WILDLIFE CRIME: KEY ACTORS, ORGANIZATIONAL STRUCTURES AND BUSINESS MODELS
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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 offences of corruption (see below), leaving each State party free to exceed the minimum standards set forth in UNCAC.

**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:** throughout this document, the term wildlife refers to all wild fauna and flora, including their products and derivatives.

**Source Country:** a country where wildlife originates or is taken from.

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**TERMINOLOGY**

1. [https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf](https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf)


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**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 item of supply entrusted to a public official in 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.
Wildlife crime can be serious crime\(^1\) 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 eradicate 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.

\(^1\) 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.
PURPOSE AND AUDIENCE

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.
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.
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 section 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
- Corrupt public officials

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

The first and most obvious is the flow of product. The flow of product comprises the physical 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.

The second is the flow of money or value. Generally, each actor in the supply chain is involved for material gain. This flow comprises the movement of money or of value from the ultimate customer to the various actors in the supply chain. This flow is often challenging to prove, because payments may be made in the form of legally or illegally traded goods, delivered in cash or transferred via informal financial systems, they may also be laundered through third party jurisdictions or otherwise disguised.

The third is the flow of communication. Unless a single individual performs every function within the value chain, there will be communication between the actors. Generally, the more sophisticated and/or integrated the criminal enterprise, the more difficult the communication will be to trace. But even when communication is face to face, there may be evidence of the actors travelling to meeting places.

The fourth is the flow of documents. Unlike the other three flows that always exist, this flow may or 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. Even when the conduct is entirely criminal, there may be some form of documentation to record transactions. In these cases, the documentation is likely to be more informal in nature. 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.
- If the answers to the first two questions are 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.
POACHERS AND PROFESSIONAL HUNTERS

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

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

DESRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Can act opportunistically or on request; can be hired directly by consolidator, OCG or customer
- Poachers are usually locals who hunt or capture wildlife without legal authority
- Professional hunters may be licensed to hunt or capture wildlife; if a professional hunters hunts or capture wildlifes in contravention of their license, this becomes poaching
- A hunting license may be fraudulent or obtained unlawfully with possible involvement of an organized criminal group

ACTOR & ROLE

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

- Is there a licence for taking/capturing the wildlife?
- Is the license genuine, or is it fraudulent or forged?
- If the license is fraudulent or forged, how and from whom was it obtained?
- Has a bribe been paid to obtain any license or document?
- Are there other licenses (e.g. for different species) that may be of interest?
LOCAL DEALER

**FACTORS FOR CONSIDERATION IN INVESTIGATIONS**

- 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 actors involved in this activity?
- Is the local dealer involved in collecting other illegal commodities?
- Does the local dealer have other, apparently legal, business activities?

- Do the local dealers sell to local customers only, or do they also sell to consolidators or other customers who may be tied to activities of OCGs?
  - Which payment method does the local dealer accept (e.g. cash, exchange for other illicit products, mobile money systems, informal transfer system, bank transfer)?
  - When do payments to the local dealer occur? Are payments regular?
  - Are there any payments from foreign companies/individuals?
  - Are there other payments for potentially related past dealings or unexplained payments that may be related to the one under investigation?
  - How does the local dealer pay the poacher/hunter?

**DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP**

- How many hunters/poachers does the dealer communicate with?
- Is communication with hunters/poachers frequent or infrequent?
- How does the local dealer know where to find buyers for wildlife items?
- Does the local dealer advertise wildlife items through any platform (e.g. social media, private messaging)?
- Do the local dealers sell to any consolidators? If so, do they sell to one or several consolidators?
- What communication methods are used between the local dealers and their sources and customers?
- Is there any communication with actors in other countries?

- Handles localized collection of wildlife for onward sales (often on a small scale); can be hired by consolidator, organized criminal group or customer.
- Collection of wildlife may be one of many businesses (possibly including a combination of legal and illegal activities).
- Local dealers are likely to have good business connections and may be associated with organized criminal groups.

- Are any books or records maintained by the local dealer?
- Are there any online records related to the local dealer's activities (emails, instant messages, social media posts, photographs, videos, etc.?)
CONSOLIDATOR

- How does the product move from the point of capture (possibly via local dealer) to 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 this activity?
- Does the consolidator intermingle wildlife with any other (legal or illegal) products for transportation and export?

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- Does the consolidator sell to local or foreign customers who may be tied to activities of OCGs?
  - Which payment method does the consolidator accept (e.g., cash, exchange for other illicit products, mobile money systems, informal transfer system, bank transfer)?
  - When do payments to the consolidator occur? Are payments regular?
  - Are there any payments from foreign companies/individuals?
  - Are there other payments for potentially related past dealings or unexplained payments that may be related to the one under investigation?
  - How does the consolidator launder proceeds?
  - How does the consolidator pay for transport?
  - How does the consolidator pay for wildlife?
  - How does the consolidator pay for licenses, if required?
  - Is there any indication of payments to public officials to facilitate transport, export or other illegal activities?

ACTOR & ROLE

Consolidator
Collecting wildlife and arranging sale and/or export

DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Conducts larger-scale collection of wildlife for onward sales.
- Consolidators are often members of organized criminal groups, in charge of procuring wildlife products from hunters/poachers/local dealers and of organizing onward sales.
- Consolidators can also arrange or be involved in logistics and transport.
- Consolidators can be hired by an organized criminal group OCG or customer.
Facilitator of (international) transport
Facilitating transport of wildlife to buyers

- What payment method does the facilitator accept (e.g. cash, exchange for other illicit products, mobile money systems, informal transfer system, bank transfer)?
  - When do payments to the facilitator occur? Are payments regular?
    - Are any payments from foreign companies/individuals?
      - Are there other payments for potentially related past dealings or unexplained payments that may be related to the one under investigation?
        - Is each payment from the facilitator to a logistics company proportionate to the services provided?
          - Do payments involved originate from the country of export or another country?

- Are any books or records maintained?
  - Does the facilitator of transport obtain licenses for transport and export, as well as shipping documents?
    - Is the shipping or licensing process outsourced to another organization (legal or illegal)?
      - How are the shipments described on shipping documentation, including but not limited to: Invoices and/or proforma invoices; packing lists; letters of instruction to shippers and bills of lading?

- Facilitators of transport make arrangements for the shipment of wildlife by land, sea or air.
  - Activities by facilitators may overlap with those of consolidators. Possibly, one actor can take the role of both.
    - They can work with one or multiple transportation or logistics companies and services, including postal services.
      - They are likely to have connections with customs authorities.

- Is the transportation for only one or several species?
  - Is there a frequently used transportation route?
    - Is wildlife transported with any other (legal or illegal) products?
      - Is the facilitator collaborating with actors inside logistics companies who know that wildlife is being shipped?

- Is communication with consolidator/shipping and logistics companies/wholesaler/retailer frequent or infrequent?
  - Does the facilitator communicate with authorities? Is it likely that corruption may be involved?
    - How is the facilitator contacted by the consolidator/shipping and the logistics companies/wholesaler/retailer?
      - What methods are used for communications with hunters/poachers, consolidators, buyers and other actors involved in the supply chain?
        - Is there any communication with actors in other countries?
WHOLESALER

**FACTORS FOR CONSIDERATION IN INVESTIGATIONS**

- Does the wholesaler focus on one or several species of wildlife?
- Does the wholesaler also deal in other commodities?
  - Is the wildlife processed into any product by the wholesalers or their associates?
  - How does the wholesaler store wildlife (alive, dead, as products, as falsely labelled items)?
  - How does the wholesaler physically receive and distribute wildlife?
  - Does the wholesaler have one or many products?

**DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP**

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

**actor & role**

Wholesaler

Importing of wholesale consignments; storing and selling wildlife

**Flow of Product**

**Flow of Money**

- What payment method(s) does the retailer use to pay shipping and logistics companies or consolidators?
- What payment method(s) does the retailer accept from customers?
- How do the wholesalers launder illicit gains?
  - Do they own any legitimate or seemingly legitimate businesses?

**Flow of Communication**

- Is the wholesaler in contact with any actors in source or transit countries? If so, by what means?
- How does the wholesaler communicate with consolidators to arrange shipments?
  - Does the wholesaler advertise products through any means?
  - Does the wholesaler conduct sales online?

**Flow of Documentation**

- Does the wholesaler provide certification for wildlife?
  - If so, is the paperwork forged or fraudulently obtained, or are genuine wildlife licenses or certificates misused?
- Are any books or records maintained?
RETAILER

**FACTORS FOR CONSIDERATION IN INVESTIGATIONS**

- How does the retailer receive and distribute wildlife?
- Does the retailer focus on one or several species of wildlife?
- Does the retailer also deal in other commodities?
  - Is the wildlife processed into any product by the retailers or their associates?
  - How does the retailer store wildlife (alive, dead, as products, as falsely labelled)

**ACTOR & ROLE**

Retailer

 Selling wildlife

**DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP**

- Individuals or businesses selling wildlife to customers.

**Flow of**

- Product
- Money
- Documentation
- Communication

**What payment method does the retailer use to pay shipping and logistics companies or consolidators?**
- What payment method does the retailer accept from customers?
- How do the retailers launder illicit gains?
- Do they own any legitimate or seemingly legitimate businesses?

**Are any books or records maintained?**
- Does the retailer provide certification for wildlife?
- If so, is it forged or fraudulently obtained, or is legal paperwork used for illegal commodities?
CUSTOMERS

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

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

ACTOR & ROLE

Customers
Purchasing and using wildlife

- How does the customer pay for wildlife?
- Do the customers pay the retailers only, or do they make payments to other actors along the supply chain?

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.

- How does the customer identify where to purchase wildlife?
- Based on word-of-mouth, advertisement, online sales, etc.?
- Do the customers place an order for wildlife, or do they purchase readily available wildlife?

Flow of Information

Flow of Value

Flow of Documentation

Jump-Start Flow

Communication
ADDITIONAL ACTORS AND ROLES
BUSINESSES THAT ARE OTHERWISE INVOLVED IN LEGAL ACTIVITIES

- Do businesses have valid documentation (e.g., licenses, permits) to trade wildlife?
- Do businesses have a traceability mechanism to establish the legal origin of wildlife?
- Do businesses trade one or several wildlife species?

- Is the business owner in contact with any actors in source or transit countries? If so, by what means?
  - How do business owners communicate to arrange the delivery of products?
  - Does the business 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 as part of 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 unwittingly transport illicit products that are concealed among legitimate cargo.
- Such businesses may include zoos, pet shops, game farms, licensed retailers of wildlife storage facilities, transport companies and freight agents.
- These businesses might mislabel illegally sourced wildlife as legal. In addition, they may transport or sell concealed illegal products alongside legal products.

- Is there any indication of business activities conducted “off-the-books” or outside the business’s 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?

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

- Is the transportation for one or several species?
  - Is wildlife transported with any other (legal or illegal) products?
  - Does the company know that wildlife is being shipped?
    If so, is the company aware that the activity is illegal?

- How are the logistics/shipping companies contacted by the transport facilitator/wholesaler/retailer?
- Does the logistics/shipping company communicate with authorities?

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- What payment method has been used to pay shipping and logistics companies?
  - Are there any payments from foreign companies/individuals?
  - Are there other payments for potentially related past dealings or unexplained payments that may be related to the one under investigation?
    - Is payment to a logistics company proportionate to the services provided? Could a bribe be involved?
    - Do payments involved originate from the country of export or another country?

- Does the shipping documentation indicate the presence of any wildlife products?
  - Are bills of lading or other shipping documents mislabeled or fraudulent?
  - How are import/export/customs documents obtained?
    - Is there any indication of fraud or corruption?
    - Do accounting books show imbalances?
    - Is there any indication of illegal business activity?

Logistics and shipping companies
Facilitating and committing wildlife

- Companies that transport cargo, including wildlife products, by land, sea or air.
CORRUPT PUBLIC OFFICIALS

FACTORS FOR CONSIDERATION IN INVESTIGATIONS

- Does the public official provide information on the location or availability of a particular species?
- Does the public official engage in activities relating to hunting or capturing wildlife?
- Does the public official negatively influence any investigation of wildlife crime?

ACTOR & ROLE

Corrupt public officials
Facilitating and committing wildlife crime

- Is there any indication of public officials living beyond their means?
  - Does the public official receive unexplained payments?
  - Does the public official receive goods or services without evidence of any payment being made?
  - Is there any indication that the public official is using illicitly gained money to pay day-to-day expenses?
  - Is there evidence that fees for licenses or permits have been illicitly taken or banked by the public official?

DESCRIPTION AND CONNECTION TO ORGANIZED CRIMINAL GROUP

- Public officials facilitating criminal activities. These can involve environmental agencies, wildlife management authorities, national park services, customs authorities, licensing authorities and regulators.
  - Corrupt public officials can facilitate criminal behaviour at any stage of the supply chain, including by:
    - Illegally providing confidential information
    - Issuing permits fraudulently
    - Turning a blind eye during inspections
    - Hindering investigations or prosecutions
  - Public officials can also be directly involved in criminal trafficking: for example, poaching protected species, smuggling wildlife via diplomatic pouch and selling confiscated products.
  - Corrupt public officials can engage with organized criminal groups on a routine basis or opportunistically on an ad hoc basis.
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 can 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 culprits, 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 are hierarchical in their operations, with 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 the 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 arranging transport 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 models are in use; and in turn, to generate questions for further analysis and investigation.
Description

- The OCG controls the sourcing, export, transport, import and sale of wildlife
- One or several person(s) overseeing complex multi-jurisdictional or global operations
- The OCG is likely to have a command-management structure with well-defined roles for each individual involved in the group's activities
INTEGRATED MODEL

Common variations in modus operandi

- 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 route(s) and method(s) being used
  - A single or multiple destination country or countries for wildlife sale

Interactions with actors outside the organized criminal group

- **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 part of the criminal group.

- **Corrupt public officials**
  The larger and more sophisticated the OCG, the higher is the level of public officials that are likely to be corrupted and the more structured is 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**
  OCG’s are more likely to own or have co-opted infrastructure for storage, transport and logistics.

Flows of Money/Value

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

Flows of Communication

- The OCG is likely to have consolidators/coordinators in (each) source country. It is likely that international communication is channeled through those focal points. They, in turn, would have relatively structured communication with those involved in the capturing/transport/processing of wildlife in the respective countries.

Flows of Documentation

- Documentation is likely to appear legitimate (i.e., forgeries, documentation obtained through corruption or laundering of illegal products using legal documentation).
ORGANIZED CRIMINAL GROUPS

Description

- The OCG 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 show varying degrees of sophistication. These may range from groups of poachers working together to consolidators who employ multiple poaching gangs and are likely to have built complex schemes to support the illegal taking of wildlife. Such schemes may include:
- Laundering illegal products through wildlife farms/zoos/legal hunting operations/game ranches/etc.
- Establishing and running parallel legal businesses to launder profits.

**Corrupt public officials**
Corruption schemes are likely to be linked to the level of sophistication of the organized criminal group, but may involve bribing officials to turn a blind eye to the activities of the group or to corruptly issue licenses or permits to hunt, capture or transport wildlife. In some cases, public officials may be part of the OCG or be complicit with the group. For example, public officials themselves may engage in hunting, capturing and transporting of wildlife. They may also provide confidential information about the location of wildlife, ongoing investigations or court proceedings.

**Logistics and shipping**
Organized criminal groups following a source-end model typically do not arrange complex transport schemes and are likely to work with other criminal groups specializing in other stages of the supply chain. Alternatively, they may use a direct-to-client transport route, such as direct mailing of products to the customer.

**Flows of Money/Value**
- Revenue and profits are likely to remain in source countries. Volumes of money involved may be relatively small. Transactions often occur in cash or through mobile money systems.
- Consolidators may receive international fund transfers for shipments of specific cargoes.
- Laundering of profits is likely to occur in source countries, particularly through legal businesses used to facilitate hunting/poaching operations (such as game lodges).

**Flows of Communication**
- There is likely to be regular communication between the consolidator and hunter(s)/poacher(s). The consolidator may communicate with (multiple) other organized criminal groups/wholesalers/retailers abroad.
- Mobile phone or messaging records can be important sources to trace communication between consolidators and hunters/poachers/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 limited. Often, hunters/poachers will seek to completely conceal their activities, rather than attempt to make them appear legitimate.
- Hunting licenses and business licenses may, however, 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 agreed upon distribution of proceeds of crime, among others.

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**Common variations in modus operandi**

- The following variations may be seen in an OCG’s operations under the source-end business model:
  - A single or multiple species being sourced
  - Operations are mostly confined to either wildlife trafficking or wildlife in combination with other commodities
  - A single country or multiple countries for wildlife sourcing
  - The OCG probably works with other organized criminal group(s) specialized in crimes linked to other stages of the supply chain; or, alternatively, it fulfils orders received directly from customers using direct-to-client transport.
  - Hunters/poachers and consolidators could be part of the same criminal group or from two distinct groups working together in source countries.
Description

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

Common variations in modus operandi
- The following variations may be seen in operations of the OCG under the transport business model:
  - A single or multiple species trafficked
  - Operations confined to wildlife trafficking or wildlife in combination with other commodities
  - A single or multiple transport route(s) and method(s) used
  - A single destination country or multiple destination countries for wildlife sales
- OCGs may operate in three distinct ways regarding the transport of wildlife:
  - They can operate a legal transport business that they occasionally exploit for the transport of illegal commodities
  - They can contract legitimate transport businesses to ship illegal commodities
  - They can run entirely illegal transport operations for the import, export and transport of wildlife. For example, an OCG may own a transport vehicle or vessel that they use to move wildlife across national borders, either as concealed cargo or using informal border crossings.

Interactions with actors outside the organized criminal group
- When OCG’s operate legal transport businesses, they are likely to use fraudulent paperwork to disguise the illegal nature of goods being transported. Corruption, particularly bribery, is likely to be small-scale and localized (such as payments to customs or border officials).
- When the groups contract legitimate transport businesses, they are likely to rely on fraudulent, forged or mislabeled paperwork as well as on the concealment of goods in other, legal commodities that are being transported.
- When OCG’s run entirely illegal transport operations to move wildlife, they operate their own means of transport and are more likely to bribe public officials to overlook illegal activities (for example, at border crossings).

Flows of Money/Value
- When OCG’s operate legal transport businesses that conceal illegal activities, investigators may see small payments between actors, with funds originating in source countries.
- When OCG’s contract legitimate transport businesses, investigators are likely to see multiple payments being received in the books of legitimate transport businesses.
- When these groups run entirely illegal transport operations to move wildlife, investigators are likely to see fewer large payments originating from destination or transit countries, and smaller payments, often in cash, to and between members of the organized criminal group.

Flows of Communication
- When OCG’s operate legal transport businesses that conceal illegal activities, investigators may see communications between the transport business and other actors in the supply chain, particularly those at the receiving end of the shipment. Code or mislabeling may be used to obfuscate the presence of wildlife.
- When OCG’s contract legitimate transport businesses, investigators may find written documentation of agreements between the organized criminal group and transport/logistics company. Investigators may also see indications of communications between the organized criminal group and other actors in the supply chain, but these may be more likely to be obfuscated or hidden.
- When OCG’s operate entirely illegal transport operations to move wildlife, the members of the group are likely to communicate face-to-face, with limited traceable communication between the members. Other traceable communications may exist between the organized criminal group and other actors involved in the supply chain, but these are more likely to be obfuscated or hidden.

Flows of Documentation
- When OCG’s operate legal transport businesses that conceal illegal activities, documentation concerning export, import and transportation will often be forged, mislabeled or corruptly acquired.
- When OCG’s contract legitimate transport businesses, investigators may find written documentation of agreements between the organized criminal group and the legitimate transport business. There is likely to be an inconsistency between the products reflected in the paperwork and the goods shipped.
- When OCG’s operate entirely illegal transport operations to move wildlife, documentation is likely to exist, but it will be minimal. If wildlife is concealed for transport amongst legitimate commodities, forged, fraudulent or mislabeled documentation will be required. Other informal business records may be kept, possibly using code or obfuscation to disguise illegal aspects.
CUSTOMER-END MODEL

Description

- The OCG's business includes a focus on, or specialization in, wholesale or retail of wildlife. Its business may also include sales of legal wildlife.
CUSTOMER-END MODEL

Common variations in modus operandi

- The following variations may be seen in an OCG’s operations under the customer-end business model:
  - A single destination country or multiple destination countries for wildlife sale
  - A wholesale-only approach, a wholesale-retail combination approach or a retail-only approach
  - A physical retail presence or presences (e.g., shops or stalls) and/or online sales
  - The wildlife is falsely marketed as legal; it is sold illegally using a legitimate business as a front company or is sold to clients who know that the product is illegal
  - A single or multiple location(s) of operations (including warehouses or other storage locations)
  - A single or multiple species sold
  - The business is focused solely on selling wildlife species or also other commodities
  - The business sells solely illegal commodities or also legal commodities
  - The wholesaler/retailer delivers goods to customers, uses a delivery service, or relies on customer pick-up
  - Wildlife is sold alive, dead or as parts or products
- In cases where live animals are involved, particular approaches of activity may be detectable. Some live species have specific requirements in terms of housing and diet, which can help tip off investigators or provide corroborating information. For example, live tigers require protective shelter and substantial quantities of meat.

Interactions with actors outside the organized criminal group

- Businesses that are otherwise involved in legal activities
  Under the customer-end model, interactions may take place between OCGs and legitimate businesses for the purpose of money laundering (e.g., concealing illicit profits through apparently benign retail operations).
  - Corrupt public officials
  There may be bribery of enforcement or regulatory authorities to avoid proper inspection, collusion with law enforcement authorities to obtain confiscated goods or bribery of public officials to provide sales permits/business licenses.
  - Logistics and shipping
  In the OCG’s dealings with legitimate logistics and shipping companies, the group may use a cut-out identity or pseudonym to thwart any enforcement actions.

Flows of Money/Value

- Under the customer-end model, most revenue from wildlife sales is likely to remain in the destination country. There may also be money-laundering through businesses in the destination country that are associated with the OCG, or in other jurisdictions outside the supply chain. There may be international financial flows back to actors in the source or transit country.

Flows of Communication

- 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 and informal channels.

Flows of Documentation

- Forged documentation (e.g., certificates of origin, CITES permits, business licenses) may be used to make products and sales appear legal.
  - Books or records of wholesale or retail businesses are expected to exist but may be obfuscated or falsified. These records may include sales invoices and sales ledgers, purchase records, contracts and financial records.
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 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 encounter a protected species and decide to poach the species to sell it to a local criminal group.
**OPPORTUNISTIC MODEL**

### Common variations in modus operandi

- The following variations may be seen in an OCG’s operations under the opportunistic business model:
  - Activities 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 route(s) and method(s) being used
    - A single destination country or multiple destination countries for wildlife sale
  - The OCG works with (an)other criminal group(s) specialized in other stages of the supply chain; or, alternatively, fulfills orders received directly from customers using direct-to-client transport.
  - 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
    - Perceived risk (e.g., of enforcement action) associated with dealing with wildlife products
    - Obtaining some other benefit or avoid some penalty (e.g., complying with a request from a partner criminal group).

### Interactions with actors outside the organized criminal group

- **Businesses that are otherwise involved in legal activities**
  OCG’s following an opportunistic model usually must rely on private businesses, as they are unlikely to establish infrastructure for supply chain activities as part of the criminal group.

- **Corrupt public officials**
  Corruption is likely to be ad hoc, with a lower level of public officials likely to be corrupted.

- **Logistics and shipping**
  If the OCG has 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 contract legal logistics/shipping operations and use strategies of concealment or falsification.

### Flows of Money/Value

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

### Flows of Communication

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

### Flows of Documentation

- In opportunistic cases, expected documentation is likely to vary. However, these cases are likely to involve a smaller amount of forged documentation and more attempts to conceal wildlife among legally traded goods or paying bribes to circumvent inspection.
By understanding the business models associated with wildlife crime, investigators can enhance 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.

**Understand the wildlife supply chain framework.**
- The wildlife supply chain is defined as activities that take place in source countries, transit countries, and destination countries. In source countries, these acts are taking and consolidation of wildlife.
- In transit countries, international transport, although transit countries can also serve as consolidation spots.
- In destination countries, the sale of wildlife through wholesalers or retailers.

[For more information, see “Supply Chain and Key Actors”]

**Understand the various actors who are involved in the supply chain framework.**
- These actors are: hunters/poachers, local dealers, consolidators, facilitators of transport, wholesalers and retailers.
- Additional actors relevant in the supply chain can be: businesses otherwise engaged in legitimate activities, public officials and logistics and shipping companies.
- Investigators should also consider the roles of banks and financial institutions.

[For more information, see tables 1 and 2 “Actors and Roles”]

**Consider which actors are known or suspected to be involved in the case, based on the available evidence and intelligence.**
- In any particular investigation, authorities should consider which of the above actors are known or suspected to be involved in the case.

[For more information, see “Wildlife crime business models”]

**Consider whether there is a business model that might be applicable to the case.**
- Based on the known and suspected actors involved in the case, and the nature of their activities, could any of the wildlife crime business models apply?

[Note: more than one could apply] [For more information, see Section “Wildlife crime business models”]

**Make linkages to other actors who might be relevant to the case based on the applicable business model(s).**
- Are there any actors in the business model who have not yet been identified through intelligence or evidence in the case?
- Can these actors be identified?

**Determine the extent of control required for the business model, and attempt to identify the actor who would have this level of control.**
- Can the business model help provide guidance in identifying leaders of OCG activity in the case?
- Does the business model involve activity in other countries?