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Actor: any person or business involved in activities related to the supply chain.

Corruption: there is no universal definition for the term “corruption.” The United Nations Convention against Corruption (UNCAC), the only global, legally binding anti-corruption instrument, recognizes that corruption is a continuously evolving phenomenon affected by various factors. National legal frameworks, therefore, differ in their descriptions of corruption. UNCAC does, however, provide a list of universally agreed offenses of corruption (see below), leaving each State party to exceed the minimum standards set forth in UNCAC.

VARIOUS OFFENCES OF CORRUPTION

- **Active bribery** - the promise, offering or giving to a national public official, a foreign public official or an official of a public international organization, directly or indirectly, of an undue advantage, in order to act, or refrain from acting, in matters relevant to official duties.

- **Passive bribery** - the solicitation or acceptance by a national public official, a foreign public official or an official of a public international organization, directly or indirectly, of an undue advantage in order to act, or refrain from acting, in matters relevant to official duties.

- **Embezzlement** - theft, diversion or misappropriation of property, funds, securities or any other form of supply entrusted to a public official for his or her official capacity.

- **Bribery in the private sector** - active or passive bribery, directly or indirectly, of or by any person who directs or works, in any capacity, for a private sector entity, to act, or refrain from acting, in breach of his or her duties.

- **Embezzlement of property in the private sector** - embezzlement by any person who directs or works, in any capacity, for a private sector entity.

- **Abuse of functions** - performance of, or failure to perform, an act in violation of the law, by a public official in order to obtain an undue advantage.

- **Trading in influence** - abuse of a public official’s real or supposed influence with an administration, public authority or State authority in order to gain an advantage or influence particular outcomes.

- **Illicit enrichment** - a significant increase in assets of a public official that cannot reasonably be explained as being the result of his or her lawful income.

- **Money laundering** - the concealment of the origins of proceeds of crime, often by means of conversion or transfers involving overseas banks or legitimate businesses.

- **Concealment** - hiding or continued retention of property, knowing that it has resulted from corruption.

ORGANIZED CRIMINAL GROUP (OCG)

A structured group of three or more persons, existing for a certain period and acting in concert with the aim of committing one or more offences in order to obtain, directly or indirectly, a financial or other material benefit.

Wildlife crime can be serious crime committed by organized criminal groups. It contributes to a broad range of harms, including environmental degradation, reduction and elimination of species, and destruction of ecosystems and wildlife resources. Furthermore, wildlife crime adds to the corrosion of social and economic development, threatens livelihoods, impacts national security and undermines the rule of law. While it remains challenging to assess the economic extent of wildlife crime, corruption and money-laundering facilitate the generation of the significant revenues from this illegal business.

Despite large seizures of wildlife and wildlife products in recent years and increased investigations of these crimes by national law enforcement agencies, there is still insufficient understanding of the organizational structures of organized criminal groups that are behind these activities. Unless investigations consider the organizational structures of groups committing wildlife crime, and unless the linkages between the different actors involved in moving wildlife at different stages of the supply chain are determined, it will be difficult to eliminate wildlife crime.

This document describes the key actors and roles that are needed for wildlife crime to exist, and it examines some of the common modi operandi (referred to throughout this document as “business models”) of organized criminal groups. It should be noted, however, that the business models are likely to change over time, as organized criminal groups adapt to new realities. This document also discusses how to investigate an illegal wildlife supply chain.

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3. In accordance with the United Nations Convention on Transnational Organized Crime, “serious crime” shall mean conduct constituting an offence punishable by a maximum deprivation of liberty of at least four years or a more serious penalty;
Understanding the supply chain of wildlife crime – from the point of capture to purchase, use or consumption by the final customer – allows investigators and judicial authorities to better understand the context in which individual criminal acts occur, and how they might be connected to broader organized criminal activity.

While the supply chain can look different in different countries and for different species, in general, it can be broken down into activities that take place in source, transit and destination countries.

In source countries, activities predominantly focus on the capture and consolidation of wildlife. In transit countries, the focus lies on international transport, although transit countries can also serve as consolidation sites. In destination countries, wholesalers or retailers distribute wildlife to customers. Wildlife can be trafficked in the form of live or dead whole animals, their parts or products derived from their parts. As such, retailers can operate in various areas, including art, decor, jewelry, fashion, cosmetics, foods, medicine, tonics and furniture. Live animals can also be trafficked as pets, for zoos or for breeding.

In source, transit and destination countries, various actors are involved to facilitate wildlife trafficking: poachers or hunters that obtain wildlife in source countries, consolidators, transporters, wholesalers, retailers and customers. These actors are discussed in detail below.

This document is intended as a training tool for investigators and prosecutors tasked with cases linked to wildlife crime, the primary target being new entrants into the field of wildlife crime.

The aim is to enhance the knowledge of investigators and prosecutors of the individual steps that criminals and associated actors need to take in order to move wildlife from its original source to the point of end use. The document is intended to help readers to understand the specific actions that facilitate wildlife crime, learn about the actors who may perform these actions and get to know some of the potential linkages between these actors.

This document is not intended to be exhaustive. It focuses on:

- Guiding investigators towards expanding the suspect pool and better understanding how different actors are linked; and
- The early stages of building understanding and knowledge of the structure of organized criminal groups involved in wildlife crime.

This document does not intend to adopt a “follow-the-money approach” but rather provides a broader view on how financial investigation techniques can be used and linked to investigations of wildlife crime.

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- Guiding investigators towards expanding the suspect pool and better understanding how different actors are linked; and
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This document does not intend to adopt a “follow-the-money approach” but rather provides a broader view on how financial investigation techniques can be used and linked to investigations of wildlife crime.
Organized criminal groups can become involved at any or all stages of the supply chain. Depending on the organization and structure of the group, and the type of wildlife being trafficked, the interactions between the organized criminal group and other actors involved in the supply chain will vary. Typical types of interactions are discussed below in the context of Business Models.

Organized criminal groups can also take advantage of, or collaborate with, additional actors to help facilitate wildlife trafficking along the supply chain. These include:

- Businesses that are otherwise involved in legal activities.
- Logistics and shipping companies.
- Corruption pursuant officials.

The supply chain can provide guidance to investigators when they examine criminal activities, determine connections and collect evidence. In addition, to understand how illegal wildlife trade is working, it is crucial to consider and trace the four flows associated with the supply chain:

1. **Flow of Products**: This involves the movement of wildlife from the point of capture to the customer. It includes transportation methods, storage and possible alterations of the product along the way.

2. **Flow of Money**: This comprises the movement of money or of value from the supplier to the customer. It involves the delivery in cash or transferred via informal financial systems, they may also be laundered to prove, because payments may be made in the form of legally or illegally traded goods.

3. **Flow of Documents**: Unlike the other three flows that always exist, this flow may not exist. There will almost certainly be documentation when an organized criminal group interacts with a legitimate business or with government. This might include, for example, interactions with banks or with legitimate transport or logistics companies.

4. **Flow of Communications**: This is the flow of information. It may consist, for instance, of handwritten notes on the back of envelopes or lists of numbers without explicit reference to what they mean.

In the context of a legal trading entity, it will be possible to match the four flows. In particular, the flow of products and the flow of money for products will be traceable through the books and records of the enterprises involved. However, if the flows of products and money do not match in a single business or when comparing the flows of different businesses, further investigation is warranted.

This document analyses the behaviour of actors involved in wildlife crime by looking through the lens of these four flows. In this context, the investigator should ask four questions, namely:

- What should have happened? This can be an analysis of how the flows would appear if all actors were acting legally.
- What did happen? This question can be answered based on the evidence found during the investigation. It should be noted that what is not found can often be of great significance.
- What should the answers to the first two questions be, different, why is this the case?
- If the answers to the first two questions are different, who is responsible?
Below is a description of all main known actors and their roles in the supply chain, as well as additional relevant actors who can take up roles. These descriptions also provide sets of non-exhaustive questions for investigators to consider as they conduct their inquiries.

### MAIN ACTORS AND ROLES

**Poachers and Professional Hunters**

- What species is targeted?
- Is it protected under domestic or international legislation?
- Is its international trade prohibited?
- How does the hunter/poacher finance the procurement of products from their original sources?
- Why did the hunter/poacher target the particular species (e.g., how does he or she identify demand?)

**FACTORS FOR CONSIDERATION IN INVESTIGATIONS**

- Which payment method is used to pay the hunter/poacher (e.g., cash, exchange for other illicit products, mobile money systems, informal transfer systems, bank transfers)?
- When does the payment occur? For instance, does the payment precede the hunting/sourcing or does it come afterwards? Is there a pre-existing arrangement with an OCG?
- Are there other payments for potentially related goods/services or unexplained payments that may be related to the one under investigation?
- Is there evidence of financing of poaching trips?

**ACTOR & ROLE**

- Are there a license for taking/capturing the wildlife?
- Is the hunter/poacher, or is it fraudulent or forged?
- If the license is fraudulent or forged, has it been provided to obtain any license or documentation?
- Are there other licenses (e.g., for different species that may be of interest?)

**DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP**

- Can act opportunistically or on request, can be used directly by criminal OCGs or customers
- Poachers are usually blank who hunt or capture wildlife without legal authority
- Professional hunters may be licensed to hunt or capture wildlife. If a professional hunter hunts or captures wildlife in contravention of their licenses, this becomes poaching
- A hunting license may be fraudulent or obtained unlawfully with possible involvement of an organized criminal group

**What actor needs to be considered as they conduct their inquiries?**

**What non-exhaustive question set is provided for investigators?**

**What characteristics of the actor should be identified?**

**What specific roles can be taken up by these actors?**

**How can investigators identify and trace the origins of the wildlife?**

**How can the actors’ roles be confirmed?**

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**Poachers and Professional Hunters**

- Capturing and selling wildlife
**LOCAL DEALER**

- How does the product move from the point of capture to the local dealer?
- Is the wildlife processed into any product (e.g. packaging, drying food)?
- Are there other activities involved in the activity?
- Is the local dealer involved in collecting or processing?
- Does the local dealer have other, apparently legal, business activities that might be of relevance?

**CONSOLIDATOR**

- How does the product move from the point of capture (possibly by any key dealer in the consolidator) and from the consolidator onwards to the next actor in the supply chain?
- Is the wildlife processed into any product (e.g. packaging, drying food)?
- Are there other actors involved in the process and what are their roles?
- Does the consolidator entertain business with any other organically linked products for transportation and export?

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**FACTORS FOR CONSIDERATION IN INVESTIGATIONS**

**ACTOR & ROLE**

- **Local Dealer**
  - **Characteristics**
    - **Experience**
    - **Position**
    - **Handling**
    - **Communication**
    - **Connectedness**
    - **Organization**
  - **Business Activity**
    - **Business Type**
    - **Income**
    - **Location**
    - **Social Media**
  - **Legal or Illegal**

- **Consolidator**
  - **Characteristics**
    - **Experience**
    - **Position**
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**DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL NETWORK**

**ACTOR & ROLE**

- Local Dealer
  - **Characteristics**
    - **Experience**
    - **Position**
    - **Handling**
    - **Communication**
    - **Connectedness**
    - **Organization**
  - **Business Activity**
    - **Business Type**
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WHOLESALE

- Does the wholesaler focus on one or two main species of wildlife?
- Does the wholesaler also deal in other commodities?
- Is the wildlife processed into any product (by the wholesaler or their associates)?
- How does the wholesaler store wildlife dead, dead, in products, or furs? Is it labeled/or labeled?
- How does the wholesaler physically receive and distribute wildlife?
- Does the wholesaler have one or many products?

- What payment method does the retailer use for online shopping or logistics companies or consolidators?
- What payment method does the retailer accept for online shopping?
- How do the wholesalers launder cash gain?
- Do they own any legitimate or seemingly legitimate businesses?

DESIGN AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Is the wholesaler involved with any actors in other countries? If yes, by what means?
- How does the wholesaler communicate with consolidation or another organization?
- Does the wholesaler advertise products in person or online?
- Does the wholesaler conduct sales online?

- The wholesaler procures large consignments of wildlife, possibly dealing with other commodities, and seeks to distribute wildlife to smaller quantities to retailers.
- Wholesalers may specialize in one or more species. They may focus primarily on wildlife or also import and sell other products.

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- Does the wholesaler keep records of contacts, consignments, doing trading, and selling?
- What payment method does the retailer use for online shopping or logistics companies or consolidators?
- What payment method does the retailer accept for online shopping?
- How do the wholesalers launder cash gain?
- Do they own any legitimate or seemingly legitimate businesses?
RETAILER

- How does the retailer receive and distribute wildlife?
- Does the retailer focus on one or more species of wildlife?
- Does the retailer also deal in other commodities?
- Is the wildlife processed into any products by the retailers or their associates?
- How does the retailer store wildlife alive, dead, or in products, if applicable?

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- Product delivered to the customer, or do they collect it?
- Is the consumer a collector?

CUSTOMERS

- How does the customer pay for wildlife?
- Do the customers pay the retailers only during transactions along the supply chain?

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- The product delivered to the customer, or do they collect it?
- Is the customer a collector?

DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Individuals or businesses selling wildlife to customers.

DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Customers are usually not part of organized criminal groups.
- They may be aware or unaware that the commodity is illegal.
- They may be occasional or regular purchasers of wildlife.
- Customers range from buyers of low-value products to those of high-value purchases, the latter are often collectors.
ADDITIONAL ACTORS AND ROLES

BUSINESSES THAT ARE OTHERWISE INVOLVED IN LEGAL ACTIVITIES

- Do businesses have valid documentation (eg. licenses, permits) to trade wildlife?
- Do businesses have a traceability mechanism to establish the legal origins of wildlife?
- Do businesses trade in several wildlife species?

- Are the business owners in contact with any actors in source or transit countries? How do they communicate to ensure the delivery of products?
- Do the business owners advertise any wildlife online or through other means?

- Businesses whose main line of work is in legal, legitimate activities may be used by, or collaborate with, organized criminal groups to facilitate the wildlife supply chain.
- Businesses may act knowingly or unknowingly. They can be involved at each stage of the supply chain. For example, legitimate businesses can be used to smuggle products that are concealed among legitimate cargo.
- Such businesses may include zoos, pet shops, game farms, licensed dealers of wildlife, storage facilities, transport companies and freight agents.
- These businesses might trade in legally sourced wildlife as legal. In addition, they may transport or sell concealed illegal products alongside legal products.

- Are there any records of any wildlife being traded?
- Do accounting books show transactions that might indicate illegal activity?
- Are worthies for wildlife provided? If so, is the paperwork forged or fraudulently obtained, or are genuine wildlife licenses or certificates misused?

- Do there any indication of business activities conducted “off the books”, outside the businesses’ legitimate line of work?
- Which payment methods are used to pay wildlife suppliers/transporters?
- Does the business use more than one bank account?
- Does the business have its tax affairs in order?
WILDLIFE CRIME BUSINESS MODELS

Organized criminal groups can vary significantly in terms of their size, structure and focus. They can be hierarchical in structure, or they can resemble more diffuse networks without clear leadership by a single individual or clique. Furthermore, territorial as well as ethnic and cultural considerations may influence the make-up of an organized criminal group. Beyond these attributes, many of these groups are organized and aligned depending on their roles, skills and access to opportunities in illicit markets. As noted above, organized criminal groups can be involved at any or all stages of the supply chain. The way in which the group approaches the supply chain – whether consciously or not – can be considered as its business model.

An organized criminal group can run operations following an approach that is integrated along the entirety of the supply chain, controlling the sourcing, export, transport, import and sale of wildlife. Alternatively, it can operate in distinct parts of the supply chain, focusing on specific roles and working with other organized criminal groups or additional actors that operate or control the other required parts of the supply chain. These partner groups may trade other illegal commodities in addition to wildlife. All roles outlined along the supply chain must be fulfilled, but not all will necessarily be fulfilled by organized criminal groups. While the forms of interaction between actors along the wildlife supply chain and organized criminal groups vary greatly, the business models described below provide a simplified overview of some common ways in which organized criminal groups interact with the supply chain. Considering these business models can help investigators identify additional potential suspects, a wider range of crimes and a broader spectrum of linkages to organized criminal activities.

An important aspect of the work of investigators and prosecutors is to determine how different actors in a supply chain connect and relate to one another, and if they are associated with organized criminal activities. It is important to note that real-world cases often may not completely align with the business models presented here. Organized criminal activities may involve combinations of these business models, and the different models are not necessarily mutually exclusive. These business models are, therefore, presented with the caveat that real-world cases involve multiple permutations of activities and multiple types of actors whose activities may be challenging to categorize as belonging to a single business model.

There are five broad business models:

1. Integrated model
   The integrated model involves an organized criminal group or groups controlling the sourcing, export, transport, import and sale of wildlife. Groups that adopt this business model typically have one person or a limited number of people exerting control over the entire criminal business. They usually operate across two or more national jurisdictions.

2. Source-end model
   The source-end model involves organized criminal groups whose focus is on, or specialization is in the hunting or capturing of wildlife in source jurisdictions and/or in consolidating captured wildlife in a source jurisdiction. Groups adopting this business model may focus on one or multiple species from one or more source countries.

3. Transport model
   The transport model involves organized criminal groups whose focus is on, or specialization is in the arranging and transporting of wildlife between source and destination countries or across one or multiple transit hubs.

4. Customer-end model
   The customer-end model involves organized criminal groups whose focus is on, or specialization is in the wholesale or retail of wildlife in destination countries.

5. Opportunistic model
   The opportunistic model involves organized criminal groups engaging at one or more stages of the supply chain on an ad hoc basis, usually as a sideline to their regular criminal activities. In this model, groups act based on demand for their services and/or their specific expertise to facilitate selected activities along the supply chain. The graphics and descriptions below illustrate the five business models in greater detail. Investigators can use these tables to evaluate whether a particular business model or business model combination is in use, and in turn, to generate questions for further analysis and investigation.
INTEGRATED MODEL

- The following variations may be seen in operations of the organized criminal group under the integrated business model:
  - A single or multiple species being trafficked
  - Operations confined to wildlife trafficking or wildlife in combination with other commodities
  - A single country or multiple countries for wildlife sourcing
  - A single or multiple transport routes (and method(s) being used)
  - A single or multiple destination country or countries for wildlife sale

- Businesses that are otherwise involved in legal activities
  - Organized criminal groups following an integrated model may have to rely less on private businesses, since they might have established infrastructure for supply chain activities as a part of the criminal group.
  - Combat public officials
    - The larger and more sophisticated the OCG, the higher the level of public officials that are likely to be corrupted and the more structural in the corruption scheme. For example, regularly occurring, larger shipments of illegal wildlife are more likely to be facilitated by regularly occurring, larger payments, potentially to high-ranking officials.
  - Logistics and shipping
    - OCGs more likely to be困难 or have co-opted infrastructure for storage, transport and logistics

Common variations in modus operandi

Interactions with actors outside the organized criminal group

- Members of the OCG are likely to receive regular payments (meaning more financial flow and potentially more financial records).
- Amounts transferred from destination to source country for other business transactions will probably occur irregularly.
- Profits are likely to be laundered in destination or third-party jurisdictions, possibly through other businesses owned by the OCG.
- Financial documentation is likely to be produced, but it is likely to be hard to access and will likely involve institutions and authorities in multiple jurisdictions.

Flows of Money/Value

Flows of Communication

- The OCG is likely to have consolidations/ coordinations in both source country. It is likely that international communication is channelled through those focal points. They in turn, will have relatively structured communication with those involved in the capturing/transport/processing of wildlife in the respective countries.

- Documentation is likely to appear legitimate, i.e., forged documentation obtained through corruption or laundering of illegal products using legal documentation.

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- Documentation is likely to appear legitimate, i.e., forged documentation obtained through corruption or laundering of illegal products using legal documentation.
**Common variations in modus operandi**

- The OCG generally specializes in the hunting, capturing and/or consolidating of wildlife in source jurisdictions.

**Interactions with actors outside the organized criminal group**

- **Businesses that are otherwise involved in legal activities**
  - OCGs following the source-end model can appear to be legitimate businesses. These may range from groups of fishermen working together to supply licenses for the illegal fishing of tuna to small-scale entrepreneurs who supply illegal hunting licenses to support the illegal dynamiting of wildlife. Such schemes may include
    - Large-scale illegal trade of wildlife. Unlike in some source countries, wildlife hunting or poaching is legal and well-regulated.
    - Establishing and expanding quasilegal wildlife businesses to launder profits.
  - **Consortiums**

- **Flows of Money/Value**
  - **Revenue and profits are likely to remain in source countries.** Volume of money involved may be relatively small.
  - Transactions often occur in cash or through mobile money systems.
  - **Consolidations may receive international fund transfers for shipments of specific species.**

- **Flows of Communication**
  - **There is likely to be regular communication between core consortium leaders and hunters/processors.**
  - The consolidation may communicate with (multiple) other organized criminal groups on “shopping”/arl bidding/enforcement.
  - Mobile phones or messaging records can be important sources to trace communication between consolidators and hunters/processors/transporters. Depending on the complexity of the organization, some communication may occur face-to-face only.

**Flows of Documentation**

- In the source-end model, documentation may be broad. Older or more established hunters/packers will seek to comply with current laws, rather than attempt to make them appear legitimate.
  - Hunting licenses and business licenses may be relevant for hunting and capturing wildlife and the subsequent laundering of proceeds through legitimate businesses.
  - **Consolidators may keep records of their dealings.** Records often include handwritten notes containing numbers, which may provide, among other evidence, information about the timing, place, or the duration of proceeds of crime, among others.
**Transport Model**

Common variations in modus operandi:

- The OCG specializes in the transport of wildlife and/or other commodities between source and destination countries or across one or multiple transit hubs.

Interactions with law enforcement agencies:

- When OCGs operate legal transport businesses, they may be more likely to use fraudulent or other techniques to circumvent the legal restrictions on goods being transported. Corruption, particularly bribery, is likely to be more common in such operations.

- When OCGs operate legitimate transport businesses, investigation reports are more likely to rely on intelligence, forensic analysis, and other methods to uncover any illegal or fraudulent activities.

- Some OCGs may operate legitimate transport businesses in order to launder large amounts of money obtained from illegal activities.

Events associated with money laundering and other illegal activities:

- When OCGs operate legal transport businesses, they may be more likely to use fraudulent or other techniques to conceal the origin or destination of funds. These funds may be laundered through legitimate transport businesses or other methods.

- When OCGs operate legitimate transport businesses, investigation reports are more likely to rely on intelligence, forensic analysis, and other methods to uncover any illegal or fraudulent activities.

- Some OCGs may operate legitimate transport businesses in order to launder large amounts of money obtained from illegal activities.

Events associated with transportation-related activities:

- When OCGs operate legitimate transport businesses, they may be more likely to use fraudulent or other techniques to conceal the origin or destination of goods being transported. Corruption, particularly bribery, is likely to be more common in such operations.

- When OCGs operate legitimate transport businesses, investigation reports are more likely to rely on intelligence, forensic analysis, and other methods to uncover any illegal or fraudulent activities.

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CUSTOMER-END MODEL

- The following variations may be seen in OGCI's operations under the customer-end business model:
  - A single destination country or multiple destination countries for wildlife sales.
  - A wholesale or retail approach, a wholesale retail combination approach or a retail only approach.
  - A physical retail presence or presence (e.g., shops or stalls and/or online sales).
  - The wildlife is likely marketed as legal in its sold being legally sold by a legitimate business as a front company or to clients who know that the product is illegal.
  - A single or multiple location(s) of operations (include warehouses or storage locations).
  - A single or multiple species sold.
  - The business is focused solely on selling wildlife species or other commodities.
  - The business sells solely illegal commodities or are illegal commodities.
  - The wholesale/retailer delivers goods to customers, a delivery service, or makes an on-customer pickup.
  - Wildlife in sold alive, dead as parts or products.
  - In cases where live animals are involved, particular approaches of activity may be unstoppable. Some
    species have specific requirements in terms of housing and diet, which can help tip-off investigators or provide corroborating information. For example, live lizards require protective shelter and substantial quantities of moist.

Common variations in modus operandi

- Businesses that are otherwise involved in legal activities.
- Under the customer-end model, interactions may take place between OGCI and legitimate businesses for the purpose of money laundering (e.g., concealing illicit profits through apparently legitimate retail operations).
- Coronet public officials.
- There may be bribery of enforcement or regulatory authorities to avoid proper inspection, collusion with law enforcement authorities to evade confiscated goods or bribery of public officials to provide sales permits/business licenses.
- Logistics and shipping.

CUSTOMER-END MODEL

- There is likely to be frequent communication between wholesalers and retailers as well as regular customers.
- Communication may exist that was undertaken for advertising and sales through social media, online sales platforms.
- There are records of wholesale or retail businesses that are expected to exist but may be obstructed or falsified.
- These records may include sales invoices and sales ledgers, purchase records, contracts and financial records.

Interactions with actors outside the organized criminal group

Flows of Money/Value

Flows of Communication

Flows of Documentation

Customer

ORGANIZED CRIMINAL GROUPS

Description

- The OGCI business includes a focus on, or specialization in, wholesale or retail of wildlife. Its business may also include sales of legal wildlife.
The opportunistic model involves criminal groups engaging at one or more stages of the supply chain on an ad hoc basis, usually as a sideline to their usual criminal activities. In this model, criminal groups act based on demand for their services and/or their particular expertise.

An example would be an OCG that ordinarily deals in other commodities and arranges a one-off shipment of wildlife products for its regular business partners.

As another example, a small group of officers of a wildlife management authority encounters a protected species and decide to poach the species to subvert to a local criminal group.

Common variations in modus operandi:

- The following variations may be seen in an OCG’s operations under the opportunistic business model:
  - A success at any stage or combination of stages in the supply chain;
  - A single or multiple species being trafficked;
  - Operations confined to wildlife trafficking, or wildlife in combination with other commodities;
  - A single country or multiple countries for wildlife sourcing;
  - A single or multiple transport routes and methods being used;
  - A single destination country or multiple destination countries for wildlife sale.

- The OCG works with a local criminal group specialized in other stages of the supply chain, or alternatively, faithful orders received directly from customers using any means of transportation.

- An OCG working under the opportunistic model is likely to become involved in wildlife based on the following factors:
  - Profitability – responding to demand for wildlife where it exists;
  - Having access to useful infrastructure, services or expertise at a certain stage or stages of the supply chain;
  - Personal ties (e.g., of enforcement agents) associated with dealing with wildlife products;
  - Obtaining some other benefit or avoidsome penalty (e.g., complying with a request from a partner criminal group).

- Expected financial flows are likely to vary across cases and strongly depend on the nature and complexity of the general operations of the OCG.

- Expected communications are likely to vary across cases, and will again strongly depend on the nature and complexity of the OCG’s general operations.

- Compliance with documentation is likely to vary, with a lower level of public officials likely to be corrupted.

- Logistics and shipping
  - If the OCG has already established transport networks for non-wildlife commodities, the group may be able to utilize this infrastructure. If the group has not established transport networks, it is likely to contact legal logistics/shipping operations and use strategies of concealment or falsification.
By understanding the business models associated with wildlife crime, investigators can refine their awareness of organized criminal activities across the wildlife supply chain, and better target the leaders of organized criminal groups. Studying these business models and applying them to concrete cases can help investigators to understand how organized crime groups involved in wildlife crime are structured, and whether they operate locally or globally. A general approach to using the business model framework in the context of wildlife crime investigations is presented below.