nature of the legal art and antiquities market, and presence of regional conflict or instability.

- This illicit trade is facilitated by the ease with which cultural objects can be transported and sold on the black market, especially when compared to higher-risk items such as drugs, weapons, or humans.
- The art and antiquities market is characterized by privacy and discretion among art dealers, collectors, and their clients, which makes cultural goods trafficking ideal for disguising the provenance of items, laundering money, and profiting illegally.<sup>368</sup>

Additionally, most sources and subject matter experts consulted in this research point to conflict and instability as key drivers of the illicit cultural property trade.<sup>369</sup> Conflict contributes to this type of trafficking in the following ways:<sup>370</sup>

- Regions experiencing conflict or instability will also experience a breakdown in law and order, which enables criminal activity generally.
- Chaos creates economic instability and drives individuals at the local level to engage in looting, sometimes to support their families.
- Conflicts drive international interest in particular countries or regions, which may increase interest in the region’s cultural heritage and fuel global demand for cultural property (whether legally acquired or not).

367 France Desmarais, “An International Observatory on Illicit Traffic in Cultural Goods,” in Countering Illicit Traffic in Cultural Goods: The Global Challenge of Protecting the World’s Heritage, ed. F. Desmarais (ICOM International Observatory on Illicit Traffic in Cultural Goods, 2015), vii, [https://www.obs-traffic.museum/sites/default/files/ressources/files/Book\\_observatory\\_illicit\\_traffic\\_version%20issuu.pdf](https://www.obs-traffic.museum/sites/default/files/ressources/files/Book_observatory_illicit_traffic_version%20issuu.pdf).

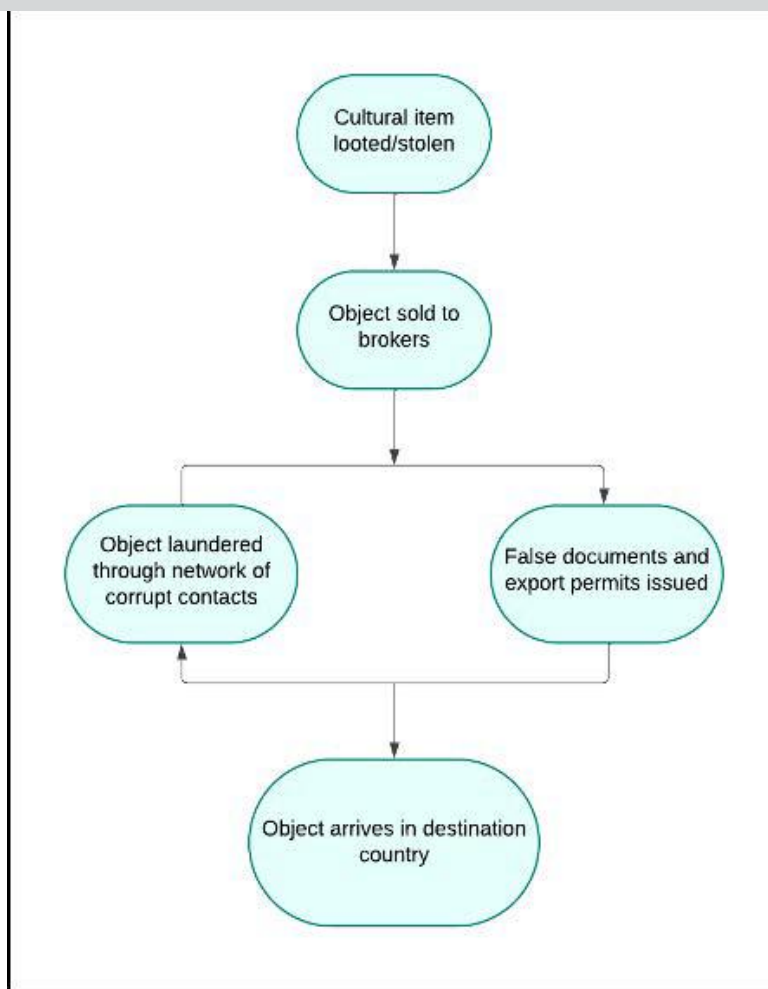
368 United Nations Interregional Crime and Justice Research Institute, Cultural Heritage Smuggling and the Nexus with Terrorism, (UNICRI, 2024), 22-23, <https://unicri.it/sites/default/files/2024-07/Cultural%20Heritage%20Smuggling%20and%20the%20Nexus%20with%20Terrorism.pdf>.

369 Michaela Millender, Identities Destroyed, Histories Revised: The Targeting of Cultural Heritage and Soft Targets by Illicit Actors, (The Soufan Center, 2024), 4, [https://thesoufancenter.org/wp-content/uploads/2024/01/TSC-Issue-Brief\\_Cultural-Heritage-Jan-2024.pdf](https://thesoufancenter.org/wp-content/uploads/2024/01/TSC-Issue-Brief_Cultural-Heritage-Jan-2024.pdf).

370 Stephen Epstein, Bureau of Near Eastern Affairs, U.S. Department of State, interviewed by Sofia Walsh, November 2024.

When cultural property items are illegally trafficked, they pass through a series of steps from the source country to the destination market, gaining value as they cross borders (see Figure 24). First, a cultural object is stolen or looted from a museum or archeological site. The object will then be sold to middlemen or brokers, who move the item through various buyers and sellers with the goal of concealing the item's illegal origin. During this process, middlemen may issue false documents, export permits, or certificates of authenticity to further legitimize the stolen item. This process often takes place in duty free zones, which may be in places such as Hong Kong or Dubai,<sup>371</sup> and is facilitated by actors who work as transnational brokers between the source and destination country.<sup>372</sup> Typically, these individuals have a deep knowledge of the legal and financial systems of the country and a network of corrupt contacts through which they can launder the item.<sup>373</sup> These middlemen often move items through the corrupt network slowly, storing or otherwise holding onto them for long periods of time and creating a significant time lag between when the item was looted and when it emerges onto the market.<sup>374</sup> Finally, the stolen item will arrive in its destination country.

**Figure 24: Trafficking Process, Cultural Goods**



371 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, p22-23.

372 Daniel Neale, "Free Trade Zones: a Pandora's Box for Illicit Money," *Global Financial Integrity*, October 7, 2019, <https://gfintegrity.org/free-trade-zones-a-pandoras-box-for-illicit-money/>.

373 Paulina Joy Picciano, "Laundered: An Analysis of Antiquities Trafficking Networks and the Illicit Market." Master's thesis, Rutgers, The State University of New Jersey, 2023, p32-33, <https://www.proquest.com/docview/2821503712/fulltextPDF/FBB20CA6683747F9PQ/1?accountid=8285&sourcetype=Dissertations%20&%20Theses>.

374 Official at the U.S. Department of State, Cultural Heritage Center, interviewed by Sofia Walsh, November 2024.

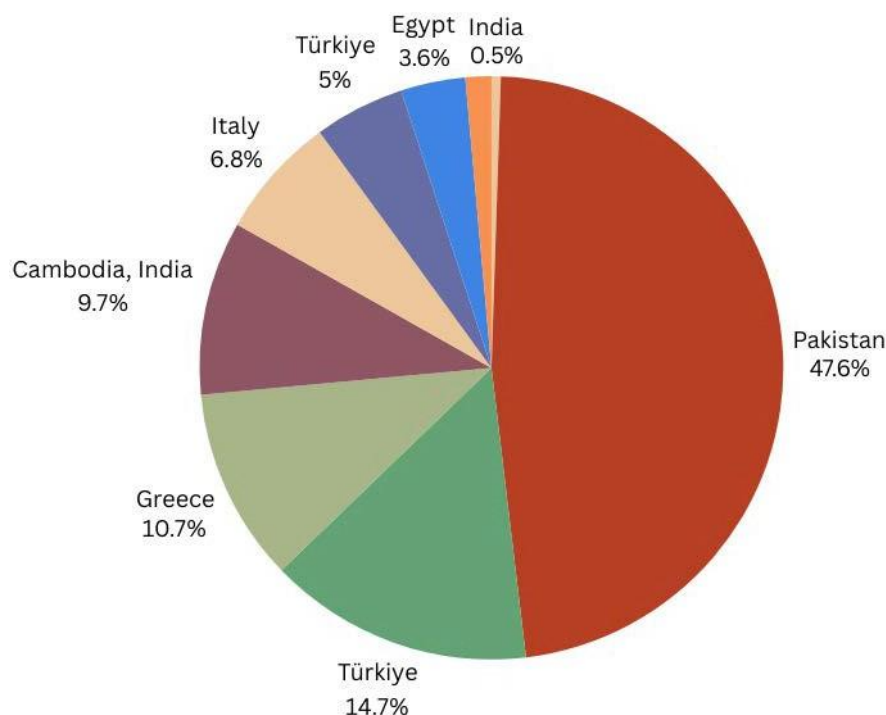
In terms of geographic trends in illicit cultural property trafficking, the RAND Corporation finds that the U.S. is the dominant importer of cultural goods, a trend which is likely facilitated by the ease with which goods can be trafficked into Europe and then imported across the Atlantic.

- \* In an analysis of illicit smuggling routes out of the Middle East, RAND also finds that many illicit cultural goods which originated in Iraq and Syria were trafficked into Turkey, Jordan, Lebanon, and Iran, with antiquity shops in these countries then selling goods into other destination countries.<sup>375</sup>

Additionally, the report notes additional smuggling routes from Iraq, Syria, and Turkey into Bulgaria,<sup>376</sup> as well as through the UAE, with data suggesting a sharp increase in cultural goods imports from the UAE into the U.S. from Iraq and Syria in the mid-2000s through the rise of the Islamic State in the 2010s.

Given the overlap between the legal and illicit trade in cultural goods and the frequency with which illegally acquired objects are provided with false documentation, it is likely that these spikes in legal imports from the UAE contained some amount of illicitly acquired cultural objects. The timing observed further suggests that conflicts in the Middle East fueled this trend and suggests the **UAE is a key transit hub** in illicit cultural property.<sup>377</sup>

**Figure 25: Cultural Property Seizures, Manhattan District Attorney's Office, October 2023-November 2024**



375 Matthew Sargent et. al., Tracking and Disrupting the Illicit Antiquities Trade with Open-Source Data, (RAND Corporation, 2020), 29-35, [https://www.rand.org/content/dam/rand/pubs/research\\_reports/RR2700/RR2706/RAND\\_RR2706.pdf](https://www.rand.org/content/dam/rand/pubs/research_reports/RR2700/RR2706/RAND_RR2706.pdf).

376 Matthew Sargent et. al., Tracking and Disrupting the Illicit Antiquities Trade with Open-Source Data, 39-40.

377 Matthew Sargent et. al., Tracking and Disrupting the Illicit Antiquities Trade with Open-Source Data, 20.

Data collected by Interpol on the number of stolen cultural objects further sheds light on the geographic distribution of the illicit cultural property trade. As of 2021, Interpol member countries reported **22,927 cultural objects stolen** (a decrease from 35,749 reported in 2020).<sup>378</sup>

- Interpol's 2021 report suggests that Asia and the South Pacific was the only region that displayed an increase in the number of objects reported stolen, potentially indicating that this area may be a hotspot for cultural property trafficking.
- However, Interpol notes that the 2021 data may be skewed by the fact that reporting systems differ among countries, not all countries possessed the same levels of access to data on stolen cultural goods, and fewer African countries participated in the 2021 survey than in 2020.<sup>379</sup> Thus, the data remains inconclusive in painting an accurate global and regional picture.

## Actors

TCOs are involved in the trafficking of cultural property and use this illicit activity to fund their other enterprises. The United Nations Interregional Crime and Justice Research Institute reports that organized crime groups use illicit cultural property trade to launder money, often by concealing the identity of the buyer, over or underestimated item prices, or performing fake sales and auctions.<sup>380</sup>

- In the case of high-value art pieces that are stolen from museums, TCOs may circulate such items as a form of underworld currency, as high-profile stolen art is unsellable on the open market.<sup>381</sup>
- A subject-matter expert at the UK's Art Loss Register (which manages a database of stolen art and partners with private auction houses) also stated that high-value art pieces may be used to launder the proceeds of other organized crime activities.<sup>382</sup>

378 INTERPOL, *Assessing Crimes Against Cultural Property*, 2020, 13, <https://www.interpol.int/content/download/16751/file/2020%20Assessing%20Crimes%20Against%20Cultural%20Property.pdf>.

379 INTERPOL, *Assessing Crimes Against Cultural Property*, 2021, 4, 10, [https://www.interpol.int/content/download/19025/file/Assesment%20Crime%20against%20cultural%20property%202021\\_Brochure-EN.pdf](https://www.interpol.int/content/download/19025/file/Assesment%20Crime%20against%20cultural%20property%202021_Brochure-EN.pdf).

380 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, p21.

381 Donna Yates and Christoph Rausch, "Private Art Businesses and Organized Crime," in *The Private Sector and Organized Crime*, (Routledge, 2022), 211-212, [https://traffickingculture.org/app/uploads/2022/10/YatesRausch\\_compressed.pdf](https://traffickingculture.org/app/uploads/2022/10/YatesRausch_compressed.pdf).

382 Olivia Whitting, Art Loss Register, interviewed by Sofia Walsh, November 2024.



Some organized crime groups may use **cultural property theft to supplement other income**.<sup>383</sup> There is also evidence to suggest that larger organized crime groups, such as the Camorra mafia, are involved in art crime in addition to other illegal activities.<sup>384</sup> Other, smaller TOC groups may be more narrowly focused on art crime yet still have an **expensive and wide-ranging impact**.<sup>385</sup> However, illicit cultural property alone is generally not enough to sustain any large criminal or terrorist organization.<sup>386</sup>

- A recent report from the Financial Action Task Force (FATF) found that organized crime groups may cooperate with terrorist organizations to procure cultural property items, then use their own networks to smuggle the items out of conflict areas (primarily in the Middle East, Africa, and Central Asia), through intermediary locations such as Turkey, Iran, and Hong Kong, and finally into destination countries in Western Europe, the U.S., and Canada.<sup>387</sup>
- FATF notes that smaller groups involved in these activities may operate **under the umbrella** of larger criminal organizations, playing distinct roles at different points along the supply chain.<sup>388</sup>

Other key actors involved in illicit cultural property trafficking include **unscrupulous private collectors and auction houses** (with smaller auction houses more likely to drive illicit trade as they are likely less concerned about reputational repercussions),<sup>389</sup> and wealthy buyers who do not carefully investigate the origin of purchases.<sup>390</sup> Individuals in economic distress may engage in subsistence looting, or the illegal excavation of objects within their home communities, out of financial need.<sup>391</sup> Typically, these individuals are the only ones in an illicit trade network who exclusively engage in cultural property trafficking; those at other points in the chain nearly always traffic other illicit goods as well.<sup>392</sup> Overall, the illicit trade in cultural property involves individuals acting as looters, sellers, middlemen, and consumers, as well as government officials and art or antiquity dealers who are willing to overlook items of questionable provenance.<sup>393</sup>

383 “Organised Crime Infiltrates Art World,” Yle Uutiset, January 29, 2013, <https://yle.fi/a/3-6470679>.

384 Donna Yates and Christoph Rausch, “Private Art Businesses and Organized Crime,” in *The Private Sector and Organized Crime*, (Routledge, 2022), p212, [https://traffickingculture.org/app/uploads/2022/10/YatesRausch\\_compressed.pdf](https://traffickingculture.org/app/uploads/2022/10/YatesRausch_compressed.pdf).

385 Louise Osborne, “Multimillion-pound international art forgery ring busted, say German police,” *The Guardian*, June 13, 2013, <https://www.theguardian.com/world/2013/jun/13/international-art-forgery-ring-busted>.

386 Dr. Eleanor King, Howard University, interviewed by Sofia Walsh, November 2024.

387 Financial Action Task Force, *Money Laundering and Terrorist Financing in the Art and Antiquities Market*, (Financial Action Task Force, 2023), 31, <https://www.fatf-gafi.org/content/dam/fatf-gafi/reports/Money-Laundering-Terrorist-Financing-Art-Antiquities-Market.pdf.coredownload.pdf>.

388 Financial Action Task Force, *Money Laundering and Terrorist Financing in the Art and Antiquities Market*, 31.

389 Olivia Whitting, Art Loss Register, interviewed by Sofia Walsh, November 2024.

390 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 23.

391 Dr. Dawn Rogala, Smithsonian Curator, interviewed by Sofia Walsh, October 2024.

392 Dr. Eleanor King, Howard University, interviewed by Sofia Walsh, November 2024.

393 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 22.

Some evidence suggests that the **Wagner Group**, a Russian state-funded private military company, may also be engaging in cultural property trafficking. The group was designated as a significant transnational crime organization by the U.S. Department of the Treasury in 2023.<sup>394</sup> Cultural heritage experts have raised the alarm that the Wagner Group has been engaged in illicit antiquity trafficking in Syria since 2016, as well as in Ukraine and regions of north and northeast Africa. The Soufan Center notes that as a group operating “both in the shadows and openly,” Wagner serves as a key example of how such organizations are primed to take advantage of conflict zones or politically unstable environments by looting and smuggling cultural objects.<sup>395</sup>

394 U.S. Department of State, “Countering the Wagner Group and Degrading Russia’s War Efforts in Ukraine,” January 26, 2023, <https://www.state.gov/countering-the-wagner-group-and-degrading-russias-war-efforts-in-ukraine/#:~:text=Today%2C%20the%20U.S.%20Department%20of,13863>.

395 Jason Blazakis et al., Wagner Group: The Evolution of a Private Army, (The Soufan Center, 2023), p9, <https://thesoufancenter.org/wp-content/uploads/2023/06/TSC-Special-Report-The-Wagner-Group-The-Evolution-Of-Putins-Private-Army-V3.pdf>.

## Case Study

A high-profile instance of illicit cultural property smuggling is the case of Subhash Kapoor, a prominent dealer who owned the Manhattan-based art and antiquities store Art of the Past. Kapoor was found guilty of stealing 19 ancient statues from India and illegally transporting them to sell in the U.S., and was convicted in 2022 on burglary and illegal export charges.<sup>396</sup>

Kapoor's arrest and conviction were the result of Operation Hidden Idol, a 2012 joint law enforcement operation between ICE's Homeland Security Division and U.S. Customs and Border Protection, with assistance from Interpol, the government of India, and the Manhattan District Attorney's Office.<sup>397</sup> In total, the operation confiscated 2,622 plundered cultural items worth \$107.6 million from Kapoor's storerooms, making him one of the most prolific smugglers of cultural commodities in the world and the purveyor of a "black-market Sotheby's."<sup>398</sup>

Kapoor began illegally smuggling artifacts from India in 2005, when he and an associate began robbing ancient Hindu temples in the Indian state of Tamil Nadu, most of which were remote, unguarded, and full of valuable cultural antiquities.

Kapoor and his associate hired teams of individuals to carry out the robberies and, as Kapoor regularly received approval from Indian customs officials to ship goods without prior inspection, successfully trafficked the items from India and into Hong Kong. Kapoor's contacts intentionally mislabeled and mixed his goods among other cargo to disguise them and assisted him with creating false documentation for the objects, claiming they had a long history of ownership outside of India to avoid implicating Kapoor in the temple robberies.<sup>399</sup>

Finally, the goods were trafficked from Hong Kong through London, and ultimately into New York. Kapoor's company, Nimbus Import Export, eventually received seven crates labeled "marble garden table sets," which contained 3,000 pounds of looted antiquities.<sup>400</sup>

Kapoor's case is an example of an individual who, while not tied to a formal organized crime group, nevertheless engaged in illegal transnational smuggling facilitated by a global network of associates. His prominence and background in the art and antiquities world, bolstered by his many donations and sales to museums such as the Metropolitan Museum of Art and the National Gallery of Australia, demonstrates the overlap between the licit and illicit markets in cultural goods, as well as the self-secrecy of this "gray market" that allows criminals to thrive.

396 Colin Moynihan and Tom Mashberg, "India Convicts Antiquities Dealer Also Facing Charges in New York," *The New York Times*, November 3, 2022, <https://www.nytimes.com/2022/11/03/arts/india-convicts-antiquities-dealer-subhash-kapoor.html>.

397 U.S. Immigration and Customs Enforcement, "ICE seizes statues allegedly linked to Subhash Kapoor, valued at \$5 million," U.S. Immigration and Customs Enforcement, December 4, 2012, <https://www.ice.gov/news/releases/ice-seizes-statues-allegedly-linked-subhash-kapoor-valued-5-million>.

398 Tom Mashberg and Max Bearak, "The Ultimate Temple Raider?: Inside an Antiquities-Smuggling Operation," *The New York Times*, July 23, 2015, <https://www.nytimes.com/2015/07/26/arts/design/the-ultimate-temple-raider-inside-an-antiquities-smuggling-operation.html>.

399 Mashberg and Bearak, "The Ultimate Temple Raider?: Inside an Antiquities-Smuggling Operation."

400 Mashberg and Bearak, "The Ultimate Temple Raider?: Inside an Antiquities-Smuggling Operation."

## Connections to Foreign Terrorist Organizations

Cultural property trafficking is generally not the primary funding source for most FTOs; however, some FTOs do engage in this crime on a smaller scale. FTOs, like organized crime groups, rely on a constant and diverse flow of income to finance their illegal activities. While FTOs do not generally specialize in cultural property trafficking, some use it to supplement other criminal activities and may rely on their already-established arms, drug, or human trafficking networks to also transport cultural goods.<sup>401</sup>

- FTOs engage in illicit cultural property trafficking in three ways: controlling and supervising the looting of historical sites; facilitating the transfer of illegally acquired objects by transporting, storing, taxing, or otherwise smuggling them; or looting and selling cultural objects directly.<sup>402</sup>
- FTOs seek to either directly generate funds through these activities, or to acquire cultural goods they can later trade for other necessities, such as weapons, vehicles, or the use of safe houses.<sup>403</sup>
- ISIS successfully bureaucratized cultural property looting and trafficking, and militants tied to ISIS and Al Qaeda continue to loot cultural property in the Sahel.<sup>404</sup>
- From 2012 to 2023, known Hezbollah financier Nazem Said Ahmad was engaged in art theft and smuggling, acquiring over US\$54 million from illegal art transactions.<sup>405</sup>

After taking over territory in Syria and Iraq, ISIS's involvement in cultural property trafficking serves as a well-documented case study of how FTOs seek to leverage this type of illicit trade to fund their own organizations. The United Nations reported on ISIS's involvement in cultural property looting and smuggling, stating that the group financed its recruitment efforts and attack operations partially via money acquired from stealing and illegally trading cultural heritage objects from archaeological sites, museums, libraries, and archives.<sup>406</sup>

401 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 9.

402 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 33.

403 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 33.

404 Will Brown, "Echoes of Isis as armed groups loot priceless artefacts across Sahel," *The Telegraph*, March 7, 2020, <https://www.telegraph.co.uk/news/2020/03/07/echoes-isis-armed-groups-loot-priceless-artefacts-across-sahel/>.

405 U.S. Department of the Treasury, "Treasury Disrupts International Money Laundering and Sanctions Evasion Network Supporting Hizballah Financier," April 18, 2023, [https://home.treasury.gov/news/press-releases/jy1422#:~:text=Since%202012%2C%20Nazem%20Said%20Ahmad,or%20business%20associates%20as%20the](https://home.treasury.gov/news/press-releases/jy1422#:~:text=Since%202012%2C%20Nazem%20Said%20Ahmad,or%20business%20associates%20as%20the; U.S. Department of Justice, ); U.S. Department of Justice, "OFAC-Designated Hezbollah Financier and Eight Associates Charged with Multiple Crimes Arising Out of Scheme to Evade Terrorism-Related Sanctions," April 18, 2023, <https://www.justice.gov/opa/pr/ofac-designated-hezbollah-financier-and-eight-associates-charged-multiple-crimes-arising-out>.

406 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 33.



ISIS's cultural property trafficking activities were uniquely institutionalized. The group created a Department of Antiquities within the Diwan al Rikaz (Office of Resources), which was dedicated to overseeing the plundering and selling of illegally acquired cultural goods. Individuals were able to purchase permits to excavate and loot archeological sites under ISIS's control, then sell the items to buyers within a specific timeframe, offering a 20 percent cut of the profit to ISIS. If the looter failed to find a buyer in the allotted time window, ISIS would re-possess the cultural item and attempt to sell it, this time claiming a 60 percent cut of the final profit.<sup>407</sup> Should the Department of Antiquities be unable to find a buyer at this point, ISIS would finally sell the artifact at an auction in Raqqa, Syria, claiming an 80 percent cut of the final profit. Other reports suggest that many objects stolen by ISIS were ultimately sold to tourists in antiquities markets in Jordan,<sup>408</sup> or ended up in auction houses in Europe and the U.S., complete with falsified export documents.<sup>409</sup> After losing the majority of its territory since 2017, ISIS's revenue from antiquities looting is likely more limited. However, as the group retains influence over territory in the Sahel, it is possible that ISIS may still have access to cultural sites.<sup>410</sup>

## Policy Recommendations

Increasing the effectiveness of the U.S. government's response to illicit cultural property trafficking will depend primarily on investing in more quantitative research on the subject. Additionally, the United States should expand bilateral cooperation with partners via Memoranda of Understanding (MOUs), work with international partners to harmonize legal codes and share best practices and increase information sharing among countries. Specifically, U.S. policymakers should consider the following:

### **Fund empirically sound, quantitative and qualitative research into the scope of the legal cultural property market.**

- ' The RAND Corporation's 2020 report cited throughout this paper would serve as an excellent example of how this open-source research could be carried out.<sup>411</sup>
- Expanding this report to include more geographic areas would offer a fuller picture of the global cultural antiquities market and would provide a more solid statistical baseline on which to develop future policy.

407 United Nations Interregional Crime and Justice Research Institute, *Cultural Heritage Smuggling and the Nexus with Terrorism*, 26.

408 Annalies Pauwels, "ISIS and illicit trafficking in cultural property: Funding terrorism through art," p68.

409 Philipp Jedicke, "Illicit Excavations," Deutsche Welle (DW), October 24, 2014, <https://www.dw.com/en/germany-attracts-trade-in-looted-artifacts/a-18019083>.

410 Financial Action Task Force, *Money Laundering and Terrorist Financing in the Art and Antiquities Market*, 30-31.

411 Matthew Sargent et. al., *Tracking and Disrupting the Illicit Antiquities Trade with Open-Source Data*.

**Focus Department of State efforts on continuing to expand Memoranda of Understanding (MOUs) with countries at high risk of being targeted for illicit cultural property trafficking.**

- Although the U.S. has ratified the 1954 Hague Convention for the Protection of Cultural Property and accepted UNESCO's 1970 Convention on illicit trafficking, bilateral MOUs focused on preventing illicit imports and exports of cultural objects between the U.S. and global partners remain essential to implement this convention.<sup>412</sup>
- Currently, the U.S. has MOUs with 33 countries; this list should be revisited and expanded.<sup>413</sup> Some efforts have been made to create a network among the Middle Eastern countries that have MOUs on cultural property with the United States. The Department of State should facilitate international conferences and workshops to develop the relationships that would further these efforts and should pursue multi-party MOUs with states at high risk of cultural property trafficking.<sup>414</sup>

**Work with international partners to harmonize legal codes regarding how illicit cultural property is defined and how it must legally be handled.**

- Presently, countries treat cultural heritage items differently, but standardizing codes across borders will improve international law enforcement efforts.<sup>415</sup>

**Improve training and information sharing among law enforcement.**

- Multiple experts interviewed for this report underscored the need for further training among customs officials, and one stated that rather than placing the onus only on source countries to better secure their cultural property, the emphasis should also be shifted onto destination countries to better identify trafficked objects.<sup>416</sup>
- Law enforcement officials working on cultural property trafficking must be able to identify variations in different types of contraband across time periods and regions; many are also simultaneously working to identify other types of illicit items, such as drugs, and have a limited bandwidth. Thus, officials should receive additional training and resources in how to quickly identify and photograph suspicious cultural objects and should also receive specific training in when to reach out to a cultural property expert for assistance.<sup>417</sup>
- Building connections between law enforcement teams working on arms, drugs, human, and cultural property trafficking is also important, as there is substantial overlap in the groups that engage in these activities and the networks they employ.<sup>418</sup>

412 Dr. Dawn Rogala, Smithsonian Curator, interviewed by Sofia Walsh October 2024.

413 "Current Agreements and Import Restrictions," U.S. Department of State, Bureau of Educational and Cultural Affairs, <https://eca.state.gov/cultural-heritage-center/cultural-property/current-agreements-and-import-restrictions>.

414 Stephen Epstein, Bureau of Near Eastern Affairs, U.S. Department of State, interviewed by Sofia Walsh, November 2024.

415 Stephen Epstein, Bureau of Near Eastern Affairs, U.S. Department of State, interviewed by Sofia Walsh, November 2024.

416 Olivia Whitting, Art Loss Register, interviewed by Sofia Walsh, November 2024.

417 Official at the U.S. Department of State Cultural Heritage Center, interviewed by Sofia Walsh, November 2024.

418 Stephen Epstein, Bureau of Near Eastern Affairs, interviewed by Sofia Walsh, November 2024.

**Facilitate information sharing between countries, particularly between countries that have more well-established institutions and processes to counter cultural property trafficking and those who do not.**

- Italy, given the expertise of its Carabinieri, could serve as an effective partner with the United States to coordinate an international workshop between countries designed to share guidelines and best practices.
- Expanded information sharing beyond international databases like those managed by Interpol and Carabinieri would also improve the global response to this crime.<sup>419</sup>

419 Embassy of Italy to the United States, interviewed by Sofia Walsh, November 2024.

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# CLOSING



To address these challenges effectively, this report outlines targeted policy recommendations, a comprehensive conclusion, sectional methodologies, and detailed appendices.



# Policy Recommendations

## 1. **Expand research**

One critical improvement we have identified is the need for effective databases, as many statistics are shaped by single-source data and lack clear methodology. The limited amount of information available on many of the crimes in this report represents a significant challenge in addressing them. Increases in research and attention from investigative entities would allow for the creation of more targeted and effective policy. Many of these crimes rely on broad assumptions of their operations and size, often years out of date.

## 2. **Enforcement**

In many places, enforcement needs to be updated, reinforced, augmented, and in some cases, begun. As one of the key components of these crimes is their low risk in relation to their profits, increasing the risk can dissuade more individuals from partaking in these crimes.

## 3. **Transparency/International Cooperation**

Greater efforts must be made to internationalize enforcement against these crimes. Criminals use the differences between countries' economies, laws, and enforcement to profit. Countries must work together to share information on criminal activity as well as best practices and investigative techniques. Additionally, countries should work to eliminate criminals' ability to transfer dirty money around the world by updating their own laws and pressuring other countries who allow for such activity to happen in their financial systems. If the criminals cannot move or use their ill-gotten gains, the crimes presented in this analysis will become less attractive.

## 4. **Reduce exploitable populations**

A requirement for many of these crimes are individuals who could be easily exploited to produce a profit for criminals. Work should be done to identify populations at risk of victimization, and to help harden them as targets against criminal exploitation.

## 5. **Reduce Demand**

One of the dark truths of transnational crime is the extent to which it is driven by consumer demand. Demand for items like drugs, keep apparel, wildlife products, or seafood provides gaps in the market for criminals to fill. One of the most effective ways to lower the value of these crimes to illegal actors is to reduce the demand for their products and services.

## 6. **Reduce root causes of crimes**

Finally, one of the most important steps is to address the root causes of crime. Poverty, unemployment, insecurity, and other issues push many into crime who would not have otherwise chosen it. Battling these root causes can reduce the number of individuals who enter into trans-national crime.

# Conclusion

The crimes covered in this report touch every corner of the globe and every country. The population negatively affected by these crimes is massive and diverse, while those who benefit is a small group of criminals. Criminal groups will exploit any vulnerability to make money and avoid responsibility, and cross-border discrepancies in wealth, consumer demand, enforcement, and social support allow for high profits.

Ultimately, the drive for easy money by TCOs hurts millions of individuals around the world. The money produced from these crimes allows for the expansion of those same criminal enterprises, creating a cycle that will grow until it hits the limits imposed by the market and enforcement. As long as there is money to be made, then individuals will engage in these crimes, regardless of the harm caused. The low risk of engaging in these illicit activities only make them more attractive to those willing to do whatever it takes to profit. To stop these crimes, we must be proactive, creative, and willing to outflank TCOs by executing precise actions, making the most of our resources, and targeting them where they are most vulnerable.

Transnational crime is also connected to foreign terrorist organizations (FTOs). Criminal networks often provide funding and logistical support to FTOs through illicit activities such as trafficking and arms smuggling, enabling these groups to finance operations and further destabilize regions. Ultimately, it is the most vulnerable who bear the heaviest burdens of transnational crime; those with the least to lose are often the ones who suffer the most. This reality invites a deeper examination of the moral and economic dimensions of these crimes. While the financial gains from illegal activities may be vast, they do not always reflect the full extent of their human consequences. Crimes like human trafficking and drug trafficking have devastating effects on individuals and communities. In addressing transnational crime, it is crucial to prioritize the human toll and consider the broader moral implications alongside economic factors. Only then can we develop effective and ethically sound strategies to combat these global issues.

These crimes are difficult to fight for a reason. Criminal groups take great efforts to avoid being caught; their ability to prosper is proof that current enforcement is not enough, and the specific ways they exploit the global system show areas where improved enforcement can have disproportionate effects. In particular, the ways in which criminals move, store, and spend ill-gotten gains are both a necessity to engage in transnational crime, and something that is controlled by institutions. Unfortunately, certain authorities allow, facilitate, and even support transnational crime for their own benefit. Greater efforts are needed to identify areas where criminals hide their profits.

This report will serve as a crucial resource for the administration as it formulates policies, allocates investments, and considers sanctions against countries involved in transnational crime. By providing a comprehensive analysis of current trends and challenges, the report offers valuable insights that can inform decision-making and shape future approaches to combating criminal networks. Furthermore, it highlights a significant and often overlooked gap in available data, underscoring the urgent need for enhanced efforts to track, monitor, and analyze transnational crime more effectively. The lack of comprehensive data limits our ability to fully understand the scope of these crimes and their impact on global security, human rights, and economic stability. To address this, the report calls for greater investment in data collection and research, as well as the development of advanced tools and international cooperation to improve crime tracking. By closing this data gap, the administration will be better equipped to design targeted, evidence-based policies that can mitigate the harmful effects of transnational crime and strengthen global security.

# Methodology

## A. Drug Trafficking

1. This report relied on data from the UNODC tables of Drug Seizures 2018-2022, and Price and Purities of Drugs. The average retail price of each drug was coalesced and multiplied by the seizures each region had reported by kilogram. The data was later adjusted for inflation from 2022 to 2024.

## B. Counterfeiting

1. This research is targeted toward finding the total value of the counterfeit goods industry annually. The data collected in this report was collected from primarily open-source platforms such as official government records, United States national news and various media outlets, as well as reports and studies conducted by think tanks and non-governmental organizations.

2. The numbers are an estimated total value of the sale and purchases of counterfeit items per year, across the globe. Much of the estimated values are based on previous years' estimates of total seizures of counterfeit goods. The numbers are then inflated due to the assumption that the production, sale, and trade of illicit goods continues to rise annually.

## C. Cybercrime

1. This study aims to provide a comprehensive overview of cybercrime statistics, utilizing data sourced from official government documents, cyber security company reports, and academic reports.

2. Data was collected from government publications and websites, cybersecurity reports from private companies, and official documents from law enforcement agencies. When statistics were unavailable through national organizations, open-source news outlets and reports provided supplementary data. For figures originally reported in foreign currencies, the research used the October 2024 exchange rate to convert all amounts to U.S. dollars (USD). Potential limitations are acknowledged due to variations in data reporting. Where different formats were presented (such as percentages or absolute figures), both were included to give a comprehensive view of the issue. While this may affect the precision of the estimates, it reflects the best available information.

3. In addition to the data collection process, this research incorporated insights from expert interviews. These included discussions with representatives from the United Nations Office on Drugs and Crime (UNODC), cybersecurity specialists, members of the intelligence community, and academia. These interviews provided valuable quantitative perspectives on cybercrime trends, challenges in combating transnational cyber threats, and recommendations for enhancing international cooperation. The inclusion of these expert opinions added depth to the analysis and helped contextualize the numerical data, enriching the overall understanding of the complexities and evolving nature of cybercrime.

#### **D. Human Trafficking**

1. This review aims to explore human trafficking non-academic sources published since 2014 to examine the current research trends associated with human trafficking and to identify gaps in research. The International Labour Organization (ILO) is virtually the sole provider of comparable data across multiple countries on the economics of forced commercial sexual exploitation and the revenues it generates. The ILO employed a value-added approach to estimate the illegal profits generated from forced labor exploitation. This methodology assumes that under normal conditions, the wages of “free” workers are roughly equivalent to the labor income share of a country’s Gross Domestic Product (GDP). To calculate illegal profits, the ILO compares the labor income share of the value added by forced labor with the actual wages paid to victims, which are often extremely low or non-existent. The difference between these two figures represents the profit traffickers and exploiters earn from forced labor. This approach provides a quantifiable measure of the economic scale of forced labor, highlighting the severe financial exploitation of victims and the substantial illicit gains that fuel this criminal industry.
2. Additionally, personal interviews were conducted to explore various perspectives on human trafficking prevention efforts and conservation strategies, with insights gathered from discussions with a campaign specialist from the Blue Campaign at the Center for Countering Human Trafficking, Department of Homeland Security, a representative responsible for illegal fishing and sustainable fisheries from the World Wide Fund for Nature, and Professor Dan Schneider, an American University faculty member specializing in transnational organized crime.

#### **E. Illegal Logging and Mining**

1. The data in this report has been pulled from a variety of sources, primarily UNODC reports, the World Bank, and the previous Global Financial Integrity report on transnational crime. Unless the year is specifically stated, all dollar value totals are adjusted to account for inflation as of 2024 based on when the data was originally published. It is important to highlight that self-reported statistics from countries can be unreliable as it is nearly impossible to determine the origin of timber and mineral products once they have been extracted. This is because many countries export their goods from nearby countries to avoid high tax rates or international sanctions. Thus, one country’s export statistics may not be indicative of their actual production.

#### **F. Illegal, Unreported, and Unregulated Fishing**

The numbers for the three types of IUU fishing (Illegal, Unreported, and Unregulated, respectively) presented in this report were each estimated using a distinct method. These estimates rely heavily on total fishing number reconstructions conducted by The Sea Around Us, a research project at the University of British Columbia led by Daniel Pauly and Dang Palomares, as well as the academic paper “Estimating the Worldwide Extent of Illegal Fishing” by Agnew et al., published in PLoS ONE in 2009. The price per ton value of fish was determined by reverse engineering the FAO’s 2024 data on total fish catch and total earnings from first sales, then adjusting for growth in value based on changes in the value per ton of fish over the past fifteen years.



## **G. Wildlife Trafficking**

1.A significant challenge in interpreting wildlife trafficking estimates is that many figures are reported without clear methodology or supporting research. Much of the data is recycled from older studies that have not been updated or rigorously verified, leading to inconsistencies and potential inaccuracies in understanding the true scale of the issue.

2.The value estimate presented here is based on a combination of previous reports, re- search articles, and publications from various NGOs. These include the 2017 Global Financial Integrity (GFI) report, which provided a foundation for understanding the history and patterns of wildlife trafficking, and the 2024 UNODC World Wildlife Crime Report, which provided the most updated statistics on wildlife trafficking reports and seizures.

3.After updating the data, the report was updated with peer-reviewed research articles, focusing on global trends and specific regions impacted by wildlife trafficking. Additionally, it is supported by reports and articles published by established NGOs, such as the Worldwide Fund for Nature (WWF) and the African Wildlife Foundation, as these organizations provide an in-depth background of wildlife trafficking. These resources helped identify trafficking trends, key trafficked species, case studies, and the economic impact of the illegal wildlife trade. Lastly, academic professors were consulted to discuss the ambiguous number of wildlife trafficking. These professors confirmed the inability to track down a cohesive estimate for wildlife trafficking.

4.Finding a conclusive number for the scale of wildlife trafficking remains difficult, as the lack of transparent methodology and reliance on outdated or unverified data hinders the accuracy of current estimates. Addressing this challenge requires more rigorous, updated research and standardized reporting practices to develop a clearer picture of the true extent of wildlife trafficking.

## **H. Oil Theft**

1.This report was conducted through research on open sources, including local news, government agency and international institutions' reports, and academia. Subject matter experts were contacted but were unavailable for or declined interviews. Some provided literature they have written on the topic which supplemented the findings of this report.

2.Because of the limited research available on the topic, important sources which support this report are the two working papers published in 2022 by Etienne Romson for the United Nations University World Institute for Development Economics Research, respectively titled "Global Oil Theft: Impact and Policy Responses" and "Countering Global Oil Theft: Responses and Solutions." Other supplemental research included the Transnational Alliance to Combat Illicit Trade's 2023 report, "Exposing Supply Chain Vulnerabilities to Illicit Trade: A Global Report on Dynamics, Hotspots, and Responses Across 10 Sectors" along with the Atlantic Council Global Energy Report by Dr. David Soud, "Downstream Oil Theft: Countermeasures and Good Practices". Other sources included reports from government agencies, local news stations, and journalists, like VerivAfrica, Visual Capitalist, and Radio Free Europe.

3.In this report, 'oil theft' encompasses the physical theft of oil and theft of oil-related money in illegal transactions (fraud, misappropriation, and other illicit activity associated with stolen oil). This is because generally, the study of oil theft lacks public data, information, and analysis. What has been written on the subject is heavily focused on that occurring in Nigeria and Mexico, and most of these sources do not provide estimates of the value of crude oil theft alone and include the value of associated trade and illegal transactions.

4. Because of insider involvement, bribery, extortion, the threat of violence, and fear of persecution, there is a persistent lack of data and practical information on illegal oil taps, artisanal refineries, and oil theft-related accidents which contribute to the overall value of global oil theft. In addition, lack of transparency and underreporting of theft and related incidents like fires, explosions, and spills may result in the underestimation of the scale and severity of oil theft problems, which makes estimating the true global value of oil theft difficult.

5. Because of this lack of transparency, underreporting, and corruption, the fundamental questions below most often go unanswered or are inaccurately answered. Without more research into these fundamental questions, the true value of oil theft will not be uncovered.

- a. How much oil is stolen? How much is crude versus fuel?
- b. How much stolen oil is exported and to which countries are they sold? How much is sold domestically?
- c. How and where is the oil stolen? Which methods and locations are most often employed and exploited by criminal groups, and are these country- or region-specific?
- d. Who is engaging in oil theft? Who is facilitating the theft? Who is financing and trading the stolen oil? How are illegal oil financial transactions conducted?

## **I. Trafficking of Small Arms and Light Weapons**

1. The value of the illicit trade of small arms and light weapons, as well as any other parts or accessories that fall under the definition, was calculated using UN Comtrade export and import data relating directly to arms as a reference for the size of the global arms trade. The global arms trade value was calculated as the sum, in USD, of confirmed imports and exports for the year 2023, and solely those trade flows identified in the database as ‘exports’ or ‘imports,’ not including ‘domestic export,’ ‘foreign import,’ ‘import of goods for inward processing,’ ‘import of goods after outward processing,’ ‘re-import,’ ‘re-export,’ ‘export of goods after inward processing,’ or ‘export of goods for outward processing.’

2. All reporters are included, and the measure is of their trade flows with all world partners within the period of 2023. The data are under the harmonized system (HS) classification, with selected commodity codes for items fitting the SALW description. The HS commodity codes used are as following appendices.

## **J. The Illicit Trade in Cultural Property**

1. As no empirically-sourced data on the global value cultural property trafficking exists, the value estimate presented in this report is based on a compilation of available statistics from law enforcement seizures and reported offenses, a data-driven 2019 report on the size of the EU illicit cultural property market, and a series of interviews conducted with subject matter experts. USD value amounts for reported seizures were collected from relevant press releases. When value estimates for multiple items were reported from one seizure, all reported values were totaled together. When value estimates from seizures were reported in euros, the value was adjusted first for 2024 inflation and then converted to USD.

2. While the other types of transnational crime included in this report have relied largely on a monetary value to estimate trends over recent years, in the case of cultural property, examining available statistics on the number of recorded offenses may also assist in painting a fuller picture of the current illicit market. See the Appendix for further data on cultural property seizures.

# Glossary

AGC	The Gaitanist Self-Defense Forces of Colombia
AI	Artificial intelligence
Ai2	Allen Institute for AI
APT	Advanced Persistent Threats
ASM	Artisanal small-scale mining
ATS	Amphetamine-type stimulants
ATT	Arms Trade Treaty
BEC	Business Email Compromise
C4ADS	Center for Advanced Defense Studies
Cast LA	Coalition to Abolish Slavery and Trafficking based in Los Angeles
CDS	Sinaloa Cartel
CIRCIA	Cyber Incident Reporting for Critical Infrastructure Act
CISA	Cybersecurity and Infrastructure Security Agency
CITES	Convention on International Trade in Endangered Species
CJNG	Cartel Jalisco Nueva Generación
CSIS	Center for Strategic and International Studies
DDoS	Distributed Denial of Service
DEA	Drug Enforcement Administration
DWF	Distant Water Fishing
Ecopetrol	Empresa Colombiana de Petróleo S.A.
EEZ	Exclusive Economic Zones
EIA	Enterprise application integration

EITI	Extractive Industries Transparency Initiative
ELN	National Liberation Army
ELN	National Liberation Army (Colombia)
EU	European Union
FAO	Food and Agriculture Organization of the United Nations
FATF	Financial Action Task Force
FBI	Federal Bureau of Investigation
FOC	Flags of Connivance
FTO	Foreign Terrorist Organizations
GCC	Gulf of Guinea Commission
GDP	Gross domestic product
GFI	Global Financial Integrity
HS	Harmonized system
IACP	International Association of Chief of Police
IC3	Internet Crime Complaint Center
ICE	U.S. Immigration and Customs Enforcement
ICT	Information communications technology
IED	improvised explosive device
ILO	International Labour Organization
IP	Intellectual property
IPOA-IUU	International Plan of Action to Prevent, Deter, and Eliminate Illegal, Unreported, and Unregulated Fishing
ISIS	Islamic State in Iraq and Syria
IUU	Illegal, Unreported, and Unregulated Fishing
JCDC	Joint Cyber Defense Collaborative
JNIM	Jama'at Nasr al-Islam wal-Muslimin
LCD	Lysergic acid diethylamide
LRA	Lord's Resistance Army

MLO	Money laundering organizations
MS-13	Mara Salvatrucha-13
NAMCOR	National Petroleum Corporation of Namibia
NGO	Non-governmental organization
NIS	Network and Information System
NPS	New psychoactive substances
OCG	Organized Crime Groups
OECD	Organization for Economic Co-operation and Development
PEMEX	Mexican state-owned petroleum corporation
PITCH	Preventing Illicit Trafficking of Cultural Heritage
PRC	People's Republic of China
RFMO	Regional Fisheries Management Organizations
RHIPTO	Norwegian Center for Global Analysis
RMFO	Regional Fishery Management Organizations
SALW	Small arms and light weapons
TCO	Transnational Crime Organization
TRACIT	Transnational Alliance to Combat Illicit Trade
UAE	United Arab Emirates
UNESCO	United Nations Educational, Scientific and Cultural Organization
UNODC	United Nations Office on Drugs and Crime
US	United States
US\$	United States dollars
USAID	United States Agency for International Development
USFWS	U.S. Fish and Wildlife Service
VTB Capital	Vneshtorgbank, Russian state-run international bank
WCO	World Customs Organization
WWF	Worldwide Fund for Nature



# Appendices

## C. Cybercrime

U.S. Homeland Security defines **Cybercrime** as any illegal activity carried out using computers or the Internet.<sup>1</sup> There are various types of cybercrime, and new forms are continuously emerging.<sup>2</sup> Interpol points to ransomware, **sextortion**, **DDoS attacks**, **cryptojacking**, **compromised websites**, and **cyber surges** as additional cybercrime threats the organization is addressing.<sup>3</sup>

**Cybercrime** is often confused with the terms cyberattack or cybersecurity. However, there are clear distinctions between cybercrime, cyberattacks, cyber warfare, and cyber threats. Multiple experts interviewed for this research classify **cyberattacks** by their focus on intentional operations, whereas cybercrime is characterized by profit-making activities that are primarily non-governmental in nature.<sup>4</sup> These subcategories extend beyond the broader domains of cybersecurity.

**Cyber espionage**, or **cyber spying**, a type of cyber-attack involving the theft of sensitive data, trade secrets, and intellectual property (IP) for economic gain, competitive advantage, or political reasons.<sup>5</sup> These attacks may be financially motivated or aligned with broader objectives like military operations, cyber terrorism, or warfare, potentially disrupting public services and infrastructure. Common targets include governments, corporations, academic institutions, and individuals such as political leaders and executives, with stolen assets ranging from technology to military intelligence.

That said, there are gray areas, particularly in cases like North Korea. Recent years have seen an increase in state-led or systematic attacks with the goal of generating national profits. This blurs the line between cybercrime and cyberattacks, illustrating how the evolving nature of cyber threats is giving rise to new complexities and dimensions in the field of cybercrime.

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<sup>1</sup> "Cybercrime," U.S. Department of Homeland Security, accessed October 21, 2024, <https://www.dhs.gov/hsi/investigate/cybercrime>.

<sup>2</sup> "Cybercrime," United Nations Office on Drugs and Crime (UNODC) and Education for Justice, accessed November 4, 2024, <https://www.unodc.org/e4j/en/mun/crime-prevention/cybercrime.html>.

<sup>3</sup> "Cybercrime Operations," INTERPOL, accessed November 4, 2024, <https://www.interpol.int/Crimes/Cybercrime/Cybercrime-operations>.

<sup>4</sup> Alazab, M., & Tang, M. (2021). "A survey of cybercrime detection: A machine learning approach." *Procedia Computer Science*, 181, 146-153. Accessed November 17, 2024, <https://www.sciencedirect.com/science/article/pii/S2352484721007289>.

<sup>5</sup> CrowdStrike, "Cyber Espionage," *CrowdStrike*, accessed November 24, 2024, [https://www.crowdstrike.com/en-us/cybersecurity-101/threat-intelligence/cyber-espionage/?srsltid=AfmBOopKcoAH5eysHrWQEPBxaiaOGB0YmxUzTshuNY\\_ol55HmlHwE10t](https://www.crowdstrike.com/en-us/cybersecurity-101/threat-intelligence/cyber-espionage/?srsltid=AfmBOopKcoAH5eysHrWQEPBxaiaOGB0YmxUzTshuNY_ol55HmlHwE10t).

**Table E. Cybercrime, Cyberattacks, and Cyber Espionage**

Types	Definition	Motivation	Targets	Examples	Cases
<b>Cybercrime</b>	Illegal activities carried out using computers or the internet.	Profit-making, primarily non-governmental.	Individuals, businesses, organizations.	Ransomware, Sextortion, Cryptojacking, DDoS Attacks.	WannaCry Ransomware Attack (2017) <sup>6</sup>
<b>Cyberattacks</b>	Deliberate attempts to disrupt, damage, or gain unauthorized access to systems, networks, or devices.	Intentional operations, often politically or militarily motivated.	Governments, infrastructure, corporations, and individuals.	Distributed Denial of Service (DDoS), malware campaigns, hacking critical infrastructure.	Stuxnet (2010) <sup>7</sup>
<b>Cyber Espionage</b>	Theft of sensitive data, trade secrets, or IP for economic, political, or competitive advantage.	Economic gain, political leverage, military objectives.	Governments, corporations, academic institutions, think tanks, political leaders, and military entities.	Theft of R&D data, blueprints, military intelligence; use of Advanced Persistent Threats (APTs).	Solarwinds Attack(2020) <sup>8</sup>

**Table F. Definition of Cybercrime**

Organization	Definition
Homeland Security Investigations	any illegal activity carried out using computers or the internet
European Commission	consists of criminal acts committed online by using electronic communications networks and information systems.
INTERPOL	offences that can only be committed using a computer, computer networks or other form of information communications technology (ICT)
Britannica	the use of a computer as an instrument to further illegal ends, such as committing fraud, trafficking in child pornography and intellectual property, stealing identities, or violating privacy
International Association of Chief of Police (IACP)	Crimes targeting individuals, corporations, and institutions through the use of computer technology are a growing threat to personal and national security

**Table G. Reported cases of cybercrime and estimated damage in 2023**

Country	Reported Cases (2023)	Estimated Damage (USD)
Australia <sup>9</sup>	94,000	139,620

<sup>6</sup> Cybersecurity and Infrastructure Security Agency (CISA), *NCCIC ICS Fact Sheet: WannaCry Ransomware*, accessed November 24, 2024, [https://www.cisa.gov/sites/default/files/FactSheets/NCCIC%20ICS\\_FactSheet\\_WannaCry\\_Ransomware\\_S508C.pdf](https://www.cisa.gov/sites/default/files/FactSheets/NCCIC%20ICS_FactSheet_WannaCry_Ransomware_S508C.pdf).

<sup>7</sup> "Stuxnet," *Council on Foreign Relations (CFR)*, accessed November 24, 2024, <https://www.cfr.org/cyber-operations/stuxnet>.

<sup>8</sup> National Cyber Security Centre (NCSC), "SolarWinds," *NCSC Annual Review 2021*, accessed November 24, 2024, <https://www.ncsc.gov.uk/collection/ncsc-annual-review-2021/the-threat/solarwinds>.

<sup>9</sup> Australian Signals Directorate, *ASD Cyber Threat Report, 2022-2023*, p.11-12,

Canada <sup>10</sup>	93,068	3.63 billion <sup>11</sup>
Germany <sup>12</sup>	136,865	300 billion <sup>13</sup>
France	-	93.46 billion <sup>14</sup>
India <sup>15</sup>	1,556,220	20 million (2024) <sup>16</sup>
Poland <sup>17</sup>	43,785	-
South Korea <sup>18</sup>	230,355	208 million (2021) <sup>19</sup>
Spain <sup>20</sup>	427,448	49.42 billion <sup>21</sup>
United Kingdom	14,771 (Q1+Q2) <sup>22</sup>	320 billion <sup>23</sup>
United States <sup>24</sup>	880,418	12.5 billion

Table G presents a direct compilation of statistics published by governments and agencies with comparable levels of public trust. However, the scope of laws and regulations defining cybercrime varies across countries, as do the

<https://www.cyber.gov.au/sites/default/files/2023-11/asd-cyber-threat-report-2023.pdf>.

<sup>10</sup> Statista. "Number of Police-Reported Cybercrime Incidents in Canada from 2014 to 2023." Accessed November 3, 2024. <https://www.statista.com/statistics/613374/police-reported-cybercrimes-canada/>.

<sup>11</sup> "Annual Cost of Cybercrime in Canada 2017-2028" Statista, March 19, 2024, <https://www.statista.com/forecasts/1457244/canada-cybercrime-cost-annual>.

<sup>12</sup> Statista. "Number of Cyber Crime Cases Recorded by Police in Germany from 2010 to 2021." Accessed November 3, 2024. <https://www.statista.com/statistics/1360141/cyber-crime-cases-recorded-police-germany/>.

<sup>13</sup> Reuters. "Cybercrime, Sabotage Cost German Firms \$300 Billion in the Past Year." August 28, 2024. <https://www.reuters.com/technology/cybersecurity/cybercrime-sabotage-cost-german-firms-300-bln-past-year-2024-08-28/>

<sup>14</sup> Statista. "Forecast: Cost of Cybercrime in France from 2020 to 2027." Accessed November 3, 2024. <https://www-statista-com.eu1.proxy.openathens.net/forecasts/1398948/france-cyber-crime-cost-annual>.

<sup>15</sup> Statista. "Number of Cyber Crime Cases Reported to the Indian Cyber Crime Coordination Centre (I4C) from 2020 to 2023." Accessed November 3, 2024. <https://www.statista.com/statistics/1499739/india-cyber-crime-cases-reported-to-i4c/>.

<sup>16</sup> Statista. "Cyber Crime in India." Accessed November 3, 2024. <https://www.statista.com/topics/5054/cyber-crime-in-india/>.

<sup>17</sup> Statista. "Cyber Crime and Cyber Security in Poland." Accessed November 3, 2024, <https://www-statista-com.eu1.proxy.openathens.net/study/66683/cyber-crime-and-cyber-security-in-poland/>.

<sup>18</sup> "2023 Cyber Crime Trends," Republic of Korea, 2023, [https://www.police.go.kr/user/bbs/BD\\_selectBbs.do?q\\_bbsCode=1001&q\\_bbscttSn=20230317103332394](https://www.police.go.kr/user/bbs/BD_selectBbs.do?q_bbsCode=1001&q_bbscttSn=20230317103332394)

<sup>19</sup> National Police Agency of South Korea. *Cybercrime Financial Damages 2021*. Accessed November 3, 2024. <https://www.police.go.kr/viewer/skin/doc.html?fn=bb7b3ddb-29a2-4906-b6f5-6b9d0bcf1f37.pdf&rs=/viewer/202411>

<sup>20</sup> Statista. "Most Reported Crimes in Spain in 2023." Accessed November 3, 2024. <https://www.statista.com/statistics/1487883/spain-most-reported-crimes/>.

<sup>21</sup> Statista. "Forecast: Cost of Cybercrime in Spain from 2020 to 2027." Accessed November 3, 2024. <https://www-statista-com.eu1.proxy.openathens.net/forecasts/1429612/spain-cybercrime-cost-annual>.

<sup>22</sup> Money.co.uk. "Fraud Report." Accessed November 3, 2024. <https://www.money.co.uk/credit-cards/fraud-report>.

<sup>23</sup> Statista. "Forecast: Cost of Cybercrime in the United Kingdom from 2020 to 2027." Accessed November 3, 2024. <https://www.statista.com/forecasts/1425776/uk-cybercrime-cost-annual>.

<sup>24</sup> Internet Crime Complaint Center (IC3). "2023 Internet Crime Complaint Center Report." Accessed November 3, 2024. [https://www.ic3.gov/AnnualReport/Reports/2023\\_IC3Report.pdf](https://www.ic3.gov/AnnualReport/Reports/2023_IC3Report.pdf).

institutions responsible for its regulation, leading to significant differences in the data. For example, in the United States, the FBI's IC3 investigation criteria are utilized, while in the United Kingdom, the National Cyber Strategy provides separate statistics for cybercrime and cybersecurity, managed by distinct agencies. These differences result in varying outcomes. Consequently, most data from other countries rely on statistics provided by Statista for consistency.

**Table H. Most Frequent types of cybercrime**

Country	Primary Threats	Secondary Threats
Australia <sup>25</sup>	Fraud and Scam	Identity Theft
Canada <sup>26</sup>	Scam	Child Sexual Abuse Material (CSAM)
China <sup>27</sup>	Fraud	Crime of Aiding information
Germany <sup>28</sup>	Ransomware	Phishing
France <sup>29</sup>	Ransomware	Phishing
India <sup>30</sup>	Phishing	Compromised Credentials
Poland <sup>31</sup>	Phishing	Ransomware
South Korea <sup>32</sup>	Cyber Fraud	Cyber defamation
Spain <sup>33</sup>	Phishing	Ransomware
United Kingdom <sup>34</sup>	Phishing	Ransomware
United States <sup>35</sup>	Phishing	Ransomware

**Table I. Estimated Annual Global Cost of Cybercrime Annually**

Source	Estimated Cost of Cybercrime (USD)	Year
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<sup>25</sup> Isabella Voce and Anthony Morgan, "Cybercrime in Australia 2023," Australian Institute of Criminology, 2023, <https://doi.org/10.52922/sr77031>.

<sup>26</sup> Ani Petrosyan, "The Impact of Cybercrime on Internet Users in Canada - Statistics & Facts," Statista, March 26, 2024, <https://www.statista.com/topics/4574/cyber-crime-in-canada/>

<sup>27</sup> Statista. "Cybersecurity in China" Assessed November 3, 2024.

<https://www-statista-com.eu1.proxy.openathens.net/study/146893/cybersecurity-in-china/>

<sup>28</sup> "The State of IT Security in Germany," Federal Office for Information Security, [https://www.bsi.bund.de/EN/Service-Navi/Publikationen/Lagebericht/lagebericht\\_node.html](https://www.bsi.bund.de/EN/Service-Navi/Publikationen/Lagebericht/lagebericht_node.html).

<sup>29</sup> ANSSI. "ANSSI Publishes 2023 Cyber Threat Overview." Accessed November 3, 2024.

<https://cyber.gouv.fr/en/actualites/anssi-publishes-2023-cyber-threat-overview>.

<sup>30</sup> "Indian Cybercrime Coordination Centre - I4C," Government of India, 2024.

<https://services.india.gov.in/service/detail/indian-cybercrime-coordination-centre-i4c>

<sup>31</sup> European Union Agency for Cybersecurity (ENISA). "CB23-11: Threat Landscape 2023." Accessed November 3, 2024. <https://cert.europa.eu/publications/threat-intelligence/cb23-11/>.

<sup>32</sup> "2023 Cyber Crime Trends," Republic of Korea, 2023,

[https://www.police.go.kr/user/bbs/BD\\_selectBbs.do?q\\_bbsCode=1001&q\\_bbscttSn=20230317103332394](https://www.police.go.kr/user/bbs/BD_selectBbs.do?q_bbsCode=1001&q_bbscttSn=20230317103332394)

<sup>33</sup> Comparitech. "Spain Cyber Security Statistics." Accessed November 3, 2024.

<https://www.comparitech.com/blog/information-security/spain-cyber-security-statistics/>.

<sup>34</sup> "Cyber Security Breaches Survey 2023," GOV.UK, April 18, 2023,

<https://www.gov.uk/government/statistics/cyber-security-breaches-survey-2023/cyber-security-breaches-survey-2023>.

<sup>35</sup> Internet Crime Complaint Center (IC3). "2023 Internet Crime Complaint Center Report." Accessed November 3, 2024. [https://www.ic3.gov/AnnualReport/Reports/2023\\_IC3Report.pdf](https://www.ic3.gov/AnnualReport/Reports/2023_IC3Report.pdf)

CSIS <sup>36</sup>	>1 trillion	2020
Cybersecurity Ventures <sup>37</sup>	9.5 trillion	2024
Statista <sup>38</sup>	9.22 trillion	2024
World Economic Forum <sup>39</sup>	10.5 trillion	2025

### Types of cybercrime

- **Fraud:** Fraud is the most frequent cybercrime, and the types of fraud are various. Cyber fraud refers to a situation in which someone uses the Internet to get money or goods from people illegally by tricking them.<sup>40</sup> If the fraudulent activity is specifically aimed at stealing money or financial benefits from others, it is referred to as a **scam**.<sup>41</sup> **Spoofing** refers to someone impersonating another person to interact for their own purposes. **Phishing**, on the other hand, is designed to deceive individuals into providing information or resources that the perpetrator would not otherwise have access to, typically for financial or informational gain.<sup>42</sup> Phishing was the most frequent crime type in the United States in 2023.<sup>43</sup>
- **Non-payment/non-delivery (advance payment fraud):**<sup>44</sup> This fraud involves financial transactions for products or services. It is a method of receiving money in advance as a seller or buyer, executing a transaction, not delivering goods or services, or receiving and paying for goods or services in advance. It is often done using excessive advertising and social media.
- **Business email compromise:**<sup>45</sup> This method is one of the most used forms of fraud today. It involves sending emails that impersonate others by using previously stolen email addresses and personal information. While financial theft is a common goal, more recent schemes involve collecting information from platforms like LinkedIn and embedding malicious links or attachments in emails, which lead to hacking attempts when opened by the recipient.<sup>46</sup>

<sup>36</sup> Center for Strategic and International Studies (CSIS). "The Hidden Costs of Cybercrime." Accessed November 3, 2024. <https://www.csis.org/analysis/hidden-costs-cybercrime>.

<sup>37</sup> Freeze, Di. 2021. "Cybercrime to Cost the World \$10.5 Trillion Annually by 2025." *Cybercrime Magazine*. April 27, 2021. <https://cybersecurityventures.com/cybercrime-damage-costs-10-trillion-by-2025/>.

<sup>38</sup> Anna Fleck, "Cybercrime Expected to Skyrocket in Coming Years." *Statista Daily Data*, February 22, 2024, <https://www.statista.com/chart/28878/expected-cost-of-cybercrime-until-2027/>.

<sup>39</sup> World Economic Forum. "New Global Rules to Crack Down on Cybercrime." January 2023. <https://www.weforum.org/stories/2023/01/global-rules-crack-down-cybercrime/>

<sup>40</sup> "Cyberfraud," Cambridge Dictionary, accessed October 21, 2024, <https://dictionary.cambridge.org/us/dictionary/english/cyberfraud>

<sup>41</sup> "Types of Scams," Australian Government, accessed October 21, 2024, <https://www.cyber.gov.au/learn-basics/watch-out-threats/types-scams>

<sup>42</sup> "Spoofing and Phishing," Federal Bureau of Investigation, August 17, 2024, <https://www.fbi.gov/how-we-can-help-you/scams-and-safety/common-frauds-and-scams/spoofing-and-phishing>.

<sup>43</sup> Internet Crime Complaint Center (IC3). "2023 Internet Crime Complaint Center Report." Accessed November 3, 2024. [https://www.ic3.gov/AnnualReport/Reports/2023\\_IC3Report.pdf](https://www.ic3.gov/AnnualReport/Reports/2023_IC3Report.pdf).

<sup>44</sup> "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology." n.d. <https://www.interpol.int/News-and-Events/News/2024/INTERPOL-Financial-Fraud-assessment-A-global-threat-boosted-by-technology>

<sup>45</sup> "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology," INTERPOL, March 11, 2024, <https://www.interpol.int/News-and-Events/News/2024/INTERPOL-Financial-Fraud-assessment-A-global-threat-boosted-by-technology>.

<sup>46</sup> "Phishing Emails," LinkedIn, accessed October 21, 2024, <https://www.linkedin.com/help/linkedin/answer/a1339266>



- **Investment fraud:**<sup>47</sup> This type of scam promises high returns by using pyramid schemes, multi-level marketing, Ponzi schemes, and cryptocurrencies to deceive individuals and generate financial gains. The scammers often pose as legitimate organizations and recruit victims through various communication channels, including social media.
- **Romance fraud (scam):**<sup>48</sup> Romance scams, which have seen a sharp rise in recent years, involve perpetrators approaching victims through social media, dating apps, or messaging platforms, pretending to form romantic relationships. The goal is to manipulate victims into providing money or financial benefits. In some cases, scammers escalate their crimes to include threats, manipulation, or even human trafficking.
- **Identity fraud:**<sup>49</sup> This method involves using technologies like phishing and smishing, as well as physical information theft and system breaches, to steal personal information, which is then exploited. While this stolen information is often used for financial gain, it can also be used for other criminal activities, such as romance scams.
- **Malware:** **Malware** is harmful software installed on a user's device without permission or knowledge. **Viruses, spyware and ransomware** are common types of malware, which continue to evolve.<sup>50</sup>
- **Ransomware:** Ransomware is a type of malware restricting user's access to their own data, threatening data destruction without payment or financial profit.<sup>51</sup> It is one of the most widespread tools used by cybercriminals for various malicious purposes. The annual cost of ransomware attacks is expected to rise, reaching US\$265 billion by 2031.<sup>52</sup> In 2023, FBI IC3 received 2,825 ransomware complaints with costs of more than US\$59.6 million in the United States.<sup>53</sup>
- **Personal Data Breach:** A data breach is the unauthorized acquisition of electronic personal information. Cybercriminals target a wide range of personal information for various purposes, including Social Security numbers, license numbers, and other sensitive data.<sup>54</sup> The unauthorized release of protected personal information could erode public trust. Once exposed, such data is often used in malicious sources such as identity theft, scams or phishing attacks.<sup>55</sup>
- **Cyberterror and cyber threats:** Cyber-criminals and cyber-terrorists differ in their motives,<sup>56</sup> but both exploit the open nature of the internet to harm others. Some aim to gather intelligence for adversaries, inflict damage, or manipulate individuals and organizations for personal or strategic gains. As society becomes more digitized, attacks targeting important servers and systems could decrease the efficiency of emergency responses due to compromised systems.<sup>57</sup>

<sup>47</sup> INTERPOL, "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology."

<sup>48</sup> INTERPOL, "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology."

<sup>49</sup> INTERPOL, "INTERPOL Financial Fraud Assessment: A Global Threat Boosted by Technology."

<sup>50</sup> "Malware: How to Protect Against, Detect, and Remove It," Consumer Advice, October 11, 2024, <https://consumer.ftc.gov/articles/malware-how-protect-against-detect-and-remove-it#what>.

<sup>51</sup> Di Freeze, "Cybercrime to Cost the World \$10.5 Trillion Annually by 2025" *Cybercrime Magazine*, April 27, 2021, <https://cybersecurityventures.com/cybercrime-damage-costs-10-trillion-by-2025/>.

<sup>52</sup> "Cybersecurity Ventures Report on Cybercrime." eSentire Inc., August 29, 2024, <https://www.esentire.com/cybersecurity-fundamentals-defined/glossary/cybersecurity-ventures-report-on-cybercrime>.

<sup>53</sup> Internet Crime Complaint Center (IC3). "2023 Internet Crime Complaint Center Report." Accessed November 3, 2024. [https://www.ic3.gov/AnnualReport/Reports/2023\\_IC3Report.pdf](https://www.ic3.gov/AnnualReport/Reports/2023_IC3Report.pdf).

<sup>54</sup> "Requirements of the District's Data Breach Notification Law," Office of the Attorney General of the District of Columbia, accessed October 21, 2024, <https://oag.dc.gov/about-oag/laws-legal-opinions/requirements-districts-data-breach-notification>.

<sup>55</sup> "Cybercrime," U.S. Department of Homeland Security, accessed October 21, 2024, <https://www.dhs.gov/hsi/investigate/cybercrime>.

<sup>56</sup> "Introduction to Cyber-Crime and Cyber-Terrorism," Federal Bureau of Investigation, accessed October 21, 2024, [https://ww3.ca2.uscourts.gov/docs/jc\\_reports/2014/3\\_Intro\\_to\\_Cyber\\_Crime.pdf](https://ww3.ca2.uscourts.gov/docs/jc_reports/2014/3_Intro_to_Cyber_Crime.pdf)

<sup>57</sup> "Cybercrime," U.S. Department of Homeland Security.

- **DDoS Attacks: Distributed Denial of Service (DDoS) attacks** make online servers slow or unavailable by overwhelming it with traffic from multiple locations and sources.<sup>58</sup> These DDoS attacks have become increasingly sophisticated and intense, leading to slow website response times, intermittent service disruptions, and negative impacts on back-office operations. In some cases, attackers used DDoS as a diversion while committing fraud, such as initiating fraudulent wire transfers with stolen credentials. This poses a serious risk to financial institutions, stock markets, and banks, as recovery from such attacks can result in significant financial costs.<sup>59</sup>
- **Digital Infringement:** Infringement focuses on the unauthorized use of intellectual property. Downloading information without authorized permission or access from the owner may violate copyright law.<sup>60</sup> Intellectual properties including copyrights, patents, and trademarks are often easily invaded and distributed online.<sup>61</sup> This could undermine important advantages in innovation and creativity, fund TCO networks in counterfeit and pirated products, and hinder the economic development of countries worldwide.<sup>62</sup>

## D. Human Trafficking

### Current Challenges in Combating Human Trafficking

The United Nations Global Report on Trafficking in Persons from 2023 published eleven key findings that highlight major challenges across the sector of human trafficking:

1. The number of detected victims (victims identified through law enforcement efforts or those who managed to escape) fell for the first time in 20 years as the pandemic limited opportunities and potentially pushed trafficking further underground, while hindering law enforcement's ability to target the crime.
2. Trafficking for sexual exploitation was less detected during the pandemic. The closure of public spaces may have forced this form of trafficking into less visible and more hazardous locations, making it more concealed and difficult to detect.
3. Victims relied on "self-rescue" as anti-trafficking responses fall short.
4. Global slowdown in convictions accelerated during the COVID-19 pandemic.
5. Increased impunity in home countries resulted in more victims being trafficked to more destinations.
6. War and armed conflicts continued to offer hunting grounds for traffickers. Armed groups in conflict zones often use trafficking as a tactic to establish territorial control and instill fear among civilians. Displaced populations are particularly vulnerable, with

<sup>58</sup> "Know the Types of Cyber Threats." Government of the Commonwealth of Massachusetts, accessed October 21, 2024, <https://www.mass.gov/info-details/know-the-types-of-cyber-threats>

<sup>59</sup> Federal Financial Institutions Examination Council, *Joint Statement Distributed Denial-of-Service (DDoS) Cyber-Attacks, Risk Mitigation, and Additional Resources*, accessed October 21, 2024, <https://www.ffiec.gov/press/PDF/FFIEC%20DDoS%20Joint%20Statement.pdf>

<sup>60</sup> Congressional Research Service, "Cybercrime: An Overview of the Federal Computer Fraud and Abuse Statute and Related Federal Criminal Laws," October 15, 2024, <https://crsreports.congress.gov/product/pdf/RL/97-1025>

<sup>61</sup> United Nations Office on Drugs and Crime (UNODC) and Education for Justice. "Cybercrime Module 11 Key Issues: Types of Intellectual Property." <https://www.unodc.org/e4j/en/cybercrime/module-11/key-issues/types-of-intellectual-property.html>

<sup>62</sup> "Cybercrime and Intellectual Property Crime," United States Department of State, accessed October 21, 2024, <https://2017-2021.state.gov/cybercrime-and-intellectual-property-crime/>

Syrian and Iraqi refugees, as well as Afghans and Rohingya fleeing conflict and persecution, being actively targeted. Evidence also shows that refugees traveling through conflict regions, such as Libya and parts of sub-Saharan Africa, continued to face significant risks. In Libya, for instance, militias oversee detention centers for migrants and refugees, exploiting detained individuals for various forms of coercion and exploitation.

7. Climate change multiplied trafficking risks.
8. Boys and men accounted for a greater share of detected victims as new forms of exploitation emerge.
9. Women and children suffered greater violence at the hands of traffickers.
10. More highly organized traffickers exploited more victims, more violently, and for longer periods of time.
11. Women were more likely than men to be traffickers or more likely than men to be convicted. This is due to the range of psychological and social factors. Additionally, women and children were more vulnerable to abduction. They may be promised higher paying jobs, access to education, and they are easier to manipulate. Additionally, children might not have birth records which means it is easier to hide them.

Pandemic restrictions may have pushed certain forms of trafficking into more concealed locations, increasing the risks for victims and reducing the likelihood of their detection by authorities. Additionally, the UNODC indicates that institutions are frequently failing to identify, protect, and track victims or provide them with justice. The global decline in trafficking convictions, which had already been decreasing since 2017, worsened during the pandemic, with a sharp 27 percent drop in 2020 compared to the previous year.

## F. Illegal, Unreported, and Unregulated Fishing

The numbers for the three types of IUU fishing (Illegal, Unreported, and Unregulated, respectively) presented in this report were each estimated using a distinct method. These estimates rely heavily on total fishing number reconstructions conducted by *The Sea Around Us*, a research project at the University of British Columbia led by Daniel Pauly and Dang Palomares, as well as the academic paper *Estimating the Worldwide Extent of Illegal Fishing* by Agnew et al., published in *PLoS ONE* in 2009. The price per ton value of fish was determined by reverse engineering the FAO's 2024 data on total fish catch and total earnings from first sales, then adjusting for growth in value based on changes in the value per ton of fish over the past fifteen years.<sup>63</sup>

Value:

1. **Illegal fishing:** The current total amount of fish worldwide was first estimated by determining a ratio of unreported to reported catch using *The Sea Around Us* data, which extends to 2019.<sup>64</sup> This ratio was applied to the current FAO catch numbers.<sup>65</sup> The illegal fishing ratio, as determined by Agnew et al., was then applied to the 2024 total catch estimate.<sup>66</sup>

<sup>63</sup> "The State of World Fishers," Food and Agriculture Organization of the United Nations, 2024, xxii.

<sup>64</sup> "Global Catch," *Sea Around Us*, 2019,

<sup>65</sup> "The State of World Fishers," Food and Agriculture Organization of the United Nations.

<sup>66</sup> David J. Agnew et al., "Estimating the Worldwide Extent of Illegal Fishing," *PLoS ONE*, 2009,

2. **Unreported fishing:** This number was calculated by applying the unreported ratio (as determined using *The Sea Around Us* data)<sup>67</sup> to the 2024 total catch estimate. Adjustments to the unreported ratio were made by analyzing the rate of change for the five years prior to 2019 and projecting this trend to 2024.
3. **Unregulated fishing:** This number was roughly estimated by applying the ratio of fishing that occurs in international waters, as reported by *The Sea Around Us*, and then applying a rate of change observed in the previous five years and projecting it to 2024.<sup>68</sup> This approach was adopted due to a lack of more precise data on unregulated fishing. The underlying rationale was that most fishing in international waters is unregulated, even though a significant portion target regulated species such as certain tunas, and fishing in international waters constitutes a smaller portion of total fishing. As a rough analog, this estimate assumes that fishing of unregulated species within exclusive economic zones (EEZs) mirrors the dynamics of unregulated fishing in international waters.

#### Limitations:

1. This assessment employs fundamentally different methods and data sources compared to previous evaluations, making it challenging to compare results and detect trends. However, since prior assessments relied on ratios calculated in 2009, the loss of comparability is not as significant as it might initially seem.
2. The report depends on the illegal fishing ratio calculated in 2009 by Agnew et al., which used data from even earlier years. The lack of recent primary research into illegal fishing makes it difficult to identify changes or trends in this domain.
3. The report treats the three types of IUU fishing as separate categories and provides a number for each, even though certain fishing activities may fall into more than one category. For instance, not all unreported fishing is illegal, and not all illegal fishing is unreported. While this approach may inflate the higher-end estimates, it was deemed preferable to attempting disaggregation, which would risk undercounting.
4. Estimating unregulated fishing is very difficult due to variability in regulations depending on location, season, and other factors, meaning a definitive list of what is unregulated does not currently exist publicly. The analog used likely underestimates the actual size of unregulated fishing but was chosen as the best available method given the lack of precise data.

#### Graphs:

1. The graph that shows the changes in IUU values assessments over time takes its values from three sources: This reports' 2024 assessment (calculated as shown above); Global Financial Integrity's 2017 report, *Transnational Crime and the Developing World*, which replicated the method of Agnew et al. with updated data; and the 2009 academic article *Estimating the Worldwide Extent of Illegal Fishing* by Agnew et al. It is worth noting that this article relied on data that was several years old by the time the article was published. All values were not adjusted for inflation.

**Table J: The value of size of IUU fishing.**

Type	High Value	Low Value	High Tonnage (Million Tons)	Low Tonnage (Million Tons)
Illegal	\$46.8 b	\$19.7 b	28.7	12.1

<sup>67</sup> "Global Catch," *Sea Around Us*.

<sup>68</sup> "Global Catch," *Sea Around Us*.

Unreported	\$44.9 b	\$42.4 b	27.4	26
Unregulated	\$8.5 b	\$4.3 b	5.2	2.6

**Table K: IUU value compared to previous estimates (without unregulated fishing)**

IU Value (without unregulated catch)	High Value (USD Billions) (Not adjusted for inflation)	Low Value (USD Billions) (Not adjusted for inflation)
Assessed Value 2024	\$91	\$62.1
Assessed Value 2017 <sup>69</sup>	\$36	\$15
Assessed Value 2009 <sup>70</sup>	\$23.5	\$10

**Table L: HS Commodity Codes**

HS 9301	Military weapons; other than revolvers, pistols and arms of heading no. 9307
HS 9302	Revolvers and pistols; other than those of heading no. 9303 or 9304
HS 9303	Firearms; other similar devices (e.g. sporting shotguns and rifles, muzzle-loading firearms, very pistols, devices for firing flares or blank ammunition, captive bolt humane killers, line throwing guns)
HS 9305	Firearms; parts and accessories, of revolvers or pistols
HS 9306	Bombs, grenades, torpedoes, mines, missiles and similar munitions of war and parts thereof; cartridges and other ammunition, projectiles and parts thereof, including shot and cartridge wads

<sup>69</sup> Channing May, "Transnational Crime and the Developing World," Global Financial Integrity, 2017.

<sup>70</sup> David J. Agnew et al., "Estimating the Worldwide Extent of Illegal Fishing," PLoS ONE, 2009,



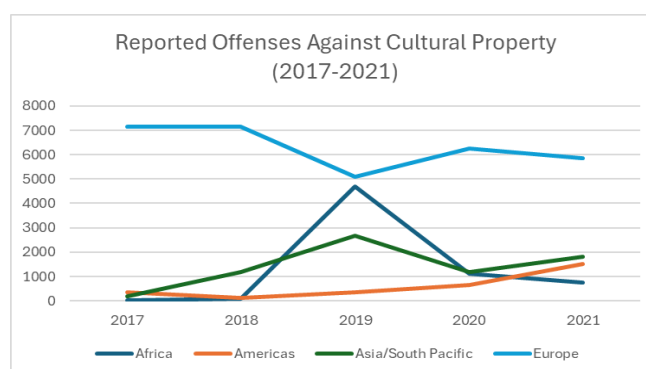
## J. The Illicit Trade in Cultural Property

### INTERPOL Seizure and Offense Data

Interpol data from 2017 to 2021 suggests that the number of reported offenses against cultural property has fluctuated slightly during this time frame with few consistent upwards or downwards trends. The exception is the Americas region, where reported offenses against cultural property have been steadily increasing, and Africa, which reported a large increase in cultural property offenses in 2019 before a sharp drop (see Figure 25).<sup>71</sup>

This data is limited; Interpol states that reporting practices vary across the countries who participated in this research and that not all countries have equal ability to track and access statistics on cultural heritage crime.<sup>72</sup> It remains possible that additional offenses against cultural property were committed and simply not discovered or reported to Interpol. Additionally, more recent data from 2022 and 2023 was not available on Interpol's website.

**Figure 25: Trends in Annual Reported Offenses Against Cultural Property by Region (2017-2021)**<sup>73</sup>



**Table M: Interpol Statistics on Annual Reported Offenses Against Cultural Property by Region (2017-2021)**<sup>74</sup>

Year	Africa	Americas	Asia/South Pacific	Europe
2017	9	354	181	7163
2018	88	105	1168	7162
2019	4681	358	2659	5088
2020	1104	668	1179	6251
2021	750	1512	1824	5861

<sup>71</sup> INTERPOL, *Assessing Crimes Against Cultural Property*, 2020, (Interpol, 2020), 10-11; and INTERPOL, *Assessing Crimes Against Cultural Property*, 2021, (Interpol, 2021), 8-9.

<sup>72</sup> INTERPOL, *Assessing Crimes Against Cultural Property*, 2020, 4.

<sup>73</sup> INTERPOL, *Assessing Crimes Against Cultural Property*, 2020, 10-11; and INTERPOL, *Assessing Crimes Against Cultural Property*, 2021, 8-9.

<sup>74</sup> INTERPOL, *Assessing Crimes Against Cultural Property*, 2020, 10-11; and INTERPOL, *Assessing Crimes Against Cultural Property*, 2021, 8-9.

## Seizure Data, Manhattan District Attorney's Office

The U.S. is the largest art market in the world and the Manhattan District Attorney's office is well-known for its emphasis on combating illegal cultural property trafficking. The table below presents data on the estimated value of the office's seizures from October 2023 to November 2024. This data is a limited snapshot into the possible value of this crime on the global scale.

**Table N: Cultural Property Seizures, Manhattan District Attorney's Office, October 2023-November 2024**

Date	Country found	Country of Origin	Number of Objects	Estimated Value, USD	Description
11/14/2024	United States	India	1,440	10 million <sup>75</sup>	Sculptures, other
11/12/2024	United States	Türkiye	14	8.3 million <sup>76</sup>	Sculptures, coins, other
5/22/2024	United States	Pakistan	133	14 million <sup>77</sup>	Gold coin, Buddhist sculptures, other
5/2/2024	United States	Egypt	10	1.4 million <sup>78</sup>	Vase, coffin face, other
4/26/2024	United States	Cambodia, India	27	3 million <sup>79</sup>	Bronze sculptures, stone relief, other
12/15/2023	United States	Greece	30	3.7 million <sup>80</sup>	Marble figures, Corinthian helmet, other
12/6/2023	United States	Türkiye	41	Over 8 million <sup>81</sup>	Busts, silver statuette, other

<sup>75</sup> "D.A. Bragg Announces The Return Of More Than 1,400 Antiquities To The People Of India," Manhattan District Attorney's Office, November 13, 2024, <https://manhattanda.org/d-a-bragg-announces-the-return-of-more-than-1400-antiquities-to-the-people-of-india/>.

<sup>76</sup> "D.A. Bragg Announces Return Of 14 Antiquities To The People Of Türkiye," September 12, 2024, <https://manhattanda.org/d-a-bragg-announces-return-of-14-antiquities-to-the-people-of-turkiye/>.

<sup>77</sup> "D.A. Bragg Announces Return Of 133 Antiquities To The People Of Pakistan," May 22, 2024, <https://manhattanda.org/d-a-bragg-announces-return-of-133-antiquities-to-the-people-of-pakistan/>.

<sup>78</sup> "D.A. Bragg Announces Return Of 10 Antiquities To The People Of Egypt," May 2, 2024, <https://manhattanda.org/d-a-bragg-announces-return-of-10-antiquities-to-the-people-of-egypt/>.

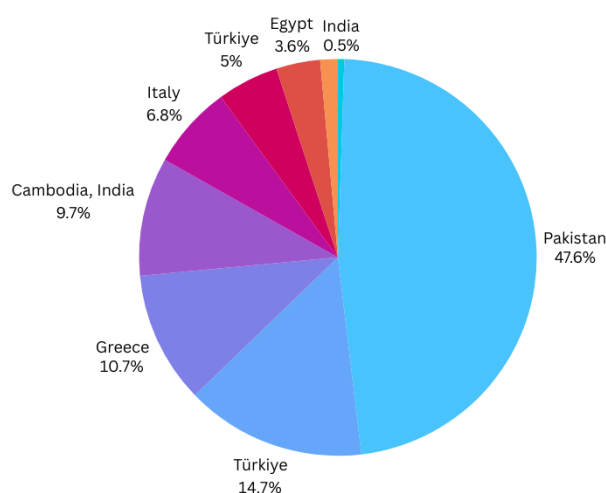
<sup>79</sup> "D.A. Bragg Announces Return Of 30 Antiquities Seized From Subhash Kapoor And Nancy Wiener," April 26, 2024, <https://manhattanda.org/d-a-bragg-announces-return-of-30-antiquities-seized-from-subhash-kapoor-and-nancy-wiener/>.

<sup>80</sup> "D.A. Bragg Announces Return of 30 Antiquities To The People of Greece," December 15, 2023, <https://manhattanda.org/d-a-bragg-announces-return-of-30-antiquities-to-the-people-of-greece/>.

<sup>81</sup> "D.A. Bragg Announces Return of 41 Antiquities To The People of Türkiye," December 5, 2023, <https://manhattanda.org/d-a-bragg-announces-return-of-41-antiquities-to-the-people-of-turkiye/>.

12/4/2023	United States	Nepal	4	1 million <sup>82</sup>	Statue, bronze masks, other
10/10/2023	United States	Italy	19	19 million <sup>83</sup>	Ancient plate, bronze plaque, Corinthian bronze helmet, other

**Figure 26: Cultural Property Seizures, Manhattan District Attorney's Office, October 2023-November 2024**



#### Seizure Data, Operations Pandora and Athena

Operations Pandora and Athena are international anti-trafficking operations to combat the seizure of stolen cultural heritage items. The joint operations, typically coordinated by INTERPOL, Europol, and the World Customs Organization, focus largely on Europe. Data on the number and types of objects seized are more readily available, but monetary value estimates are often not included in operation reports. The table below includes sums of all publicly available monetary values reported by the involved law enforcement agencies (adjusted for inflation and converted to USD). These numbers remain a limited snapshot of the possible overall value of global cultural property trafficking.

**Table O: Operation Pandora and Athena Cultural Object Seizures**

Operation	Year	Number of Seized Objects	Types of Objects	Estimated Values Provided (2024)
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<sup>82</sup> "D.A. Bragg Announces Return of Four Antiquities to the People of Nepal," December 4, 2023, <https://manhattanda.org/d-a-bragg-announces-return-of-four-antiquities-to-the-people-of-nepal/>.

<sup>83</sup> "D.A. Bragg Announces Return of 19 Antiquities to Italy," October 10, 2023, <https://manhattanda.org/d-a-bragg-announces-return-of-19-antiquities-to-italy/>.

				USD) <sup>84</sup>
Pandora <sup>85</sup>	2016	3,561	500 archeological items; 400 ancient coins; marble Ottoman tombstone; 18th-century post-Byzantine painting; other	Unknown
Athena and Pandora II <sup>86</sup>	2017	41,000	Roman coins; ceramic, metal, and stone objects; 39 historical weapons, porcelain items; other	Carving of Christ (US\$8,224.54) <sup>87</sup>
Pandora III <sup>88</sup>	2018	Over 18,000	Ceramic objects; ancient coins; historical military equipment; 15th-century Bible; Mesopotamian crystal cylinder; other	Unknown
Athena II and Pandora IV <sup>89</sup>	2019	Over 19,000	Ancient jewelry; gold mask and figurines; coins; paintings; fossils; other	Unknown
Pandora V <sup>90</sup>	2020	Over 56,400	Ancient coins; ceramics; marble items; books; weapons; religious items; other	US\$13,562,015 <sup>91</sup>

<sup>84</sup> "CPI Inflation Calculator," accessed November 25, 2024,

<https://www.in2013dollars.com/europe/inflation/2023?amount=457440>; "Euro (EUR) To US Dollar (USD) Exchange Rate History for July 17, 2024," accessed November 25, 2024, <https://www.exchange-rates.org/exchange-rate-history/eur-usd-2024-07-17>.

<sup>85</sup> "Operation Pandora: 3,561 artefacts seized and 75 people arrested," World Customs Organization, January 23, 2017, <https://www.wcoomd.org/en/media/newsroom/2017/january/operation-pandora.aspx>.

<sup>86</sup> "Over 41 000 artefacts seized in global operation targeting the illicit trafficking of cultural goods," Europol, accessed December 1, 2024, <https://www.europol.europa.eu/media-press/newsroom/news/over-41-000-artefacts-seized-in-global-operation-targeting-illicit-trafficking-of-cultural-goods>.

<sup>87</sup> 2017 value in euros estimated at EUR 6000; USD price listed above adjusted for 2024 inflation and conversion; Europol, "Over 41 000 artefacts seized in global operation targeting the illicit trafficking of cultural goods," <https://www.europol.europa.eu/media-press/newsroom/news/over-41-000-artefacts-seized-in-global-operation-targeting-illicit-trafficking-of-cultural-goods>.

<sup>88</sup> "Over 18,000 items seized and 59 arrests made in operation targeting cultural goods," World Customs Organization, July 19, 2019, <https://www.wcoomd.org/ru-ru/media/newsroom/2019/july/over-18000-items-seized-and-59-arrests-made-in-operation-targeting-cultural-goods.aspx>.

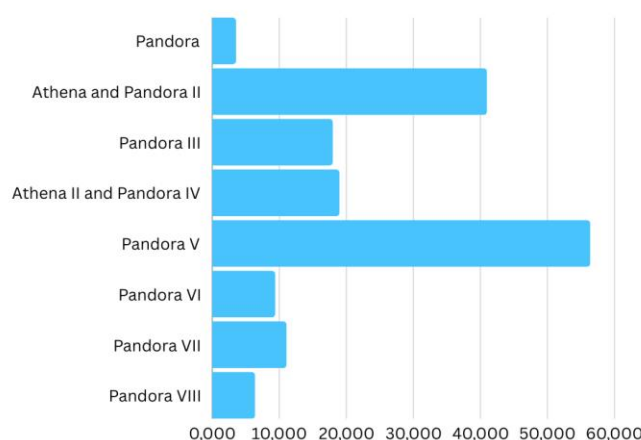
<sup>89</sup> "101 people arrested and 19,000 artefacts recovered in international crackdown on cultural goods trafficking," World Customs Organization, May 6, 2020, <https://www.wcoomd.org/ru-ru/media/newsroom/2020/may/101-arrested-and-19000-artefacts-recovered-in-international-crackdown.aspx>.

<sup>90</sup> "More than 56,400 cultural goods seized and 67 arrested," INTERPOL, May 11, 2021, <https://www.interpol.int/en/News-and-Events/News/2021/More-than-56-400-cultural-goods-seized-and-67-arrested>.

<sup>91</sup> 2020 combined value in euros of priced objects estimated at EUR 10,305,000; USD price listed above adjusted for 2024 inflation and conversion; INTERPOL "More than 56,400 cultural goods seized and 67 arrested," <https://www.interpol.int/en/News-and-Events/News/2021/More-than-56-400-cultural-goods-seized-and-67-arrested>.

Pandora VI <sup>92</sup>	2021	9,408	Gold coins; Aztec artifacts; paintings; religious items; pottery vessels; other	US\$639,490 <sup>93</sup> (91 gold Roman coins)
Pandora VII <sup>94</sup>	2022	11,094	Ancient books; marble bust; ancient coins; religious sculptures, ancient jewelry; other	Unknown
Pandora VIII <sup>95</sup>	2023	Over 6,400	Gold items; religious objects; ivory objects; ancient coins; paintings; weapons; other	US\$504,172 <sup>96</sup>

**Figure 27: Operation Pandora and Athena Cultural Object Seizures**



1. A 2019 European Commission report estimates that the value of the legal cultural property market within the European Union totals between 64 million to 318 million euros as of 2019 (or US\$70,044,800 to \$348,035,100).<sup>97</sup> Adjusted for inflation to calculate the 2024 value, the market totals US\$85,841,809.38 to \$429,230,629.57.<sup>98</sup>

<sup>92</sup> "A total of 52 arrests in operation across 28 countries targeting trafficking in cultural goods," Europol, accessed December 1, 2024, <https://www.europol.europa.eu/media-press/newsroom/news/total-of-52-arrests-in-operation-across-28-countries-targeting-trafficking-in-cultural-goods>.

<sup>93</sup> 2021 value in euros estimated at EUR 500,000; USD price listed above adjusted for 2024 inflation and conversion; Europol, "A total of 52 arrests in operation across 28 countries targeting trafficking in cultural goods," <https://www.europol.europa.eu/media-press/newsroom/news/total-of-52-arrests-in-operation-across-28-countries-targeting-trafficking-in-cultural-goods>.

<sup>94</sup> "International art trafficking operation leads to 60 arrests and over 11,000 objects recovered," INTERPOL, May 4, 2023, <https://www.interpol.int/en/News-and-Events/News/2023/International-art-trafficking-operation-leads-to-60-arrests-and-over-11-000-objects-recovered>.

<sup>95</sup> "85 arrests, 6,400 objects recovered in international operation against art trafficking," INTERPOL, July 19, 2024, <https://www.interpol.int/en/News-and-Events/News/2024/85-arrests-6-400-objects-recovered-in-international-operation-against-art-trafficking>.

<sup>96</sup> 2023 combined value in euros of priced objects estimated at EUR 457,440; USD price listed above adjusted for 2024 inflation and conversion; INTERPOL, "85 arrests, 6,400 objects recovered in international operation against art trafficking," <https://www.interpol.int/en/News-and-Events/News/2024/85-arrests-6-400-objects-recovered-in-international-operation-against-art-trafficking>.

<sup>97</sup> Brodie and Yates, *Illicit Trade in Cultural Goods in Europe*, (EU Commission, 2019), 15.

<sup>98</sup> "Inflation Calculator," <https://www.usinflationcalculator.com/>.



- The report examined the legal market for cultural goods in the EU and was limited to the 28 EU countries, the European Economic Area countries (Iceland, Liechtenstein, and Norway), the Western Balkans, Egypt, Lebanon, Türkiye, and Russia.<sup>99</sup>
- The analysis was based on sales data from major European auction houses (from mid-2017 to mid-2018), and online sales from platforms Invaluable, Catawiki, eBay, Sixbid, and VCoins (ranging from observation periods of six months to one day).<sup>100</sup>

These estimates are imperfect but given the difficulty in determining the legality of a cultural good and the complete lack of empirically-sourced research on the illicit market, they remain the best numbers currently available that are substantiated by data. Given the limited scope of the research, it is likely that the global trade in illicit cultural property is worth more than suggested by these reports and may in fact total several billion dollars.

2. To supplement the limited statistical findings of these reports, the author requested interviews with the following individuals and organizations:

**Table P: Interview Requests, Cultural Property Trafficking Subject Matter Experts**

Did Not Respond to Interview Request	Interview Request Declined	Interview Request Accepted
<ul style="list-style-type: none"> <li>• Art Institute of Chicago</li> <li>• Department of Homeland Security, Homeland Security Investigations</li> <li>• Dr. Erin Thompson, John Jay College of Criminal Justice</li> <li>• UNESCO, Movable Heritage and Museums Unit, Culture Sector</li> <li>• Institute of Art and Law (United Kingdom)</li> <li>• Museum of the Bible</li> <li>• FBI L.A. Field Office</li> <li>• De Young Museum</li> </ul>	<ul style="list-style-type: none"> <li>• INTERPOL</li> <li>• Smithsonian National Gallery of Art</li> <li>• National Taiwan Museum of Fine Arts</li> </ul>	<ul style="list-style-type: none"> <li>• Dr. Dawn Rogala, Smithsonian's Museum Conservation Institute</li> <li>• Sara Leonowitz, Director, Washington Conservation Guild</li> <li>• U.S. Department of State, Cultural Heritage Center</li> <li>• Olivia Whitting, Art Loss Register</li> <li>• Dr. Eleanor King, Howard University</li> <li>• Helena Arose, the Antiquities Coalition</li> <li>• Stephen Epstein, U.S. Department of State, Bureau of Near Eastern Affairs</li> <li>• Embassy of Italy to the United States</li> </ul>

<sup>99</sup> Brodie and Yates, *Illicit Trade in Cultural Goods in Europe*, (EU Commission, 2019), 48.

<sup>100</sup> Brodie and Yates, *Illicit Trade in Cultural Goods in Europe*, 87-96.

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# About

This report is a collaboration between Global Financial Integrity and Masters' students at the American University School of International Service Practicum **"Intelligence and Analysis"** in the Fall of 2024.

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