



**GLOBAL  
INITIATIVE**

AGAINST TRANSNATIONAL  
ORGANIZED CRIME

# COMPOUND CRIME

CYBER SCAM  
OPERATIONS  
IN SOUTHEAST  
ASIA

MAY 2025



## ACKNOWLEDGEMENTS

This research report was produced by the Global Initiative Against Transnational Organized Crime (GI-TOC)'s Observatory of Illicit Economies in Asia-Pacific in partnership with the Australian-funded ASEAN-Australia Counter Trafficking programme and the Regional Support Office of the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime. The views expressed in this publication are the authors' alone and are not the views of the Australian Government.

The publication was drafted by Kristina Amerhauser and Audrey Thill with support from Martin Thorley, Louise Taylor and Matt Herbert. Sincere appreciation goes to the external reviewer, Jason Tower, from the United States Institute of Peace for his comments and feedback as well as to the technical experts at the ASEAN-Australia Counter Trafficking programme and the Regional Support Office of the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime who provided input.

The report is based on qualitative and quantitative data and analysis collected by researchers based in and working across Southeast Asia. The team would like to thank Lindsey Kennedy and Nathan Paul Southern, who work for The Eyewitness Project, Matt Blomberg, Aung Khant Si Thu, Yu Mon Htay, and the researchers at Humanity Research Consultancy (HRC) and the Asia Centre for their hard work and dedication to this research. We would also like to thank others who prefer to remain anonymous as well as the many interview partners for their open and frank insights and contributions.

The team would also like to thank the GI-TOC's Publications team.

© 2025 Global Initiative Against Transnational Organized Crime.  
All rights reserved.

No part of this publication may be reproduced or transmitted in any form or by any means without permission in writing from the Global Initiative.

Cover photo: *GI-TOC*

Please direct inquiries to:  
The Global Initiative Against Transnational Organized Crime  
Avenue de France 23  
Geneva, CH-1202  
Switzerland  
[www.globalinitiative.net](http://www.globalinitiative.net)

# CONTENTS

Acronyms and abbreviations .....	ii
<b>Executive summary .....</b>	<b>1</b>
Methodology .....	3
Key findings .....	3
<b>Basic parameters .....</b>	<b>5</b>
What is a scam compound? .....	5
Hitching a ride on the BRI? .....	9
A typology of scams .....	9
Scam victims .....	11
<b>Key players .....</b>	<b>12</b>
People who conduct scams .....	12
Scam operation managers .....	14
Recruiters and traffickers .....	15
IT personnel .....	16
Corrupt officials .....	17
Role shifters .....	18
<b>Enabling infrastructure .....</b>	<b>20</b>
Technology .....	20
Private sector .....	21
<b>Harms and impacts .....</b>	<b>24</b>
Abuse and discrimination in compounds .....	24
Threats to freedom and human rights .....	25
Corruption of politics .....	25
Threats to peace and security .....	26
Harming the economy and development .....	27
Tearing societies apart .....	28
Environmental harms .....	29
<b>Case studies .....</b>	<b>30</b>
O'Smach, Cambodia .....	30
The Golden Triangle Special Economic Zone, Laos .....	32
Shwe Kokko, Myawaddy, Myanmar .....	34
Bamban, the Philippines .....	37
<b>Conclusion and recommendations .....</b>	<b>39</b>
Notes .....	42

# ACRONYMS AND ABBREVIATIONS

<b>AI</b>	Artificial intelligence
<b>ASEAN</b>	Association of Southeast Asian Nations
<b>BGF</b>	Border Guard Force
<b>BRI</b>	Belt and Road Initiative
<b>COA</b>	Cambodian Oknha Association
<b>GDP</b>	Gross domestic product
<b>GI-TOC</b>	Global Initiative Against Transnational Organized Crime
<b>GTSEZ</b>	Golden Triangle Special Economic Zone
<b>ISP</b>	Internet service provider
<b>KNA</b>	Karen National Army
<b>KNLA</b>	Karen National Liberation Army
<b>KNU</b>	Karen National Union
<b>NGO</b>	Non-governmental organization
<b>OECD</b>	Organisation for Economic Co-operation and Development
<b>PAGCOR</b>	Philippine Amusement and Gaming Corporation
<b>POGO</b>	Philippine offshore gaming operator
<b>SEZ</b>	Special economic zone
<b>USIP</b>	United States Institute of Peace
<b>UNODC</b>	United Nations Office on Drugs and Crime
<b>UWSA</b>	United Wa State Army





## EXECUTIVE SUMMARY

**A**s the world grappled with policy responses to the COVID-19 pandemic, criminals across Southeast Asia seized an opportunity to gear up cyber scam operations on an extraordinary scale. Where casinos, hotels and resorts lay empty due to travel restrictions, organized networks repurposed these facilities to employ recruits for the explicit purpose of defrauding people worldwide through cyber fraud.

Criminal organizations redeployed workers from the online gaming and gambling industry and forcibly recruited tens of thousands more to fill burgeoning 'scam compounds', as they are referred to locally.<sup>1</sup> Five years on, hundreds of thousands of victims remain trapped and exploited across Southeast Asia in such criminal compounds.

These victims are in turn forced to victimize others by perpetrating fraud against unsuspecting individuals. One common process begins with the spamming of innumerable phone numbers or social media accounts with messages aimed at eliciting a response. Recruits then cultivate false relationships with the few who respond, often on a false romantic premise. They persuade targets of a once-in-a-lifetime opportunity to get rich from purported investment schemes, ultimately in order to drain victims of their savings. However, this is just one of many types of fraud being conducted at scam compounds.

Cyber scam operations represent the latest iteration of a well-established criminal ecosystem, blending sophisticated technology with organized criminal tactics to create a highly lucrative and adaptable industry. Criminal organizations have been able to rely on existing money laundering networks and a proliferation of both cryptocurrencies and virtual asset service providers to hide enormous profits from this activity.<sup>2</sup>

The activity generates tens of billions of dollars per year. By one estimate, the money made from cyber scams in the Mekong equates to 40% of the combined formal gross domestic product (GDP) of Laos, Cambodia and Myanmar.<sup>3</sup> Combined with the forced labour of trafficked persons, these profit margins present clear threats to national economies, governance and international security.

Given such staggering illicit profits, it is no surprise that this illegal industry has expanded beyond the region. Scam centres staffed by forced labour have been identified in the United Arab Emirates,<sup>4</sup> Montenegro,<sup>5</sup> Peru<sup>6</sup> and Namibia,<sup>7</sup> among other locations.

While such operations have grown substantially since the pandemic, online scams and fraud have been a significant problem in Southeast Asia for more than a decade.<sup>8</sup> The roots of the industry can

be traced to Chinese-speaking communities located across Asia, and the phenomenon remains driven in large part (albeit not exclusively) by Chinese-speaking criminal actors, some of whom relocated to Southeast Asia after a crackdown by China on domestic casinos in the 2000s.<sup>9</sup>

Since 2021, there has been a growing body of research documenting various aspects of the cyber scam crisis in Southeast Asia, including on recruitment methods, dual victimization (i.e., both those exploited for forced criminality and those targeted by scams), criminal networks and the global reach of the phenomenon.<sup>10</sup> Journalists – many of whom are referenced in this report – have provided some of the most detailed accounts of conditions inside scam compounds.<sup>11</sup>

These illicit facilities are spread throughout Southeast Asia in capital cities, small towns and (both genuine and self-proclaimed) special economic zones (SEZs). They often share similar blueprints and are occupied by multiple scam operations.

This report contributes to existing literature by examining the criminal economy surrounding these cyber scam operations. It discusses the criminal actors who profit and provides insights into the characteristics of cyber scam compounds, the typology of scams and the profiles of victims targeted.

Four detailed case studies – zeroing in on scam compounds in Cambodia, Laos, Myanmar and the Philippines – further explore the relationships between perpetrators, collaborators and victims, as well as provide additional insights into the harms caused by cyber scam operations.

Holistic responses that break down barriers and enhance cooperation and coordination among all stakeholders are urgently needed to address this phenomenon. This report concludes by providing



**FIGURE 1** Southeast Asia, showing the focus countries of this study: Cambodia, Laos, Myanmar and the Philippines.



recommendations that could be pursued by key actors in national governments, the international community and civil society actors who seek to engineer positive change. These recommendations include, among others, the need to raise more awareness of the multi-faceted harms of cyber scams, close regional loopholes and build resilience in affected communities.

The report was drafted in the second half of 2024 and its key findings have since been presented to government, civil society and private sector actors to build awareness, engagement and action on the topic.

## Methodology

This report is based on multi-method research conducted in the first six months of 2024 by a team of 14 researchers and civil society partners with significant experience investigating organized crime and corruption in Southeast Asia. Researchers conducted field visits and in-person interviews with villagers, local government officials, investigative journalists, people who worked for money laundering operations and scam centres and civil society organizations that operate in affected areas. The report also draws on a literature review of secondary sources, including analysis of over 350 articles, blogs and media reports in English and local languages. Social media analysis provided insight into the locations and conditions of scam compounds and communication patterns among criminal actors. The GI-TOC validated the information through additional semi-structured interviews, open-source research and source triangulation, and then synthesized and analyzed the data for this report.

Initial drafts of this report were reviewed by an external expert working on cyber scam operations in Southeast Asia as well as technical experts working for the ASEAN-Australia Counter Trafficking programme and the Regional Support Office of the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime. The preliminary findings were also presented at a regional multi-stakeholder expert group meeting co-organized by the Regional Support Office of the Bali Process on People Smuggling, Trafficking in Persons and Related Transnational Crime, the ASEAN-Australia Counter Trafficking programme and the GI-TOC in Bali, Indonesia, in October 2024. This meeting served as an opportunity to further refine the research findings.

## Key findings

- The cyber scam industry appears to be continuously changing, highly adaptable and mobile. Despite crackdowns in numerous locations, compounds often close only temporarily, relocate to less scrutinized or smaller facilities, or switch jurisdictions.
- Cyber scam operators create two types of victims by defrauding people through online scams and exploiting their (often forced) recruits. The latter type challenges existing perceptions of and distinctions between victims and perpetrators.
- Local elites – from elected officials and influential business owners to armed group leaders – play a significant role in driving and facilitating cyber scams. These include ‘role shifters’, who can be defined as individuals who simultaneously hold positions in government, business and criminal networks or shift between those roles. They influence both the criminal ecosystem and the policy responses to it.
- Cyber scam operations exemplify a convergence of various forms of transnational organized crime on a large scale. Trafficking in persons, financial fraud, cybercrime, corruption and money laundering – the latter also channeled through cryptocurrencies – are best understood as facets of a single issue

rather than distinct categories. This dovetailing of criminal activities has been accelerated by technological advances, blurred lines between criminal groups and private sector entities, corruption and the weak rule of law.

- It is increasingly clear that the scale and repercussions were previously vastly underestimated by local and international stakeholders working on the phenomenon. The multi-faceted impact of the cyber scam industry extends well beyond the financial harm caused to victims. It threatens the rule of law, peace, security, sustainable development, freedom and human rights, while also undermining the economy and environment. While these harms are most acute in Southeast Asia, the knock-on effects are global.





## BASIC PARAMETERS

**T**he success of cyber scam operations across Southeast Asia depends on a combination of the actors involved, the spaces they occupy and the power structures that uphold them. From remote border regions to urban centres, these hubs of exploitation are based in hotels, casinos and purpose-built compounds.

Cyber scam operations take place at the intersection of the criminal underworld and the upperworld of business and politics. Many of these operations are able to hide behind a façade of business that makes them appear legitimate and benefit from an ecosystem of corruption. As the scam industry evolves, it adapts to law enforcement efforts by relocating operations and diversifying scams and fraud to maximize profits.

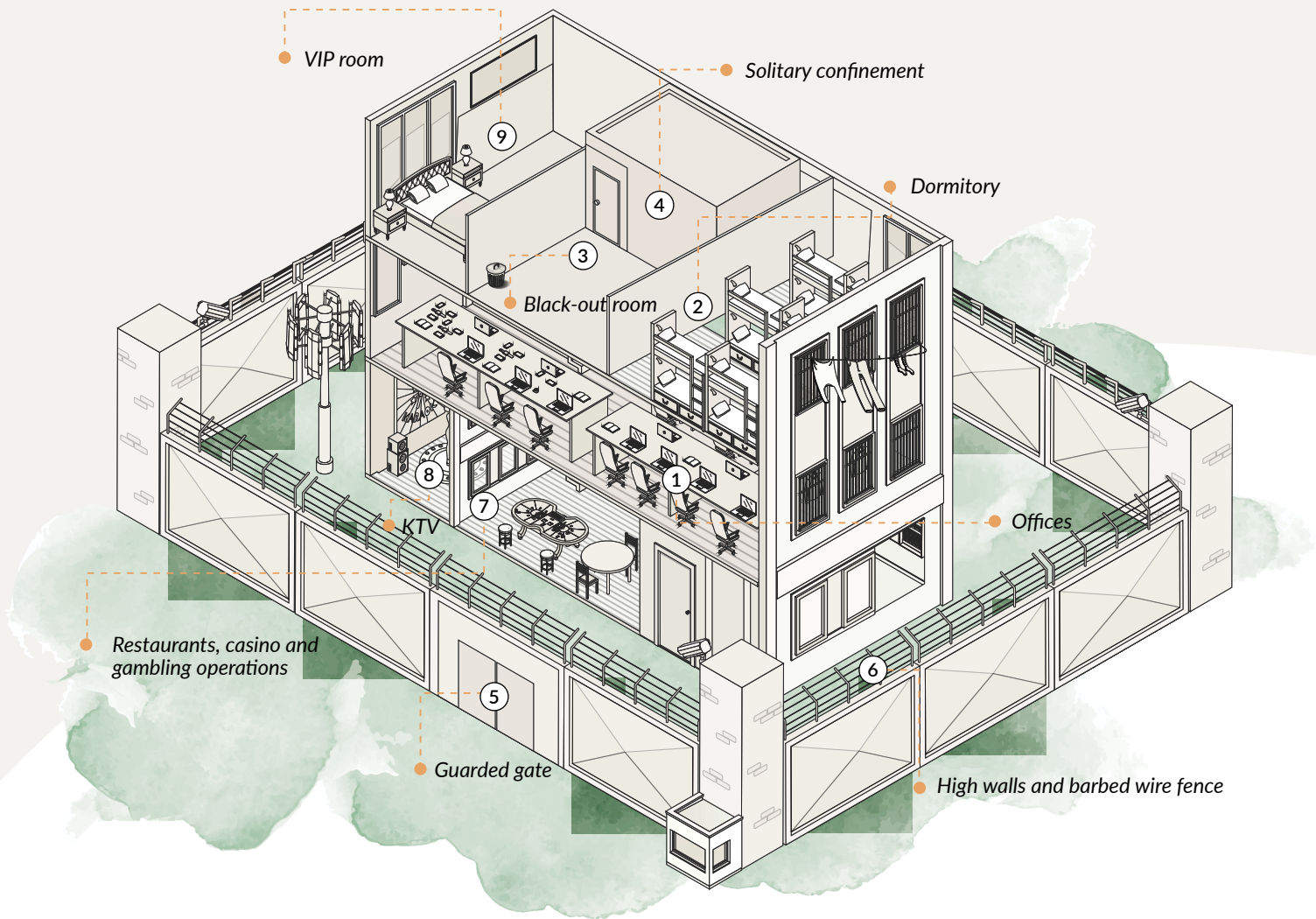
### What is a scam compound?

Cyber scam operations in Southeast Asia are fluid and take on different shapes depending on the space available in different contexts. Some fill only an apartment; others fill large, multi-storey buildings in walled compounds or entire hotels.

Scam compounds generally appear to cluster in areas where state control is limited or has been co-opted by criminal groups,<sup>12</sup> including border areas where law enforcement and border officials are unable or unwilling to enforce the law.<sup>13</sup> These areas, which had previously also drawn alleged illegal gambling operations,<sup>14</sup> have attracted scam operations using forced criminality for a number of reasons, including their proximity to human trafficking routes and the ease of relocating compounds across borders amid government crackdowns.<sup>15</sup> While these are often remote areas, they still have access to electricity and the internet.<sup>16</sup> In addition, scam compounds can be found in bigger towns and cities, where – in most cases – they enjoy protection from local elites and security forces, or exploit low trust between communities and authorities.<sup>17</sup>

As can be observed in the schematic below, buildings hosting scam compounds across Southeast Asia often follow a similar blueprint. Many are based in re-purposed hotels, casinos, villas and apartment complexes.<sup>18</sup> In the Philippines, scam operations were discovered in the offices of licensed offshore casinos.<sup>19</sup> In Myanmar, some compounds near the Thai border are purpose-built with rows of block dormitories.<sup>20</sup> In some of these locations, multiple scam operations operate in a single location or in close proximity.

## SCHEMATIC OF A SCAM COMPOUND



- ① **Offices** – Large offices filled with rows of computers and cell phones serve as the primary scamming operation centres.
- ② **Dormitory** – People who conduct scams sleep in dormitories with bunk beds.
- ③ **Black-out room** – People who conduct scams but resist orders, try to escape or underperform are beaten or tortured in rooms with blacked-out windows.
- ④ **Solitary confinement** – Solitary confinement rooms are also used for punishment.
- ⑤ **Guarded gate** – Compound entrances are usually heavily monitored by armed security personnel or military officers, CCTV systems and guard dogs.
- ⑥ **High walls and barbed wire fence** – Some compounds are surrounded by tall walls topped with barbed wire fencing to prevent workers from escaping.
- ⑦ **Restaurants, casino and gambling operations** – Some scam compounds are located inside or adjacent to casinos. Others include gambling halls and restaurants where people who conduct scams can spend their wages.
- ⑧ **KTV** – Karaoke rooms within the compound provide access to entertainment, drugs, alcohol and sex workers.
- ⑨ **VIP room** – Higher-level criminals who reside at the scam compound have access to luxury suites or condos.

NOTE: This graphic is based on the testimonies of people who have worked in scam compounds and visits by GI-TOC researchers to active and abandoned scam compounds across the region. The representation is a schematic and may not accurately reflect all compounds in the area.





A shuttered cyber scam compound in Sihanoukville where Cambodian authorities said they had recovered evidence of human trafficking, kidnapping and torture during raids in 2022. © Cindy Liu/Reuters

Compounds feature extensive security measures – including gates, guard stations with private security and large dogs, window bars, inward facing closed circuit television cameras and barbed wire fences.<sup>21</sup> While these measures ostensibly keep unwanted guests out, their primary purpose is to keep workers inside and prevent them from escaping.

Scam compounds are often self-contained, housing all necessary facilities within individual buildings or inside compound walls. Workers are usually restricted to tall dormitory-style buildings where they sleep in crowded rooms lined with bunk beds. Higher-ranking employees share these spaces in some cases, allowing for constant surveillance of lower-ranking people who are forced to perpetrate the scams.<sup>22</sup> Some dormitories have balconies where workers dry their laundry. There have been suicide attempts from these balconies, some of which were successful.<sup>23</sup> Bars on windows or balconies suggest attempts to prevent suicide as well as escape.

In stark contrast to the cramped conditions for workers, compound managers and those supervising scam operations have been reported to reside in master suites on the top floors of these buildings<sup>24</sup> or in luxury condos within or near the compound.<sup>25</sup>

Work areas consist of rows of computers where people are forced to conduct a variety of online scams for 12 hours or more per day. Sometimes work hours are at night to align with scam targets' schedules. For people who fail to meet performance targets, break rules or resist the managers, black-out rooms and isolation cells serve as areas for punishment and torture.<sup>26</sup>

Larger compounds house on-site businesses where workers can spend wages earned from perpetrating scams. These include karaoke bars and drug bars, restaurants, barber shops and medical centres.<sup>27</sup> These amenities, however, often reinforce the cycle of exploitation rather than support workers. For example, they are reported to significantly overcharge workers for medical care: a single painkiller can cost US\$50.<sup>28</sup> In addition, massage spas, gambling rooms and VIP karaoke bars reportedly exist for senior managers, where they gather to drink, sing and socialize in private rooms.<sup>29</sup>

One key feature of the scam industry is its mobility; scam operations relocate as authorities clamp down in one location, resulting in scam compounds mushrooming in another location.<sup>30</sup> People who have worked in scam compounds report a certain 'life cycle of operations' where workers operate for

multiple months after which they are moved or sold to different compounds. For example, this includes crossing through Thailand in transit between the Golden Triangle SEZ, Cambodia and Myanmar.<sup>31</sup> Sometimes these are hurried night-time relocations involving several vehicle changes<sup>32</sup> and border crossings through formal checkpoints and unmonitored crossings.<sup>33</sup> Alternatively, some scam operations stay in place or temporarily close in response to law enforcement crackdowns. In several cases, these acts of enforcement appear to be performative, rather than effective efforts aimed at eliminating scam centres.<sup>34</sup> This may explain why scam operations return after the dust has settled.<sup>35</sup>

The list of known scam compound locations in Cambodia, Laos, Myanmar and the Philippines is long and continuously changing. 'You can really see how many of these scam operations are dispersing,' noted one cyber scam expert covering Myanmar. 'They are not limited to border areas anymore but can be found across the country, even in Mandalay and Yangon.'<sup>36</sup> Similarly, recent on-the-ground reports and satellite imagery indicate that scam compounds are being built or expanded in many new sites in Cambodia and Laos.<sup>37</sup> In the Philippines, observers say operations are fragmenting into smaller units based out of nondescript buildings to disguise their activities<sup>38</sup> after the federal ban on licensed Philippine offshore gaming operators (POGOs) that took effect at the end of 2024.<sup>39</sup> Operations also frequently move equipment and labour to new sites within or between countries, sometimes selling workers to other groups.<sup>40</sup>

## The role of special economic zones

There has been much reporting on scam operations in SEZs. However, while scam operations exist in legally designated SEZs, there does not appear to be a causal link between the two and there are only a limited number of SEZs where scam operations have been confirmed. Reporting seems to be conflated as many cyber scam compounds are in self-declared SEZs or other types of economic zones.

SEZs are designed to stimulate trade, attract investment and create jobs through deregulation, tax incentives, trade benefits and other investment privileges.<sup>41</sup> However, lax regulatory oversight has also facilitated organized criminal activities by creating space to generate and launder illicit proceeds. As a result, some SEZs are hubs for illicit activities, including counterfeit goods manufacturing, drug (and drug precursor) trafficking, flora and fauna trafficking, tax evasion, gambling and money laundering.

For example, according to the Office of the UN High Commissioner for Human Rights, several SEZs in the region stand out as enablers of corruption. This report and various media articles raise concerns about MDS Thmorda SEZ in Cambodia, the Golden Triangle SEZ in Laos and Clark Freeport SEZ in the Philippines,<sup>42</sup> among others.<sup>43</sup> These locations are reported to host various criminal activities, such as drug<sup>44</sup> and wildlife trafficking,<sup>45</sup> illegal casinos and cyber scams.<sup>46</sup>

In addition, the presence of casinos and online gambling companies in SEZs is widely understood to increase the risk of criminal activity. The United Nations Office on Drugs and Crime (UNODC) estimated that there were approximately 340 licensed and unlicensed casinos in 2021 across Southeast Asian SEZs,<sup>47</sup> some of which were used for money laundering, illegal gambling and, more recently, cyber scams involving forced criminality.<sup>48</sup> The involvement of Chinese-owned developers, management and security at these sites may also contribute to this risk.<sup>49</sup> ■



## Hitching a ride on the BRI?



Scam compounds have been discovered in facilities owned by Chinese developers, some of whom claim to be affiliated with China's Belt and Road Initiative. © Brent Lewin/Bloomberg via Getty Images

Individuals (and groups) linked to the cyber scam industry have often (falsely) portrayed their activities across Southeast Asia as being linked to the development of China's Belt and Road Initiative (BRI). The BRI is a flagship programme promoting Chinese influence on overseas trade in tandem with the development of Chinese funded transport and other infrastructure.<sup>50</sup>

Given that the Chinese government does not officially publish a list of BRI projects, it seems that some investors have taken advantage of this situation to claim their developments are BRI-linked, yet their affiliation remains ambiguous. For example, Wan Kuok-koi ('Broken Tooth'), who was previously linked to scam compounds in Myanmar, has reportedly characterized his alleged criminal enterprises as being part of the BRI.<sup>51</sup> The developers of Yatai New City in Myanmar initially described it as a BRI project<sup>52</sup> and a Chinese state-owned enterprise was one of the major contractors involved in building the city.<sup>53</sup> However, Yatai later denied its affiliation with the BRI after the Chinese embassy claimed it was entirely a third-party investment. It denied any involvement with 'illegal casinos' and urged that 'all companies within our area abide by Myanmar laws and regulations'.<sup>54</sup>

The Dara Sakor Seashore Resort in Cambodia was reportedly described as the largest BRI-affiliated project in the region by its developer, a Chinese state-owned enterprise, but its status is unclear.<sup>55</sup> The Cambodian government-aligned *Khmer Times* reported that although the Dara Sakor project 'pre-dates the BRI by five years, it is aligned with the BRI's core values'.<sup>56</sup> In 2022, scam workers were released from buildings adjacent to the LongBay Casino Hotel complex within the Dara Sakor concession.<sup>57</sup> The owners of LongBay are now sanctioned by the United Kingdom for facilitating or obtaining benefit from people 'held in servitude or required to perform forced or compulsory labour'.<sup>58</sup> The owners of the Dara Sakor concession have also been sanctioned by the United States.<sup>59</sup>

## A typology of scams

There are many types of online scams perpetrated across the region; the principal ones are summarized below.

- Romance and investment scams (also called pig-butchering scams): 'Pig-butchering', which originates from the Chinese phrase '杀猪盘' (shā zhū pán),<sup>60</sup> aims to build trust with targets and lure them into thinking that they are embarking on romantic relationships, ultimately in order to extract money fraudulently for non-existent investment schemes.<sup>61</sup>

- Impersonation scams: Scammers pose as trusted entities (such as police<sup>62</sup> or company customer service representatives<sup>63</sup>) to convince victims to divulge sensitive information or transfer funds.
- E-commerce scams: These involve creating fake online stores or listings on legitimate platforms, offering non-existent or counterfeit goods to deceive buyers and steal money or personal data.<sup>64</sup>
- Crypto Ponzi schemes: An investment fraud that purports to offer high profits with little or no risk. Like traditional Ponzi schemes, this involves paying 'returns' to existing investors using funds contributed by new investors. These schemes collapse when new investments slow down.<sup>65</sup>
- Online extortion: Blackmailing of targets with embarrassing or incriminating information, often with a deceptive sexual element (which is called sextortion). For example, perpetrators acquire sexually explicit images or videos of victims through 'nude chats' that are recorded without the consent of the victim.<sup>66</sup> Other variations use similar tactics to acquire personal data from victims.<sup>67</sup>
- Other cyber-enabled crimes: These encompass a range of cyber-attacks, including phishing and malware attacks. Phishing is orchestrated through deceptive emails, websites or text messages that appear to be from reputable sources to trick victims into providing sensitive information such as passwords, credit card information or financial account details. Malware attacks involve malicious software that infiltrates devices or networks, usually to steal data, spy on users or extort money. This can involve use of viruses, ransomware, spyware and QR codes that trigger an automatic download of malware.<sup>68</sup>

Such schemes are quickly evolving as the criminal industry is experimenting with new types of scams. They often involve cryptocurrencies, particularly stablecoins, which is a type of cryptocurrency pegged to a stable asset such as the US dollar.<sup>69</sup>

It is worth noting that while scams function differently from the victim's perspective, it appears that they frequently operate out of the same types of compounds. People forced to conduct these scams cast a wide net with text messages and chats, striking up conversations with anyone who responds. The similarity of romance investments scams conducted across different scam compounds is often because standardized manuals are used, which set out social engineering techniques to groom targets. These manuals have been discovered in raided compounds and are readily available online.<sup>70</sup>

A complete and accurate estimate of the value of funds stolen through these scams remains elusive. While blockchain analysis firms, think tanks and governments have released estimates for the financial impact of scams, these numbers are not comparable. They clearly differ in how they classify scams, which type of scam they analyze, whether these scams are conducted globally or are region-specific, the type of assets included in the estimates and calculation methods.

For instance, in 2024, cryptocurrency scams received at least US\$9.9 billion on-chain according to Chainalysis (down from over US\$10 billion in 2023).<sup>71</sup> US officials reported its citizens lost at least US\$4.57 billion in assets from investment scams and US\$652.5 million from 'romance/confidence' scams in 2023;<sup>72</sup> and Australia reported AUD1.57 billion (US\$1.1 billion) was defrauded by romance and investment scams in 2023.<sup>73</sup> The United States Institute of Peace (USIP) estimated global 'illegal and unregulated online gambling and sophisticated scamming operations' generated US\$64 billion in 2023.<sup>74</sup> Within that figure, USIP estimates 'criminal syndicates' in Mekong countries were responsible for US\$43.8 billion.<sup>75</sup>

Comparability issues notwithstanding, these estimates confirm that scam operations are extremely profitable. Additionally, useful trends are evident in individual analyses conducted consistently over a span of several years. For example, Chainalysis found that crypto revenues from romance scams increased 85-fold between 2020 and 2023.<sup>76</sup>

Nonetheless, greater comparability in research methodologies and more comprehensive data are both clearly needed to provide better insight into the financial flows associated with cyber scams.<sup>77</sup>

## Scam victims

Scam targets are diverse and globally dispersed. The locations of chosen victims often correlate with the languages spoken by scam workers. In some cases, however, scammers rely on language translation software and generative artificial intelligence (AI) chatbots to broaden their reach.<sup>78</sup> Scammers are often instructed to identify targets that appear financially stable, and they often pose as women on mainstream social media platforms to attract middle-aged or older male victims.<sup>79</sup> Other operations specifically target the elderly, LGBTQI+ people and women.<sup>80</sup>

Many reported victims are based in Australia, Canada, China, Europe, India and the US.<sup>81</sup> Some rescued scam labourers have reported that they were specifically told not to target Asians. However, people in many countries across the region – notably Thailand,<sup>82</sup> Vietnam,<sup>83</sup> Singapore<sup>84</sup> and Indonesia<sup>85</sup> – are frequently targeted by scams.<sup>86</sup>

Scam operations assess the likelihood of targets taking the bait. They often focus on vulnerable individuals, such as those experiencing difficult life changes, like divorce or the death of a family member. Those in financial trouble are reported to be more likely to fall for scams that promise quick money, like Ponzi schemes and other fake investments. Cryptocurrency scams are also common because many people do not understand the risks and lack digital security knowledge, making them easier targets.<sup>87</sup>

Yet anyone can fall victim to online scams,<sup>88</sup> even tech-savvy individuals with investment experience, as was the case with a bank CEO in the US.<sup>89</sup> People with experience using online brokerage accounts are not immune because scammers often use legitimate apps to house illegitimate brokerage services.<sup>90</sup>

Furthermore, the scammers employ sophisticated psychological manipulation and social engineering techniques to control victims and prevent them from noticing red flags. For example, they foster emotional dependency, generate a sense of urgency to pressure victims to invest quickly and exploit a human tendency to double down on investments despite losses (the sunk cost fallacy) by encouraging them to take out loans to 'invest' more, even after surrendering their entire life savings.<sup>91</sup>



## KEY PLAYERS

**A**cross Southeast Asia, cyber scam operations exploit and thrive in a well-established criminal ecosystem already comprising many different illicit markets and actors. According to the GI-TOC's 2023 Global Organized Crime Index, the region hosts diverse criminal actors, including criminal networks, state-embedded actors and foreign criminal groups.<sup>92</sup> Cyber scam operations are run and facilitated by a variety of actors who operate across the region and beyond.

Inside scam compounds, cyber scams involve numerous actors, ranging from organized criminal groups to recruitment networks and individuals forced to conduct the scams. The criminal networks are often fragmented with smaller groups operating alongside larger criminal organizations. Researchers have often uncovered multiple scam operations and managers operating in close proximity in major scam locations.

### People who conduct scams

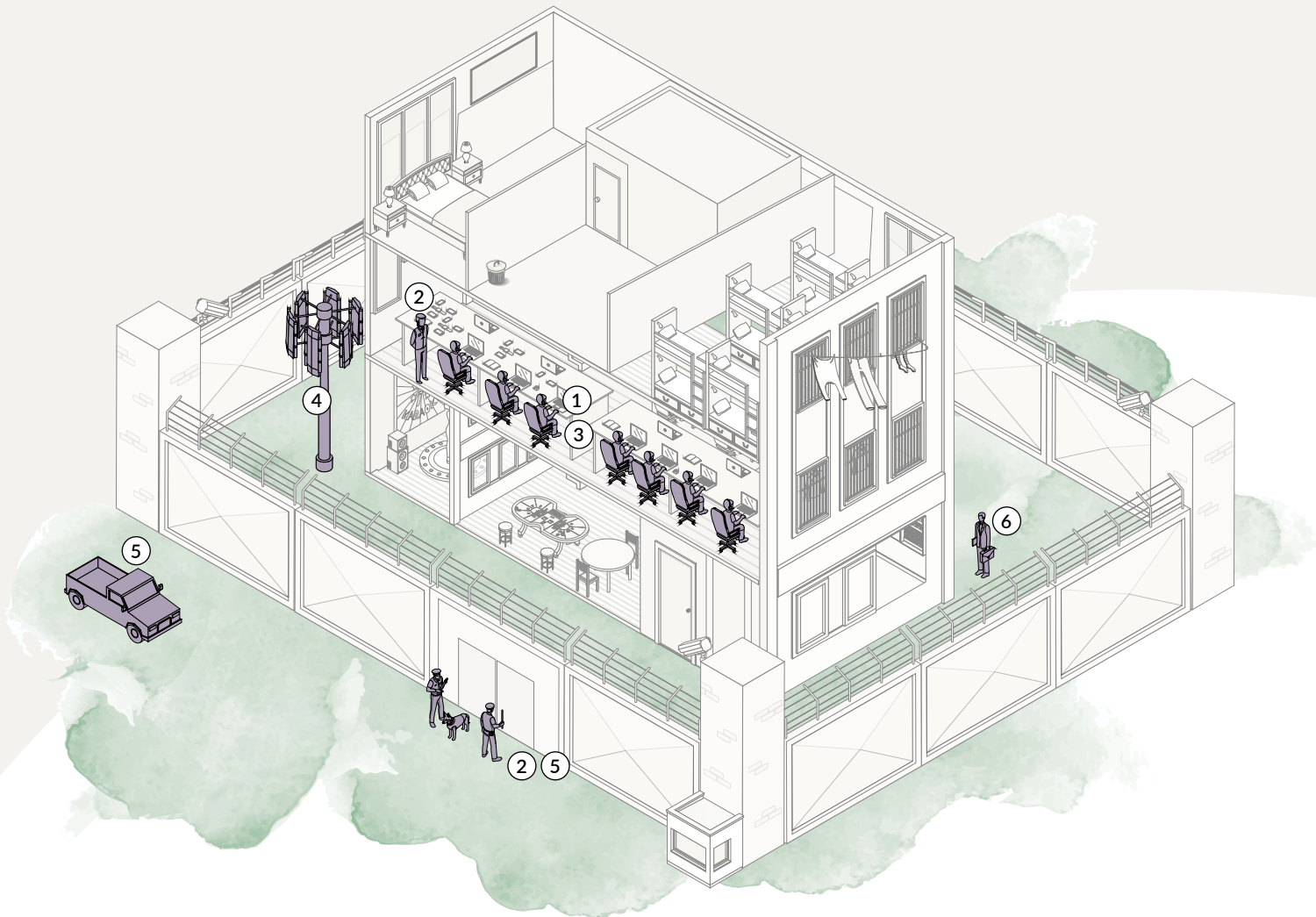
During the pandemic, high unemployment in some countries led people to search for work online; some accepted fake job offers that landed them in scam compounds.<sup>93</sup> Individuals from all around the world, of different age groups and social backgrounds, are recruited by traffickers for scam operations. Although initially Asian men in their twenties and thirties were prime targets, all demographics are currently at risk, especially those experiencing financial distress, discrimination and displacement from natural disasters, climate change and conflict. For instance, recruiters operating from within Yangon, Myawaddy and the Golden Triangle SEZ reportedly target Myanmar nationals fleeing conflict or seeking work.<sup>94</sup> Additionally, there have been reports of pregnant women and teenagers being forced into the industry.<sup>95</sup>

Citizens from Myanmar, Laos and the Philippines are trafficked abroad, while others work in compounds in their home countries alongside foreigners. Workers in Cambodia's scam compounds are primarily foreign.<sup>96</sup> In total, it is estimated that people from more than 66 countries have been trafficked to Southeast Asia's scam compounds.<sup>97</sup>

Reports from international organizations suggest significant numbers of individuals are involved in scam operations across Southeast Asia. In 2023, the Office of the UN High Commissioner for Human Rights estimated there to be at least 100 000 people in Myanmar's scam compounds and 120 000 in Cambodia.<sup>98</sup> By 2024, USIP estimated 500 000 people to be allegedly forcibly involved in scam operations across Southeast Asia.<sup>99</sup> While regional governments have acknowledged these operations, they have disputed such estimates without offering comprehensive alternative data.<sup>100</sup> In response to international reporting, for example, Cambodia's Ministry of Interior issued a statement characterizing such claims as an 'attempt to exaggerate the reality, demonstrating their ulterior motives, which undermine the integrity of Cambodia on the international stage' and noting that 'most of the complaints of the concerned parties derived from work disputes, contracts, and conditions as excuses to return to their home country'.<sup>101</sup>



## CRIMINAL ACTORS AT SCAM COMPOUND LEVEL



- ① **People who conduct scams** sometimes do so willingly and sometimes under duress. Forced labour is often the result of trafficking in persons, while willing labour is provided by low-level criminals. Some enter willingly but are later unable to leave or are trafficked but decide to stay as they are able to make a profit. These workers do the 'grunt work' in cyber scam operations, notably by identifying, targeting, chatting with and luring victims. Some operatives are employed as translators.
- ② **Scam operations managers** are primarily actors within Chinese-speaking criminal networks running the day-to-day operations, including by providing security for a compound. There are also reports of local criminal networks as well as networks from South Korea, Japan and other Southeast Asian countries who often work in collaboration with Chinese-speaking criminal networks.
- ③ **Recruiters and traffickers** consist of multiple actors, including brokers, smugglers and traffickers spanning multiple countries. Recruiters sometimes operate from trafficking victims' countries of origin, and some function like legitimate job agencies, deceiving job seekers with fake jobs and then trafficking them to compounds. Some are reportedly based at compounds as 'human resources' staff or as scam workers who recruit friends and acquaintances.
- ④ **IT personnel** encompass individuals and companies in the tech sector and money laundering networks involved in funnelling the proceeds of crime, often through cryptocurrency transactions. They provide crucial services to criminal groups. Some do not necessarily consider themselves part of a criminal group.
- ⑤ **Corrupt officials** include police, military or border guards and other government officials. They not only facilitate workers' journeys to scam compounds, but also provide protection from raids or physical security on-site. They have also been reported to facilitate the movement of scam operatives between compounds.
- ⑥ **Role shifters** are business owners, politicians and crime bosses who hold multiple roles (and who sometimes shift between those roles). Individuals may be more closely aligned with one profile than others, but their defining feature is their ability to switch. They have significant influence over investments, law-making and law enforcement processes and wield their influence to shape the criminal economy of the region.

Precise estimates of people who conduct scams remain challenging to establish for several reasons. Victim identification procedures vary across jurisdictions,<sup>102</sup> and law enforcement sometimes reportedly classify potential trafficking cases as immigration offences or labour disputes.<sup>103</sup> Additionally, the clandestine nature of these operations impedes consistent data collection and verification.

Evidence gathered from survivors, researchers and satellite imagery suggests the number and size of scam compounds – and therefore likely the scale of trafficking in persons – is significant.<sup>104</sup> Even limited law enforcement data confirms a large number of people continue to work in scam compounds. Myanmar authorities reportedly transferred 31 000 people allegedly involved in cyber scams to Chinese authorities during a crackdown on cyber scams in Myanmar along the Chinese border in November 2023.<sup>105</sup> In the Golden Triangle SEZ, authorities reportedly detained and deported 771 people conducting 'tele fraud' within several days in August 2024; at least 548 Indian nationals were among those deported in 2024.<sup>106</sup> Cambodian authorities detained around 700 foreign workers (primarily Chinese) at just two resorts in Preah Sihanouk province in March 2024 for their alleged involvement in illegal gambling and scam operations.<sup>107</sup> Between August and December 2024, Chinese law enforcement – and counterparts in Laos, Myanmar, Cambodia, Thailand and Vietnam – reportedly detained and deported more than 70 000 suspects involved primarily in 'telecom fraud' across the region.<sup>108</sup>

## Scam operation managers

Many scam operations are run by Chinese-speaking criminal networks. As a dominant actor, these groups have so far received the most attention in international and local reporting.<sup>109</sup> However, criminal groups originating from elsewhere in Asia – notably of Japanese, Vietnamese, Malaysian and South Korean origin – have been identified in Laos, Cambodia, the Philippines and Myanmar.<sup>110</sup>

According to a Japanese police attaché based in the region, the Japanese groups include Yakuza-affiliates and other organized crime groups that are more 'loosely networked' and operate alone, or in smaller, fractured units. South Korean and Japanese nationals arrested for alleged scam and telecom fraud in several countries include both criminal fugitives and people recruited online deceptively and forced to scam.<sup>111</sup> Most of the Japanese and South Korean criminal groups appear to be renting space in larger compounds or casinos owned by powerful local developers.<sup>112</sup>

There have also been reports of scam operations taking place in Japan,<sup>113</sup> indicating the further spread of the phenomenon, as criminal networks put expertise gained in Southeast Asia into practice at home. As cyber scam operations continue to spread across the region and beyond, it is likely that copycats will enter the market (or have already done so).

Chinese-speaking criminal networks collaborate with local criminal networks in many locations. For example, while Chinese-speaking actors often provide security, including through Chinese private security companies,<sup>114</sup> local armed groups or police supplement these efforts with their own forces.<sup>115</sup> A former worker at a scam compound in Shwe Kokko, Myanmar, explained that the operation's leader was always accompanied by two Chinese-speaking bodyguards, four Myanmar security guards and a German Shepherd dog.<sup>116</sup> The United Wa State Army, a Myanmar ethnic armed organization, Laos national police and Chinese security have previously been reported to provide security in the Golden Triangle SEZ.<sup>117</sup> It also appears that Chinese-speaking criminal networks have de facto authority over some areas with scam operations. An example is Laukkai, Myanmar, where prior to the takeover by an ethnic armed organization in 2024,<sup>118</sup> the national military and police reportedly were unable to exert authority over the illegal casino and scam operations, or were unwilling to do so because their non-intervention allegedly benefited them financially.<sup>119</sup>

Chinese scam operatives during a police raid on a suspected scam compound in Batam City, Indonesia in August 2023. Scam operations are reported to deceptively recruit young, tech-savvy individuals to work for them.

© STR/AFP via Getty Images



The relationships between criminal networks requires further investigation. Despite the proximity of many scam operations and managers within the same buildings and/or cities, not much is yet known about competition – or indeed cooperation – between the criminal actors and networks that run the compounds. So far, it appears that this illegal market has provided enough low hanging fruit for diverse criminal groups to operate, but it is unclear whether this will continue if or when the market consolidates.

Furthermore, high-level managers or owners above the day-to-day management of compounds are based regionally. Several of the 10 people arrested in Singapore in 2023 and later convicted as part of a S\$3 billion (US\$2.2 billion) money laundering case had ties to online gambling and telecommunication scams in the Philippines and Cambodia.<sup>120</sup> While originally from China, they held a variety of passports acquired before taking up residence in Singapore, and owned numerous businesses used as fronts to launder funds.<sup>121</sup> Two of those convicted were reportedly shareholders in the company that built the Baofu compound in Bamban, the Philippines, which was later found to house scam operations (and constitutes one of our case studies).<sup>122</sup>

## Recruiters and traffickers

Scam operatives report being recruited online through professional-looking job advertisements posted to social media.<sup>123</sup> They are interviewed and receive job offers in sales, marketing and customer service, only to realize later that the job is to perpetrate scams.<sup>124</sup> As the industry evolves and becomes more sophisticated in its use of technology, the UNODC has reported an increasing demand for workers skilled in data science, search engine optimization and digital marketing.<sup>125</sup> This suggests that some job descriptions used to recruit these skilled workers may align with the actual roles; however, they may still deceive the recruits about the location and criminality of the employer.

Still others are lured to scam compounds by friends, relatives or acquaintances who are also scammers, but who recruit others, including in exchange for their own freedom.<sup>126</sup> For example, between May and August 2022, a 23-year-old individual fell victim to a supposed friend's offer of a job fixing air conditioners in Thailand; instead, he was forced to operate in a scam compound in Laos with no option of leaving until his one-year contract was completed. He was only released after his family

paid a ransom of the equivalent of US\$12 457.<sup>127</sup> Similarly, a young man from Kachin State, Myanmar was invited to work in Laukkai, Myanmar where he reluctantly accepted a job at a cyber scam operation only to realize that his friend had benefited from the arrangement.<sup>128</sup>

The structure of recruiting and trafficking networks often remains unclear, although they seem to vary depending on the country of origin and involve multiple actors such as recruiters, brokers, smugglers and traffickers.<sup>129</sup> Some recruiters are reportedly based in scam compounds, earning commission for each person they recruit,<sup>130</sup> while others work in the same countries as their victims.<sup>131</sup> Brokers also play a key role in re-selling people between compounds. *Frontier Myanmar*, a local online magazine, reports that 'they will sell the workers to another broker if the company already has more workers than it needs ... the workers do not know they are being sold'.<sup>132</sup>

Some reports indicate that recruitment networks or brokers even collaborate with legitimate job agencies. For example, individuals who previously sought legal employment through agencies in Dubai were later deceived into accepting job offers at cyber scam operations in Southeast Asia.<sup>133</sup> According to Humanity Research Consultancy, a social enterprise researching the topic, it appears that Dubai-based agencies were implicated in this scheme, to the point where some received payments directly from criminal networks.<sup>134</sup>

Recruitment commissions can be substantial. For example, a criminal group allegedly earned US\$1.67 million for trafficking 82 workers via Taiwan Taoyuan International Airport to Cambodia.<sup>135</sup>

Some traffickers are recruited online by adverts like those used to recruit scam operatives: recruiters are tasked with 'appeasing' the 'clients' (referring to trafficking victims) throughout the journey until they reach the scam compounds. Recruiters reportedly instruct clients to turn off their mobile phones during the trip, but there appears to be no requirement to confiscate them. A post on China Youth Online reported that trafficking three victims to compounds yields a bonus of RMB16 666 (US\$2 291), for six victims a bonus of RMB18 888 (US\$2 596) and for trafficking 23 victims a bonus of RMB99 999 (US\$13 746). Additionally, introducing new intermediaries to the team can also result in bonuses ranging from RMB8 888 to RMB88 888 (US\$1 246 to US\$12 462).<sup>136</sup>

More research is needed to better understand the relationship and collaboration between the criminal scam operations and compound managers in Southeast Asia and recruitment networks or local trafficking in persons networks in countries of origin.<sup>137</sup>

## IT personnel

IT professionals and people involved in online money laundering are key facilitators, with some working as freelancers, for companies or as staff directly embedded in scam operations. Many can also be described as (criminal) opportunists or crime-as-a-service providers that offer IT support, websites and apps used in scams (for instance, fake versions of legitimate investment platforms),<sup>138</sup> as well as money laundering services.<sup>139</sup>

Some have backgrounds in the region's financial and technology industries, which have hosted numerous start-ups in fintech, especially cryptocurrency companies.<sup>140</sup> While this industry has seen tremendous growth and innovation, some aspects appear to have been co-opted or directly developed in the interests of criminal actors, especially for fraud and money laundering.<sup>141</sup>

Money laundering networks include professional money laundering 'gateway' companies, high-risk virtual asset providers (such as currency exchangers, decentralized exchanges and crypto 'mixers') and mule account holders, who are tricked or intentionally sell their bank accounts to criminal groups.



## Gateway companies

'Gateway companies' (also called 'Tongdao', 通道) are intermediaries at the centre of money laundering activities. Using public and private Telegram or other chat groups, they connect scam operations with the money launderers who transfer the stolen funds through networks of connected mule accounts (referred to as 'motorcades').<sup>142</sup> Mule accounts exist in local and international banks.<sup>143</sup> Funds stolen from scam victims pass through mule accounts and out of those countries.<sup>144</sup>



Huione Pay has an office on a major boulevard in the heart of Phnom Penh, Cambodia. Photo: GI-TOC

Gateway companies operate much like legitimate businesses, complete with departments, standard operating procedures and risk management strategies.<sup>145</sup> They even mediate disputes between scam operations and money launderers, for instance, when a mule account holder steals funds they were supposed to launder.<sup>146</sup>

One example appears to be Huione Pay (匯旺APP), a company owned by the conglomerate Huione Group, which describes itself as 'Alipay in Cambodia'. Huione Pay and other vendors listed on an online marketplace owned by the conglomerate Huione Guarantee have reportedly facilitated between US\$70 billion–US\$89 billion in cryptocurrency transactions since 2021.<sup>147</sup> While it could not be confirmed whether all of these transactions were related to crime, two blockchain analytics firms traced some to scam operations, armed groups and members of the North Korea-affiliated hacking group Lazarus.<sup>148</sup> In March 2025, Huione Pay had reportedly been stripped of its banking licence by the National Bank of Cambodia but Huione then claimed that its payment operations did not require one. It also said media reports linking it to illicit activities were false.<sup>149</sup> In May 2025, the US Department of the Treasury's Financial Crimes Enforcement Network identified Huoioe Group as a financial institution of primary money laundering concern and a critical node for laundering proceeds from cyber scam operations. It proposed to sever its access to the US financial system.<sup>150</sup> Several days later, Huione Pay was observed taking down its signage in Phnom Penh, and Telegram banned thousands of accounts and usernames that had been linked to it.<sup>151</sup>

While some IT personnel and money laundering professionals are unaware their products and services facilitate scam operations, others willingly participate. Interviews with employees at several gateway (money laundering) companies and currency exchangers revealed some knew their work catered to scams, while others did not perceive their work as being part of a criminal organization.<sup>152</sup> Similarly, some of the nominal holders of accounts used in money laundering are people who have sold their accounts to criminal groups for a small sum but who otherwise do not participate in the money laundering process.<sup>153</sup>

## Corrupt officials

Cyber scam compounds have also thrived by exploiting corruption and patronage systems in host countries. This corruption appears to extend beyond lower-level bribery to high-level protection of the industry. Indeed, the evidence points to involvement by high-ranking law enforcement and other

government officials across the region and in all focus countries of this research. Corruption and bribery seemingly facilitate scam compound operations at every step of the supply chain.

For example, one victim reported that her recruiter facilitated an express pass at the immigration office in Laos.<sup>154</sup> This is not unique as border officials have been known to facilitate trafficking in persons and ignore signs of it across several countries in Southeast Asia.<sup>155</sup>

Law enforcement complicity in cyber scam operations appears to be widespread, as police stations are sometimes located adjacent to scam compounds. There are also accounts of high-ranking police officers collecting bribes from scam operations.<sup>156</sup> For example, a former scam worker who had escaped a compound in Cambodia claimed that police forced him to sign a letter stating that he was working of his own free will and had not been kidnapped or physically abused.<sup>157</sup>

Previous reports have also alleged that armed and uniformed Cambodian police officers may be directly working with trafficking networks and providing protection for convoys that transport people from one compound to another. Cambodian police units have reportedly conducted raids with the intention of extracting bribes and have sold rescued workers back to trafficking networks.<sup>158</sup>

## Grey zone: criminal perpetrator or victim?

There are countless pictures and videos posted on TikTok and other social media platforms that show the inside operations of scam compounds and the violence that takes place inside. The materials show people being beaten, held captive, tortured and forced to conduct physical exercise in the extreme heat. Posted directly from inside compounds, they constitute a unique and grim primary source.

Although most people who conduct scams are exposed to extreme pressure and physical abuse is common, not all low-level workers fit the profile of a 'perfect victim'. Instead, they fall along a spectrum.<sup>159</sup> While most are trafficked and forced into criminality, at the other end of the spectrum there exist 'career criminals' who work in the compounds willingly.<sup>160</sup> Some people fall in between. For instance, some may join willingly and might have known that they were being recruited to commit criminal acts, but find themselves unable to opt out of the work or to leave when they arrive at a compound.<sup>161</sup> Others may have been deceived during recruitment but decide to stay even beyond the required period as they gain promotions, generate significant profits<sup>162</sup> and pocket high commissions.<sup>163</sup> Media reporting also suggests that some scam workers have been rescued and returned multiple times to their home country, but keep on going back.<sup>164</sup> In addition, it appears that some people forced into the industry come to regard it as 'a job like any other'.<sup>165</sup> ■

## Role shifters

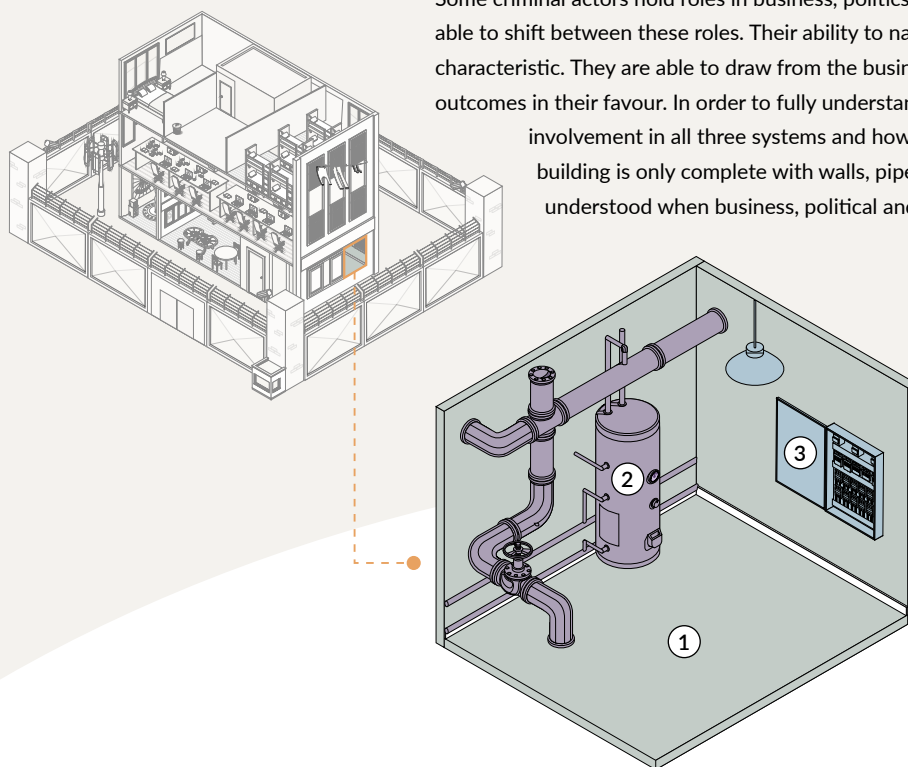
In the cyber scam ecosystem, a relatively small group of individuals appears to wield extraordinary influence. These actors – 'role shifters' – are not defined exclusively by their criminality; they appear to juggle multiple roles and can seamlessly transition between the realms of business, politics and crime, blurring the lines between legitimate and illicit activities. Their ability to navigate multiple networks is their defining characteristic, allowing them to adapt their roles as needed depending on the network they are engaging with.

'Role shifters' function as pivotal gatekeepers in the cyber scam landscape. They often determine who can establish and operate compounds, where these operations are located, and their duration based on the protection they receive. Whether by owning and renting out the compound facilities or controlling the police, their connections with the compounds shape not only individual locations but also the broader industry within countries and the wider region. When viewed through the lens of 'role shifters', the criminal ecosystem appears more ordered than is initially apparent. As the illicit market evolves and potentially consolidates, these gatekeepers could become even more crucial, potentially leading to increased competition among criminal groups vying for their favour or at least permission to operate. Many of these individuals are well-known figures in Southeast Asia, often recognized as successful businessmen and politicians.

As visualized below, role shifters own and direct multiple companies involved in real estate, casinos and online gambling operations in locations where scam operations have been recorded. Many are politically connected or are connected through family ties. In some cases, connections span multiple countries, highlighting the regional nature of the cybercrime phenomenon.

## ROLE SHIFTERS ENABLING CYBER SCAM OPERATIONS

Some criminal actors hold roles in business, politics and crime simultaneously and appear to be able to shift between these roles. Their ability to navigate multiple networks is their defining characteristic. They are able to draw from the business, political and criminal realm to engineer outcomes in their favour. In order to fully understand their influence, it is crucial to look at their involvement in all three systems and how these overlap and interact. Just like a building is only complete with walls, pipes and electricity, their actions are better understood when business, political and criminal involvement is assessed together.



- ① **Business** (*walls and foundation*)  
Role shifters own multiple companies in real estate, casinos, online gambling and other sectors. Many of these businesses host scam compounds directly or have served as fronts for other illicit operations. Businesses are quite literally the foundations of cyber scam operations.

- ② **Politics** (*pipes and sewage*)  
Role shifters are all politically connected individuals, either holding public office or with government connections. Their political connections provide them with a layer of protection and impunity. They can seemingly make unwanted attention go away.

- ③ **Crime** (*electricity*)  
Role shifters play key roles in cyber scam operations as well as other types of organized crime, including illegal gambling, trafficking in persons, illegal wildlife trade and illegal logging. Sometimes illicit profits can also buy more influence and power.



## ENABLING INFRASTRUCTURE

**W**hile scams and fraud are not new phenomena, cyber scam operations are thriving in Southeast Asia because of the enabling infrastructure and the speed at which technology is developing and the increasing opportunities for its misuse. They also thrive through support from the private sector, which allows scam operations to hide behind a front of legitimate-seeming businesses.

### Technology

Technological advances have been crucial to the growth of cyber scam operations. Some scam operations employ sophisticated tools like Sim boxes, allowing them to send out thousands of simultaneous calls or texts appearing to originate from local area codes.<sup>166</sup> Reports indicate compounds are using Starlink internet receivers, which directly connect to satellites to provide high-speed internet without requiring local internet infrastructure.<sup>167</sup> To avoid detection, some groups reportedly employ 'mirror' websites – copies of original websites, but using randomly-generated web addresses that change with each access.<sup>168</sup> Some scam operations exploit legitimate investment apps, available on mainstream platforms like Apple and Google, that sublicense external brokerage services, thereby enabling rogue firms to insert fraudulent investment links.<sup>169</sup>

While technological advances have without doubt brought innovation to the criminal ecosystem, it remains unclear to what extent AI is being deployed, even as it rapidly evolves. Evidence suggests scam operations are experimenting with AI technologies to produce chatbot-generated conversations, photos and deepfakes,<sup>170</sup> with the latter reportedly being used to pass Know Your Customer screenings at banks.<sup>171</sup> Some scam operations are reportedly exploiting the concept of AI as a marketing tool, including by using AI-related buzzwords in their investment pitches and incorporating AI-related terms in website URLs.<sup>172</sup> Many reports suggest, however, that the people conducting the scams usually type out conversations with victims in their first or second language or use translation software,<sup>173</sup> rather than using AI to generate conversations.<sup>174</sup>

Cryptocurrencies and high-risk virtual asset service providers, which are widely used to scam victims and serve as key money laundering tools, are also broadening the criminal ecosystem by attracting new networks and innovators.<sup>175</sup> One example is the proliferation of decentralized exchanges. Scam operations and money laundering networks use these to launder stolen cryptocurrency by 'chain-hopping',<sup>176</sup> which involves quickly moving crypto between wallets on different blockchains to try to spread out and obscure financial trails.<sup>177</sup> The rapid technological advances employed by scam operations and related money laundering networks have outpaced efforts to stop them.



## Private sector

The current cyber scam industry in Southeast Asia relies heavily on goods and services supplied by the private sector, including technology described in the previous section, utilities, communication tools, transportation, financial and business incorporation services and much more. The examples in this section are far from an exhaustive list. The involvement of these businesses span a spectrum from unwitting enablers to active participants in the criminal economy.

Many legitimate companies, such as social media platforms, are misused by scammers. These platforms are exploited for recruiting scam workers, conducting scams and money laundering. Companies housing scam compounds use social media platforms for reputational laundering, posting content that projects a positive public image.<sup>178</sup> Encrypted messaging apps facilitate communication and peer-to-peer transactions within criminal networks.<sup>179</sup>

Internet service providers (ISPs) and telecom operators provide internet and phone access to scam compounds. In Thailand, some ISPs and operators have reportedly provided these services illegally.<sup>180</sup> A study that traced the location of ISPs used by scam compounds in Cambodia and Myanmar found that most were based in Thailand. Some connectivity was provided by illegal internet lines stretching across Thailand's borders to Cambodia and Myanmar,<sup>181</sup> and by mobile phone signal towers in Thailand pointing at Myanmar.<sup>182</sup> Some scam compounds in Myawaddy (Myanmar) reportedly rely on towers provided by Mytel,<sup>183</sup> a joint venture between the Myanmar military and Viettel, a Vietnamese state-owned defence enterprise.<sup>184</sup>

State-owned enterprises also appeared to contribute in meeting the needs of scam compounds. Thailand's Provincial Electricity Authority allegedly previously sold power to a company owned by the Karen National Army, which then distributed the power to regions with scam operations in Myanmar's Kayin State.<sup>185</sup> This contract was terminated in June 2023,<sup>186</sup> but reports suggest that electricity sales continued.<sup>187</sup> In February 2025, Thailand then announced a cut of electricity, internet and fuel supplies to five locations along its border with Myanmar as a response to scam centres.<sup>188</sup> The impact on scam centres, however, has been unclear, as some scam compounds had reportedly

Thai National Broadcasting Telecommunications Commission staff inspected mobile phone signal towers in Tak province in May 2024 and suspended 84 that they found were sending signals to Myanmar. Photo: NBTC on Facebook



bought generators to withstand the outage, meaning that residents outside the compounds were likely to be the worst affected.<sup>189</sup> Fuel shortages in Myanmar border areas were reported almost immediately after the announcement.<sup>190</sup>

Businesses provide a range of other services that enable the movement of people and equipment between scam compounds. This includes transportation companies and courier services based in countries that host scam compounds and adjacent countries, particularly Thailand. For example, in June 2024, Thai police intercepted a shipment of 58 Starlink receivers destined for Mae Sot, Thailand (near Myawaddy), at a shipping company near Cambodia.<sup>191</sup> Thai authorities have seized other scam-related items transported through the country, such as SIM cards and cell phones.<sup>192</sup>

Many legitimate companies that enable cyber scams have policies and teams dedicated to reducing the risks of criminal misuse. For example, Facebook's parent company Meta said it is collaborating with Thai police to stop scams and fraud and removed 1.2 billion fake accounts between April and July 2024.<sup>193</sup> Yet the complex issue of private sector involvement in cyber scams, especially the blurred lines between legitimate and criminal businesses, requires much more attention by individual companies and regulators.

Beyond unintentional enablers, there are many companies directly controlled by or primarily serving criminal actors. Some owners use aliases or shell companies to disguise beneficial ownership, while others openly list themselves or family members as directors and shareholders of companies that are associated with scam compounds.<sup>194</sup>

Examples of such companies include custom-built 'super apps' designed for exclusive use within scam compounds. These apps allow scam operations total control over financial transactions, including worker payments and internal purchases. Some apps resemble food delivery platforms but are used for money laundering purposes; the digital equivalent of an empty shopfront.<sup>195</sup>

Actors often base their operations in formally registered businesses such as hotels,<sup>196</sup> call centres,<sup>197</sup> businesses in 'hi-tech' industrial parks<sup>198</sup> and casinos.<sup>199</sup> In the Philippines, scam operations used licensed POGOs as front companies until the 2024 ban.<sup>200</sup>

Furthermore, various criminal actors and their families have registered a plethora of businesses that appear to piggyback on scam operations, such as those supplying construction and medical services, real estate, restaurants and transportation – all essential services for a small city. While these activities are not illegal per se, they are often owned by scam compound owners and managers or by their friends and business partners.<sup>201</sup>

Money laundering and other goods and services that scam operations need can be found in online marketplaces, often based in Telegram channels. One of the first and largest marketplaces with 350 000 users was operated by the Kokang Border Guard Force (BGF) from Myanmar, but many similar marketplaces have cropped up throughout the region.<sup>202</sup> Scam operators (and other criminal actors) are able to connect with vendors selling GPS-trackers, electric shock shackles, electric batons, tear gas, target data (e.g., phone numbers), packages of photos used to create fake online profiles to target victims,<sup>203</sup> scam software tools,<sup>204</sup> white-label products and services (e.g., re-brandable websites),<sup>205</sup> AI tools (e.g. AI face-changing deepfake software and generative AI chatbots) and many other goods and services.<sup>206</sup>

Huione Guarantee – part of the Huione Group, which is the same group behind Huione Pay – is allegedly 'the largest illicit online marketplace to have ever operated', according to blockchain analytics

firm Elliptic. The company reportedly hosts an online platform and chat groups where vendors sell scam-related equipment and software and advertise money laundering services.<sup>207</sup> The company has denied these claims, yet admits that ‘detention equipment’ has been advertised for sale on the website and hidden users may commit fraud and money laundering through loopholes in the rules.<sup>208</sup>

In statements after the release of Elliptic’s July 2024 report, Huione claimed it had deleted posts about selling the illegal equipment and noted the company was cooperating with Elliptic to ‘let them help us with high-risk [cryptocurrency] address identification’.<sup>209</sup> However, data published by Elliptic in January 2025 suggests the company’s response continues to fall short. Meanwhile, monthly inflows to wallets linked to Huione Guarantee and its vendors reportedly increased by 51% and the number of site users to 900 000.<sup>210</sup> Parent company Huione Group has also since reportedly released its own ‘ChatMe’ messaging app integrated with Huione Guarantee and Huione Pay<sup>211</sup> and a blockchain (Huione Chaine or Xone Chain<sup>212</sup>) decentralized cryptocurrency exchange and stablecoin (USDH).<sup>213</sup> The range of tools and services offered made it an attractive one-stop shop for actors involved in the illicit industry.<sup>214</sup>



## HARMS AND IMPACTS

**T**he harms caused by cyber scam operations across Southeast Asia are significant and multi-faceted. So far, attention has largely focused on the massive financial impact of scams worldwide and extreme psychological harm to victims (both forced recruits and fraud victims). Many have lost hundreds of thousands (or even millions) of US dollars, and some incur debts after surrendering their life savings.<sup>215</sup> Some victims commit suicide.<sup>216</sup> However, the data also sheds light on a diversity of additional harms at the national, regional and global levels.

### Abuse and discrimination in compounds

There is increasing awareness of the harms done to victims of exploitation for forced criminality – the death and violence many are exposed to including through long working hours, beatings, torture and assassinations.<sup>217</sup> Gender-based violence, sexual abuse and racial discrimination are reported to be common.

Scam compound managers reportedly exploit racial and ethnic differences to control their workforce, sometimes segregating workers by nationality and seeding distrust among different groups. For example, in the Golden Triangle SEZ, some workers in the scam industry claimed that companies treated people from African countries worse than they did their Asian counterparts.<sup>218</sup> In addition, during police raids targeting specific nationalities, managers have been known to lock other workers in their rooms. Even when diverse groups are housed together, fear and suspicion appears to be preventing unity.<sup>219</sup>

Some people working at scam compounds are also exposed to gender-based violence and discrimination. Women and LGBTQI+ individuals reportedly face disproportionate violence and sexual abuse. Indeed, survivors of scam compounds report sexual violence perpetrated by people described as ‘big bosses’ against female workers.<sup>220</sup> A Vietnamese transgender woman rescued from the O’Smach compound in Cambodia described targeted abuse due to her gender identity.<sup>221</sup> Female staff working as ‘models’ – personas used to defraud scam victims – are forced to engage in sexual video calls with scam targets.<sup>222</sup> For instance, Indian men rescued from Cambodia reported that women had to conduct ‘nude calls’ with scam targets.<sup>223</sup> Additionally, women are coerced into sexual exploitation if they underperform in their assigned roles or need to make more money to pay off debts to the operation.<sup>224</sup>

Entertainment venues within compounds also often exploit women by offering sex to external clients, criminal bosses and others working at the compound.<sup>225</sup> In Myanmar, a former Kayin Border Guard



Force (BGF) member (a group now known as the Karen National Army, KNA) claimed that women working at the Shwe Kokko casino regularly left with a senior BGF officer.<sup>226</sup> A 2023 raid on a POGO running online scams in Manila uncovered an in-house entertainment section where sex workers were displayed in a viewing chamber for customer selection.<sup>227</sup> More research is needed to better understand the conditions of sexual exploitation and/or sex work at scam compounds in specific locations and across the region.

## Threats to freedom and human rights

One of the most direct harms of cyber scam operations is the threat they pose to human rights, including the right to life, liberty and security of trafficking in persons victims forced to work in scam operations. Their human rights are not only violated inside the compounds but sometimes also after 'rescue', when they are unable to access adequate support and help by authorities, are detained on immigration charges or even resold by corrupt officials to other compounds. Most people identified at compounds do not appear to have access to justice or support by local authorities.

For example, police in Cambodia are reportedly unlikely to screen for trafficking victims if they come from compounds owned by powerful local elites,<sup>228</sup> and in Myanmar, the military-controlled government is assumed to have made little effort to identify trafficking victims in the first place.<sup>229</sup> By failing to recognize people rescued from scam compounds as human trafficking victims, governments risk revictimizing them and punishing them for unlawful acts they committed while detained in scam compounds.<sup>230</sup>

Furthermore, those who expose cyber scam operations are often at risk: the witnesses, survivors, whistle-blowers, journalists and activists who become targets of the authorities and/or suffer retribution from the criminals they expose.<sup>231</sup> For example, Mech Dara, a Cambodian investigative journalist who has reported extensively on the country's scam operations, was arrested in September 2024 on charges of inciting unrest.<sup>232</sup> Dara was released on bail after making an apology video and has since announced he will leave journalism because he is 'still afraid'.<sup>233</sup> In addition, Chen Baorong – a Chinese businessman based in Sihanoukville and head of the Cambodia-China Charity, an organization that rescues and repatriates Chinese victims of trafficking – was arrested in 2022 and imprisoned for 10 months, after helping a presumed trafficking victim.<sup>234</sup> Other NGO representatives have opted not to speak out for fear of retaliation or have moved to neighbouring countries instead.<sup>235</sup>

Countries across the region have also significantly restricted freedom of the media and access to information. In February 2023, Cambodia banned Voice of Democracy, one of the last independent media outlets in the country.<sup>236</sup> Journalists also told the GI-TOC about 'lawfare' – threats of legal proceedings aimed at preventing them from publishing their findings – alongside surveillance, arbitrary arrests and threats, including some made by officials attending UN conferences.

## Corruption of politics

The relationship between organized crime and corruption is circular and difficult to break, particularly as actors hold positions in business, politics and crime simultaneously.

Corruption also erodes trust in public institutions, in a region where this trust is already low.<sup>237</sup> Corruption can also generate instability in international relations. For example, it appears that the relationship between countries in the region has been tested numerous times, including when scam

operations received prior warning of cross-border law enforcement operations, significantly reducing the number of workers rescued.<sup>238</sup> Various representatives working at embassies and foreign ministries based in and/or covering the focus countries of this report have expressed frustration that local authorities appear not to be supporting the adequate rescue and repatriation of their citizens.

Political interests and corruption within countries also hamper regional cooperation. In 2023, Indonesia pushed for a common Association of Southeast Asian Nations (ASEAN) approach on how to respond to scam compounds, but disagreements over the reality on the ground led to little practical collaboration. Despite a recent push for ASEAN to act from Chinese officials, there remains a divide within ASEAN, compounded by a failure to reach agreement on how to approach the conflict in Myanmar.<sup>239</sup>

## Threats to peace and security

Cyber scam operations threaten the sovereignty of states. As criminal actors infiltrate politics and business, they undermine the government's ability to control borders against criminal networks.

Some international observers contend that safeguarding the cyber scam industry has become a strategic priority for governments where scam centres are operating due to its profitability and the high level of elite involvement. 'In some countries corruption appears to be so entrenched that if you take away the patronage system there could be major security concerns,' said one organized crime expert who focuses on the region, noting possible adverse consequences for service provision.<sup>240</sup> Disrupting the criminal ecosystem in one location, therefore, could have regional security implications.

Criminal markets often proliferate in conflict zones; cyber scam operations are no exception. The instability triggered by the 2021 coup in Myanmar has amplified opportunities for cyber scam operations,



In April 2024, conflict near Myawaddy resulted in the Karen National Army consolidating control of Myawaddy and its illicit economy. Around 2 000 civilians fled to Thailand to escape the violence. © Kaung Zaw Hein/SOPA Images/LightRocket via Getty Images

impacting not only those brought in to cyber scam operations but also civilians living in the area.<sup>241</sup> In some areas cyber scams have become a key source of revenue for the border guard forces under the authority of the Myanmar military and other nonstate armed groups involved in the criminal activity.<sup>242</sup>

## Harming the economy and development

According to one estimate, the total annual revenue from pig-butcherings scams was US\$12.8 billion in Cambodia, which is equivalent to almost half of the country's GDP (US\$31.7 billion in 2023); US\$10.9 billion in Laos, equivalent to more than two-thirds of GDP (US\$15.8 billion in 2023); and US\$15.3 billion in Myanmar, equivalent to almost one quarter of its GDP (US\$64.8 billion in 2023).<sup>243</sup> These amounts are significant and often dwarf other well-embedded criminal economies, such as the illicit drug trade.<sup>244</sup>

Revenues generated by cyber scams also dwarf current official development assistance, which for Cambodia, Laos, Thailand, Myanmar and the Philippines together stood at just below US\$5 billion in 2022 according to the Organisation for Economic Co-operation and Development (OECD)<sup>245</sup> – or less than 10% of this criminal market.

USIP describes its estimate that scam 'syndicates' in mainland Southeast Asia defrauded victims of around US\$43.8 billion in 2023 as 'conservative'.<sup>246</sup> This figure does not factor in the broader financial losses due to corruption and money laundering, as well as the inequality that organized crime and corruption create within societies. While the business owners of scam compounds and corrupt officials profit massively from the illicit industry, the average salary for a typical Cambodian is around US\$150 per month.

Profits stemming from the cyber scam industry therefore significantly distort national economies in Southeast Asia. Most of these profits either do not enter the region at all or are not put to productive use. Instead, it is likely that they are transferred to offshore financial centres or invested in real estate in Bangkok, Singapore, Dubai and elsewhere. 'We are talking about a massive transfer of wealth, out of the region where it is needed,' one expert noted.<sup>247</sup>

As the economies of Southeast Asia struggle to perform, young people often become disillusioned and vulnerable to recruitment. Some report seeking work in scam operations as the only job opportunity, while others are lured by quick investment schemes.<sup>248</sup> This exacerbates a brain drain away from productive activity, as well-educated and tech-savvy young people are recruited to work in scam operations. Indeed, in 2022 and 2023, 75% of all victims who left scam compounds and were received by the International Organization of Migration were male, multilingual and highly educated, with 50% holding a higher-education degree.<sup>249</sup> This burden is carried particularly by the countries of origin of the people who are trafficked and forced to scam.

The impact on the economy is further compounded by falls in legitimate investment and tourism to areas where scam compounds are prevalent. The reputational risk has been highlighted as a key concern by countries themselves. For instance, tourism from China to some Southeast Asian countries affected by scams is believed to have dropped in response to the Chinese film *No More Bets*, which portrays the cyber scam industry in an unspecified country in the region.<sup>250</sup> In July 2024, the spokesperson for Cambodia's Ministry of Interior reiterated that the country is 'a safe tourism destination' and asserted 'that there has not been a single recorded instance of a tourist becoming a genuine victim of online scamming gangs or kidnappings'.<sup>251</sup>

In January 2025, Chinese TV actor Wang Xing was allegedly trafficked to KK Park, a scam compound in Myawaddy, Myanmar, after being lured to Bangkok for a fake film opportunity. Although he was later released, his case reportedly triggered trip cancellations and renewed calls for the release of others allegedly held in KK Park and similar compounds.<sup>252</sup> In response, the news agency Radio Free Asia reported that local armed groups and business owners in Myawaddy had agreed to implement rules prohibiting forced labour, threats, torture, child labour, human trafficking and scam operations, according to a source described as a businessman.<sup>253</sup> Thai officials maintained that only ‘first-time (Chinese) tourists in tour groups’ cancelled their trips, while ‘free independent travellers’ continued to arrive. In addition, Thai Prime Minister Paetongtarn Shinawatra announced plans to personally assure Chinese President Xi Jinping of Thailand’s safety for Chinese tourists.<sup>254</sup>

## Tearing societies apart

Cyber scam operations are reported to sow fear and suffering in communities and there is widespread evidence that it erodes social, family and community ties and values. The impact is especially stark in smaller villages and border areas where these operations take place. For example, almost all local people researchers spoke to in O’Smach in Cambodia were aware of what was happening and had witnessed or assisted in some element of an escape from the compounds.<sup>255</sup>

This has created a feeling of helplessness as everybody knows about what is going on, but nobody knows what to do about it. One villager in O’Smach reported: ‘They can control the situation; that’s why the news does not spread ... There was one Vietnamese victim whose fingers got cut off inside the compound, but the police came and arrested him [the victim] so that they can control the narrative.’<sup>256</sup>

In many cases it has completely changed the character of the town. This is probably most visible in Sihanoukville, which has become a boom-and-bust town. In the Golden Triangle SEZ and Myawaddy, which have seen growing numbers of Chinese citizens, this includes the increased use of Chinese language (including in signage) and the elevation of the yuan to the de facto legal currency.<sup>257</sup>

Family ties have also been put under strain, as some spend months trying to reconnect with family members working in scam compounds, or who are held in detention by authorities before repatriation.<sup>258</sup> Many families have also reportedly paid ransoms of between US\$3 000 and US\$30 000 to secure the release of a family member.<sup>259</sup>



An abandoned casino in Sihanoukville, Cambodia. Residents have witnessed the city’s dramatic transformation from a sleepy backwater into a gambling and scam hub.

© Valeria Mongelli/Getty Images



## Environmental harms

Criminal actors profiting from cyber scam operations have also been linked to other types of crime, including illegal logging, sand trafficking and the illegal wildlife trade.<sup>260</sup>

Some construction for cyber scam operations causes significant environmental damage, particularly where such activity takes place in economic development zones. These zones have been associated with water and air pollution, deforestation, erosion, river diversion and sand dredging and the illegal wildlife trade. In Myawaddy, Myanmar, developers cleared forests and farmland for buildings that now allegedly host scam operations.<sup>261</sup>

At the same time, it is important to acknowledge that organized crime can have some perceived benefits, in addition to the harm it causes. Local residents have found work inside scam compounds (e.g. cleaning services and construction).<sup>262</sup> Also infrastructure has improved in many remote areas as a result of scam operations – such as water, electricity or telecommunication services that serve the compounds and the communities – highlighting the complexities of responding to cybercrimes without worsening the vulnerabilities of communities that depend on them for survival or stability.

For some, working at cyber scam operations has been a ticket to upward social mobility, particularly for young people who are successful at scamming and who earn sizeable commissions and bonuses.<sup>263</sup> The salary offers used to recruit people to conduct scams are usually higher than local average salaries,<sup>264</sup> although what the salary workers end up getting is sometimes much lower than initially promised.<sup>265</sup> An Indonesian national trafficked to a scam compound in Phnom Penh noted they had acquired key skills, such as the art of persuasion of closing sales. Nevertheless, some may not be able to apply these skills in the legitimate economy – partly because of lack of options or because of the stigma attached – and find themselves forced to return to the scam industry. Aside from the violent punishments, they said it was a ‘good job’ because it ‘shows how we are smarter than others’.<sup>266</sup> Meanwhile, bribes paid to police officers have become a supplementary source of income, especially in a system where they are often forced to pay up the chain of command.

## CASE STUDIES

**W**e examine below four scam compounds in Cambodia, Laos, Myanmar and the Philippines. These countries, once primarily source and transit points for trafficking in persons networks,<sup>267</sup> have become major destination countries for such operations.

When this report was first finalized in October 2024, the Baofu compound in the Philippines appeared to have been shut down and was under investigation by the Presidential Anti-Organized Crime Commission.<sup>268</sup> Crackdowns have also been announced in other locations cited in our case studies, but the broad picture is one of continued activity, albeit sometimes in more fragmented and smaller-scale compounds, rather than imminent closure.

### O'Smach, Cambodia

O'Smach exemplifies how scam compounds are 'hidden in plain sight' and embedded in local economies. This case study highlights the mobility of scam operations and their use of existing infrastructure.

Located near Cambodia's northern border with Thailand, O'Smach is a town of about 11 000 inhabitants. Until the late 1990s, the region was occupied by the Khmer Rouge, which perpetrated a genocide that killed an estimated 2.5 million people between 1975 and 1979.<sup>269</sup> The area remains remote, and government services are limited.

The town is dominated by casino and hotel complexes, which sit between Cambodian and Thai passport control counters, allowing visitors to access them from both sides.<sup>270</sup> The entrances to two casinos are directly adjacent to a police station and customs checkpoint.<sup>271</sup>



**FIGURE 2** Cambodia, showing the location of O'Smach near the border with Thailand.

### The scam compounds

Both O'Smach Resort and Royal Hill Resort have heavily guarded multi-story buildings believed to house scam workers.<sup>272</sup> At both locations, construction of new dormitories was observed during a site visit in March 2024, which suggested possible future expansion of the workforce.<sup>273</sup>

The transformation of these resorts into scam compounds occurred over several years. In 2018, residents observed an influx of workers believed to be Chinese and Vietnamese at both resorts, and residents say these workers frequented local shops.<sup>274</sup> In 2020, the situation changed. Workers stayed inside, ostensibly



O'Smach Resort (left) and Royal Hill Resort (right) have heavily guarded multi-story buildings believed to house scam workers. Photos: GI-TOC

for COVID-19 safety protocols, but they never came out again.<sup>275</sup> 'They have everything they need inside,' a local observer noted. 'Shops, KTVs [karaoke bars], restaurants, beer gardens ... everything, except freedom.'<sup>276</sup> Evidence suggests that scam operations expanded to locations such as O'Smach as crackdowns in Sihanoukville and Phnom Penh forced operators to seek out less visible, less scrutinized locations.<sup>277</sup>

The first reported suspicious death at O'Smach Resort came on 5 December 2020 when a Chinese woman fell from the second floor of the hotel. While both Khmer and English versions of the story claim she jumped, only the original Khmer source notes that one of the woman's eyes was bruised in a manner that indicated 'she was beaten.'<sup>278</sup> This was the first in a series of suspicious deaths connected to the compound reported by the media.<sup>279</sup>

By October 2022, the compounds linked to forced scamming were exposed.<sup>280</sup> Reports emerged of trafficking in persons and forced criminality at O'Smach Resort, as Cambodian authorities rescued 75 foreigners from the location.<sup>281</sup> Workers described gruelling 12-hour workdays, building fake online profiles and coaxing victims to 'invest' in fraudulent cryptocurrency schemes. Resistance or failure to perform allegedly triggered severe punishment, including food deprivation, beatings and torture.<sup>282</sup> 'They torture like during the Khmer Rouge,' said a security guard at one of the compounds.<sup>283</sup>

In O'Smach, the compounds' activities are widely known and multiple residents claim to have witnessed people escaping and running into the forests nearby.<sup>284</sup> Yet, given the challenging and constrained media environment within the country, the stories of violence from inside the compound largely stay in O'Smach.<sup>285</sup> Social media, particularly TikTok, have therefore become crucial for people inside the compound to spread information and call for help.<sup>286</sup>

Many residents have helped escaped workers by providing food, clothing and cash, the latter to call relatives or find transportation out of town.<sup>287</sup> In just a few months, one family assisted 30 Vietnamese men who escaped. Also, Cambodian workers – cleaners, kitchen staff and construction workers, who are among the rare few to freely enter and exit the compounds – are reported to have assisted in some escapes.<sup>288</sup> Others are fearful and stay away from the compounds, knowing that getting involved could endanger themselves and their families.<sup>289</sup>

NGOs involved in rescues from O'Smach believe some of the people forced to scam were relocated from Myanmar's Kokang Special Administrative Zone in late 2023.<sup>290</sup> As authorities stage more crackdowns in the Golden Triangle SEZ and Myawaddy,<sup>291</sup> it is plausible that some may relocate to O'Smach to fill the newly built dormitories.

Despite the reporting, scam operations appeared to continue in early 2025. In January 60 workers, many from Nepal and Pakistan, were reported to have escaped the compound.<sup>292</sup>

## The Golden Triangle Special Economic Zone, Laos

The Golden Triangle Special Economic Zone (GTSEZ), located in Laos' Bokeo province, demonstrates how scam compounds exploit SEZs and benefit from elite protection, challenging the notion that the zone is beyond the limits of state control.

The Golden Triangle, where Laos, Myanmar and Thailand intersect, has long been known for transnational crime and collusion between drug traffickers and law enforcement.<sup>293</sup> Laos established this SEZ in 2007<sup>294</sup> and later partnered with Zhao Wei and his company, Dok Ngiew Kham Group (Kings Romans Group),<sup>295</sup> in a bid to change its 'negative reputation' as a 'drug zone'.<sup>296</sup> Today, the project is reportedly 80% owned by Kings Romans Group and 20% by Laos.<sup>297</sup>

While the zone attracted significant investments — at least US\$2 billion, according to the GTSEZ WeChat channel<sup>298</sup> — the Golden Triangle's reputation endures.<sup>299</sup> It is still alleged to be a 'criminal enclave'<sup>300</sup> consisting of multiple converging criminal markets.<sup>301</sup>

### The scam compounds

The GTSEZ appears to host numerous scam compounds. As of August 2024, Laotian officials acknowledged that up to 400 illegal 'call centres' were operating scams in the zone, a reported increase of more than 30% from 2022,<sup>302</sup> but still a very conservative estimate. By analysing WeChat and Telegram groups used by scam industry insiders, the GI-TOC identified 30 distinct locations with scam compounds.<sup>303</sup> Various criminal groups appear to be operating alongside each other, renting entire buildings, floors or individual offices.<sup>304</sup> The GTSEZ management committee, chaired by Zhao Wei, is regarded as being in overall charge, renting out buildings and managing security.<sup>305</sup>

Security is the responsibility of the GTSEZ 'public security bureau', which is a private security force.<sup>306</sup> Laos' Ministry of Public Security, whose Anti-Trafficking Department investigates trafficking-related



**FIGURE 3** The Golden Triangle Special Economic Zone, located near the tri-border area between Myanmar, Laos and Thailand.



A Lao military officer stands guard near the Kings Romans Casino in the Golden Triangle Special Economic Zone. © Pongmanat Tasiri/SOPA Images/LightRocket via Getty Images



cases, maintains an office and officers inside the GTSEZ.<sup>307</sup> This ministry has coordinated raids with Chinese authorities to detain and deport alleged scam workers.<sup>308</sup> Despite this, the agency has been accused of failing to investigate human trafficking cases proactively and did not screen SEZ workers for signs of trafficking and forced criminality in 2023.<sup>309</sup> Additionally, according to local sources, soldiers affiliated with two ethnic armed organizations from Myanmar also provide security services in the zone: the United Wa State Army (UWSA) and the National Democratic Alliance Army (NDAA).<sup>310</sup> The GI-TOC was unable to verify this claim independently. However, information shared via a UWSA-linked WeChat account seems to confirm this. In this communication, the UWSA appears to recall members from the GTSEZ to Wa territory.<sup>311</sup> The US has also previously alleged that connections exist between Zhao Wei and the UWSA in running major drug trafficking operations out of the GTSEZ.<sup>312</sup>

The number of people forced to work as scam operatives in the GTSEZ is not known. However, USIP estimates at least 85 000 foreign nationals work in Laos' scam compounds, most of which are based in the GTSEZ.<sup>313</sup> These people are trafficked from abroad and bussed through Laos or ferried by boat from Thailand and Myanmar.<sup>314</sup> Some migrant workers and Laotians enter the GTSEZ willingly and later become workers at the scam operations.<sup>315</sup>

Conditions in the compounds are harsh, with many victims reporting being beaten and punished in other ways (for example, by being forced to stand in the sun for hours) for failing to meet their quotas.<sup>316</sup> Work days are reported to be extremely long, typically between 12 and 20 hours.<sup>317</sup> The work involves conducting a variety of scams and fraud, ranging from investment scams to 'nude chat' extortion and running fake gambling sites.<sup>318</sup> Scam operations also use debt bondage tactics – including arbitrary fines and incentive structures based on scam success – to consolidate control over their workforce.<sup>319</sup>

Nearby, Bokeo International Airport, which is now the third-largest airport in Laos, officially opened in February 2024.<sup>320</sup> While the airport was ostensibly built to serve tourists,<sup>321</sup> a person rescued from the GTSEZ claimed they were flown to Bokeo by their captors.<sup>322</sup> If it accepts more commercial flights,<sup>323</sup> observers warn the airport could facilitate human trafficking on a massive scale.<sup>324</sup>

## Elite protection of the GTSEZ

A common narrative holds that the GTSEZ is off limits to state officials. Indeed, a scam worker recalled being threatened by his manager who said: 'There is no government here ... we can kill you.'<sup>325</sup> Yet Laotian officials and police are present and have described the GTSEZ as 'properly managed and operated'.<sup>326</sup> Legally speaking, SEZs are subject to the central government's 'macro management' while maintaining autonomy in administration and business decisions.<sup>327</sup>

Nevertheless, Laos police have reportedly faced constraints in the zone in the past, possibly imposed by higher-ranking officials.<sup>328</sup> Currently, however, the situation may be in flux, as Zhao Wei and Laotian authorities reportedly issued an ultimatum to cyber scam operators to vacate the GTSEZ in August 2024.<sup>329</sup> However, Zhao Wei appears to have announced the crackdown to businesses weeks ahead of the action as well as warning them ahead of patrols.<sup>330</sup> While previous crackdowns in the zone had little effect,<sup>331</sup> Chinese authorities have then been involved in larger joint law enforcement action.<sup>332</sup> It remains to be seen whether this marks a substantial campaign to oust scam compounds from the zone or a temporary or even selective effort. Researchers who visited the zone in late 2024 and again in April 2025 reported to the GI-TOC that businesses continued, including beyond the borders of the zone.

## Shwe Kokko, Myanmar

Myawaddy is a classic example of a border area nurturing criminal activity. Perhaps less apparent, however, are the complex relationships within the ecosystem that shift as various actors vie for a share in the illicit economy. This case study focuses on Shwe Kokko, one of several scam compounds in the region.

Located on a bend in the Moei River on Myanmar's border with Thailand, Shwe Kokko Myaing (hereafter, Shwe Kokko) sits just north of Myawaddy, a bustling economic hub.<sup>333</sup> The former Kayin BGF, now rebranded as the KNA<sup>334</sup> controls the area and most licit and illicit trade.<sup>335</sup>



**FIGURE 4** Myanmar, showing the location of Shwe Kokko near the border with Thailand.

Development of Shwe Kokko – or Yatai New City<sup>336</sup> – began in 2017 as a joint venture between a KNA company, Chit Linn Myaing, and Yatai International Holdings Group (Yatai).<sup>337</sup> The US\$15 billion ‘smart city’ project<sup>338</sup> incorporated blockchain technology for its financial infrastructure, developed by BCB Blockchain and Fincy, to facilitate currency exchanges and international transactions.<sup>339</sup>

Key figures involved in Shwe Kokko appear to include Colonel San Myint (commonly known as Saw Chit Thu) of the KNA and Chinese nationals, including former Yatai Chairman She Zhijiang, Chinese businessman Zhong Baojia and a variety of other actors and entities affiliated with the Chinese state.<sup>340</sup> When Yatai registered a subsidiary in Myanmar, She Zhijiang was the largest shareholder.<sup>341</sup> He reportedly made an initial down payment to Saw Chit Thu who signed the lease to develop the so-called Myanmar Yatai Shwe Kokko SEZ at Shwe Kokko.<sup>342</sup> At the time of writing, She Zhijiang was detained in Thailand for illegal gambling charges and faces extradition to China.<sup>343</sup> He claims that Yatai would never permit telecoms fraud and scams in its vicinity.<sup>344</sup>

According to Justice for Myanmar investigations, Saw Chit Thu is deeply involved in Shwe Kokko and illicit businesses in the area.<sup>345</sup> The KNA collects tax revenue directly from businesses inside Shwe Kokko<sup>346</sup> and reportedly keeps 30% of the total profit, while Yatai retains 70%.<sup>347</sup> Additionally, the KNA

Numerous scam operations are reported to be based in and around Myawaddy. Some workers are recruited locally or from across Southeast Asia and beyond. © Manan Vatsyayana/AFP via Getty Images



reportedly gives the Myanmar military between 10% and 50% of the roughly US\$192 million of its own share of annual profit.<sup>348</sup> Shwe Kokko is therefore a major source of revenue for its stakeholders. Additionally, Saw Chit Thu and his relatives reportedly own at least six KNA businesses,<sup>349</sup> including two properties outside Shwe Kokko<sup>350</sup> where scam compounds have been reported.<sup>351</sup> In October 2024, Saw Chit Thu and his company Chit Linn Myaing Group were sanctioned by the EU for their involvement in scam compounds;<sup>352</sup> Saw Chit Thu had previously been sanctioned by the UK in 2023. In February 2025, media also reported that Thailand was preparing to issue arrest warrants for leaders of the Myanmar junta-allied Karen State BGF on charges of transnational human trafficking, allegedly including Saw Chit Thu.<sup>353</sup>

## Scam compounds in Shwe Kokko

Shwe Kokko was initially aimed at attracting online gambling companies.<sup>354</sup> During the COVID-19 pandemic, some converted to scams while others added scams to their online gambling operations.<sup>355</sup> While operations have been flourishing, there have also been several campaigns to clear the city's image. For example, in May 2024, the KNA announced plans to clear out scam compounds from Shwe Kokko. However, this process has been gradual and voluntarily. A KNA major noted: 'It's important to remember that when there are thousands of people in one place, it is impossible to send all of them home in a short time ... They have to pack their belongings to leave, making it logistically difficult for large groups to depart all at once.'<sup>356</sup>

Prior to that crackdown, small and medium-sized scam operators potentially numbering in the thousands rented space in buildings alongside casinos and KTV bars.<sup>357</sup> Workers at scam compounds are foreigners and Myanmar nationals, many of whom are recruited by recruiters working in Myanmar.<sup>358</sup>

Various scams are perpetrated, but cryptocurrency investment schemes appear to predominate.<sup>359</sup> Workplace conditions are severe, with reported 12+ hour workdays and harsh punishments. In video footage obtained by Radio Free Asia, victims appeared to be tortured with cattle prods, beaten and burned.<sup>360</sup>

While the KNA is administratively linked to Myanmar's military, it has semi-autonomous control over economic activity in Shwe Kokko. This jurisdictional ambiguity enables plausible deniability regarding illegal activities.<sup>361</sup> However, the UK and the US have imposed sanctions on both Saw Chit Thu and She Zhijiang for providing support for and obtaining benefit from 'trafficking of individuals to Shwe Kokko ... where they were forced to work as scammers', and the UK designation also cites She Zhijiang's involvement at KK Park.<sup>362</sup> Both have denied wrongdoing,<sup>363</sup> and Saw Chit Thu claimed no illicit activity was occurring in Shwe Kokko.<sup>364</sup> Yatai and the KNA have also denied reports of illegal gambling, human trafficking and forced criminality in Shwe Kokko.<sup>365</sup> 'We did not know that they would operate scams,' a major in the KNA stated in May 2024. 'We only saw that they use computers. We didn't know what they were doing.'<sup>366</sup> Journalists visiting the area in late 2024 reported that 'Yatai says there are no more scams in Shwe Kokko. It has put up huge billboards all over town proclaiming, in Chinese, Burmese and English, that forced labour is not allowed, and that "online businesses" should leave.'<sup>367</sup> However, they also reported that local people reported that scams and forced labour continued.<sup>368</sup>

## Other scam operations near Myawaddy

In addition to Shwe Kokko, several other scam parks have been identified near Myawaddy.<sup>369</sup> Two of the most notorious are KK Park and Dongmei Park (originally called Saixigang Industrial Park).

KK Park appears to be one of the largest compounds, reported to house thousands of people who are forced to perpetrate scams.<sup>370</sup> Dongmei Park, reportedly built to accommodate scam groups forced out of Sihanoukville,<sup>371</sup> is assumed to be owned by 14K triad leader Wan Kuok-koi ('Broken Tooth') and several Malaysian nationals.<sup>372</sup> Both Wan Kuok-koi and Dongmei Group were sanctioned by the US in 2020.<sup>373</sup>

Many other scam parks have been identified by researchers and journalists near Myawaddy, including Kosai Casino, Jinxin Park, Apollo Park, Dongfanghui, TM Park, Hengsheng Park, the Huanya International New City project and Yulong (Yulongwan) Bay Park.<sup>374</sup> Many are allegedly run and/or owned by Chinese-speaking criminal groups and family members of high-ranking military figures. They are also said to be protected by various armed groups operating in the region.<sup>375</sup> ■

### Alliances in flux

These scam operations benefit from protection characterized by complex alliances.<sup>376</sup> For instance, just prior to Myanmar's 2021 coup, Saw Chit Thu and other BGF/KNA leaders threatened to resign in response to the then civilian government's investigation of alleged bribery related to Shwe Kokko.<sup>377</sup> Some observers believe it was General Min Aung Hlaing, current head of the military-run government, who persuaded them not to resign, perhaps by informing them of the plans for a coup and negotiating a profit-sharing agreement.<sup>378</sup>

Several events have disrupted these alliances. For example, in January 2024, when the former Kayin BGF renamed itself as the KNA,<sup>379</sup> it ostensibly cut ties with the military.<sup>380</sup> Several months later, the KNA helped the Myanmar military regain control of territory from another ethnic armed organization by acting as a neutral third party.<sup>381</sup> Some observers and journalists believe Saw Chit Thu used the opportunity to play both sides – Myanmar's military and the armed group – while also trying to increase his own power and control of the illicit economy.<sup>382</sup> What is clear is that allegiances in the Myawaddy border region are complex and continually shifting, with most armed actors in the region involved or complicit in scam centre operations in some form.

The future of Shwe Kokko's scam operations remains uncertain, yet many signs indicate that Shwe Kokko will not be shut down.<sup>383</sup> Notably, in August 2024, Saw Chit Thu, Buddhist monks, public officials and 'supporters' organized a ceremony for She Zhijiang's health and 'speedy return' to Shwe Kokko.<sup>384</sup> A cyber scam expert on Myanmar reported that in early September 2024, Yatai management established a new committee and policies, further suggesting continuity.<sup>385</sup> Another crackdown appeared to be taking place in early 2025 in response to Thai and Chinese pressure, which led to thousands of foreigners being freed from Myanmar's scam centres.<sup>386</sup> However, many of those rescued appear to remain trapped at the border area where conditions are dire and have remained challenging in the aftermath of the March 2025 earthquake. Nonetheless, some scam operations have been observed to be fragmenting and relocating south to Payathonzu, Kayin state, travelling in convoys flanked by KNA cars.<sup>387</sup> Others are likely relocating to the many less-scrutinized scam facilities in Myawaddy.<sup>388</sup>



## Bamban, the Philippines

The Baofu compound in Bamban provides an example of a local elite acting as a gatekeeper and possibly as an instigator of the scam compound. It also provides insights into how POGOs – which are now banned – were previously used as a front to hide illegal scam operations.

Located just 100 kilometres north of Manila, the small city of Bamban describes itself as a ‘gateway for economic growth ... driven by good governance’.<sup>389</sup> Central to this case is Alice Guo, who rose from obscurity to become Bamban’s first female mayor in 2022.<sup>390</sup> Prior to her election, Guo co-founded Baofu Land Development in 2019,<sup>391</sup> which acquired eight parcels of land and spent US\$104.3 million building a 7.9 hectare compound adjacent to the municipal hall.<sup>392</sup> The Baofu compound hosted 36 buildings, including villas, two seven-storey dormitories, offices and an Olympic-sized swimming pool.<sup>393</sup>

At peak operation, the Baofu compound housed multiple POGOs. Prior to becoming mayor, Guo reportedly helped one such company, Hongsheng Gaming Technology, apply for permission to operate there.<sup>394</sup> Hongsheng lost its licence in 2023 for running cryptocurrency scams,<sup>395</sup> after which it allegedly changed its name to Zun Yuan Technology and continued operating on three floors of the Baofu administration buildings.<sup>396</sup>

Notably, the Philippine Amusement and Gaming Corporation (PAGCOR) maintained an office on one of the three floors.<sup>397</sup> This was before the federal ban on POGOs, therefore PAGCOR was still licensing casinos, including those based in the Baofu compound. Despite their proximity to scam operations, PAGCOR reported no red flags.<sup>398</sup>

A police raid of the compound came after an escaped Vietnamese citizen claimed he crawled through a riverbed to a nearby farm. Security guards from Zun Yuan reportedly pursued the man and tried to force a local family to turn him over.<sup>399</sup> The Malaysian embassy also sent an urgent appeal to the Filipino Presidential Anti-Organized Crime Commission to help trafficking victims inside the Baofu compound.<sup>400</sup>

On 12 March 2024, police from the Metro Manila office of the Criminal Investigation and Detection Group served two search warrants to Zun Yuan Technology for suspected human trafficking and illegal detention.<sup>401</sup> When they entered Baofu, police found 678 people of various nationalities, including Filipinos.<sup>402</sup> Authorities immediately deported 165 of the foreigners to China.<sup>403</sup> They also found evidence of scam operations, including phone banks and computers, scam instruction manuals, shotguns and hidden rooms.<sup>404</sup>

## Elite protection of Baofu

During the ensuing investigation, Guo came under scrutiny and has since been dismissed from office. Documents (including utility and other bills) addressed to Guo and an SUV registered under her name were found in the compound.<sup>405</sup> Additionally, local police units reported to Guo and the police station was adjacent to the compound and municipal hall, strongly suggesting knowledge if not complicity on the part of the police.<sup>406</sup>



**FIGURE 5** The Philippines, showing the location of Bamban.



Former mayor of Bamban Alice Guo faces multiple charges of money laundering, trafficking in persons, tax evasion and obtaining Filipino citizenship through fraud. © Jam Sta Rosa/AFP via Getty Images

Under oath, Guo claimed ignorance of the criminal activities in Baofu and downplayed her involvement in the Hongsheng POGO.<sup>407</sup> Guo's citizenship was also questioned due to discrepancies on her birth certificate.<sup>408</sup> In July, the National Bureau of Investigation published a fingerprint analysis which suggested she might be Guo Hua Ping, a Chinese national who emigrated to the Philippines in 2003, raising questions about her identity and involvement in Bamban.<sup>409</sup>

The challenges of prosecuting a state-embedded actor tied to scam compounds became apparent when Guo failed to appear at senate hearings and then fled the country by boat.<sup>410</sup> In early September 2024, however, Guo was arrested in Indonesia and deported back to the Philippines.<sup>411</sup> She now faces numerous complaints and charges for trafficking in persons, money laundering, tax evasion and misrepresenting her identity in the mayoral election; she has pleaded not guilty.<sup>412</sup>

Recent investigations have revealed further potential connections between Guo, scam operations in the Baofu compound and regional criminal networks. Two individuals who were involved in incorporating Baofu Land Development alongside Guo were convicted in Singapore as part of the earlier cited S\$3 billion money laundering case in 2023.<sup>413</sup> In the Philippines, ongoing investigations are examining the possible involvement of former government officials in the Baofu scam operations,<sup>414</sup> including one who allegedly consulted for both Hongsheng (the reported scam operator at Baofu) and Lucky South 99, a POGO operator currently facing accusations of trafficking in persons and operating scam compounds in Cebu and Pampanga.<sup>415</sup> While these investigations are still in progress and no final legal determinations have been made, the allegations, if proven, would demonstrate systemic corruption and broader criminal connections rather than isolated cases.<sup>416</sup>



## CONCLUSION AND RECOMMENDATIONS

Cyber scam operations inflict multi-faceted harms on fundamental aspects of society in Southeast Asia, by shackling hundreds of thousands of forced recruits to a life of exploitation, undermining economic stability, impeding wider development, eroding good governance and destroying societal trust.

These impacts resonate at the local, national, regional and global levels. Indeed, the scale of exploitation of forced labour, recruitment from areas of vulnerability and conflict around the world, the global proliferation of fraud victims and the staggering profits generated for increasingly powerful organized criminal groups mean that the region's cyber scam industry has become a threat to international peace and security.<sup>417</sup> The complex entanglement of criminal operations throughout Southeast Asia necessitates a comprehensive response that tackles the criminal ecosystem holistically rather than by focusing on individual criminal markets. Traditional criminal justice responses and siloed approaches targeting specific crimes have proven insufficient. The issue is more complex than a single country or institution can deal with on its own.

Instead, there is an urgent need to break down barriers among involved stakeholders, for policymakers and law enforcement to share best practices across crime types and to develop integrated strategies across the region and beyond.

Such efforts will face powerful vested interests, even as leading actors in Southeast Asia work tirelessly to strengthen existing interventions, identify new entry points and reduce harms. Tackling key drivers – corruption, tech as well as private sector infrastructure – offers an important starting point.

Notwithstanding the existing sanctioning of a few major criminal players, greater efforts should also be made by the international community to hold complicit elites to account. By working with them despite strong knowledge of their wrongdoing, the international community risks legitimizing their actions.

The recommendations below identify approaches that could be pursued by key actors who seek to engineer positive change.

**Who? All stakeholders****What? Raise awareness on the multi-faceted harms**

Responses should be guided by awareness of the multi-faceted harms inflicted by cyber scams. A comprehensive strategy should not only focus on stopping the financial crimes but also on reducing the most harmful aspects of the scam industry and its wide-ranging impacts on individuals, societies and economies. This should involve supporting the immediate needs of individual victims but also requires addressing the individual and collective vulnerabilities exploited by cyber scams. For instance, there is a clear need to better understand the changing profiles of people targeted by operations and to increase awareness among potential victims. Furthermore, it is essential to address the long-term economic and societal impacts of the scam industry on communities at source, and to focus on young people who are drawn into the scam industry.

**Who? Local governments****What? Prioritize the reduction of areas of weak accountability**

The ability of scam compounds to exploit blurred areas of accountability and the rule of law — such as in some border areas and SEZs— is a feature of scam compounds that must be addressed. Governments need to reassert authority in SEZs and border areas where oversight is limited or where authorities have been corrupted. The practice of permitting unofficial or self-proclaimed SEZs or relinquishing governance in certain regions has inadvertently fostered criminal activity. Closing SEZs altogether or at least reclaiming effective control over these areas is essential for mounting a successful fight against organized crime and corruption. Closures should be considered only in tandem with compensatory economic development strategies that would provide legitimate economic opportunities to communities and would counter the clear unintended consequences of businesses moving away from these areas. To be effective, such a policy must also be preceded by the exposure of corruption and the development of anti-corruption measures to tackle the wider permissive environment that has allowed the cyber scam industry to flourish.

**Who? National governments****What? Identify entry points to create political will**

Achieving meaningful change requires substantial political will, which at present appears lacking. Nonetheless, examples of national efforts exist, including the Philippines' ban on POGOs in July 2024,<sup>418</sup> and scam-related money laundering investigations and prosecutions in Singapore. These examples constitute potential areas to focus engagement in other countries.

Government actors should also consider responses that might not require additional political buy-in or where support might already exist. Such actions could focus on reversing the significant economic impact caused by damage to the region's reputation. These approaches may offer more immediate ways to address the issue, while building momentum for broader reforms.

**Who? The international community and the private sector****What? Push for stronger regulation of global technology companies globally through private-public partnerships**

While technological advancements have enabled some aspects of the criminal market, they also offer significant opportunities for legitimate business growth and improved livelihoods. The focus should be on attempting to future-proof responses to stay ahead of criminal adaptations. This involves leveraging private sector knowledge and data to anticipate and counter emerging threats. Collaborative efforts between legitimate tech companies, financial institutions and law enforcement agencies can lead



to more effective cyber scam and wider fraud prevention and detection mechanisms. In addition, companies facilitating crime need to be made more aware of – and held accountable for – the misuse of technology that they create and sell.

**Who? The international community**

**What? Expose enablers of cyber scams and impose penalties**

More effort needs to be put into going after the enablers and supporting infrastructure – the people and businesses who provide key services to the industry – including money laundering support. This should include a range of sanctions tailored to the offence, including criminal and civil penalties, naming and shaming as well as the blacklisting of individuals and companies that are not in compliance with regulations. Enablers must also be included in sanction designations.

**Who? Multilateral and regional organizations, specifically the UN, ASEAN and the Bali Process**

**What? Close regional loopholes and strengthen collaboration**

A regional approach is needed because many of the criminal actors driving and profiting from cyber scams are not tied to a specific jurisdiction. This is true of the computer programmers, white-label service providers and money laundering actors who facilitate scam operations. Similarly, people forced to conduct the scams are recruited globally and could potentially work anywhere local conditions allow it. As long as the approach remains country-focused, loopholes will be exploited and the situation will remain akin to a game of ‘whack-a-mole’.

Given the transnational nature of these criminal networks, and the ease with which scam operations continue to relocate across borders, strengthening regional cooperation is paramount. This needs to go beyond dialogue and requires concrete measures that strengthen information sharing and cooperation between governments, particularly law enforcement agencies – already initiated by UNODC,<sup>419</sup> the Bali Process, including through its Regional Support Office, and ASEAN – but also strengthening regional private sector and civil society networks. Thailand has a key role to play in this, not least given its geographic position in the ‘middle’ of mainland Southeast Asia’s cyber scam phenomenon. Its recent efforts to crack down on scam operations and money laundering networks could serve as a catalyst for regional action, potentially enabling cooperation and encouraging other countries to follow suit.<sup>420</sup>

**Who? Civil society**

**What? Build local resilience and strengthen the social fabric in affected communities**

Engaging and supporting local communities in affected areas is crucial. While this would look different in each place, efforts could focus on building resilience to criminal exploitation, supporting victims and strengthening prevention programmes, including through improving digital and financial literacy. It could also bolster free and independent media to mitigate the shrinking space in which civil society operates. Such grassroots efforts are vital to complement top-down approaches.

## NOTES

- 1 International Organization for Migration, IOM's regional situation report on trafficking in persons into forced criminality in online scamming centres in Southeast Asia, February 2024, [https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update\\_december-2023.pdf](https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update_december-2023.pdf).
- 2 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf); UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
- 3 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 4 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).
- 5 Taiwan Taichung District Prosecutors Office, 92 Indicted in Montenegro cross-border fraud case, 3 June 2020, <https://www.tcc.moj.gov.tw/296098/296099/685148/685150/788328/post>.
- 6 Staff, Dozens of Malaysians rescued in Peru after being trafficked to commit online fraud, *The Guardian*, 9 October 2023, <https://www.theguardian.com/world/2023/oct/09/dozens-of-malaysians-rescued-in-peru-after-being-trafficked-to-commit-online>.
- 7 Interpol, USD 257 million seized in global police crackdown against online scams, 27 June 2024, <https://www.interpol.int/en/News-and-Events/News/2024/USD-257-million-seized-in-global-police-crackdown-against-online-scams>; Zorena Jantze, Funds of Chinese Auspansplatz cryptoscam syndicate forfeited to state, 23 January 2025, Informanté, <https://informante.web.na/?p=369061>.
- 8 For example, UNODC, Darknet cybercrime threats to Southeast Asia, 2020, [https://www.unodc.org/roseap/uploads/documents/Publications/2021/Darknet\\_Cybercrime\\_Threats\\_to\\_Southeast\\_Asia\\_report.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2021/Darknet_Cybercrime_Threats_to_Southeast_Asia_report.pdf); Hao Yu, 300 transnational fraud suspects were taken from Laos to Fujian, China, BBC News, 8 January 2016, [https://www.bbc.com/zhongwen/simp/china/2016/01/160108\\_china\\_fraud\\_extradition\\_laos](https://www.bbc.com/zhongwen/simp/china/2016/01/160108_china_fraud_extradition_laos); Charles Arthur, Philippines police arrest four over phone scam, *The Guardian*, 28 November 2011, <https://www.theguardian.com/technology/2011/nov/28/philippines-arrests-phone-scam-hacking>.
- 9 Enze Han, Non-state Chinese actors and their impact on relations between China and Mainland Southeast Asia, *Trends in Southeast Asia*, January 2021, 1, [https://www.iseas.edu.sg/wp-content/uploads/2020/12/TRS1\\_21.pdf](https://www.iseas.edu.sg/wp-content/uploads/2020/12/TRS1_21.pdf); Amanda Gore, Lindsey Kennedy, Nathan Southern, Daan van Uhm, Asian roulette: Criminogenic casinos and illicit trade in environmental commodities in South East Asia, GI-TOC, July 2022, <https://globalinitiative.net/analysis/casino-crime-south-east-asia/>.
- 10 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>; International Organization for Migration, IOM's regional situation report on trafficking in persons into forced criminality in online scamming centres in Southeast Asia, February 2024, [https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update\\_december-2023.pdf](https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update_december-2023.pdf); Office of the United Nations High Commissioner for Human Rights, Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response, August 2023, <https://bangkok.ohchr.org/wp-content/uploads/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf>; UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
- 11 Such as those writing for *Voice of Democracy* (Cambodia), *the Irrawaddy* and *Myanmar Now* (Myanmar), *Radio Free Asia* (Laos, Cambodia, Myanmar) and *Rappler* (The Philippines), and international media houses, such as *Al Jazeera*, *Reuters*, *Pro Publica*, *The New York Times*, *Bloomberg*, and others.
- 12 GI-TOC, Intersections: Building blocks of a global strategy against organized crime, 2024, <https://globalinitiative.net/analysis/global-strategy-against-organized-crime-intersections/>; Quoc Vu, Man says he's trapped in a scam compound with 'thousands', Radio

- Free Asia, 11 January 2024, <https://www.rfa.org/english/news/vietnam/human-trafficking-01112024095958.html>.
- 13 US Department of State, 2024 trafficking in persons report: Burma, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/burma/>; US Department of State, 2024 trafficking in persons report: Thailand, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/thailand/>; US Department of State, 2024 trafficking in persons report: Cambodia, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/>; US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>.
  - 14 Saing Soenthrith, Chinese nationals questioned over scam, 4 March 2016, Cambodia Daily, <https://english.cambodiadaily.com/news/109408-109408/>; Jason Tower and Priscilla Clapp, Myanmar's casino cities: The role of China and transnational criminal networks, US Institute of Peace, [https://www.usip.org/sites/default/files/2020-07/20200727-sr\\_471-myanmars\\_casino\\_cities\\_the\\_role\\_of\\_china\\_and\\_transnational\\_criminal\\_networks-sr.pdf](https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf); Sebastian Strangio, The 'lawless' playgrounds of Laos, Al Jazeera, 24 July 2016, <https://www.aljazeera.com/features/2016/7/24/the-lawless-playgrounds-of-laos>.
  - 15 Jintamas Saksornchai and Cindy Liu, Investigative article: Workers in fraudulent operation deported from Cambodia to Laos and Myanmar, Voice of Democracy, 26 October 2022, <https://www.vodkhmer.news/2022/10/26/scam-workers-relocated-from-cambodia-to-laos-myanmar/>; GI-TOC, Intersections: Building blocks of a global strategy against organized crime, 2024, <https://globalinitiative.net/analysis/global-strategy-against-organized-crime-intersections/>; RFA Lao, Four Laotian trafficking victims freed from Myanmar casino faced regular beatings, Radio Free Asia, 16 February 2023, <https://www.rfa.org/english/news/laos/casino-02162023163151.html>.
  - 16 UNODC, Cyberfraud syndicates observed deploying new tech and expanding capabilities amidst shifting threat landscape in Southeast Asia, officials warn, 6 August 2024, <https://www.unodc.org/roseap/en/2024/08/cyberfraud-syndicates-analyst-meeting/story.html>; Valentina Casulli, Mina Chiang, Larry Cameron, Aaron Kahler and Ian Mitchell, From fake job ads to human trafficking: the horrifying reality of the human trafficking scam trade, The Mekong Club, 27 July 2023, [https://themekongclub.org/wp-content/uploads/2023/07/From\\_Fake\\_Job\\_Ads\\_to\\_Human\\_Trafficking\\_The\\_Horrifying\\_Reality\\_of\\_the\\_Human\\_Trafficking\\_Scam\\_Trade\\_2023.pdf](https://themekongclub.org/wp-content/uploads/2023/07/From_Fake_Job_Ads_to_Human_Trafficking_The_Horrifying_Reality_of_the_Human_Trafficking_Scam_Trade_2023.pdf).
  - 17 Vincent MacIsaac, Myanmar's scam hells can't release their captives, The Irrawaddy, 6 September 2024, <https://www.irrawaddy.com/news/burma/myanmars-scam-hells-cant-release-their-captives.html>; Sui-Lee Wee, They're forced to run online scams. Their captors are untouchable, 28 August 2023, *The New York Times*, <https://www.nytimes.com/2023/08/28/world/asia/cambodia-cyber-scam.html>.
  - 18 Abby Seiff, Explained: What are scam parks?, Radio Free Asia, 23 January 2025, <https://www.rfa.org/english/china/2025/01/23/scam-parks-compounds-cambodia-thailand-myanmar-laos/>; Danielle Keeton-Olsen, Indonesians say they were forced to cheat in Cambodia under threat of torture, Voice of Democracy, 22 September 2022, <https://www.vodkhmer.news/2022/09/22/learning-to-scam-under-threat-of-tasers/>; RFA Burmese, How a scam ring opened shop in downtown Yangon, Radio Free Asia, 14 September 2023, <https://www.rfa.org/english/news/myanmar/yangon-scam-compound-09142023131525.html>; *Bangkok Post*, Six arrested over call centre scams in southern Thailand, 13 December 2024, <https://www.bangkokpost.com/thailand/general/2919006/six-arrested-over-call-centre-scams-in-southern-thailand>.
  - 19 Jun A. Malig, Pampanga Pogo linked to scams, trafficking; 186 rescued in raid, *Philippine Daily Inquirer*, 6 June 2024, <https://newsinfo.inquirer.net/1948727/pampanga-pogo-linked-to-scams-trafficking-186-rescued-in-raid>; Sunstar, 4 Korean Pogo operators nabbed in Cebu City raid, 4 August 2022, <https://www.sunstar.com.ph/cebu/local-news/4-korean-pogo-operators-nabbed-in-cebu-city-raid>.
  - 20 Teele Rebane, Ivan Watson, Tom Booth, Carlotta Dotto, Marco Chacon and Mark Oliver, A sophisticated criminal network is using modern day slaves to con thousands of Americans out of their life savings, CNN, 27 December 2023, <https://www.cnn.com/interactive/2023/12/asia/chinese-scam-operations-american-victims-intl-hnk-dst/>.
  - 21 RFA Burmese, How a scam ring opened shop in downtown Yangon, Radio Free Asia, 14 September 2023, <https://www.rfa.org/english/news/myanmar/yangon-scam-compound-09142023131525.html>.
  - 22 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
  - 23 Mech Dara, Two falls from Sihanoukville buildings under investigation, Voice of Democracy, 31 March 2022, <https://vodenglish.news/two-falls-from-sihanoukville-buildings-under-investigation/>; *Khmer Times*, Foreigner jumps to death at Bavet casino, 14 June 2024, <https://www.khmertimeskh.com/501506168/foreigner-jumps-to-death-at-bavet-casino/>; *Khmer Times*, Foreign casino worker commits suicide, 17 October 2023, <https://www.khmertimeskh.com/501377267/foreign-casino-worker-commits-suicide/>.
  - 24 The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>.
  - 25 Joann Manabat, Bamban mayor linked to raided POGO in Tarlac, Rappler, 26 March 2024, <https://www.rappler.com/philippines/luzon/bamban-mayor-guo-linked-raided-pogo-tarlac/>.
  - 26 Affidavit from Filipino citizen rescued from O'Smach, September 2023; Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
  - 27 Ibid; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>; The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>;

- Jack Adamović Davies, Torture, forced labor alleged at Prince Group-linked compound, Radio Free Asia, 12 February 2024, <https://www.rfa.org/english/news/cambodia/prince-group-investigation-02122024143012.html>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>.
- 28 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
- 29 Southeast Asia: Torture room and karaoke bars in gang-run 'scam-farms', UN Geneva, 9 July 2024, <https://www.ungeneva.org/en/news-media/news/2024/07/95196/southeast-asia-torture-rooms-and-karaoke-bars-gang-run-scam-farms>.
- 30 Jintamas Saksornchai and Cindy Liu, Investigative article: Workers in fraudulent operation deported from Cambodia to Laos and Myanmar, Voice of Democracy, 26 October 2022, <https://vodenglish.news/scam-workers-relocated-from-cambodia-to-laos-myanmar/>; GI-TOC, Intersections: Building blocks of a global strategy against organized crime, 2024, <https://globalinitiative.net/analysis/global-strategy-against-organized-crime-intersections/>; RFA Lao, Four Laotian trafficking victims freed from Myanmar casino faced regular beatings, Radio Free Asia, 16 February 2023, <https://www.rfa.org/english/news/laos/casino-02162023163151.html>.
- 31 The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>; The Bali Process Regional Support Office, Trapped in deceit: Responding to the trafficking in persons fuelling the expansion of Southeast Asia's online scam centres, April 2024, [https://s3.ap-southeast-2.amazonaws.com/assets.rso.baliprocess.net/app/uploads/2023/09/19144842/TIPScams-Policy-Brief\\_RSO.pdf](https://s3.ap-southeast-2.amazonaws.com/assets.rso.baliprocess.net/app/uploads/2023/09/19144842/TIPScams-Policy-Brief_RSO.pdf); Affidavit from Filipino citizen rescued from O'Smach, September 2023.
- 32 Jintamas Saksornchai and Cindy Liu, Investigative article: Workers in fraudulent operation deported from Cambodia to Laos and Myanmar (Khmer language), Voice of Democracy, 26 October 2022, <https://www.vodkhmer.news/2022/10/26/scam-workers-relocated-from-cambodia-to-laos-myanmar/>.
- 33 Humanity Research Consultancy, Responses to trafficking in persons for forced criminality in the Thai context, October 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/670655ed4731be839f8b6bbc\\_HRC-FC-report\\_Final.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/670655ed4731be839f8b6bbc_HRC-FC-report_Final.pdf).
- 34 Jason Tower and Priscilla A. Clapp, Myanmar scam hubs revive fast after China eases pressure on junta, US Institute of Peace, 26 September 2024, <https://www.usip.org/publications/2024/09/myanmar-scam-hubs-revive-fast-after-china-eases-pressure-junta>.
- 35 Examples include Sihanoukville and Kampot in Cambodia; Fiona Kelliher and Mech Dara, Scam victims say human trafficking still a problem in Cambodia, Voice of America, 9 March 2024, Scams, <https://www.voanews.com/a/scam-victims-say-human-trafficking-still-a-problem-in-cambodia/7520511.html>; Jack Brook, Yan Huang and Sovann Sreypich, human trafficking thrived at Bokor Mountain behind tycoon's luxury hotel, 9 February 2023, <https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/>; Multiple site visits to Bokor Mountain, Kampot province, Cambodia, April and June 2024.
- 36 It is worth noting that some of the scam centres identified in Yangon or Mandalay appear to be operating differently and sometimes without the forced criminality element. Interview with foreign expert on Myanmar, March 2024, by phone.
- 37 Coby Hobbs and Khuon Narim, Mystery raids: Over 1,000 potential trafficking victims unaccounted for, CamboJA News, 9 December 2024, <https://cambojanews.com/mystery-raids-over-1000-potential-trafficking-victims-unaccounted-for/>; Cyber Scam Monitor, Cambodia's online compounds continue to expand, 29 October 2024, <https://cyberscammonitor.substack.com/p/cambodias-online-compounds-continue>. Reports from field research in Laos provided by a journalist in April 2025.
- 38 Agence France-Presse, Scam farms in PH change tactics to avoid crackdown, 10 December 2024, <https://www.abs-cbn.com/news/nation/2024/12/10/scam-farms-in-ph-change-tactics-to-avoid-crackdown-1729>; Helene Delgado, POGO-free by 2025? Gov't expects 'rogue' POGOs to flourish, vows to go after them, ABS-CBN, 11 December 2024, <https://www.abs-cbn.com/news/nation/2024/12/11/pogo-free-by-2025-govt-expects-rogue-pogos-to-flourish-vows-to-go-after-them-1558>.
- 39 Reuters, Philippines' Marcos bans offshore gaming operators, 22 July 2024, <https://www.reuters.com/world/asia-pacific/philippines-marcos-orders-closure-offshore-gaming-industry-2024-07-22/>.
- 40 Affidavit from Filipino citizen rescued from O'Smach, September 2023; Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, ProPublica, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 41 United Nations Industrial Development Organization, Economic Zones in the ASEAN: Industrial Parks, Special Economic Zones, Eco Industrial Parks, Innovation Districts as Strategies for Industrial Competitiveness, August 2015, [www.unido.org/sites/default/files/2015-08/UCO\\_Viet\\_Nam\\_Study\\_FINAL\\_0.pdf](http://www.unido.org/sites/default/files/2015-08/UCO_Viet_Nam_Study_FINAL_0.pdf); Development Intelligence Lab, What challenges do special economic zones pose to development?, 31 August 2023, <https://www.devintelligencelab.com/intel/31august2023>.
- 42 Office of the United Nations High Commissioner for Human Rights, Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response, August 2023, [https://bangkok.ohchr.org/sites/default/files/wp\\_files/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf](https://bangkok.ohchr.org/sites/default/files/wp_files/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf).
- 43 RFA Lao, Four Laotian trafficking victims freed from Myanmar casino faced regular beatings, Radio Free Asia, 16 February 2023, <https://www.rfa.org/english/news/laos/casino-02162023163151.html>; C4ADS, Zoned out a comprehensive impact evaluation of Mekong economic development zones, 2021, <https://c4ads.org/wp-content/uploads/2021/06/ZonedOut-Report.pdf>.
- 44 UNODC, World drug report: Key findings and conclusions, June 2024, [https://www.unodc.org/documents/data-and-analysis/WDR\\_2024/WDR24\\_Key\\_findings\\_and\\_conclusions.pdf](https://www.unodc.org/documents/data-and-analysis/WDR_2024/WDR24_Key_findings_and_conclusions.pdf).



- 45 Vincent Nijman, Ming Xia Zhang, Chris R. Shepard, Pangolin trade in the Mong La Wildlife Market and the role of Myanmar in the smuggling of pangolins into China, *Global Ecology and Conservation*, January 2016, 5, 118-126, [www.sciencedirect.com/science/article/pii/S2351989415300342](https://www.sciencedirect.com/science/article/pii/S2351989415300342); Environmental Investigation Agency, Footage reveals criminal-run tiger 'farms' in Laos have actually been expanded, 8 March 2022, <https://eia-international.org/press-releases/footage-reveals-criminal-run-tiger-farms-in-laos-have-actually-been-expanded/>.
- 46 Mech Dara and Cindy Liu, From timber to human trafficking: rescued victims allege major scam operations in tycoon's SEZ, *Voice of Democracy*, 17 November 2021, <https://vodenglish.news/from-timber-to-human-trafficking-rescued-victims-allege-major-scam-operations-in-tycoons-sez/>; *The Philippine Star*, DOJ indicts 8 for trafficking in relation to Clark scam raid where 1,000 were rescued, 2 June 2023, <https://www.philstar.com/headlines/2023/06/02/2270984/doj-indicts-8-trafficking-relation-clark-scam-hub-raid-where-1000-were-rescued>; RFA Lao, Laos orders Golden Triangle scammers out of zone by end of month, *Radio Free Asia*, 12 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-sez-scammers-08122024171757.html>.
- 47 UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
- 48 Amanda Gore, Lindsey Kennedy, Nathan Southern, Daan van Uhm, Asian roulette: Criminogenic casinos and illicit trade in environmental commodities in South East Asia, *GI-TOC*, July 2022, <https://globalinitiative.net/analysis/casino-crime-south-east-asia/>; UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf); C4ADS, Zoned out a comprehensive impact evaluation of Mekong economic development zones, 2021, <https://c4ads.org/wp-content/uploads/2021/06/ZonedOut-Report.pdf>.
- 49 C4ADS, Zoned out a comprehensive impact evaluation of Mekong economic development zones, 2021, <https://c4ads.org/wp-content/uploads/2021/06/ZonedOut-Report.pdf>.
- 50 Yu Jie and Jon Wallace, What is China's Belt and Road Initiative (BRI)?, Chatham House, 13 September 2021, <https://www.chathamhouse.org/2021/09/what-chinas-belt-and-road-initiative-bri>.
- 51 US Department of Treasury, Treasury Sanctions Corrupt Actors in Africa and Asia, 9 December 2020, <https://home.treasury.gov/news/press-releases/sm1206>; Lewis Sanders IV, Julia Bayer, Juliet Pineda and Yuchen Li, How Chinese mafia are running a scam factory in Myanmar, 30 January 2024, *Deutsche Welle*, <https://www.dw.com/en/how-chinese-mafia-are-running-a-scam-factory-in-myanmar/a-68113480>.
- 52 The Irrawaddy, 'New City' on Thai-Myanmar border part of BRI despite China's denials, *Developer Claims*, 1 September 2020, <https://www.irrawaddy.com/news/burma/new-city-thai-myanmar-border-part-bri-despite-chinas-denials-developer-claims.html>.
- 53 Jason Tower and Priscilla A. Clapp, Myanmar: casino cities run on blockchain threaten nation's sovereignty, *US Institute of Peace*, 30 July 2020, <https://www.usip.org/publications/2020/07/myanmar-casino-cities-run-blockchain-threaten-nations-sovereignty>.
- 54 Shwe Kokko is 'not part of BRI' says developer Yatai, *Frontier Myanmar*, 27 July 2020, <https://www.frontiermyanmar.net/en/shwe-kokko-is-not-part-of-bri-says-developer-yatai/>.
- 55 Danielle Keeton-Olsen and Mech Dara, Rescue reveals scam compound at Koh Kong's UDG, 24 August 2022, <https://vodenglish.news/rescue-reveals-scam-compound-at-koh-kongs-udg/>; Daphne Psalidakis and Prak Chan Thul, U.S. imposes sanctions on Chinese firm over Cambodia project, *Reuters*, 16 September 2020, <https://www.reuters.com/article/world/us-imposes-sanctions-on-chinese-firm-over-cambodia-project-idUSKBN2662NU/>.
- 56 *Khmer Times*, Dara Sakor project gives positive edge to Cambodia's development, 18 March 2022, <https://www.khmertimeskh.com/501043312/dara-sakor-project-gives-positive-edge-to-cambodias-development/>.
- 57 Danielle Keeton-Olsen and Mech Dara, Rescue reveals scam compound at Koh Kong's UDG, *Voice of Democracy*, 24 August 2022, <https://vodenglish.news/rescue-reveals-scam-compound-at-koh-kongs-udg/>. See also Al Jazeera, Forced to scam: Cambodia's cyber slaves, 14 July 2022, <https://www.aljazeera.com/program/101-east/2022/7/14/forced-to-scam-cambodias-cyber-slaves>.
- 58 Office of Financial Sanctions Implementation HM Treasury, Global Human Rights, 8 December 2023, [https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice\\_Global\\_Human\\_Rights\\_081223.pdf](https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf).
- 59 US Department of Treasury, Press Releases, Treasury sanctions Chinese entity in Cambodia under global Magnitsky authority, 15 September 2020, <https://home.treasury.gov/news/press-releases/sm1121>.
- 60 Adam Hayes, Katie Miller and Suzanne Kvilhaug, Pig butchering scams: What they are, warning signs, and how to avoid them, *Investopedia*, <https://www.investopedia.com/pig-butchering-scams-8605501#toc-avoid-being-butchered>.
- 61 Cezary Podkul, What's a pig butchering scam? here's how to avoid falling victim to one, *ProPublica*, 19 September 2022, <https://www.propublica.org/article/whats-a-pig-butchering-scam-heres-how-to-avoid-falling-victim-to-one>; Cassandra Cross, Romance baiting, cryptorom and 'pig butchering': an evolutionary step in romance fraud, *Current Issues in Criminal Justice*, 4 September 2023, 36, 3, 334-346, <https://www.tandfonline.com/doi/full/10.1080/10345329.2023.2248670#abstract>.
- 62 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 63 Quoc Vu, Man says he's trapped in a scam compound with 'thousands', *Radio Free Asia*, 11 January 2024, <https://www.rfa.org/english/news/vietnam/human-trafficking-01112024095958.html>.

- 64 Sonal Nain, Inside Thailand's \$2 billion scam industry now targeting Americans, *Newsweek Magazine*, 8 September 2024, <https://www.newsweek.com/inside-thailand-2-billion-china-scam-industry-now-targeting-americans-1947561>; *The Straits Times*, Shopee customers lost \$399,000 in 2024 after making payments outside app to scammers, 26 January 2025, <https://www.straitstimes.com/singapore/shopee-customers-lost-399000-to-scammers-in-2024>.
- 65 Securities and Exchange Commission, Ponzi schemes using virtual currencies, [https://www.sec.gov/files/ia\\_virtualcurrencies.pdf](https://www.sec.gov/files/ia_virtualcurrencies.pdf).
- 66 RFA Lao and Eugene Whong, Debt-trapped Lao 'chat girls' forced to sell sex in China-run economic zone, 19 December 2021, <https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html>; U Sudhakar, Chinese scammers in Cambodia force Indian women to make nude calls back home: Victim, *The Times of India*, 9 July 2024, <https://timesofindia.indiatimes.com/city/hyderabad/chinese-scammers-in-cambodia-exploit-indian-women-in-cybercrime-scheme/articleshow/111590199.cms>; Zhang Pengxiang, Five young people trapped in a fraud den in Laos, Huining police successfully rescued them, *Gansu Daily*, 28 September 2024, <https://gansu.gansudaily.com.cn/system/2023/09/28/030883181.shtml>.
- 67 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf); Interview with employee of a gateway company, Cambodia, February 2024.
- 68 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 69 Chainalysis, The 2024 Crypto Crime Report: The latest trends in ransomware, scams, hacking, and more, February 2024, <https://www.chainalysis.com/wp-content/uploads/2024/06/the-2024-crypto-crime-report-release.pdf>; Chainalysis, Illicit volumes portend record year as on-chain crime becomes increasingly diverse and professionalized, 15 January 2025, <https://www.chainalysis.com/blog/2025-crypto-crime-report-introduction/>.
- 70 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, *ProPublica*, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 71 Chainalysis, The 2025 Crypto Crime Report, February 2025, <https://www.chainalysis.com/wp-content/uploads/2025/03/the-2025-crypto-crime-report-release.pdf>.
- 72 FBI San Francisco, FBI releases internet crime report: California received highest reported monetary losses and complaints nationwide, Federal Bureau of Investigation, 4 April 2024, <https://www.fbi.gov/contact-us/field-offices/sanfrancisco/news/fbi-releases-internet-crime-report>.
- 73 Australian Competition and Consumer Commission, Targeting scams: Report of the National Anti-Scam Centre on scams activity 2023, April 2024, <http://www.accc.gov.au/system/files/targeting-scams-report-activity-2023.pdf>.
- 74 John M. Griffin and Kevin Mei, How do crypto flows finance slavery? The economics of pig butchering, *SSRN*, February 2024, [https://papers.ssrn.com/sol3/papers.cfm?abstract\\_id=4742235](https://papers.ssrn.com/sol3/papers.cfm?abstract_id=4742235); US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 75 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 76 Chainalysis also refers to them as pig-butchering scams. Chainalysis, The 2024 Crypto Crime Report: The latest trends in ransomware, scams, hacking, and more, February 2024, <https://www.chainalysis.com/wp-content/uploads/2024/06/the-2024-crypto-crime-report-release.pdf>.
- 77 Chainalysis, The 2024 Crypto Crime Report: The latest trends in ransomware, scams, hacking, and more, February 2024, <https://www.chainalysis.com/wp-content/uploads/2024/06/the-2024-crypto-crime-report-release.pdf>.
- 78 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, *ProPublica*, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 79 Office of the United Nations High Commissioner for Human Rights, Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response, August 2023, <https://bangkok.ohchr.org/wp-content/uploads/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf>.
- 80 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104; Emily Fishbein, 'A global monster': Myanmar-based cyber scams widen the net, *Frontier Myanmar*, 24 August 2024, <https://www.frontiermyanmar.net/en/a-global-monster-myanmar-based-cyber-scams-widen-the-net/>; Luke Barr, Americans lost \$5.6 billion in cryptocurrency scams in 2023: FBI, *ABC News*, 9 September 2024, <https://abcnews.go.com/Politics/americans-lost-56-billion-cryptocurrency-scams-2023-fbi/story?id=113514484>.
- 81 Federal Bureau of Investigation, Internet Crime Report 2023, 2023, [https://www.ic3.gov/Media/PDF/AnnualReport/2023\\_IC3Report.pdf](https://www.ic3.gov/Media/PDF/AnnualReport/2023_IC3Report.pdf); Kathleen Magramo, Gangs netting up to \$3 trillion a year as Southeast Asia human trafficking becomes a global crisis, *Interpol says*, *CNN*, 28 March 2024, <https://www.cnn.com/2024/03/28/asia/southeast-asia-interpol-scam-human-trafficking-crime-intl-hnk/index.html>; Kareyst Lin, Why investment scams are on the rise and how you can protect yourself, *The Straits Times*, 1 September 2024, <https://www.straitstimes.com/singapore/why-investment-scams-are-on-the-rise-and-how-you-can-protect-yourself>.
- 82 Diego Almada Lopez, Binance unmask \$277 million crypto scam in Thailand, *Crypto Briefing*, 3 October 2023, <https://cryptobriefing.com/binance-unmasks-crypto-scam-thailand/>.

- 83 Quoc Vu, Man says he's trapped in a scam compound with 'thousands', Radio Free Asia, 11 January 2024, <https://www.rfa.org/english/news/vietnam/human-trafficking-01112024095958.html>.
- 84 Christine Tan, I was told to scam Singaporeans: Bangladeshi man who was trafficked to scam compounds, *The Straits Times*, 11 April 2024, <https://www.straitstimes.com/singapore/courts-crime/i-was-told-to-scam-singaporeans-bangladeshi-man-who-was-trafficked-to-scam-compounds>.
- 85 Phon Sothyroth and Leila Goldstein, Cambodian police contradict Indonesian officials, claim repatriated Indonesians are not victims, *CamboJA News*, 10 August 2023, <https://cambojanews.com/cambodian-police-contradict-indonesian-officials-claim-repatriated-indonesians-are-not-victims/>.
- 86 Emily Fishbein, 'A global monster': Myanmar-based cyber scams widen the net, *Frontier Myanmar*, 24 August 2024, <https://www.frontiermyanmar.net/en/a-global-monster-myanmar-based-cyber-scams-widen-the-net/>.
- 87 Kam-Fung Cheung, Cracking the code: why people fall for scams, 9 July 2023, <https://www.businessthink.unsw.edu.au/articles/cracking-the-code-why-people-fall-scams>.
- 88 Erin Handley, Hellena Souisa, Iris Zhao and Angelique Lu, Inside the 'pig-butcher' scams seeing thousands trafficked into cyber slavery, *ABC News*, 15 September 2022, <https://www.abc.net.au/news/2022-09-16/cambodia-human-trafficking-online-scam-pig-butcher/101407862>; Cezary Podkul, What's a pig butchering scam? here's how to avoid falling victim to one, *ProPublica*, 19 September 2022, <https://www.propublica.org/article/whats-a-pig-butcher-scam-heres-how-to-avoid-falling-victim-to-one>.
- 89 Dan Mangan, Cryptocurrency 'pig butchering' scam wrecks Kansas bank, sends ex-CEO to prison for 24 years, *CNBC*, 21 August 2024, <https://www.cnn.com/2024/08/21/cryptocurrency-shan-hanes-pig-butcher-scam.html>.
- 90 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, *ProPublica*, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 91 Martina Dove, the psychology of fraud, persuasion and scam techniques, London: Routledge, 2020, <https://www.routledge.com/The-Psychology-of-Fraud-Persuasion-and-Scam-Techniques-Understanding-What/Dove/p/book/9780367859565>.
- 92 See GI-TOC, Global Organized Crime Index, South-Eastern Asia, [https://ocindex.net/region/south-eastern\\_asia](https://ocindex.net/region/south-eastern_asia); Ranking behind Central America (1<sup>st</sup>), Western Asia (2<sup>nd</sup>), South America (3<sup>rd</sup>), and East Africa (4<sup>th</sup>).
- 93 Interpol, INTERPOL issues global warning on human trafficking-fueled fraud, 7 June 2023, <https://www.interpol.int/en/News-and-Events/News/2023/INTERPOL-issues-global-warning-on-human-trafficking-fueled-fraud>.
- 94 Office of the United Nations High Commissioner for Human Rights, Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response, August 2023, <https://bangkok.ohchr.org/wp-content/uploads/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf>; US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 95 Office to Monitor and Combat Trafficking in Persons, Human Trafficking and Cyber Scam Operations, US Department of State, June 2023, <https://www.state.gov/wp-content/uploads/2023/12/Human-Trafficking-and-Cyber-Scam-Operations.pdf>; Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
- 96 Virma Simonette and Kelly Ng, Hundreds rescued from love scam centre in the Philippines, 14 March 2024, *BBC News*, <https://www.bbc.com/news/world-asia-68562643>; RFA Lao and Eugene Whong, Debt-trapped Lao 'chat girls' forced to sell sex in China-run economic zone, 19 December 2021, <https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html>; Sui-Lee Wee, They're forced to run online scams. Their captors are untouchable, 28 August 2023, *The New York Times*, <https://www.nytimes.com/2023/08/28/world/asia/cambodia-cyber-scam.html>; RFA Burmese, How a scam ring opened shop in downtown Yangon, Radio Free Asia, 14 September 2023, <https://www.rfa.org/english/news/myanmar/yangon-scam-compound-09142023131525.html>.
- 97 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>; US Institute of Peace, Cyber scams and human trafficking in Cambodia and Vietnam, 28 January 2025, [https://www.youtube.com/watch?v=-vXNcx8jyck&ab\\_channel=UnitedStatesInstituteofPeace](https://www.youtube.com/watch?v=-vXNcx8jyck&ab_channel=UnitedStatesInstituteofPeace).
- 98 Office of the United Nations High Commissioner for Human Rights, Hundreds of thousands trafficked to work as online scammers in SE Asia, says UN report, 29 August 2023, <https://www.ohchr.org/en/press-releases/2023/08/hundreds-thousands-trafficked-work-online-scammers-se-asia-says-un-report>.
- 99 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 100 Phoung Vantha, Cambodia challenges UN on scam center claims, *Cambodianess*, 31 August 2023, <https://cambodianess.com/article/cambodia-challenges-un-on-scam-center-claims>; Pou Soreachny and Nhoun Narim, Cambodia never denied human trafficking problem; Remains committed to combatting it, *CamboJA News*, 14 December 2024, <https://cambojanews.com/cambodia-never-denied-human-trafficking-problem-remains-committed-to-combating-it/>; Kheukham Chanlivong, Lao police bust nine fraud rings, seize thousands of devices in 2024, *The Laotian Times*, 2 January 2025, <https://laotiantimes.com/2025/01/02/lao-police-bust-nine-fraud-rings-seize-thousands-of-devices-in-2024/>.
- 101 *Khmer Times*, The Interior Ministry reiterates the government's commitment to combat all illegal activities, 27 October 2024,

- <https://www.khmertimeskh.com/501580648/the-interior-ministry-reiterates-the-governments-commitment-to-combat-all-illegal-activities/>.
- 102 US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>; US Department of State, 2024 trafficking in persons report: Burma, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/burma/>; US Department of State, 2024 trafficking in persons report: Thailand, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/thailand/>; US Department of State, 2024 trafficking in persons report: Cambodia, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/>.
- 103 US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>; Danielle Keeton-Olson and Som Pich Chenta, Malaysian politicians say their citizens continue to be trapped in scam operations in Cambodia [Khmer], VOD, 21 April 2022, <https://www.vodkhmer.news/2022/04/21/after-malaysian-rescues-from-cambodia-politician-warns-more-people-trapped/>.
- 104 Dave Grunebaum, In Southeast Asia's scam centers, human trafficking worsens, VOA, 5 December 2024, <https://www.voanews.com/a/in-southeast-asia-s-scam-centers-human-trafficking-worsens/7888452.html>; Aidan Jones, Evidence gathered from survivors, researchers and satellite imagery suggests the number and size of scam compounds and scale of human trafficking in the region is growing, South China Morning Post, 13 January 2025, <https://www.scmp.com/week-asia/politics/article/3294577/scam-city-growing-how-myanmars-cyber-fraud-hubs-outfox-efforts-shut-them-down>; US Institute of Peace, Cyber scams and human trafficking in Cambodia and Vietnam, 28 January 2025, [https://www.youtube.com/watch?v=vXNcx8jyck&ab\\_channel=UnitedStatesInstituteofPeace](https://www.youtube.com/watch?v=vXNcx8jyck&ab_channel=UnitedStatesInstituteofPeace); Cyber Scam Monitor, Cambodia's online compounds continue to expand, 29 October 2024, <https://cyberscammonitor.substack.com/p/cambodias-online-compounds-continue>; Fiona Kelliher and Mech Dara, Scam victims say human trafficking still a problem in Cambodia, Voice of America, 9 March 2024, Scams, <https://www.voanews.com/a/scam-victims-say-human-trafficking-still-a-problem-in-cambodia/7520511.html>.
- 105 Reuters, Myanmar hands over to China thousands of telecom fraud suspects, 21 November 2023, <https://www.reuters.com/world/asia-pacific/myanmar-hands-over-china-thousands-telecom-fraud-suspects-2023-11-21/>.
- 106 Sebastian Strangio, Lao, Chinese officials detain 771 in raid on Golden Triangle gambling hub, The Diplomat, <https://thediplomat.com/2024/08/lao-chinese-officials-detain-771-in-raid-on-golden-triangle-gambling-hub/>; RFA Lao, Lao authorities raid more Golden Triangle scam centers as deadline passes, 29 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-scam-centers-raids-08292024143130.html>; Kheukham Chanlivong, Lao police bust nine fraud rings, seize thousands of devices in 2024, *The Laotian Times*, 2 January 2025, <https://laotiantimes.com/2025/01/02/lao-police-bust-nine-fraud-rings-seize-thousands-of-devices-in-2024/>.
- 107 Mech Dara, Over 700 Chinese to be deported after dramatic sweep at two Sihanoukville resorts, 6 April 2024, *CamboJA News*, <https://cambojanews.com/over-700-chinese-to-be-deported-after-dramatic-sweep-at-two-sihanoukville-resorts/>.
- 108 Xinhua, Cambodia to set up inter-departmental committee to combat online fraud [Chinese], *ChinaNews*, 28 January 2025, <https://www.chinanews.com.cn/gj/2025/01-28/10361041.shtml>; Taing Rinith, Lancang-Mekong bloc unite against telecom fraud, *Khmer Times*, 24 January 2025, <https://www.khmertimeskh.com/501628656/lancang-mekong-bloc-unite-against-telecom-fraud/>.
- 109 Poppy McPherson and Tom Wilson, Crypto scam: Inside the billion-dollar 'pig-butcher' industry, Reuters, 23 November 2023; <https://www.reuters.com/investigates/special-report/fintech-crypto-fraud-thailand/>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>; Huo Beixiong, The escape of the Myawaddy telecom fraud group in Myanmar (Part 2): "Piggy" waiting to go home, Wainao, 5 March 2024, <https://www.wainao.me/wainao-reads/Myanmar-telecom-scam-group-escape-ch2-03052024>.
- 110 Vietnam Plus, Cyber fraud ring bust in Golden Triangle Special Economic Zone, 7 August 2024, <https://en.vietnamplus.vn/cyber-fraud-ring-bust-in-golden-triangle-special-economic-zone-post291542.vnp>; AP News, Cambodia to deport 19 Japanese cybercrime scam suspects, 7 April 2023, <https://apnews.com/article/japanese-deport-cambodia-cybercrime-scam-b77af70a4a74b20a2d10134f87a73b05>; Sunstar, 4 Korean Pogo operators nabbed in Cebu City raid, 4 August 2022, <https://www.sunstar.com.ph/cebu/local-news/4-korean-pogo-operators-nabbed-in-cebu-city-raid>; Bureau of Immigration, BI to deport 3 South Korean fugitives, 4 October 2024, <https://immigration.gov.ph/bi-to-deport-3-south-korean-fugitives/>; Kyodo News, 8 telecom fraud suspects arrested after deportation from Philippines, 31 January 2024, <https://english.kyodonews.net/news/2024/01/2a079dcc3055-update1-8-telecom-fraud-suspects-arrested-after-deportation-from-philippines.html>; US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 111 Interview and email exchange with Japanese police attaché based in Southeast Asia between November 2023 and May 2024; NHK World, Japanese phone scam suspects arrested on their way back from Cambodia, 6 October 2024, [https://www3.nhk.or.jp/nhkworld/en/news/20241007\\_09/](https://www3.nhk.or.jp/nhkworld/en/news/20241007_09/); Bureau of Immigration, BI to deport 3 South Korean fugitives, 4 October 2024, <https://immigration.gov.ph/bi-to-deport-3-south-korean-fugitives/>.
- 112 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 113 *The Japan Times*, 90 arrested in Osaka over social media investment scam, 24 July 2024, <https://www.japantimes.co.jp/>



- news/2024/07/24/japan/crime-legal/osaka-social-media-investment-fraud/.
- 114 C4ADS, Zoned out a comprehensive impact evaluation of Mekong economic development zones, 2021, <https://c4ads.org/wp-content/uploads/2021/06/ZonedOut-Report.pdf>; International Crisis Group, Stepping into Southeast Asia's most conspicuous criminal enclave, 17 January 2024, <https://www.crisisgroup.org/asia/south-east-asia/stepping-south-east-asias-most-conspicuous-criminal-enclave>.
  - 115 The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>; Interviews, O'Smach residents, Cambodia, March 2024.
  - 116 The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>.
  - 117 Ya New and Andrew Nachemson, 'Like slaves': Myanmar workers trafficked to Laos scam hub, *Frontier Myanmar*, 19 June 2024, <https://www.frontiermyanmar.net/en/like-slaves-myanmar-workers-trafficked-to-laos-scam-hub/>; Information provided by an expert, September 2024.
  - 118 RFA, Ethnic army overruns junta command center in Myanmar's Kokang region, 5 January 2024, <https://www.rfa.org/english/news/myanmar/surrender-01052024165956.html>.
  - 119 Nanda, The Kokang casino dream, *Frontier Myanmar*, 23 July 2020, <https://www.frontiermyanmar.net/en/the-kokang-casino-dream/>; Emily Fishbein and Nu Nu Lusan, Trapped in Myanmar's cyber-scam factories, *Al Jazeera*, 29 July 2024, <https://www.aljazeera.com/news/longform/2024/7/29/trapped-in-myanmars-cyber-scam-mills>.
  - 120 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
  - 121 Kelly Ng, The \$2bn dirty-money case that rocked Singapore, *BB News*, 12 April 2024, <https://www.bbc.com/news/world-asia-66840450>; Lydia Lam, All the convicts in Singapore's S\$3 billion money laundering case have been sentenced. What now?, *Channel News Asia*, 14 June 2024, <https://www.channelnewsasia.com/singapore/billion-dollar-money-laundering-case-recap-cna-explains-conclusion-4401811>; Why investment scams are on the rise and how you can protect yourself, *The Straits Times*, 1 September 2024, <https://www.straitstimes.com/singapore/why-investment-scams-are-on-the-rise-and-how-you-can-protect-yourself>.
  - 122 Kelly Ng, The \$2bn dirty-money case that rocked Singapore, *BBC News*, 12 April 2024, <https://www.bbc.com/news/world-asia-66840450>; *The Straits Times*, Philippine mayor under probe for alleged link to Singapore's S\$3b money laundering case, 27 May 2024, *The Business Times*, <https://www.businesstimes.com.sg/singapore/philippine-mayor-under-probe-alleged-link-singapores-s3b-money-laundering-case>.
  - 123 Valentina Casulli, Mina Chiang, Larry Cameron, Aaron Kahler and Ian Mitchell, From fake job ads to human trafficking the horrifying reality of the human trafficking scam trade, *The Mekong Club*, 27 July 2023, [https://themekongclub.org/wp-content/uploads/2023/07/From\\_Fake\\_Job\\_Ads\\_to\\_Human\\_Trafficking\\_The\\_Horrifying\\_Reality\\_of\\_the\\_Human\\_Trafficking\\_Scam\\_Trade\\_2023.pdf](https://themekongclub.org/wp-content/uploads/2023/07/From_Fake_Job_Ads_to_Human_Trafficking_The_Horrifying_Reality_of_the_Human_Trafficking_Scam_Trade_2023.pdf); *Frontier Myanmar*, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>.
  - 124 Danielle Keeton-Olsen, Indonesians say they were forced to cheat in Cambodia under threat of torture, *Voice of Democracy*, 22 September 2022, <https://www.vodkhmer.news/2022/09/22/learning-to-scam-under-threat-of-tasers/>; UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
  - 125 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
  - 126 Zhang Pengxiang, Five young people trapped in a fraud den in Laos, Huining police successfully rescued them, *Gansu Daily*, 28 September 2024, <https://gansu.gansudaily.com.cn/system/2023/09/28/030883181.shtml>; Ya New and Andrew Nachemson, 'Like slaves': Myanmar workers trafficked to Laos scam hub, *Frontier Myanmar*, 19 June 2024, <https://www.frontiermyanmar.net/en/like-slaves-myanmar-workers-trafficked-to-laos-scam-hub/>.
  - 127 Ho Kwan-yi and Cheng Sheng-wei, Imprisoned in a fraudulent park in Laos! Mother raises NT\$390,000 to rescue son [Chinese], 29 August 2022, *TVBS*, <https://tw.news.yahoo.com/%E9%81%AD%E5%9B%9A-%E5%AF%AE%E5%9C%8B-%E8%A9%90%E9%A8%99%E5%9C%92%E5%8D%80-%E6%AF%8D%E6%80%A5%E7%B1%8C39%E8%90%AC%E8%B7%A8%E6%B5%B7%E6%95%91%E5%AD%90-103953975.html?guccounter=1>.
  - 128 Emily Fishbein and Nu Nu Lusan, Trapped in Myanmar's cyber-scam factories, *Al Jazeera*, 29 July 2024, <https://www.aljazeera.com/news/longform/2024/7/29/trapped-in-myanmars-cyber-scam-mills>.
  - 129 International Organization for Migration, IOM's regional situation report on trafficking in persons into forced criminality in online scamming centres in Southeast Asia, February 2024, <https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update-december-2023.pdf>; *Frontier*, A day in the life of a Shwe Kokko scammer, 1 June 2023, <https://www.frontiermyanmar.net/en/a-day-in-the-life-of-a-shwe-kokko-scammer/>.
  - 130 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam

- operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
- 131 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf); Phontham Visapra, Sri Lankan citizen reveals harrowing details of being trafficked into Laos, *The Laotian Times*, 13 February 2023, <https://laotiantimes.com/2023/02/13/sri-lankan-citizen-reveals-harrowing-details-of-being-trafficked-into-laos/>; UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
  - 132 Ya New and Andrew Nachemson, 'Like slaves': Myanmar workers trafficked to Laos scam hub, *Frontier Myanmar*, 19 June 2024, <https://www.frontiermyanmar.net/en/like-slaves-myanmar-workers-trafficked-to-laos-scam-hub/>.
  - 133 Gina McKeon, Scam, sleep and scam again. Inside the scam facility behind those annoying text messages, Australian Broadcasting Corporation, 10 June 2024, <https://www.abc.net.au/news/2024-06-11/inside-the-scam-factory-pig-butchering-and-cyberscams/103937064>.
  - 134 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).
  - 135 UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
  - 136 Liu Yinheng, Chen Xiao and Wang Junli, People who are determined to make a fortune are not only trapped in the northern Myanmar fraud zone, *China Youth Daily*, 5 September 2023, [https://zqb.cyol.com/html/2023-09/05/nw.D110000zqgnb\\_20230905\\_1-11.htm](https://zqb.cyol.com/html/2023-09/05/nw.D110000zqgnb_20230905_1-11.htm).
  - 137 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfd4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf); Phontham Visapra, Sri Lankan citizen reveals harrowing details of being trafficked into Laos, *The Laotian Times*, 13 February 2023, <https://laotiantimes.com/2023/02/13/sri-lankan-citizen-reveals-harrowing-details-of-being-trafficked-into-laos/>; UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf);
  - 138 Poppy McPherson and Tom Wilson, Crypto scam: Inside the billion-dollar 'pig-butchering' industry, *Reuters*, 23 November 2023, <https://www.reuters.com/investigates/special-report/fintech-crypto-fraud-thailand/>.
  - 139 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf); Interviews with four employees of gateway companies, Cambodia, February–March 2024.
  - 140 Zennon Kapron, Asia Pacific fintech 2024: A balanced vision, *Forbes*, 27 December 2023, <https://www.forbes.com/sites/zennonkapron/2023/12/27/asia-pacific-fintech-2024-a-balanced-vision/>; Shaun Turton, Cyber slavery: inside Cambodia's online scam gangs, *Nikkei Asia*, 1 September 2021, <https://asia.nikkei.com/Spotlight/The-Big-Story/Cyber-slavery-inside-Cambodia-s-online-scam-gangs>.
  - 141 Elliptic, Crime in the Metaverse, 2024, <https://www.elliptic.co/resources/crime-in-the-metaverse/>; Zennon Kapron, Why crypto crime in Asia is becoming more problematic, *Forbes*, 6 June 2024, <https://www.forbes.com/sites/digital-assets/2024/06/06/why-crypto-crime-in-asia-is-becoming-more-problematic/>.
  - 142 UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf); Interviews with four employees of gateway companies, Cambodia, February–March 2024.
  - 143 Interviews with four employees of gateway companies, Cambodia, February–March 2024; Bloomberg News and Somruedi Banchongduang, Scam losses 'topped B60bn in last two years', *Bangkok Post*, 13 June 2024, <https://www.bangkokpost.com/business/general/2810391/scam-losses-topped-b60bn-in-last-two-years>; Harsh Kumar and Ashutosh Mishra, Mushrooming mule accounts fuel rise in financial frauds, says official, *Business Standard*, 7 August 2024, [https://www.business-standard.com/finance/news/mushrooming-mule-accounts-fuel-rise-in-financial-frauds-says-official-124080601440\\_1.html](https://www.business-standard.com/finance/news/mushrooming-mule-accounts-fuel-rise-in-financial-frauds-says-official-124080601440_1.html).
  - 144 Sarah Koh, 305 suspected scammers, money mules under police probe; victims lose over \$12.8m, *The Straits Times*, 15 September 2024, <https://www.straitstimes.com/singapore/courts-crime/over-300-suspected-scammers-money-mules-under-police-probe-victims-lose-over-128m>; *Bangkok Post*, Suspects arrested in 3-billion-baht mule account scam, 12 July 2024, <https://www.bangkokpost.com/thailand/general/2828063/mule-account-scam-gang-arrested-deceiving-over-50-foreign-workers>; Interviews with four employees of gateway companies, Cambodia, February–March 2024; The Nation, Central bank closes some 200,000 mule accounts so far this year, 13 June 2024, <https://www.nationthailand.com/news/general/40038787>.
  - 145 Interviews with four employees of gateway companies and a currency exchange trader, Cambodia, February–March 2024.
  - 146 Yanyu Chen, Moving bricks: Money-laundering practices in the online scam industry, *Global China Pulse*, 24 September 2024, <https://globalchinapulse.net/moving-bricks-money-laundering-practices-in-the-online-scam-industry/>.

- 147 Chainalysis, Illicit volumes portend record year as on-chain crime becomes increasingly diverse and professionalized, 15 January 2025, <https://www.chainalysis.com/blog/2025-crypto-crime-report-introduction/>; Elliptic, Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin, 14 January 2025, <https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin/>; Elliptic, Huione Guarantee: The multi-billion dollar marketplace used by online scammers, 10 July 2024, <https://www.elliptic.co/blog/cyber-scam-marketplace/>; Chainalysis, 2024 Crypto crime mid-year update part 2: China-based CSAM and cybercrime networks on the rise, pig butchering scams remain lucrative, 29 August 2024, <https://www.chainalysis.com/blog/2024-crypto-crime-mid-year-update-part-2/>.
- 148 Chainalysis, 2024 Crypto crime mid-year update part 2: China-based CSAM and cybercrime networks on the rise, pig butchering scams remain lucrative, 29 August 2024, <https://www.chainalysis.com/blog/2024-crypto-crime-mid-year-update-part-2/>; Elliptic, Huione Guarantee: The multi-billion dollar marketplace used by online scammers, 10 July 2024, <https://www.elliptic.co/blog/cyber-scam-marketplace/>.
- 149 Lindsey Kennedy and Nathan Paul Southern, Where does North Korea get its cash?, GI-TOC, 31 March 2025, <https://globalinitiative.net/analysis/where-does-north-korea-get-its-cash/>.
- 150 Financial Crimes Enforcement Network, FinCEN finds Cambodia-based Huione Group to be of primary money laundering concern, proposes a rule to combat cyber scams and heists, 1 May 2025, <https://www.fincen.gov/news/news-releases/fincen-finds-cambodia-based-huione-group-be-primary-money-laundering-concern>.
- 151 Camboja News, Huione Pay removes sign after US blacklist move, 7 May 2025, <https://cambojanews.com/huione-pay-removes-sign-after-u-s-blacklist-move/>; WIRE, The internet's biggest-ever black market just shut down amid Telegram purge, 14 May 2025, <https://www.wired.com/story/the-internets-biggest-ever-black-market-shuts-down-after-a-telegram-purge/>.
- 152 Interviews with four employees of gateway companies, Cambodia, February–March 2024.
- 153 Yanyu Chen, Moving bricks: Money-laundering practices in the online scam industry, Global China Pulse, 24 September 2024, <https://globalchinapulse.net/moving-bricks-money-laundering-practices-in-the-online-scam-industry/>.
- 154 Interview of trafficking survivor, 29 March 2024, online call.
- 155 US Department of State, 2024 trafficking in persons report: Burma, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/burma/>; US Department of State, 2024 trafficking in persons report: Thailand, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/thailand/>; US Department of State, 2024 trafficking in persons report: Cambodia, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/>.
- 156 Lindsey Kennedy and Nathan Paul Southern, 'Just as scared': Cyberscam victims in Cambodia find no freedom in rescue, Al Jazeera, 24 November 2023, <https://www.aljazeera.com/features/2023/11/24/just-as-scared-cyberscam-victims-in-cambodia-find-no-freedom-in-rescue>.
- 157 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, ProPublica, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 158 Lindsey Kennedy and Nathan Paul Southern, 'Just as scared': Cyberscam victims in Cambodia find no freedom in rescue, Al Jazeera, 24 November 2023, <https://www.aljazeera.com/features/2023/11/24/just-as-scared-cyberscam-victims-in-cambodia-find-no-freedom-in-rescue>; Tessa Wong, Bui Thu and Lok Lee, Cambodia scams: Lured and trapped into slavery in Southeast Asia, BBC News, 20 September 2022, <https://www.bbc.com/news/world-asia-62792875>.
- 159 UNODC, Exploitation and abuse: The scale and scope of human trafficking in South Eastern Europe, May 2022, [https://www.unodc.org/documents/human-trafficking/Exploitation\\_and\\_Abuse.pdf](https://www.unodc.org/documents/human-trafficking/Exploitation_and_Abuse.pdf); Jayashri Srikanth, Perfect victims and real survivors: The iconic victim in domestic human trafficking law, *Boston University Law Review*, 87, 157, <https://www.bu.edu/law/journals-archive/bulr/volume87n1/documents/SRIKANTIAHV.2.pdf>.
- 160 Hannah Beech, Drugs, scams and sin: Myanmar's war has made it the global crime capital, *The New York Times*, 31 December 2024, <https://www.nytimes.com/2024/12/31/world/asia/myanmar-drugs-crime.html>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>; Ya New and Andrew Nachemson, 'Like slaves': Myanmar workers trafficked to Laos scam hub, *Frontier Myanmar*, 19 June 2024, <https://www.frontiermyanmar.net/en/like-slaves-myanmar-workers-trafficked-to-laos-scam-hub/>.
- 161 RFA Burmese, How a scam ring opened shop in downtown Yangon, Radio Free Asia, 14 September 2023, <https://www.rfa.org/english/news/myanmar/yangon-scam-compound-09142023131525.html>; RFA Lao and Eugene Whong, Debt-trapped Lao 'chat girls' forced to sell sex in China-run economic zone, 19 December 2021, <https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html>; Danielle Keeton-Olsen, Indonesians say they were forced to cheat in Cambodia under threat of torture, 22 September 2024, <https://www.vodkhmer.news/2022/09/22/learning-to-scam-under-threat-of-tasers/>.
- 162 Valentina Casulli, Mina Chiang, Larry Cameron, Aaron Kahler and Ian Mitchell, From fake job ads to human trafficking the horrifying reality of the human trafficking scam trade, *The Mekong Club*, 27 July 2023, [https://themekongclub.org/wp-content/uploads/2023/07/From\\_Fake\\_Job\\_Ads\\_to\\_Human\\_Trafficking\\_The\\_Horrifying\\_Reality\\_of\\_the\\_Human\\_Trafficking\\_Scam\\_Trade\\_2023.pdf](https://themekongclub.org/wp-content/uploads/2023/07/From_Fake_Job_Ads_to_Human_Trafficking_The_Horrifying_Reality_of_the_Human_Trafficking_Scam_Trade_2023.pdf); Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>.
- 163 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).

- 164 Interview with a Southeast Asian government representative assisting nationals to return home in Jakarta, Indonesia, October 2023.
- 165 Interviews of employees of gateway companies, Cambodia, February 2024.
- 166 Wittayakorn Boonruang, Thai police announce arrests in crackdown on transnational scam call-center gang, Benar News, 31 May 2024, <https://www.benarnews.org/english/news/thai/phone-scam-05312024145359.html>.
- 167 Komsan Tortermvasana, Fraud raid seizes 58 satellite devices, Bangkok Post, 19 June 2024, <https://www.bangkokpost.com/business/general/2813459/fraud-raid-seizes-58-satellite-devices>; See Starlink, <https://www.starlink.com/>.
- 168 UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
- 169 Cezary Podkul, Authorities raid alleged cyberscam compounds in Cambodia, ProPublica, 3 October 2022, <https://www.propublica.org/article/pig-butcher-scams-raided-cambodia-apple-trafficking>.
- 170 Arda Akartuna, Are pig butchering scammers using AI? Here's what the latest trends show, Elliptic, 17 July 2024, <https://www.elliptic.co/blog/are-pig-butcher-scammers-using-ai-heres-what-the-latest-trends-show>.
- 171 UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
- 172 Arda Akartuna, Are pig butchering scammers using AI? Here's what the latest trends show, Elliptic, 17 July 2024, <https://www.elliptic.co/blog/are-pig-butcher-scammers-using-ai-heres-what-the-latest-trends-show>.
- 173 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, ProPublica, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 174 Frontier Myanmar, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>.
- 175 Elliptic, Crime in the Metaverse, 2024, <https://www.elliptic.co/resources/crime-in-the-metaverse>; UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
- 176 Office of Public Affairs, Cyber scam organization disrupted through seizure of nearly \$9m in crypto, US Department of Justice, 21 November 2023, <https://www.justice.gov/opa/pr/cyber-scam-organization-disrupted-through-seizure-nearly-9m-crypto>.
- 177 UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
- 178 Jason Tower and Priscilla A. Clapp, Myanmar scam hubs revive fast after China eases pressure on junta, US Institute of Peace, 26 September 2024, <https://www.usip.org/publications/2024/09/myanmar-scam-hubs-revive-fast-after-china-eases-pressure-junta>; Various posts on GTSEZ English, <https://www.facebook.com/profile/100092240258160/search/?q=zhao%20wei>.
- 179 For more examples and details see: UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf); UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf); Interviews with four employees of gateway companies, Cambodia, February–March 2024; Elliptic, Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin, 14 January 2025, <https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin>.
- 180 Sebastian Strangio, Thailand cuts off internet, mobile phone connections to Myanmar scam hub, The Diplomat, <https://thediplomat.com/2024/05/thailand-cuts-off-internet-mobile-phone-connections-to-myanmar-scam-hub/>.
- 181 Valentina Casulli, Mina Chiang, Larry Cameron, Aaron Kahler and Ian Mitchell, From fake job ads to human trafficking the horrifying reality of the human trafficking scam trade, The Mekong Club, 27 July 2023, [https://themekongclub.org/wp-content/uploads/2023/07/From\\_Fake\\_Job\\_Ads\\_to\\_Human\\_Trafficking\\_The\\_Horrifying\\_Reality\\_of\\_the\\_Human\\_Trafficking\\_Scam\\_Trade\\_2023.pdf](https://themekongclub.org/wp-content/uploads/2023/07/From_Fake_Job_Ads_to_Human_Trafficking_The_Horrifying_Reality_of_the_Human_Trafficking_Scam_Trade_2023.pdf); Wassayos Ngamkham, Police find cross-border data cables serving call scammers in Cambodia, Bangkok Post, 14 December 2022, <https://www.bangkokpost.com/thailand/general/2460499/police-find-cross-border-data-cables-serving-call-scammers-in-cambodia>.
- 182 Office of the National Broadcasting and Telecommunications Commission, The NBTC office visited the area to follow up on the adjustment of mobile phone signal towers along the border in Mae Sot District, Mae Ramat District, Tak Province, and ordered business operators to remove all towers along the border. If they do not comply, the maximum penalty will be the revocation of the license, 15 May 2024, <https://www.nbt.go.th/News/Information/66026.aspx>.
- 183 Mizzima, Karen scam centres using Mytel after Thai telecom companies cut connections, 18 May 2024, <https://eng.mizzima.com/2024/05/18/10010>.
- 184 International Trade Administration, Defense and Security Sector, 30 January 2024, <https://www.trade.gov/country-commercial-guides/vietnam-defense-and-security-sector>; Viettel Global, Myanmar, <http://viettelglobal.vn/globals/myanmar.html>; Aung Naing, Junta awards tender for online lottery system to military-owned Mytel, 12 June 2023, Myanmar Now, <https://myanmar-now.org/en/news/junta-awards-tender-for-online-lottery-system-to-military-owned-mytel/>; Aung Naing, Junta awards tender for

- online lottery system to military-owned Mytel, 12 June 2023, Myanmar Now, <https://myanmar-now.org/en/news/junta-awards-tender-for-online-lottery-system-to-military-owned-mytel/>.
- 185 See Shwe Myint Thaung Yinn, <http://shwemyintthaungyinn.com/>.
- 186 Associated Press, Thailand cuts power to Chinese-developed casinos at Myanmar border linked to cyberscams, drugs, human trafficking, *South China Morning Post*, 7 June 2023, <https://www.scmp.com/news/asia/southeast-asia/article/3223200/thailand-cuts-power-chinese-developed-casinos-myanmar-border-linked-cyberscams-drugs-human>; Thai PBS, The reason Myanmar cut off electricity to the city of Chinese scammers, not renewing the Thai electricity concession, 8 June 2023, <https://www.thaipbs.or.th/news/content/328611>.
- 187 Karen News, Telecom scamming operations restart in Shwe Kokko, 28 April 2024, <https://karennews.org/2024/04/telecom-scamming-operations-restart-in-shwe-kokko/>.
- 188 Thai BPS, Under pressure from China, Thailand finally cracks the whip on scam call centers, 5 February 2024, <https://world.thaipbs.or.th/detail/56429>.
- 189 Nontarat Phaicharoen and Kunawut Boonreak, Thai authority cuts electricity to 2 regions in southeastern Myanmar, Radio Free Asia, 6 June 2023, <https://www.rfa.org/english/news/myanmar/thai-myanmar-power-cut-06062023221141.html>; *The Nation*, Shwe Kokko people snap up generators after Thailand cuts power to border crime hub, 13 June 2023, <https://www.nationthailand.com/thailand/general/40028495>.
- 190 Pa Pa, Fuel demand soars as Thailand cuts off power to Myanmar border towns, *The Irrawaddy*, 6 February 2025, <https://www.irrawaddy.com/news/burma/fuel-demand-soars-as-thailand-cuts-off-power-to-myanmar-border-towns.html>.
- 191 Komsan Tortermvasana, Fraud raid seizes 58 satellite devices, Bangkok Post, 19 June 2024, <https://www.bangkokpost.com/business/general/2813459/fraud-raid-seizes-58-satellite-devices>.
- 192 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 193 Inside Thailand's \$2 billion scam industry now targeting Americans, *Newsweek*, 8 September 2024, <https://www.newsweek.com/inside-thailand-2-billion-china-scam-industry-now-targeting-americans-1947561>.
- 194 Examples of the latter: Open Corporates, L.Y.P Group Co., Ltd., <https://opencorporates.com/companies/kh/00028391>; Open Corporates, Zheng Heng (Cambodia) Co., Ltd., <https://opencorporates.com/companies/kh/00020884>.
- 195 Information provided by an investigative journalist, May 2024.
- 196 Jack Davies, Lee Chi Chi, Chan Yun Nam and Sovannarith Keo, Wanted Chinese kingpin owns casino with Cambodian senator's son-in-law, Radio Free Asia, 22 June 2021, <https://www.rfa.org/english/news/special/hunsen-family/xu-aimin.html>; Mech Dara, Cindy Liu and Danielle Keeton-Olsen, Victims allege Sihanoukville precincts with ties to major businesses are sites of scams, torture, detention, *Voice of Democracy*, 18 February 2022, <https://vodenglish.news/victims-allege-sihanoukville-precincts-with-ties-to-major-businesses-are-sites-of-scams-torture-detention/>; Office of Financial Sanctions Implementation HM Treasury, Global Human Rights, 8 December 2023, [https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice\\_Global\\_Human\\_Rights\\_081223](https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223).
- 197 RFA Lao, Laos orders Golden Triangle scammers out of zone by end of month, Radio Free Asia, 12 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-sez-scammers-08122024171757.html>.
- 198 Mech Dara and Cindy Liu, From timber to human trafficking: rescued victims allege major scam operations in tycoon's SEZ, *Voice of Democracy*, 17 November 2021, <https://vodenglish.news/from-timber-to-human-trafficking-rescued-victims-allege-major-scam-operations-in-tycoons-sez/>; *The Straits Times*, Indonesia arrests 88 Chinese nationals in Riau Islands over love scams, 30 August 2023, <https://www.straitstimes.com/asia/se-asia/indonesia-arrests-88-chinese-nationals-in-riau-islands-over-love-scams>.
- 199 Jason Tower and Priscilla Clapp, Myanmar's casino cities: The role of China and transnational criminal networks, US Institute of Peace, [https://www.usip.org/sites/default/files/2020-07/20200727-sr\\_471-myanmars\\_casino\\_cities\\_the\\_role\\_of\\_china\\_and\\_transnational\\_criminal\\_networks-sr.pdf](https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf); *Khmer Times*, 75 foreigners rescued from casino, 18 October 2022, <https://www.khmertimeskh.com/501170369/75-foreigners-rescued-from-casino>.
- 200 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>.
- 201 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104; Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>; UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf); Jack Adamović Davies, Torture, forced labor alleged at Prince Group-linked compound, Radio Free Asia, 12 February 2024, <https://www.rfa.org/english/news/cambodia/prince-group-investigation-02122024143012.html>.
- 202 UNODC, Transnational organized crime and the convergence of cyber-enabled fraud, underground banking and technological innovation in Southeast Asia: A shifting threat landscape, October 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC\\_Convergence\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/TOC_Convergence_Report_2024.pdf).
- 203 Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, *ProPublica*, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 204 Elliptic, Huione Guarantee: The multi-billion dollar marketplace used by online scammers, 10 July 2024, <https://www.elliptic.co/blog/cyber-scam-marketplace>.



- 205 'White-label' refers to products or services that are typically rebranded and used by other companies. For example, an online gambling company may use white-label services for web design, betting technology, online security and securing offshore licenses or sub-licenses; UNODC, Casinos, money laundering, underground banking, and transnational organized crime in East and Southeast Asia: A hidden and accelerating threat, January 2024, [https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino\\_Underground\\_Banking\\_Report\\_2024.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2024/Casino_Underground_Banking_Report_2024.pdf).
- 206 WIRED, The \$11 Billion Marketplace Enabling the Crypto Scam Economy, July 10, <https://www.wired.com/story/pig-butcher-scam-crypto-huione-guarantee/>; Arda Akartuna, Are pig butchering scammers using AI? Here's what the latest trends show, Elliptic, 17 July 2024, <https://www.elliptic.co/blog/are-pig-butcher-scammers-using-ai-heres-what-the-latest-trends-show>.
- 207 Elliptic, Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin, 14 January 2025, <https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin>; Will Jackson, Cambodian online marketplace outed as one-stop shop for scammers' money laundering and 'detention equipment' needs, Australian Broadcasting Corporation, 26 July 2024, <https://www.abc.net.au/news/2024-07-27/online-marketplace-for-money-laundering-and-scammers/104131624>.
- 208 Will Jackson, Cambodian online marketplace outed as one-stop shop for scammers' money laundering and 'detention equipment' needs, Australian Broadcasting Company, <https://www.abc.net.au/news/2024-07-27/online-marketplace-for-money-laundering-and-scammers/104131624>.
- 209 Ibid.
- 210 Elliptic, Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin, 14 January 2025, <https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin>.
- 211 See ChatMe, We are the future, <https://www.chatme.global/>.
- 212 Huione Foundation, Huione Chain Overview, <https://docs.huione.org/support>; Xone, [https://x.com/xone\\_chain/status/1878720798325948494](https://x.com/xone_chain/status/1878720798325948494).
- 213 Oliver Knight, Company behind illicit \$24B Telegram marketplaces launches stablecoin, 17 January 2025, Coin Desk, <https://www.coindesk.com/business/2025/01/14/company-behind-illicit-24-b-telegram-marketplaces-launches-stablecoin>; Uniswap, Huione USDH, <https://app.uniswap.org/explore/tokens/ethereum/0xd79021d7e9358f2e5ec291774a2e22ea904a87b>.
- 214 Elliptic, Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin, 14 January 2025, <https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin>.
- 215 Cezary Podkul, What's a pig butchering scam? here's how to avoid falling victim to one, ProPublica, 19 September 2022, <https://www.propublica.org/article/whats-a-pig-butcher-scam-heres-how-to-avoid-falling-victim-to-one>; US Attorney's Office District of Massachusetts, United States files forfeiture action to recover cryptocurrency traceable to pig butchering romance scam, 13 March 2024, <https://www.justice.gov/usao-ma/pr/united-states-files-forfeiture-action-recover-cryptocurrency-traceable-pig-butcher-scam>; Dan Mangan, Cryptocurrency 'pig butchering' scam wrecks Kansas bank, sends ex-CEO to prison for 24 years, CNBC, 21 August 2024, <https://www.cnbc.com/2024/08/21/cryptocurrency-shan-hanes-pig-butcher-scam.html>.
- 216 Teele Rebane and Ivan Watson, Killed by a scam: A father took his life after losing his savings to international criminal gangs. He's not the only one, CNN, 20 June 2024, <https://www.cnn.com/2024/06/17/asia/pig-butcher-scam-southeast-asia-dst-intl-hnk/index.html>; Cezary Podkul and Cindy Liu, Human trafficking's newest abuse: Forcing victims into cyberscamming, ProPublica, 13 September 2022, <https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming>.
- 217 Phon Pothyroth and Leila Goldstein, Dead Chinese man linked to alleged scam operation, Sihanoukville Compound, Cambodia News, 15 June 2023, <https://cambodjanews.com/>.
- 218 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfde4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).
- 219 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104.
- 220 Affidavit from Filipino citizen rescued from O'Smach, September 2023; Interviews with former scam worker and residents, Myawaddy, Myanmar and Mae Sot, Thailand, March 2024.
- 221 Interview with NGO staff member, Cambodia, February 2024.
- 222 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 2023, 55, 4, 575-603, 10.1080/14672715.2023.2268104; Telegram, job posted to Jobs in Dubai, 24 July 2024, [https://t.me/JOB\\_DUBAI\\_99](https://t.me/JOB_DUBAI_99); Yang Zekun, Police in Laos and China cooperate to bring criminals to justice, 23 April 2024, <https://www.chinadaily.com.cn/a/202404/23/WS66275226a31082fc043c380b.html>.
- 223 U Sudhakar, Chinese scammers in Cambodia force Indian women to make nude calls back home: Victim, *The Times of India*, 9 July 2024, <https://timesofindia.indiatimes.com/city/hyderabad/chinese-scammers-in-cambodia-exploit-indian-women-in-cybercrime-scheme/articleshow/111590199.cms>.
- 224 Frontier, Scam City: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>; RFA Lao and Eugene Whong, Debt-trapped Lao 'chat girls' forced to sell sex in China-run economic zone, 19 December 2021, <https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html>.
- 225 Daphne Galvez, Torture den found in Pasay POGO hub, *The Philippine Star*, 1 November 2023, <https://www.philstar.com/nation/2023/11/01/2308078/torture-den-found-pasay-pogo-hub>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>.
- 226 Interview with former BGF/KNA officer, online, March 2024.

- 227 Daphne Galvez, Torture den found in Pasay POGO hub, *The Philippine Star*, 1 November 2023, <https://www.philstar.com/nation/2023/11/01/2308078/torture-den-found-pasay-pogo-hub>.
- 228 US Department of State, 2024 trafficking in persons report: Cambodia, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/cambodia/>.
- 229 US Department of State, 2024 trafficking in persons report: Burma, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/burma/>.
- 230 Office of the United Nations High Commissioner for Human Rights, Online scam operations and trafficking into forced criminality in Southeast Asia: recommendations for a human rights response, August 2023, <https://bangkok.ohchr.org/wp-content/uploads/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf>.
- 231 Tommy Walker, In Cambodia, reporting on illegal scam centers brings threats, *Voice of America*, 27 June 2023, <https://www.voanews.com/a/in-cambodia-reporting-on-illegal-scam-centers-brings-threats/7687812.html>; Danielle Keeton-Olsen, Scam stories hinge on on-the-ground journalism, *Global China Pulse*, 18 September 2024, <https://globalchinapulse.net/scam-stories-hinge-on-on-the-ground-journalism/>.
- 232 George Wright and Len Leng, Award-winning Cambodian journalist who exposed cyberscams is arrested, *BBC*, 1 October 2024, <https://www.bbc.com/news/articles/cdjez9219n7o>.
- 233 Tommy Walker, Fearful after arrest, Cambodian reporter who exposed scam centers quits media, *VOA*, 20 November 2024, <https://www.voanews.com/a/fearful-after-arrest-cambodian-reporter-who-exposed-scam-centers-quits-media/7870797.html>; Reuters, Cambodian journalist freed on bail after apologising for 'harmful' posts, 25 October 2024, <https://www.reuters.com/world/asia-pacific/detained-cambodian-journalist-seeks-bail-after-apologising-harmful-posts-2024-10-24/>.
- 234 Mech Dara, Chinese scam rescuer released from prison after 10 months, *Voice of Democracy*, 2 January 2023, <https://vodenglish.news/chinese-scam-rescuer-released-from-prison-after-10-months/>.
- 235 GI-TOC engagement with stakeholders across Southeast Asia.
- 236 Kelly NG, Cambodia's Hun Sen shuts down independent media outlet *Voice of Democracy*, *BBC News*, 13 February 2023, <https://www.bbc.com/news/world-asia-64621595>.
- 237 Transparency International, Global corruption barometer: Asia 2020, <https://www.transparency.org/en/gcb/asia/asia-2020>.
- 238 Danielle Keeton-Olsen, Thai police visit concludes with 66 rescued, other victims moved, *Voice of Democracy*, 12 April 2022, <https://vodenglish.news/thai-police-visit-concludes-with-66-rescued-other-victims-moved/>.
- 239 Edna Tarigan, ASEAN leaders to agree to cooperate in fighting cyber scams, *Associated Press*, 10 May 2023, <https://apnews.com/article/asean-myanmar-human-trafficking-6d8d9b1c32cf4ed82edec79523db30e3>; Sebastian Strangio, China's fm calls on Southeast Asia to tackle online scamming scourge, *The Diplomat*, 17 January 2025, <https://thediplomat.com/2025/01/chinas-fm-calls-on-southeast-asia-to-tackle-online-scamming-scourge/>; Gillian Murphy, The cyber-scam industry and its implications for ASEAN success, *Columbia Political Review*, <https://www.cpreview.org/articles/2024/1/the-cyber-scam-industry-and-its-implications-for-asean-success>.
- 240 Interview with organized crime expert, Bangkok, Thailand, February 2024.
- 241 May Wong and Darrelle Ng, 'Afraid to sleep at home': Myanmar civilians flee to Thai border as conflict intensifies, *CAN*, 25 April 2024, <https://www.channelnewsasia.com/asia/myanmar-coup-crisis-thailand-border-towns-fleeing-conflict-myanmar-4291716>; Priscilla A. Clapp and Jason Tower, The Myanmar army's criminal alliance, *US Institute of Peace*, 7 March 2024, <https://www.usip.org/publications/2022/03/myanmar-armys-criminal-alliance>.
- 242 Naw Betty Han, 'Business is back': BGF adapts under pressure, *Frontier Myanmar*, 8 April 2024, <https://www.frontiermyanmar.net/en/business-is-back-bgf-adapts-under-pressure/>; Jason Tower and Priscilla A. Clapp, Myanmar scam hubs revive fast after China eases pressure on junta, *US Institute of Peace*, 26 September 2024, <https://www.usip.org/publications/2024/09/myanmar-scam-hubs-revive-fast-after-china-eases-pressure-junta>.
- 243 World Bank, GDP (current US\$) - Cambodia, Lao PDR, Thailand, Myanmar, Philippines, <https://data.worldbank.org/indicator/NY.GDP.MKTP.CD?locations=KH-LA-TH-MM-PH>; US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 244 For example, see UNODC, Myanmar Opium Survey 2022, 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/Myanmar\\_Opium\\_Survey\\_2022.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/Myanmar_Opium_Survey_2022.pdf).
- 245 These numbers include primarily payments from OECD countries. Official Development Assistance made by China is not included; OECD, CRS: Creditor Reporting System (flows), [https://data-explorer.oecd.org/vis?df\[ds\]=DisseminateFinalBoost&df\[id\]=DSD\\_CRS%40DF\\_CRS&df\[ag\]=OECD.DCD.FSD&dq=DAC.PHL%2BLAO%2BTHA%2BKHM%2BMMR.1000.100.\\_T.\\_T.D.V.\\_T.\\_&lom=LASTNPERIODS&lo=5&to\[TIME\\_PERIOD\]=false&vw=tb](https://data-explorer.oecd.org/vis?df[ds]=DisseminateFinalBoost&df[id]=DSD_CRS%40DF_CRS&df[ag]=OECD.DCD.FSD&dq=DAC.PHL%2BLAO%2BTHA%2BKHM%2BMMR.1000.100._T._T.D.V._T._&lom=LASTNPERIODS&lo=5&to[TIME_PERIOD]=false&vw=tb).
- 246 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>; US Institute of Peace, Cyber scams and human trafficking in Cambodia and Vietnam, 28 January 2025, [https://www.youtube.com/watch?v=-vXNcx8jyck&ab\\_channel=UnitedStatesInstituteofPeace](https://www.youtube.com/watch?v=-vXNcx8jyck&ab_channel=UnitedStatesInstituteofPeace).
- 247 Interview with organized crime expert, online, August 2024.
- 248 Tara Siegel Bernard, Lured by a promising job, he was forced to scam people, *The New York Times*, 10 September 2024, <https://www.nytimes.com/2024/09/10/business/scammers-trafficking-cybercrime.html>; Al Jazeera English, She Zhijiang: Discarded Chinese spy or criminal mastermind?, *YouTube*, 26 September 2024, [https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab\\_channel=AlJazeeraEnglish](https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab_channel=AlJazeeraEnglish).
- 249 International Organization for Migration, IOM's regional situation report on trafficking in persons into forced criminality in online scamming centres in Southeast Asia, February 2024,

- [https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update\\_december-2023.pdf](https://roasiapacific.iom.int/sites/g/files/tmzbd1671/files/documents/2024-02/iom-southeast-asia-trafficking-for-forced-criminality-update_december-2023.pdf).
- 250 Ao Shen and Randy Liu, No More Bets, 2023, <https://www.imdb.com/title/tt28076784/>; Hit Chinese movie raises fears of travel in Southeast Asia, *Japan Times*, 4 September 2023, <https://www.japantimes.co.jp/news/2023/09/04/asia-pacific/crime-legal/china-cambodia-myanmar-tourism-cyberscams-trafficking/>.
- 251 Niem Chheng, 'Safe' Kingdom: Reputation marred by scamming reports, *The Phnom Penh Post*, 9 July 2024, <https://www.phnompenhpost.com/post-in-depth/-safe-kingdom-reputation-marred-by-scamming-reports>.
- 252 Nectar Gan, Joyce Jiang and Kocha Olarn, A Chinese actor was abducted from Thailand. His swift return has sparked hopes – and fears – back home, CNN, 15 January 2025, <https://www.cnn.com/2025/01/14/china/china-actor-thailand-scam-myanmar-intl-hnk/index.html>; Beijing News, 7 January 2025, [https://weibo.com/1644114654/P8BWtrQxW?refer\\_flag=1001030103\\_&layerid=5120524776636848](https://weibo.com/1644114654/P8BWtrQxW?refer_flag=1001030103_&layerid=5120524776636848); RFA Mandarin and RFA Cantonese, Chinese actor rescued from Myanmar's scam park, Radio Free Asia, 10 January 2025, <https://www.rfa.org/english/china/2025/01/10/china-myanmar-thailand-kk-park-actor/>.
- 253 Radio Free Asia, Myanmar scammers agree to stop forced labor after actor rescued, 16 January 2025, <https://www.rfa.org/english/myanmar/2025/01/16/scam-center-rules/>.
- 254 Bangkok Post, PM to reassure Chinese president about tourist safety, 21 January 2025, <http://www.bangkokpost.com/thailand/general/2944450/pm-to-reassure-chinese-president-about-tourist-safety>
- 255 Interviews, multiple residents, O'Smach, March 2024.
- 256 Interview with Cambodian hotel receptionist, O'smach, March 2024.
- 257 Frontier Myanmar, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>.
- 258 Liu Zhongquan, Catching the 'snake head' and cutting off the 'black hand', Jilin Tonghua Border Management Detachment cracked a major case of organizing others to illegally cross the national border, Legal Daily, <https://news.ifeng.com/c/8T6Fjv0G3hN>.
- 259 UNODC, Casinos, cyber fraud and trafficking in persons for forced criminality in Southeast Asia, Policy brief, August 2023, [https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP\\_for\\_FC\\_Summary\\_Policy\\_Brief.pdf](https://www.unodc.org/roseap/uploads/documents/Publications/2023/TiP_for_FC_Summary_Policy_Brief.pdf).
- 260 Gerald Flynn and Andy Ball, How a 'dirty gambling company' may have set the standard for habitat destruction in Cambodia, Mongabay, 8 February 2022, <https://news.mongabay.com/2022/02/how-a-dirty-gambling-company-may-have-set-the-standard-for-destruction-in-cambodia/>; Jack Board, In Focus: Cambodia's US\$16 billion 'eco-city' raises financial and environmental concerns, Channel News Asia, 4 May 2024, <https://www.channelnewsasia.com/asia/cambodia-sihanoukville-bay-lights-eco-city-prince-group-4252091>; Site visit, April 2023; Site visit to Boten, Laos, May 2022.
- 261 Al Jazeera, She Zhijiang: Discarded Chinese spy or criminal mastermind?, YouTube, 26 September 2024, [https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab\\_channel=AlJazeeraEnglish](https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab_channel=AlJazeeraEnglish).
- 262 Interview with a former construction worker, O'Smach, March 2024; Mech Dara and Michael Dickison, Casino cleaner recalls three hours in Poipet inferno, Voice of Democracy, 3 January 2024, <https://vodenglish.news/casino-cleaner-recalls-three-hours-in-poipet-inferno/>.
- 263 Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 55, 4 (2023), pp 575–603.
- 264 Frontier Myanmar, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>.
- 265 The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>; Ivan Franceschini, Ling Li and Mark Bo, Compound capitalism: A political economy of Southeast Asia's online scam operations, *Critical Asian Studies*, 55, 4 (2023), pp 575–603.
- 266 Danielle Keeton-Olsen, Indonesians say they were forced to cheat in Cambodia under threat of torture, Voice of Democracy, 22 September 2024, <https://www.vodkhmer.news/2022/09/22/learning-to-scam-under-threat-of-tasers/>.
- 267 GI-TOC, Criminality in South Eastern Asia, Global Organized Crime Index 2023, [https://ocindex.net/region/south-eastern\\_asia](https://ocindex.net/region/south-eastern_asia).
- 268 Rappler, High-end villas at the Baofu compound in Bambang, Tarlac become tenantless five months after the raid, 5 August 2024, <https://www.youtube.com/watch?v=jfbs5sl4ZQk>.
- 269 University of Minnesota, Cambodia, <https://cla.umn.edu/chgs/holocaust-genocide-education/resource-guides/cambodia>; Tom Mintier, Royalist troops hold on to Cambodian outpost, CNN, 21 August 1997, <http://edition.cnn.com/WORLD/9708/21/cambodia/>; Elizabeth Becker, O Smach journal; On its last legs, the saddest Cambodian army, *The New York Times*, 20 October 1997, <https://www.nytimes.com/1997/10/20/world/o-smach-journal-on-its-last-legs-the-saddest-cambodian-army.html>.
- 270 VOD Staff, Briefs: regional media report more scam rescues, Voice of Democracy, 24 October 2022, <https://vodenglish.news/briefs-regional-media-reports-more-scam-rescues/>.
- 271 Site visit, March 2024.
- 272 Mech Dara, Trafficking rescues reach Oddar Meanchey, 19 October 2022, Voice of Democracy, <https://vodenglish.news/trafficking-rescues-reach-oddar-meanchey/>.
- 273 Site visit, March 2024; Also visible from Google Earth at <https://earth.google.com/web/search/royal+hill+resort/@14.432223,86,103.696573,257.71915228a,553.3828924d,35y,-0h,0t,0r/data=CigiJgokCSuz67m5mC5AEek-4eDnkS5AGbCwUWE1JV5AIbJ1SqWkI15AOgMKATA>.
- 274 Interviews with Cambodian hotel receptionist, motodup driver and shopkeeper, O'Smach, March 2024.
- 275 Interview with Cambodian shopkeeper, O'Smach, March 2024.
- 276 Interviews with Cambodian security guard and shopkeeper, O'Smach, March 2024.

- 277 Mech Dara, Amid ongoing scam raids, Sihanoukville residents recall insecurity, Voice of Democracy, 29 September 2022, <https://vodenglish.news/amid-ongoing-scam-raids-sihanoukville-residents-recall-insecurity/>; Mech Dara, Eerie silence descends on notorious Sihanoukville scam compounds, Voice of Democracy, 19 September 2022, <https://vodenglish.news/eerie-silence-descends-on-notorious-sihanoukville-scam-compounds/>.
- 278 Chan Reaksmey and Mut Sreypov, Suspicious! The body of a Chinese woman who jumped from the second floor of a hotel turned a blind eye!, 5 December 2020, <https://kohsantepheapdaily.com.kh/article/1223005.html>; Chinese woman dies after jumping from O'smach Hotel, 6 December 2020, <https://cne.wtf/2020/12/06/chinese-woman-dies-after-jumping-from-osmach-hotel/>.
- 279 Him Vichet, Broken-hearted man jumps from 5-storey building, *Nokor Thom Daily*, 18 October 2023, <https://norkorthom.com/archives/213055>; Buth Reaksmey Kongkea, Woman charged with murder of money lender in O'Smach, 12 March 2024, <https://www.khmertimeskh.com/501454161/woman-charged-with-murder-of-money-lender-in-osmach/>.
- 280 Affidavit from Filipino citizen rescued from O'Smach, September 2023.
- 281 It is unclear whether they were identified as trafficking victims. *Khmer Times*, 75 foreigners rescued from casino, 18 October 2022, <https://www.khmertimeskh.com/501170369/75-foreigners-rescued-from-casino>; Mech Dara, Trafficking rescues reach Oddar Meanchey, 19 October 2022, Voice of Democracy, <https://vodenglish.news/trafficking-rescues-reach-oddar-meanchey/>.
- 282 Mech Dara, Trafficking rescues reach Oddar Meanchey, 19 October 2022, Voice of Democracy, <https://vodenglish.news/trafficking-rescues-reach-oddar-meanchey/>; Interview with NGO staff member, Cambodia, February 2024; Affidavit from Filipino citizen rescued from O'Smach, September 2023.
- 283 Interview with Cambodian security guard, O'Smach, March 2024.
- 284 Interview with Cambodian motodup driver, O'Smach, March 2024.
- 285 Freedom House, Cambodia, 2024, <https://freedomhouse.org/country/cambodia/freedom-world/2024>.
- 286 Interview with NGO staff member, Cambodia, February 2024.
- 287 Interviews with residents, O'Smach, March 2024.
- 288 Interview with construction worker and security guard, O'Smach, March 2024.
- 289 Interviews with residents, O'Smach, March 2024; Maurice Eisenbruch, The cloak of impunity in Cambodia I: cultural foundations, *The International Journal of Human Rights*, 22, 6 (2018), <https://www.tandfonline.com/doi/full/10.1080/13642987.2018.1454905#d1e307>.
- 290 Interview with NGO staff member, Cambodia, February 2024.
- 291 RFA Lao, Laos orders Golden Triangle scammers out of zone by end of month, Radio Free Asia, 12 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-sez-scammers-08122024171757.html>; Naw Betty Han, South for the winter: Myanmar's cyber scam industry migrates, *Frontier Myanmar*, 29 August 2024, <https://www.frontiermyanmar.net/en/south-for-the-winter-myanmars-cyber-scam-industry-migrates/>.
- 292 Radio Free Asia, Storming past guards, 60 foreigner workers escape from Cambodian casino, 6 January 2025, <https://www.rfa.org/english/cambodia/2025/01/06/cambodia-workers-flee-casino/>; CamboJa, O'Smach Resort, Long Linked to Cyber Scams and Sanctioned by US, Sees Worker Revolt Amid Anti-Trafficking Gaps, 9 January 2025, <https://cambojanews.com/osmach-resort-long-linked-to-cyber-scams-and-sanctioned-by-us-sees-worker-revolt-amid-anti-trafficking-gaps/>.
- 293 Andrew R.C. Marshall, Special Report: In Mekong, Chinese murders and bloody diplomacy, Reuters, 27 January 2012, <https://www.reuters.com/article/us-special-report-mekong-idUSTRE80Q00G20120127/>; Bertil Lintner, Guide to investigating organized crime in the Golden Triangle – Introduction, Global Investigative Journalism Network, 28 November 2022, <https://gijn.org/resource/guide-to-investigating-organized-crime-in-the-golden-triangle-introduction/>.
- 294 Lao News Agency, Vice Premier praises Golden Triangle Zone developer for noticeable progress, 28 October 2015, <https://kpl.gov.la/En/detail.aspx?id=7678>.
- 295 Chinese: 金三角经济特区; Laotian: ເຂດເສດຖະກິດພິເສດສາມຫຼ່ຽມຄຳ.
- 296 National Committee for Special and Specific Economic Zone Secretariat Office, Development Strategy for Special and Specific Economic Zone (SEZ) in the Lao PDR, 2011–2020, 2012, <https://laofab.org/document/download/3139>.
- 297 Lao News Agency, Over 170 domestic and foreign companies invest in Special Economic Zones in 2023, 3 January 2024, <https://kpl.gov.la/EN/detail.aspx?id=79363>.
- 298 Joshua Berlinger, Is an alleged drug kingpin from China investing millions in a port in Laos?, CNN, 7 December 2020, <https://www.cnn.com/2020/12/07/asia/laos-ban-mom-port-zhao-wei-intl-hnk-dst/index.html>.
- 299 National Committee for Special and Specific Economic Zone Secretariat Office, Development Strategy for Special and Specific Economic Zone (SEZ) in the Lao PDR, 2011–2020, 2012, <https://laofab.org/document/download/3139>.
- 300 International Crisis Group, Stepping into South East Asia's most conspicuous criminal enclave, 17 January 2024, <https://www.crisisgroup.org/asia/south-east-asia/stepping-south-east-asias-most-conspicuous-criminal-enclave>.
- 301 See for example, Environmental Investigation Agency, Footage reveals criminal-run tiger 'farms' in Laos have actually been expanded, 8 March 2022, <https://eia-international.org/press-releases/footage-reveals-criminal-run-tiger-farms-in-laos-have-actually-been-expanded/>; Amanda Gore, Lindsey Kennedy, Nathan Southern, Daan van Uhm, Asian roulette: Criminogenic casinos and illicit trade in environmental commodities in South East Asia, GI-TOC, July 2022, <https://globalinitiative.net/analysis/casino-crime-south-east-asia/>; US Department of the Treasury, Treasury sanctions the Zhao Wei Transnational Criminal Organization, 30 January 2018, <https://home.treasury.gov/news/press-releases/sm0272>.
- 302 RFA Lao, Laos orders Golden Triangle scammers out of zone by end of month, Radio Free Asia, 12 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-sez-scammers-08122024171757.html>.
- 303 Telegram, multiple messages shared by scam industry insiders.

- 304 Ibid., Alastair McCready, Will Laos' economic zones boost growth or bring in criminals?, Nikkei Asia, 10 October 2023, <https://asia.nikkei.com/Spotlight/Asia-Insight/Will-Laos-economic-zones-boost-growth-or-bring-in-criminals>.
- 305 Various reports refer to a management committee, administrative committee, and management board, but they all appear to be referring to the same entity; Lao People's Democratic Republic, Decree on special economic zone, 7 June 2018, [https://laosez.gov.la/pdf/decree\\_188gov\\_en.pdf](https://laosez.gov.la/pdf/decree_188gov_en.pdf).
- 306 International Crisis Group, Stepping into South East Asia's most conspicuous criminal enclave, 17 January 2024, <https://www.crisisgroup.org/asia/south-east-asia/stepping-south-east-asias-most-conspicuous-criminal-enclave>.
- 307 US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>.
- 308 Ministry of Public Security, Discussion meeting to prevent and solve the phenomenon of corruption in the special economic zone of the Golden Triangle, Ton Behe District, Bo Keo Province, 28 February 2024, <https://laosecurity.gov.la/?p=2599>; Radio Free Asia Lao, Lao authorities raid more Golden Triangle scam centers as deadline passes, 29 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-scam-centers-raids-08292024143130.html>.
- 309 US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>.
- 310 Input provided by experts working on cyber-scam operations in Southeast Asia, online, March–September 2024.
- 311 Information provided by an expert, September 2024. See also: <https://www.usip.org/publications/2024/10/latest-southeast-asias-transnational-cybercrime-crisis>.
- 312 US Department of the Treasury, Treasury sanctions the Zhao Wei Transnational Criminal Organization, 30 January 2018, <https://home.treasury.gov/news/press-releases/sm0272>.
- 313 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 314 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).
- 315 Sasha Jespersen, Henrik Alffram, Lisa Denney and Pilar Domingo, Labour migration in Cambodia, Laos, Thailand and Vietnam: migrants' vulnerabilities and capacities across the labour migration cycle, ASEAN-Australia Counter Trafficking programme, December 2022, [https://www.aseanact.org/wp-content/uploads/2023/02/Thematic\\_brief\\_1\\_FINAL.pdf](https://www.aseanact.org/wp-content/uploads/2023/02/Thematic_brief_1_FINAL.pdf); RFA Lao, Lao and Chinese security forces raid call centers in the Golden Triangle, 21 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-call-centers-raid-08212024154847.html>.
- 316 Humanity Research Consultancy, Uncovering the spread of human trafficking for online fraud into Laos and Dubai, July 2024, [https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39\\_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf](https://cdn.prod.website-files.com/662f5d242a3e7860ebcfe4f/66a9db2e56d3b112ae6eff39_USAID-Asia-CTIP-Laos-Dubai-Investigation.pdf).
- 317 Emily Fishbein, 'A global monster': Myanmar-based cyber scams widen the net, Frontier Myanmar, 24 August 2024, <https://www.frontiermyanmar.net/en/a-global-monster-myanmar-based-cyber-scams-widen-the-net/>.
- 318 Zhang Pengxiang, Five young people trapped in a fraud den in Laos, Huining police successfully rescued them, Gansu Daily, 28 September 2024, <https://gansu.gansudaily.com.cn/system/2023/09/28/030883181.shtml>; Liu Zhongquan, Catching the 'snake head' and cutting off the 'black hand', Jilin Tonghua Border Management Detachment cracked a major case of organizing others to illegally cross the national border, Legal Daily, <https://news.ifeng.com/c/8T6Fjv0G3hN>; RFA Lao and Eugene Whong, Debt-trapped Lao 'chat girls' forced to sell sex in China-run economic zone, 19 December 2021, <https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html>.
- 319 Interview with NGO staff member, Cambodia, February 2024.
- 320 Lao News Agency, Bokeo newly-built international airport opened, February 5 2024, <https://kpl.gov.la/En/detail.aspx?id=80238>.
- 321 Phontham Visapra, Bokeo International Airport launch overshadowed by sudden flight cancellations, *Laotian Times*, 5 February 2024, <https://laotiantimes.com/2024/02/05/bokeo-international-airport-launch-overshadowed-by-sudden-flight-cancellations/>.
- 322 Interview, person rescued from a scam compound in the GTSEZ, March 2024.
- 323 Lane Xang Airways International is the only company reported to offer commercial flights, but tickets are not listed online. As of mid-2024, the airplane registered to the company makes several daily trips between Vientiane and Ban Huoeisay (Huay Xai) Airport, about 62 kilometres from the GTSEZ; Lane Xang Airways, <https://www.lxairways.com/>; Phontham Visapra, Bokeo International Airport launch overshadowed by sudden flight cancellations, *Laotian Times*, 5 February 2024, <https://laotiantimes.com/2024/02/05/bokeo-international-airport-launch-overshadowed-by-sudden-flight-cancellations/>; Flightradar24, Flight history for aircraft - RDPL-34159, <https://www.flightradar24.com/data/aircraft/rdpl-34159#>.
- 324 US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>.
- 325 Affidavit from Filipino citizen rescued from O'Smach, September 2023.
- 326 Paul Eckert and Bounchanh Mouangkham, Lao casino operator rejects U.S. 'transnational criminal organization' designation, 5 February 2018, <https://www.rfa.org/english/news/laos/lao-zhaowei-02052018145742.html>.
- 327 Special Economic Zone Promotion and Management Office, About SEZO, <https://laosez.gov.la/index.php/en/about-us/sezo>; Lao People's Democratic Republic, Decree on special economic zone and specific economic zone in the Lao PDR, 26 October 2010, [https://www.wto.org/english/thewto\\_e/acc\\_e/laos\\_e/wtacclao20a1\\_leg\\_3.pdf](https://www.wto.org/english/thewto_e/acc_e/laos_e/wtacclao20a1_leg_3.pdf).
- 328 Radio Free Asia Lao, Lao authorities seem powerless to stop crime in Golden Triangle economic zone, 25 November 2022, <https://www.rfa.org/english/news/laos/golden-triangle-11252022131629.html>; Matthew Campbell and Patpicha Tanakasempipat, Golden Triangle: How crypto scammers found a criminal paradise in Laos, Bloomberg, 19 August 2024, <https://>



- [www.bloomberg.com/features/2024-golden-triangle-special-economic-zone/Golden%20Triangle:%20How%20Crypto%20Scammers%20Found%20A%20Criminal%20Paradise%20in%20Laos](https://www.bloomberg.com/features/2024-golden-triangle-special-economic-zone/Golden%20Triangle:%20How%20Crypto%20Scammers%20Found%20A%20Criminal%20Paradise%20in%20Laos).
- 329 GTSEZ Lao, Mr. Zhao Wei, Chairman of the Board of Directors, made a comment during the meeting to eliminate telecommunications fraud gangs, 28 August 2024, <https://www.youtube.com/watch?v=qVHGeesUNxQ>; RFA Lao, Laos orders Golden Triangle scammers out of zone by end of month, Radio Free Asia, 12 August 2024, <https://www.rfa.org/english/news/laos/golden-triangle-sez-scammers-08122024171757.html>; Sebastian Strangio, Laos issues ultimatum to Golden Triangle scam operators, The Diplomat, 14 August 2024, <https://thediplomat.com/2024/08/laos-issues-ultimatum-to-golden-triangle-scam-operators/>.
- 330 Jason Tower and Priscilla A. Clapp, The latest on Southeast Asia's transnational cybercrime crisis, USIP, 30 October 2024, <https://www.usip.org/publications/2024/10/latest-southeast-asias-transnational-cybercrime-crisis>.
- 331 Telegram, multiple messages shared by alleged scam workers; US Department of State, 2024 trafficking in persons report: Laos, 2024, <https://www.state.gov/reports/2024-trafficking-in-persons-report/laos/>.
- 332 Sebastian Strangio, Lao, Chinese officials detain 771 in raid on Golden Triangle gambling hub, The Diplomat, 22 August 2024, <https://thediplomat.com/2024/08/lao-chinese-officials-detain-771-in-raid-on-golden-triangle-gambling-hub/>.
- 333 Frontier Myanmar, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>; Tony Cheng, Why the fall of Myawaddy, Myanmar's 'gateway' to Thailand, is so important, 12 April 2024, Al Jazeera, <https://www.aljazeera.com/news/2024/4/12/the-fall-of-myawaddy-myanmars-gateway-to-thailand-and-the-world>.
- 334 Also known as the Karen Border Guard Force.
- 335 John Buchanan, Militias in Myanmar, July 2016, Asia Foundation, <https://asiafoundation.org/wp-content/uploads/2016/07/Militias-in-Myanmar.pdf>; Frontier Myanmar, Junta trade policies spark a smuggling revival at Thai border, 5 October 2022, <https://www.frontiermyanmar.net/en/junta-trade-policies-spark-a-smuggling-revival-at-thai-border/>; Naw Betty Han and Thomas Kean, On the Thai-Myanmar border, COVID-19 closes a billion-dollar racket, 7 June 2020, Frontier Myanmar, <https://www.frontiermyanmar.net/en/on-the-thai-myanmar-border-covid-19-closes-a-billion-dollar-racket/>.
- 336 Although Yatai and various media companies describe Shwe Kokko as an SEZ, its 70-year lease exceeds the 50 years SEZs permitted under Myanmar law. It is therefore unclear whether Shwe Kokko is legally registered as a SEZ; The Pyidaungsu Hluttaw Law No. 1/2014, <https://faolex.fao.org/docs/pdf/mya221961.pdf>. Examples of the zone described as an SEZ: RFA Lao, Four Laotian trafficking victims freed from Myanmar casino faced regular beatings, Radio Free Asia, 16 February 2023, <https://www.rfa.org/english/news/laos/casino-02162023163151.html>; Aung Naing, Karen BGF taxes Shwe Kokko workers as it moves away from Myanmar's military, Myanmar Now, 26 February 2024, <https://myanmar-now.org/en/news/karen-bgf-taxes-shwe-kokko-workers-as-it-moves-away-from-myanmars-military/>; Aung Zaw, Shwe Kokko: how Myanmar's crime hub is destabilizing the region, The Irrawaddy, 27 February 2023, <https://www.irrawaddy.com/opinion/analysis/shwe-kokko-how-myanmars-crime-hub-is-destabilizing-the-region.html>.
- 337 YATAI International Holding Group, <https://www.yatai.vip/home?path=0>.
- 338 International Crisis Group, Commerce and conflict: Navigating Myanmar's China relationship, 30 March 2020, <https://www.crisisgroup.org/asia/south-east-asia/myanmar/305-commerce-and-conflict-navigating-myanmars-china-relationship>; Naw Betty Han, Shwe Kokko locked down as locals fear clashes between Tatmadaw, BGF, 30 December 2020, Frontier Myanmar, <https://www.frontiermyanmar.net/en/shwe-kokko-locked-down-as-locals-fear-clashes-between-tatmadaw-bgf/>.
- 339 Jason Tower and Priscilla A. Clapp, Myanmar: Transnational Networks plan digital dodge in casino enclaves, 23 July 2020, <https://www.usip.org/publications/2020/07/myanmar-transnational-networks-plan-digital-dodge-casino-enclaves>; Debarghya Sil, Fintech startup Fincy secures \$11 mn from parent company GBCI ventures, Entrepreneur Asia Pacific, 12 June 2020, <https://www.entrepreneur.com/en-au/news-and-trends/fintech-startup-fincy-secures-11-mn-from-parent-company/351794>.
- 340 Jason Tower and Priscilla A. Clapp, Myanmar's criminal zones: A growing threat to global security, US Institute of Peace, 9 November 2022, <https://www.usip.org/publications/2022/11/myanmars-criminal-zones-growing-threat-global-security>; Yatai IHG may seek to co-opt Myanmar government officials through dubious connections, The Irrawaddy, 6 October 2020, <https://www.irrawaddy.com/news/burma/yatai-ihg-may-seek-to-co-opt-myanmar-government-officials-through-dubious-connections.html>; Jason Tower and Priscilla A. Clapp, Myanmar: casino cities run on blockchain threaten nation's sovereignty, US Institute of Peace, 30 July 2020, <https://www.usip.org/publications/2020/07/myanmar-casino-cities-run-blockchain-threaten-nations-sovereignty>; <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>.
- 341 Tang Ailin, Fan Wenjun, Liang Shuting and Han Wei, Cover story: A fugitive businessman's high-profile bet in Myanmar, Caixin Global, 26 October 2020, <https://www.caixinglobal.com/2020-10-26/cover-story-a-fugitive-businessmans-high-profile-bet-in-myanmar-101618684.html>.
- 342 Jason Tower and Priscilla A. Clapp, Myanmar: casino cities run on blockchain threaten nation's sovereignty, US Institute of Peace, 30 July 2020, <https://www.usip.org/publications/2020/07/myanmar-casino-cities-run-blockchain-threaten-nations-sovereignty>.
- 343 The Irrawaddy, Chinese mega project in Myanmar 'not affected' by owner's arrest: company official, 15 August 2022, <https://www.irrawaddy.com/news/burma/chinese-mega-project-in-myanmar-not-affected-by-owners-arrest-company-official.html>; Andrew Nachemson, The mystery man behind the Shwe Kokko project, 7 July 2020, Frontier Khmer, <https://www.frontiermyanmar.net/en/the-mystery-man-behind-the-shwe-kokko-project/>.
- 344 Jonathan Head, Casinos, high-rises and fraud: The BBC visits a bizarre city built on scams, BBC, 6 February 2025, <https://www.bbc.co.uk/news/articles/c04nx1vnw17o>.

- 345 Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>; See also Caleb Quinley and Khun Kali, A sanctioned strongman and the 'fall' of Myanmar's Myawaddy, Al Jazeera, 1 May 2024, <https://www.aljazeera.com/news/2024/5/1/a-sanctioned-strongman-and-the-fall-of-myanmars-myawaddy>.
- 346 Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>; Aung Naing, Karen BGF taxes Shwe Kokko workers as it moves away from Myanmar's military, Myanmar Now, 26 February 2024, <https://myanmar-now.org/en/news/karen-bgf-taxes-shwe-kokko-workers-as-it-moves-away-from-myanmars-military/>.
- 347 Htun Htun, Myanmar government eyes town status for controversial China-backed project, 28 December 2020, The Irrawaddy, <https://www.irrawaddy.com/news/burma/myanmar-government-eyes-town-status-controversial-china-backed-project.html>.
- 348 Interview with local journalist, March 2024, by online call; Jason Tower and Priscilla A. Clapp, China forces Myanmar scam syndicates to move to Thai border, 22 April 2024, US Institute of Peace, <https://www.usip.org/publications/2024/04/china-forces-myanmar-scam-syndicates-move-thai-border>.
- 349 Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>.
- 350 These include Yulong Bay Resort Tourism Development Co., Ltd. and Myanmar Apollo International Investment Co., Ltd.
- 351 Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>; The Irrawaddy, Myanmar's BGF: A family-run criminal enterprise with friends across Asia, 22 May 2024, <https://www.irrawaddy.com/news/burma/myanmars-bgf-a-family-run-criminal-enterprise-with-friends-across-asia.html>.
- 352 European Council, Myanmar/Burma: EU lists three individuals and one entity responsible for scam operations entailing serious human rights violations and threatening the peace, security and stability of Myanmar and the region, 29 October 2024, <https://www.consilium.europa.eu/en/press/press-releases/2024/10/29/myanmarburma-eu-lists-three-individuals-and-one-entity-responsible-for-scam-operations-entailing-serious-human-rights-violations-and-threatening-the-peace-security-and-stability-of-myanmar-and-the-region/>.
- 353 The Irrawaddy, Thailand Prepares Arrest Warrants for Myanmar Junta-Allied Scam Warlords, 11 February 2025, <https://www.irrawaddy.com/news/burma/thailand-prepares-arrest-warrants-for-myanmar-junta-allied-scam-warlords.html>.
- 354 International Crisis Group, Commerce and conflict: Navigating Myanmar's China relationship, 30 March 2020, <https://www.crisisgroup.org/asia/south-east-asia/myanmar/305-commerce-and-conflict-navigating-myanmars-china-relationship>; Jason Tower and Priscilla Clapp, Myanmar's casino cities: The role of China and transnational criminal networks, US Institute of Peace, [https://www.usip.org/sites/default/files/2020-07/20200727-sr-471-myanmars\\_casino\\_cities\\_the\\_role\\_of\\_china\\_and\\_transnational\\_criminal\\_networks-sr.pdf](https://www.usip.org/sites/default/files/2020-07/20200727-sr-471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf).
- 355 Andrew Nachemson, The mystery man behind the Shwe Kokko project, 7 July 2020, Frontier Khmer, <https://www.frontiermyanmar.net/en/the-mystery-man-behind-the-shwe-kokko-project/>.
- 356 Khin Khin Ei, Interview: Karen Border Guard Force plans 'exodus' of foreign scammers from Myawaddy, Radio Free Asia, 15 May 2024, <https://www.rfa.org/english/news/myanmar/karen-border-guard-force-scams-myawaddy-05142024160410.html>.
- 357 Interview with local journalist, March 2024, by online call; The Irrawaddy, Sex, drugs and cyber scams: Inside Myanmar's notorious online crime hub, 8 May 2024, <https://irrawaddy.com/in-person/interview/sex-drugs-and-cyber-scams-inside-myanmars-notorious-online-crime-hub.html>.
- 358 The Irrawaddy, Scam operations flourish in Myanmar's biggest city, 7 March 2024, <https://www.irrawaddy.com/news/investigation/scam-operations-flourish-in-myanmars-biggest-city.html>; Frontier, A day in the life of a Shwe Kokko scammer, 1 June 2023, <https://www.frontiermyanmar.net/en/a-day-in-the-life-of-a-shwe-kokko-scammer/>.
- 359 The Irrawaddy, Scam operations flourish in Myanmar's biggest city, 7 March 2024, <https://www.irrawaddy.com/news/investigation/scam-operations-flourish-in-myanmars-biggest-city.html>; Frontier, A day in the life of a Shwe Kokko scammer, 1 June 2023, <https://www.frontiermyanmar.net/en/a-day-in-the-life-of-a-shwe-kokko-scammer/>; Interview with local journalist, March 2024, by online call.
- 360 RFA Lao, Four Laotian trafficking victims freed from Myanmar casino faced regular beatings, Radio Free Asia, 16 February 2023, <https://www.rfa.org/english/news/laos/casino-02162023163151.html>.
- 361 Andrew Ong, Shadow capital at Myanmar's margins: Shwe Kokko new city and its predecessors, *ISEAS Perspective*, 1 December 2020, 136, [https://www.iseas.edu.sg/wp-content/uploads/2020/11/ISEAS\\_Perspective\\_2020\\_136.pdf](https://www.iseas.edu.sg/wp-content/uploads/2020/11/ISEAS_Perspective_2020_136.pdf).
- 362 Office of Financial Sanctions Implementation HM Treasury, Global Human Rights, 8 December 2023, [https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice\\_Global\\_Human\\_Rights\\_081223.pdf](https://assets.publishing.service.gov.uk/media/6572d548049516000d49be78/Notice_Global_Human_Rights_081223.pdf); US Department of the Treasury, Treasury sanctions Burma warlord and militia tied to cyber scam operations, 5 May 2025, <https://home.treasury.gov/news/press-releases/sb0129>.
- 363 Pimuk Rakkanam, Myanmar closes border checkpoint amidst conflict, Radio Free Asia, 27 April 2024, <https://www.rfa.org/english/news/myanmar/myanmar-border-closure-04262024071834.html>; Al Jazeera English, She Zhijiang: Discarded Chinese spy or criminal mastermind?, YouTube, 26 September 2024, [https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab\\_channel=AlJazeeraEnglish](https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab_channel=AlJazeeraEnglish).
- 364 Mizzima, Yatai International denies shutdown claims as operations continue in Shwe Kokko amid sanctions, 28 September 2024, <https://eng.mizzima.com/2024/09/28/14473>.
- 365 The Irrawaddy, 'New City' on Thai-Myanmar border part of BRI despite China's denials, Developer Claims, 1 September 2020, <https://www.irrawaddy-com.webpkgcache.com/doc/-/s/www>.

- irrawaddy.com/news/burma/new-city-thai-myanmar-border-part-bri-despite-chinas-denials-developer-claims.html; Saw Lwin, Myanmar's cyber scam hub is just a 'small business,' Karen major says, 27 May 2024, The Irrawaddy, <https://www.irrawaddy.com/in-person/interview/myanmars-cyber-scam-hub-is-just-a-small-business-karen-major-says.html>.
- 366 Saw Lwin, Myanmar's cyber scam hub is just a 'small business,' Karen major says, 27 May 2024, The Irrawaddy, <https://www.irrawaddy.com/in-person/interview/myanmars-cyber-scam-hub-is-just-a-small-business-karen-major-says.html>.
- 367 Jonathan Head, Hundreds of foreigners freed from Myanmar's scam centres, BBC, 13 February 2025, <https://www.bbc.co.uk/news/articles/c2d3w90x86po>.
- 368 Jonathan Head, Casinos, high-rises and fraud: The BBC visits a bizarre city built on scams, BBC, 6 February 2025, <https://www.bbc.co.uk/news/articles/c04nx1vnw17o>.
- 369 Jason Tower and Priscilla A. Clapp, China forces Myanmar scam syndicates to move to Thai border, 22 April 2024, US Institute of Peace, <https://www.usip.org/publications/2024/04/china-forces-myanmar-scam-syndicates-move-thai-border>.
- 370 Al Jazeera English, She Zhijiang: Discarded Chinese spy or criminal mastermind?, YouTube, 26 September 2024, [https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab\\_channel=AlJazeeraEnglish](https://www.youtube.com/watch?v=Ls8Y-2HmvHI&ab_channel=AlJazeeraEnglish); Chainalysis Team, The on-chain footprint of Southeast Asia's 'pig butchering' compounds: Human trafficking, ransoms, and hundreds of millions scammed, 24 February 2024, <https://www.chainalysis.com/blog/pig-butchering-human-trafficking/>.
- 371 Andrew Nachemson, The mystery man behind the Shwe Kokko project, 7 July 2020, Frontier Khmer, <https://www.frontiermyanmar.net/en/the-mystery-man-behind-the-shwe-kokko-project/>.
- 372 The Irrawaddy, Myanmar's BGF: A family-run criminal enterprise with friends across Asia, 22 May 2024, <https://www.irrawaddy.com/news/burma/myanmars-bgf-a-family-run-criminal-enterprise-with-friends-across-asia.html>; Feliz Solomon and Clarence Leong, The elusive crime boss linked to billion-dollar 'pig butchering' scams, *The Wall Street Journal*, 29 December 2024, [https://www.wsj.com/world/china/china-mafia-broken-tooth-wan-kuok-koi-online-fraud-scam-70c09afb?st=ep5xc6&reflink=desktopwebshare\\_permalink](https://www.wsj.com/world/china/china-mafia-broken-tooth-wan-kuok-koi-online-fraud-scam-70c09afb?st=ep5xc6&reflink=desktopwebshare_permalink).
- 373 US Department of the Treasury, Treasury sanctions corrupt actors in Africa and Asia, 9 December 2020, <https://home.treasury.gov/news/press-releases/sm1206>.
- 374 Saw Bothol and Souphatta, 'Thousands' of trafficked people held at scam casino site amid escalating violence, Radio Free Asia, 25 April 2023, <https://www.rfa.org/english/news/laos/trafficking-04252023100423.html>; The Irrawaddy, Hell room next to the source, video, 30 March 2024, <https://www.youtube.com/watch?v=GQcEmpu73ec>; The Irrawaddy, Myanmar's BGF: A family-run criminal enterprise with friends across Asia, 22 May 2024, <https://www.irrawaddy.com/news/burma/myanmars-bgf-a-family-run-criminal-enterprise-with-friends-across-asia.html>; Huo Beixiong, The escape of the Myawaddy telecom fraud group in Myanmar (Part 2): "Piggy" waiting to go home, Wainao, 5 March 2024, <https://www.wainao.me/wainao-reads/Myanmar-telecom-scam-group-escape-ch2-03052024>; Jason Tower and Priscilla A Clapp, Beijing's crackdown pushes Myanmar criminal groups to Karen State as the junta's control of these groups and their revenue weakens, US Institute of Peace, 22 April 2024, <https://www.usip.org/publications/2024/04/china-forces-myanmar-scam-syndicates-move-thai-border>.
- 375 Jason Tower and Priscilla A. Clapp, China forces Myanmar scam syndicates to move to Thai border, 22 April 2024, US Institute of Peace, <https://www.usip.org/publications/2024/04/china-forces-myanmar-scam-syndicates-move-thai-border>; Isabelle Qian, 7 months inside an online scam labor camp, *The New York Times*, 17 December 2023, <https://www.nytimes.com/interactive/2023/12/17/world/asia/myanmar-cyber-scam.html>; The Irrawaddy, Myanmar's BGF: A family-run criminal enterprise with friends across Asia, 22 May 2024, <https://www.irrawaddy.com/news/burma/myanmars-bgf-a-family-run-criminal-enterprise-with-friends-across-asia.html>; Huo Beixiong, The escape of the Myawaddy telecom fraud group in Myanmar (Part 2): "Piggy" waiting to go home, Wainao, 5 March 2024, <https://www.wainao.me/wainao-reads/Myanmar-telecom-scam-group-escape-ch2-03052024>.
- 376 Radio Free Asia, Kayin State Border Guards resign to protest ouster of top leaders by Myanmar Military, 15 January 2021, <https://www.rfa.org/english/news/myanmar/resign-01152021175503.html>.
- 377 Frontier Myanmar, Scam city: How the coup brought Shwe Kokko back to life, 23 June 2022, <https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/>; Naw Betty Han, Shwe Kokko locked down as locals fear clashes between Tatmadaw, BGF, 30 December 2020, Frontier Myanmar, <https://www.frontiermyanmar.net/en/shwe-kokko-locked-down-as-locals-fear-clashes-between-tatmadaw-bgf/>; Than Naing Zaw, Some army officers related to the Shwe Kokko project are being investigated, The Irrawaddy, 8 October 2020, <https://burma.irrawaddy.com/news/2020/10/08/231296.html>.
- 378 Interview with local journalist, March 2024, by online call; Brian Wei, Junta no. 2 fails to persuade allied Karen armed group to stay with Myanmar military, The Irrawaddy, 25 January 2024, <https://www.irrawaddy.com/news/burma/junta-no-2-fails-to-persuade-allied-karen-armed-group-to-stay-with-myanmar-military.html>; Radio Free Asia, Kayin State Border Guards resign to protest ouster of top leaders by Myanmar Military, 15 January 2021, <https://www.rfa.org/english/news/myanmar/resign-01152021175503.html>.
- 379 Karen News, All Karen Border Guard Force units to be rebranded as The Karen National Army, 2 March 2024, <https://karennews.org/2024/03/all-karen-border-guard-force-units-to-be-rebranded-as-the-karen-national-army/>.
- 380 John Buchanan, Militias in Myanmar, July 2016, Asia Foundation, <https://asiafoundation.org/wp-content/uploads/2016/07/Militias-in-Myanmar.pdf>.
- 381 The military wing of the KNU; ACLED, Regional Overview Asia-Pacific April 2024, 9 May 2024, <https://acleddata.com/2024/05/09/regional-overview-asia-pacific-april-2024/>; Saw Lwin, Karen forces clash with Myanmar military along strategic highway to Myawaddy, The Irrawaddy, 28 May 2024, <https://www.irrawaddy.com/news/war-against-the-junta/karen-forces-clash-with-myanmar-military-along-strategic-highway-to-myawaddy.html>; International Crisis Group, Ethnic autonomy and its consequences in post-coup Myanmar, 30 May 2024, <https://www.crisisgroup.org/asia/south-east-asia/myanmar/b180-ethnic-autonomy-and-its-consequences-post-coup-myanmar>.

- 382 Caleb Quinley and Khun Kali, A sanctioned strongman and the 'fall' of Myanmar's Myawaddy, Al Jazeera, 1 May 2024, <https://www.aljazeera.com/news/2024/5/1/a-sanctioned-strongman-and-the-fall-of-myanmars-myawaddy>.
- 383 Jason Tower and Priscilla A. Clapp, Myanmar scam hubs revive fast after China eases pressure on junta, US Institute of Peace, 26 September 2024, <https://www.usip.org/publications/2024/09/myanmar-scam-hubs-revive-fast-after-china-eases-pressure-junta>.
- 384 Somchai T., Shwe Kokko YATAI holds a big merit-making event to send encouragement to the city's founder, She Zhijiang, Thai Public Media, 16 August 2024, <https://www.thaipublicmedia.com/2024/08/Shwe-Kokko-YATAI-holds-a-grand-merit-making-event.html>; Myanmar Now, Junta-allied Karen border guard force holds prayer ceremony for alleged scam kingpin, 13 August 2024, <https://myanmar-now.org/en/news/junta-allied-karen-border-guard-force-holds-prayer-ceremony-for-alleged-scam-kingpin/>.
- 385 Jason Tower, X post, 6 September 2024, [https://x.com/Jason\\_Tower79/status/1832252990993871295](https://x.com/Jason_Tower79/status/1832252990993871295).
- 386 Jonathan Head, Hundreds of foreigners freed from Myanmar's scam centres, BBC, 13 February 2025, <https://www.bbc.co.uk/news/articles/c2d3w90x86po>.
- 387 Naw Betty Han, South for the winter: Myanmar's cyber scam industry migrates, Frontier Myanmar, 29 August 2024, <https://www.frontiermyanmar.net/en/south-for-the-winter-myanmars-cyber-scam-industry-migrates/>; Vincent MacIsaac, Myanmar's scam hells can't release their captives, The Irrawaddy, 6 September 2024, <https://www.irrawaddy.com/news/burma/myanmars-scam-hells-cant-release-their-captives.html>; RFA Burmese, Facing crackdown, Chinese scam gangs in Myanmar relocate to lawless Kayin township, 13 January 2025, <https://www.rfa.org/english/myanmar/2024/12/13/myanmar-payathonzu-online-scamming/>.
- 388 Justice for Myanmar, The Karen Border Guard Force/Karen National Army criminal business network exposed, 22 May 2024, <https://www.justiceformyanmar.org/stories/the-karen-border-guard-force-karen-national-army-criminal-business-network-exposed>; Caleb Quinley and Khun Kali, A sanctioned strongman and the 'fall' of Myanmar's Myawaddy, 2 May 2024, Al Jazeera, <https://www.aljazeera.com/news/2024/5/1/a-sanctioned-strongman-and-the-fall-of-myanmars-myawaddy>.
- 389 Municipality of Bamban, Vision Statement, <https://www.bambantarlac.gov.ph/vision-mission/>.
- 390 A day with Alice Guo vlog #1, video, 20 April 2022, <https://www.youtube.com/watch?v=Pailj-yKjYw>.
- 391 Gabriel Pabico Lalu, Telcos urged to attend Pogo probe to pinpoint areas using data heavily, *Philippine Daily Inquirer*, 17 July 2024, <https://globalnation.inquirer.net/243005/telcos-urged-to-attend-pogo-probe-to-pinpoint-areas-using-data-heavily>.
- 392 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, 22 May 2024, [https://www.youtube.com/watch?v=qSO159U1uz0&ab\\_channel=SenateofthePhilippines](https://www.youtube.com/watch?v=qSO159U1uz0&ab_channel=SenateofthePhilippines); Marlon Ramos, Senators probe Tarlac Pogo for 'spy ops'; mayor grilled, 8 May 2024, *Philippine Daily Inquirer*, <https://globalnation.inquirer.net/235006/senators-probe-tarlac-pogo-for-spy-ops-mayor-grilled>.
- 393 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>; Joann Manabat, Bamban mayor linked to raided POGO in Tarlac, Rappler, 26 March 2024, <https://www.rappler.com/philippines/luzon/bamban-mayor-guo-linked-raided-pogo-tarlac/>.
- 394 Joann Manabat, Senate looking into link of POGOs to hacking of gov't websites, Rappler, 7 May 2024, <https://www.rappler.com/philippines/senate-looking-into-link-pogos-hacking-government-websites/>.
- 395 Pagcor, List of cancelled offshore gaming licensees, 15 January 2024, <https://www.pagcor.ph/regulatory/pdf/offshore/list-of-cancelled-offshore-gaming-licensees.pdf>; Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>; Marlon Ramos, Senators probe Tarlac Pogo for 'spy ops'; mayor grilled, 8 May 2024, *Philippine Daily Inquirer*, <https://globalnation.inquirer.net/235006/senators-probe-tarlac-pogo-for-spy-ops-mayor-grilled>.
- 396 Lian Buan, How Alice Guo concealed POGO link when she was mayor, Rappler, 19 August 2024, <https://www.rappler.com/newsbreak/inside-track/how-alice-guo-concealed-pogo-link-mayor/>; Marlon Ramos, Senators probe Tarlac Pogo for 'spy ops'; mayor grilled, 8 May 2024, *Philippine Daily Inquirer*, <https://globalnation.inquirer.net/235006/senators-probe-tarlac-pogo-for-spy-ops-mayor-grilled>.
- 397 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>.
- 398 Ibid; Daily Tribune, Zero POGO crimes in last 3 months: PAGCOR, 25 March 2024, <https://tribune.net.ph/2024/03/25/zero-pogo-crimes-in-last-3-months-pagcor>.
- 399 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>.
- 400 Rebecca Ratcliffe and Guill Ramos, Cognac, tortoisés and a pink-striped helicopter: inside the mystery of Alice Guo, the missing Philippines mayor, *The Guardian*, 4 August 2024, <https://www.theguardian.com/world/article/2024/aug/04/inside-mystery-alice-guo-missing-philippines-mayor>.
- 401 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luF0>.
- 402 Ian Laqui, Philippines departs 165 Chinese nationals from Bamban POGO hub, *The Philippine Star*, 15 May 2024, <https://www.philstar.com/headlines/2024/05/15/2355328/philippines-deports-165-chinese-nationals-bamban-pogo-hub>; Tony Lopez, Who in the world is Alice Leal Guo? Nobody can tell us, not even Alice herself, *The Philippine Star*, 6 June 2024, <https://www.philstar.com/the-freeman/opinion/2024/06/06/2360622/who-world-alice-leal-guo-nobody-can-tell-us-not-even-alice-herself>.
- 403 Ian Laqui, Philippines departs 165 Chinese nationals from Bamban POGO hub, *The Philippine Star*, 15 May 2024, <https://www.philstar.com/headlines/2024/05/15/2355328/philippines-deports-165-chinese-nationals-bamban-pogo-hub>.

- 404 Virma Simonette and Kelly Ng, Hundreds rescued from love scam centre in the Philippines, BBC News, 14 March 2024, <https://www.bbc.com/news/world-asia-68562643>; Tony Lopez, Who in the world is Alice Leal Guo? Nobody can tell us, not even Alice herself, *The Philippine Star*, 6 June 2024, <https://www.philstar.com/the-freeman/opinion/2024/06/06/2360622/who-world-alice-leal-guo-nobody-can-tell-us-not-even-alice-herself>; Rebecca Ratcliffe and Guill Ramos, Cognac, tortoisés and a pink-striped helicopter: inside the mystery of Alice Guo, the missing Philippines mayor, *The Guardian*, 4 August 2024, <https://www.theguardian.com/world/article/2024/aug/04/inside-mystery-alice-guo-missing-philippines-mayor>.
- 405 Senate of the Philippines, Committee on Women, Children, Family Relations and Gender Equality, May 7, 2024, <https://www.youtube.com/watch?v=LXqIRF9luFO>.
- 406 Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 7 May 2024, <https://www.youtube.com/watch?v=LXqIRF9luFO>.
- 407 Ibid; Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, YouTube, 22 May 2024, [https://www.youtube.com/watch?v=qSO159U1uz0&ab\\_channel=SenateofthePhilippines](https://www.youtube.com/watch?v=qSO159U1uz0&ab_channel=SenateofthePhilippines).
- 408 Marlon Ramos, Senators probe Tarlac Pogo for 'spy ops'; mayor grilled, 8 May 2024, *Philippine Daily Inquirer*, <https://globalnation.inquirer.net/235006/senators-probe-tarlac-pogo-for-spy-ops-mayor-grilled>; Committee on Women, Children, Family Relations and Gender Equality, committee hearing, Senate of the Philippines, 22 May 2024, [https://www.youtube.com/watch?v=qSO159U1uz0&ab\\_channel=SenateofthePhilippines](https://www.youtube.com/watch?v=qSO159U1uz0&ab_channel=SenateofthePhilippines).
- 409 Niko Baua, NBI releases findings on third fingerprint linked to Mayor Alice Guo, ABS-CBN News, 3 July 2024, <https://news.abs-cbn.com/news/2024/7/3/nbi-finds-another-alice-guo-in-database-1257>.
- 410 Joel Guinto, Fury as suspected China spy flees the Philippines, BBC News, 21 August 2024, <https://www.bbc.com/news/articles/ckggy8yxxwlo>.
- 411 Lian Buan, How Alice Guo was caught by Indonesian police in only 18 days, Rappler, 4 September 2024, <https://www.rappler.com/newsbreak/inside-track/how-alice-guo-caught-indonesia-police-only-days/>.
- 412 Rebecca Ratcliffe, Fugitive former mayor Alice Guo arrives in Philippines after deportation from Indonesia, *The Guardian*, 5 September 2024, <https://www.theguardian.com/world/article/2024/sep/05/fugitive-former-mayor-alice-guo-deported-indonesia-philippines>; Jacob Lazaro, Alice Guo pleads not guilty to first of 4 pending charges, *Philippine Daily Inquirer*, 28 September 2024, <https://globalnation.inquirer.net/250568/alice-guo-pleads-not-guilty-to-first-of-4-pending-charges>; Joahna Lei Casilao, Alice Guo pleads not guilty to material misrepresentation, GMA News Online, 5 December 2024, <https://www.gmanetwork.com/news/topstories/nation/929067/alice-guo-pleads-not-guilty-to-material-misrepresentation/story/>.
- 413 *The Straits Times*, Philippine mayor under probe for alleged link to Singapore's S\$3b money laundering case, 27 May 2024, *The Business Times*, <https://www.businesstimes.com.sg/singapore/philippine-mayor-under-probe-alleged-link-singapores-s3b-money-laundering-case>; Christine Tan, \$3b money laundering convicts now accused of human trafficking in the Philippines, *The Straits Times*, 19 September 2024, <https://www.straitstimes.com/singapore/courts-crime/3b-money-laundering-convicts-now-accused-of-human-trafficking-in-the-philippines>; Lydia Lam, All the convicts in Singapore's S\$3 billion money laundering case have been sentenced. What now?, Channel News Asia, 14 June 2024, <https://www.channelnewsasia.com/singapore/billion-dollar-money-laundering-case-recap-cna-explains-conclusion-4401811>.
- 414 Lian Buan, Making sense of the Alice Guo enterprise, Rappler, 11 September 2024, <https://www.rappler.com/newsbreak/in-depth/alice-guo-enterprise-pogos/>; Lian Buan, Convicted pork scam player transacted in 2020 for POGOs in Porac, Bamban, Laoag, Rappler, 17 June 2024, <https://www.rappler.com/philippines/dennis-cunanan-pdaf-scam-pogo-bamban-porac-laoag/>; *The Philippine Star*, PAGCOR: Harry Roque is 'legal head' of raided POGO hub, <https://www.philstar.com/headlines/2024/07/10/2369162/pagcor-harry-roque-legal-head-raided-pogo-hub>.
- 415 Denise Mae P. Codis, PAOCC: Lucky South 99 owner among those charged in Lapu Pogo raid, SunStar Philippines, 23 September 2024, <https://www.sunstar.com.ph/cebu/paocc-lucky-south-99-owner-among-those-charged-in-lapu-pogo-raid>; Jun A. Malig, Pampanga Pogo linked to scams, trafficking; 186 rescued in raid, *Philippine Daily Inquirer*, 6 June 2024, <https://newsinfo.inquirer.net/1948727/pampanga-pogo-linked-to-scams-trafficking-186-rescued-in-raid>.
- 416 Mark Ernest Villeza, Ex-official in PDAF scam linked to POGO ops — Hontiveros, *The Philippine Star*, 18 June 2024, <https://www.philstar.com/headlines/2024/06/18/2363725/ex-official-pdaf-scam-linked-pogo-ops-hontiveros>.
- 417 US Institute of Peace, Transnational crime in Southeast Asia: A growing threat to global peace and security, May 2024, <https://www.usip.org/publications/2024/05/transnational-crime-southeast-asia-growing-threat-global-peace-and-security>.
- 418 Kathleen Magramo, Philippines bans gambling operations catered to illicit Chinese players, CNN, 23 July 2024, <https://www.cnn.com/2024/07/23/asia/philippines-pogos-ban-illegal-gambling-intl-hnk/index.html> and Reuters, Philippines' Marcos bans offshore gaming operators, 22 July 2024, <https://www.reuters.com/world/asia-pacific/philippines-marcos-orders-closure-offshore-gaming-industry-2024-07-22/>.
- 419 UNODC, Scams and trafficking for forced criminality: UN emergency response network to combat human trafficking in Southeast Asia, May 2024, <https://www.unodc.org/roseap/en/2024/05/emergency-response-network/story.html>.
- 420 The Nation, Anti-online scam centre gets off the ground, 1 November 2023, <https://www.nationthailand.com/thailand/general/40032467>.





**GLOBAL  
INITIATIVE**  
AGAINST TRANSNATIONAL  
ORGANIZED CRIME

ABOUT THE GLOBAL INITIATIVE

The Global Initiative Against Transnational Organized Crime is a global network with over 700 Network Experts around the world. The Global Initiative provides a platform to promote greater debate and innovative approaches as the building blocks to an inclusive global strategy against organized crime.

[www.globalinitiative.net](http://www.globalinitiative.net)