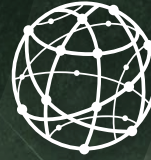




Australian Government



**GLOBAL  
INITIATIVE**  
AGAINST TRANSNATIONAL  
ORGANIZED CRIME

# MEKONG

## RISK MONITOR



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## Australian Government

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# ABOUT THE MEKONG RISK MONITOR

Welcome to the first issue of the Mekong Risk Monitor. The monitor is a periodic publication by the Mekong Network to Counter Transnational Crime (MNET-CTC), a programme implemented in partnership by the Global Initiative Against Transnational Organized Crime (GI-TOC) and the Australian government. The monitor tracks developments in the illicit economies of Cambodia, Laos, Myanmar, Thailand and Vietnam, and their intersection with regional development, governance and security issues. It draws on primary and secondary sources, including interviews with key stakeholders such as journalists and state officials, civil society input and open-source monitoring to deliver evidence-based analysis of emerging threats and vulnerabilities.

Each issue reports on trends and priorities in these countries' criminal markets, situating local developments within broader regional and global dynamics with a view to increasing the

understanding of organized crime in the Mekong region. They seek to strengthen evidence-based policymaking and programming to improve resilience and foster collaboration among government, civil society and international partners. This monitor focuses on four criminal markets: the sexual exploitation and abuse of women and girls, cyber scam operations, drug trafficking and financial crime. It aims to show how shifting political, economic and technological conditions create opportunities for organized crime and how governments, communities and civil society respond.

We encourage readers and contributors to share feedback, data or ideas for future issues that highlight new trends, add original evidence or contextualize ongoing developments in the region's criminal markets. Contact the MNET-CTC team: [ioannis.vlassis@globalinitiative.net](mailto:ioannis.vlassis@globalinitiative.net).

## In this issue

The inaugural edition addresses five interrelated dynamics shaping the region's illicit economies. The first article tracks the use of crypto assets in financial crime in Vietnam, examines the rise of digital-asset fraud and money laundering schemes, and highlights the gaps in regulatory oversight that criminal actors continue to exploit. The second looks at recent developments in cyber scam operations in the Golden Triangle Special Economic Zone in Laos, evaluates the latest government crackdowns and discusses what this may mean for the future of the zone. The third article looks at Cambodian women who are vulnerable to exploitation, investigates

persistent patterns of bride trafficking to China, and the complicity of intermediaries and officials who sustain this trade in people. The fourth article explores how app-based delivery services in Thailand are exploited by drug networks for distribution, blurring the line between legitimate services and criminal logistics. The final article assesses the smuggling of cash in and out of Laos, explores the centrality of cash in the local criminal economy, and how porous borders and capacity failures facilitate cross-border money movements. Together, these stories spotlight the risks posed to communities, state institutions and local economies in the Mekong region.



# THE EVOLVING USE OF CRYPTO ASSETS IN FINANCIAL CRIME IN VIETNAM

In February 2025, Hanoi police arrested a 32-year-old Vietnamese man for allegedly masterminding a nationwide Ponzi scheme involving a fake crypto platform known as CrossFi. More than 1 900 investors were lured into depositing over VND 2 trillion (over US\$75 million) into what they believed was a cutting-edge blockchain project. According to the Hanoi Municipal Police, the perpetrators behind the scheme disguised their operations behind a facade of legitimate-looking business ventures and virtual currency projects, promising exceptionally high returns. Seduced by the attractive profits on offer, numerous investors fell victim to the fraud, with one reportedly suffering losses of up to VND 13 billion (over US\$490 000).<sup>1</sup>

This was not an isolated incident. Between early 2024 and mid-2025, Vietnam witnessed an unprecedented surge in crypto-related criminal activity, most notably large-scale investment fraud and transnational money laundering operations. While public warnings from law enforcement and regulatory bodies have increased, this crime wave has exposed critical gaps in regulatory control, investigative capacity and cross-border financial surveillance.

Dozens of high-profile arrests, seizures and investigative breakthroughs across more than a dozen provinces suggest that Vietnam has become a hotspot for hybrid crypto fraud – schemes that blend classic Ponzi tactics with digital token manipulation and social engineering. These scams typically involve creating fake investment platforms, issuing unlisted or fabricated cryptocurrencies (e.g. MTC, PAYN, MPX, CBP)

and offering ‘guaranteed’ daily returns. To gain credibility, perpetrators often stage luxury conferences at five-star hotels, flaunt wealth on social media and exploit multi-level marketing tactics to rapidly scale their victim base.

One of the most notorious cases is the Matrix Chain scam, a prosecuted case that used a rigged binary options platform, a type of online trading where users seek to predict whether the price of an underlying asset will rise or fall within a specific timeframe. However, the results were manipulated by the scammers, who lured in over 138 000 investor accounts, causing estimated losses of nearly VND 10 000 billion (approximately US\$394 million).<sup>2</sup> The PaynetCoin case, which is still under investigation, defrauded over 500 000 investors across Vietnam, with total losses estimated at trillions of VND. Authorities initially seized VND 800 billion (over US\$30 million) in cash at the scene.<sup>3</sup>

Other prosecuted major schemes, such as CrossFi, Cashback Pro and Toptrade1, used similar methods and each caused damages ranging from VND 2 000 billion to over VND 5 000 billion (approximately US\$80 million to over US\$200 million). These platforms typically collapsed within six to 12 months, locking user withdrawals and deleting all backend data.

In the latest case from August 2025, the Lao Cai Province Police arrested 25 individuals involved in a nationwide crypto fraud ring using fake investment platforms, attracting over 10 000 investors, with estimated losses reaching tens of trillions of VND.<sup>4</sup> Further cases and investigations can be referred to in Figure 1.

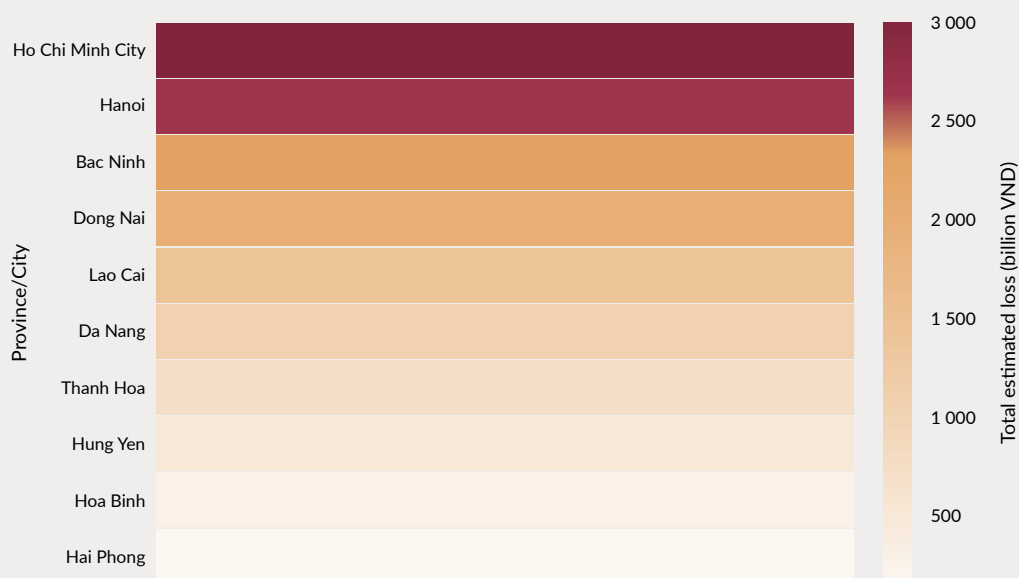
Case name	Location	Scam/crime type	Estimated loss (VND)	Key modus operandi
Matrix Chain <sup>5</sup>	Nationwide	Ponzi multi-level marketing scam	~ 10 trillion	App-based DeFi token, staged seminars
Cashback Pro <sup>6</sup>	Hanoi, Ho Chi Minh City	Multi-level pyramid	~ trillions	Unrealistic profit, social media marketing
PaynetCoin <sup>7</sup>	Nationwide	Token scam + over-the-counter laundering	~ trillions	Issued fake coin, used over-the-counter brokers
CrossFi <sup>8</sup>	Ho Chi Minh City	Laundering and fake token	~ 2 trillion	USDT-based funnelling through Binance
Madam Ngo case <sup>9</sup>	Regional	Transnational laundering	~ 7.9 trillion	Rented bank accounts, USDT conversion
Naga Kingdom <sup>10</sup>	Lao Cai	Game-based scam	~ 200 billion	Non-fungible token game fraud, staged events

**FIGURE 1** Major crypto-related scams and laundering cases in Vietnam, 2024–2025.

SOURCE: GI-TOC analysis based on provincial case distribution from CAND Online reports<sup>11</sup>

To further illustrate the disproportionate scale of damages, Figure 2 shows the estimated losses from major crypto-related fraud and laundering cases recorded in Vietnam between 2024 and 2025. While new cases continue to emerge, a few large-scale schemes account for the vast majority of reported financial harm – highlighting the increasingly systemic impact of crypto-related scams on victims nationwide.

Most cases emerged from urbanized, high-connectivity areas such as Ho Chi Minh City, Hanoi and Bac Ninh – centres of fintech and investor density. However, some rural provinces like Hoa Binh, Dak Nong and Nghe An also recorded sizable losses, suggesting these networks penetrated deeply into lower-tier cities and peripheral regions.



**FIGURE 2** Crypto-related criminal losses by province (Vietnam, 2024–2025).

SOURCE: GI-TOC analysis based on provincial case distribution from CAND Online reports<sup>12</sup>

While crypto is often viewed as a tool for fraud by means of fake tokens or investment platforms, Vietnam police say it also plays a growing role as a motivator for other serious crimes. Several embezzlement and theft cases – for example a state accountant stealing billions of VND,<sup>13</sup> or an electronics store employee misappropriating nearly 140 iPhones – have been motivated by prior crypto losses.<sup>14</sup> In a case in Hung Yen, four men staged a fake in-person USDT transaction before violently robbing VND 3 billion (over US\$113 000) from the crypto seller.<sup>15</sup> These cases demonstrate how crypto’s perceived anonymity, high profit potential and weak platform oversight may enable a wide range of misuse – from hiding criminal proceeds to luring people into transnational crime networks as either victims or unknowing participants.

## From regulatory silence to cautious engagement

Until recently, Vietnam maintained a cautious stance on crypto assets, withholding formal recognition without establishing a clear regulatory framework. This regulatory inaction created a legal vacuum widely exploited by illicit actors. For instance, in 2017, the State Bank of Vietnam declared that virtual currencies

were not considered legal means of payment and advised financial institutions to avoid involvement in crypto-related transactions.<sup>16</sup> However, as evidenced by the surge in criminal cases between 2024 and 2025, this did not deter actors from becoming involved with crypto: the long list of crypto-related cases in Vietnam shows that crypto-related crimes have not only increased in number but also in scale and complexity.

Up until this year, laws had prohibited crypto as legal tender and allowed criminal prosecution under generic penal code provisions (e.g. fraud, illegal multi-level marketing or money laundering). A pivotal shift in regulation occurred in March 2025, when the government issued Resolution No. 05/2025/NQ-CP, establishing a sandbox for the pilot development of a digital asset market.<sup>17</sup> This landmark document introduced, for the first time, legal definitions of ‘digital assets’, ‘crypto-assets’, and ‘digital asset service providers’. The resolution also outlined a phased roadmap for regulated participation, including eligibility conditions for domestic and foreign investors, licensing requirements for virtual asset service providers (VASPs), and anti-money laundering/counter financing of terrorism (AML/CFT) obligations.

In parallel, Vietnam passed the Law on Digital Technology Industry 2025 on 14 June 2025, which situates crypto regulation within a broader digital economy and fintech strategy.<sup>18</sup> The Vietnamese government also enacted Decree No. 94/2025/ND-CP, setting out principles for sandbox experimentation to implement financial technology solutions such as credit scoring, data sharing on open applications programming interfaces, and peer-to-peer lending.<sup>19</sup> While these developments suggest a growing political appetite to manage crypto markets, there are still significant gaps.

The Asia-Pacific Group's February 2025 third follow-up report continued to rate Vietnam as non-compliant with the Financial Action Task Force (FATF)'s Recommendation 15 on virtual assets and VASPs, and argued Vietnam had not regulated, licensed or registered VASPs for AML/CFT purposes, nor had it imposed any supervisory or preventive measures.<sup>20</sup> Authorities had enacted new instruments such as the 2022 Anti-Money Laundering Law<sup>21</sup> and Decree 19/2023/ND-CP,<sup>22</sup> as well as launched the Circular 27/2025/TT-NHNN,<sup>23</sup> to align with FATF Recommendation 15. However, experts consider that these are ambiguous when it comes to recognizing virtual assets or VASPs as reporting entities, and continue to fall short of addressing the complex vulnerabilities on the ground.<sup>24</sup> In addition, so far no oversight or sanctions have been applied to VASPs, and Vietnam has not yet conducted a national risk assessment specifically addressing money laundering and terrorist financing risks from virtual assets. These omissions were flagged as a critical vulnerability affecting the integrity of Vietnam's financial system, exposing it to unmitigated abuse from unregulated crypto flows.

The consequence is a fragmented legal framework where crypto policy seems to be developing in parallel to but not embedded within Vietnam's AML framework. This extends beyond AML, reflecting a broader lack of coherence in how emerging technologies are governed in siloes in Vietnam. As the sandbox proceeds into implementation under Resolution 05 and Decree 94, the effectiveness of institutional coordination – between the Ministry of Finance, the Central Bank and law enforcement – will be critical in transforming political intent into effective regulatory practice.

## Institutional gaps and limits of prohibition

Vietnamese authorities are making notable strides in dismantling criminal rings, freezing assets and warning the public of the risks of unregulated digital assets. However, without legislative reform and institutional clarity, these efforts will remain fragmented. Tactics like seizing luxury cars, freezing bank accounts or extraditing foreign suspects are essential, but they fight symptoms rather than causes.

A forward-looking governance approach is needed, one that legalizes certain crypto activities under strict compliance obligations (including registration, audit, taxation and AML monitoring), while simultaneously criminalizing fraudulent token schemes and unlicensed exchanges. Several regional neighbours – including Thailand, Singapore and the Philippines – are already experimenting with such dual-track models.

Closing three key institutional gaps could significantly enhance the institutional response. First, a comprehensive licensing framework for crypto platforms should be implemented. Several major schemes, such as Matrix Chain, PaynetCoin and the Cashback Pro case operated without any formal licensing in Vietnam, instead relying on mobile apps, social media and token issuance without oversight. In addition, the 2023 Exness case showed how platforms may use Vietnamese-language domains and local banking channels for deposits, despite lacking a legal licence.<sup>25</sup> Even after being blocked by national internet authorities, the platform quickly reappeared under a new domain and continued to accept Vietnamese investors.<sup>26</sup> Going forward, it is therefore crucial to implement the licensing framework for crypto platforms currently under development – a roadmap is already outlined in Resolution 05 and the new legal instruments that are being drafted. Until these come into effect, scam operators can exploit loopholes by registering offshore shell entities, hosting events domestically and launching unregulated apps with limited local accountability.

Second, law enforcement efforts need to better coordinate across borders and collaboration with private sector entities needs to be enhanced. So far, authorities often respond reactively to highly publicized cases, with limited inter-provincial or cross-border coordination to map the full structure of crypto fraud syndicates. Financial intelligence sharing with major exchanges or blockchain analytics providers is also underdeveloped.

Finally, policymakers need to identify a regulatory body responsible for crypto asset supervision. So far, the central bank (the State Bank of Vietnam) disclaims authority, while securities regulators treat most tokens as outside the capital market, creating a 'regulatory vacuum' where no entity monitors suspicious wallet activity, enforces know-your-customer rules on exchanges or even tracks domestic token launches.

The high number of cryptocurrency-related cases suggest that reactive enforcement alone is no longer sufficient. The scale of reported losses – over VND 20 trillion (around US\$800 million) across provinces in just two years – indicates that crypto risks have become systemic. As Vietnam moves forward with its pilot digital asset framework, this moment offers a key opportunity to close supervisory gaps and embed crypto oversight more firmly into the broader AML and financial integrity system. ■

# THE GOLDEN TRIANGLE SPECIAL ECONOMIC ZONE: THE END OF A CRIMINAL DYNASTY OR EXPANSION INTO NEW LOCATIONS?

**O**n 24 October 2025, the Management Committee of the Golden Triangle Special Economic Zone (GTSEZ) in Laos announced that all online gambling operations inside the zone must cease by 2 November, and that all companies and personnel involved in online gambling would be required to exit the zone in advance of that day or face unspecified consequences.<sup>27</sup> From 2–18 November, a large-scale inspection was mobilized inside the zone to ensure compliance with the new orders.<sup>28</sup> Given that the orders were issued only in Chinese and Lao languages, it is likely that the intention of this action was to signal to the Chinese government and to Chinese online gambling and scam syndicates that Lao authorities are beginning to regulate the otherwise extreme levels of illicit activity inside the zone.<sup>29</sup> However, like earlier announcements related to online scams and online gambling, the GTSEZ management team's notice of planned enforcement actions provided criminal actors with the opportunity to temporarily relocate to other areas.<sup>30</sup> Are the Lao authorities now becoming more serious about cracking down on the country's scam economy? What does this mean for the future of the GTSEZ? And to what extent is this a result of growing Chinese economic and security influence in the region?



Laos's Golden Triangle Special Economic Zone has faced allegations of involvement in illicit activities, including online scamming operations. ©STR/AFP via Getty Images

## Rise of a crime city

The GTSEZ began to take shape in 2007 when the Kings Romans Group – a designated transnational criminal organization run by Chinese businessman Zhao Wei, who is subject

to US sanctions<sup>31</sup> – signed a 99-year lease with the Lao government granting them control over a 39 square mile stretch of Lao territory on the banks of the Mekong River at the point where Myanmar, Thailand and Laos meet.<sup>32</sup> The zone is designed around a large casino resort first used to launder illicit proceeds from Myanmar's narcotics trade, and later as a cover for online gambling and online scamming operations, according to the US Treasury Department.<sup>33</sup>

Active in the zone in close partnership with the Kings Romans Group are a large number of representatives of key ethnic armed organizations, especially the United Wa State Army (UWSA), which was sanctioned by the United States Treasury Department in 2018 for its involvement in narcotics.<sup>34</sup> By late 2024, the population stood at an estimated 120 000,<sup>35</sup> of which over 60% were from neighbouring China or Myanmar. The zone reportedly contained casinos, karaoke bars, hotels, entertainment complexes, brothels, drug bars and a number of facilities hosting online gambling and online scamming operations, including using forced criminality.<sup>36</sup>

Despite this illicit activity, Zhao and his Kings Romans Group have always claimed that the GTSEZ has developed and stabilized the region. In one interview, he pointed to the good quality of the roads in the zone and the construction of a number of tourist attractions, including a 'Chinatown area' that is frequented occasionally by tour groups from China.<sup>37</sup> Promotional materials for the zone emphasize its oversized airport,<sup>38</sup> but leave out the countless stories of trafficking victims, billions of dollars in revenue from online scams, the rampant money laundering taking place through the casinos, and the regular seizures of narcotics and other illicit goods passing through the zone into Thailand.<sup>39</sup>

## A crackdown?

Despite the sanctions, the Kings Romans Group reportedly continues to provide illicit businesses the opportunity to operate inside the zone.<sup>40</sup> By August 2024, the zone hosted the majority of the country's online scam operations, which net an estimated US\$10.9 billion in illicit proceeds each year.<sup>41</sup> In August 2024, however, Zhao announced during a ceremony he presided over with the governor of Bokeo Province that all illegal online activity



inside the GTSEZ would have to end within two weeks.<sup>42</sup> Seemingly a result of joint pressure from China, Thailand and Laos, this announcement resulted in a sudden outflow of individuals from the GTSEZ into Myanmar and Cambodia. Others, largely higher-level management, temporarily crossed over into Thailand or travelled to Vientiane where they waited for an announcement from Zhao that it was safe to return. From August until December 2024, an estimated 900 were arrested by Lao authorities and repatriated from the GTSEZ.<sup>43</sup>

In December 2024, Zhao seemed to signal that the operation had concluded and that individuals could return to the GTSEZ, with his social media channels circulating images of him receiving a developmental medal from Luang Namtha Governor Viengsavath Siphandone.<sup>44</sup> By January 2025, there were reports of significant numbers of Chinese nationals returning to the zone.

Meanwhile, directives from the UWSA's Brigade 171 – a military unit that has traditionally provided security for the GTSEZ – sent a conflicting signal. In a move almost certainly prompted by Chinese pressure, the UWSA called for all of its personnel and all Wa people in Laos to return to Wa state or face penalties.<sup>45</sup> The UWSA tried to explain this move by stating it needed to train additional troops to govern territories recently taken under its control.<sup>46</sup> In reality, the move paralleled China's recall of its nationals that took place during the COVID-19 pandemic. Large numbers of Wa personnel working inside the zone were among those departing during the final months of 2024.

By mid-2025, questions emerged once again about whether Zhao and his family members, who had previously been involved in managing the zone in a very public way, might be facing further challenges.<sup>47</sup> Throughout the first half of 2025, the GTSEZ had received a series of high-level visitors from Chinese state-owned enterprises<sup>48</sup> and had multiple visits from the Lao deputy prime minister.<sup>49</sup> It also held a number of high-level ceremonies, including one marking the opening of the zone's new customs house.<sup>50</sup> Conspicuously absent from all of these ceremonies were Zhao and members of his family. His last public appearance was in December 2024. Social media posts on China's WeChat platform speculate wildly about Zhao's location, with one citing a Cambodian media report that claims he has 'stepped out of the spotlight'.<sup>51</sup>

Another signal that things may not be going well for Zhao's criminal network is the fact that the GTSEZ's entire executive leadership team left their positions before August 2025, prompting the zone's management team to put out a public advertisement for a new CEO and deputy CEO.<sup>52</sup>

While there have been reports of new victims being trafficked into the GTSEZ throughout 2025 and of ongoing scam operations inside the zone,<sup>53</sup> there is also evidence that scam activity is at significantly lower levels compared with early 2024.<sup>54</sup> Meanwhile, census data released in July 2025 indicates that the population had decreased by about 50 per cent, to 65 300 since late 2024.<sup>55</sup> Construction on several buildings also seems to have stalled as of October 2025. Chinese influencers recently visiting the zone have also posted extensively about the number of restaurants, bars and coffee shops that are now closed and shuttered.<sup>56</sup>

## Future of the zone

Since early 2025, three trends have become increasingly clear. First, the Lao government has worked to demonstrate they are in control of and governing the GTSEZ, and that they are suppressing illicit activity. The Lao government has hosted visits by foreign diplomats and has taken the lead around recent announcements related to the opening of the new customs house.<sup>57</sup> The zone's management committee is much less visible in public media reports about activities inside the zone. A promotional video launched in 2025 emphasized that checkpoints in and out of the zone are controlled by the Lao government and immigration. This contradicts earlier narratives about the zone being completely under security provided by the management committee, which had used security personnel from northern Myanmar.<sup>58</sup>

Second, the zone's management committee has partnered with a range of Chinese businesses to try to create a narrative of a 'successful economic transition'. In early 2025, the management committee hired a Chinese-based company, Yunnan Tengyun Xichuang Investment, to author a report titled 'Friendly Cooperation in the Golden Triangle SEZ: Research Report on the Zone's Developmental Transition'.<sup>59</sup> The company invited Yunnan-based researchers and policymakers to attend a workshop around the report as part of a move to deepen Belt and Road Initiative (BRI) cooperation between China and Laos in the GTSEZ. This seems to dovetail with China's ambitions to deepen its economic and security influence in the zone. In December 2024, a consortium of Chinese investors, including a subsidiary of a provincial state-owned enterprise, the HCT Group, signed a series of deals centred on the development of an industrial scale cattle ranch meant to supply 500 000 cattle a year primarily to the Chinese market. This deal was framed as an effort by the Yunnan provincial government to implement high-level agreements signed by the heads of state of China and Laos around the implementation of the BRI.<sup>60</sup>



Third, to date, moves to address crime inside the zone have not fundamentally resolved challenges related to human trafficking, forced criminality, online scamming and money laundering.<sup>61</sup> Instead, the management committee's repeated approach of providing advance notice of any law enforcement actions has enabled criminal actors to temporarily exit the zone to avoid scrutiny. Ahead of the most recent round of inspections that started on 2 November 2025, large numbers of foreign nationals relocated to Vientiane, Boten, Tachileik and other locations across the region.<sup>62</sup> There are now growing reports of scam centre activity taking place in these alternative locations.<sup>63</sup>

## Expansion

With international attention mounting around the criminal activity in the GTSEZ, there are increasing signs of greater involvement in the zone on the part of Lao authorities and Chinese state actors, including state-owned enterprises. Meanwhile, the GTSEZ leadership has kept a much lower profile over the past year, likely in support of efforts by the governments of Laos and China to create a narrative that they are in control of the situation. However, although policies have tightened, sparking a noticeable reduction of activity in the GTSEZ, there is little indication that the authorities have a plan to systematically disrupt transnational crime in the zone. The primary issue is that the Laos and Chinese authorities continue to rely on the Kings Romans Group as a partner to address these problems. For the Kings Romans Group, the possibility of transitioning such a massive investment – an estimated US\$3.5 billion has been invested into the zone, according to the company's own reporting – into lawful economic activity is highly unlikely. Given the notorious reputation of the zone, the prospects of it emerging as a successful hub for legitimate business or for tourism are dim. As such, the Kings Romans Group is unlikely to be incentivized to crack down on illicit activities, so that its key revenue centres – the casinos and revenue from scam syndicates – can continue. At present, the strategy of the Kings Romans Group seems to be to work with authorities in a 'campaign style' to advance what are portrayed as crackdowns. This means that scam syndicates need to hand over several hundred individuals per crackdown and spend significant amounts of time operating outside of the zone.

Already there are clear signs that parts of the business are shifting into other casino hotspots in the country, particularly casinos located around Vientiane. The That Luang Chinatown



**Risks of narcotics and other illicit goods spilling over from the GTSEZ into Thailand persist.** *Photo supplied*

area of Vientiane is now regularly frequented by individuals visiting from the GTSEZ, and there are growing signs that parts of the scam business are now being implemented from alternative locations around Laos.<sup>64</sup> Equally concerning is another trend across the Mekong on the Myanmar side of the border, where the town of Tachileik now features new casinos, hotels and emerging 'compounds' that appear purpose built to host online scam operations. In mid-November, the Myanmar Ministry of Commerce sent a delegation to the GTSEZ to negotiate greater 'economic cooperation' between Myanmar and the zone. Given the nature of the business actors in the zone, it is possible that this represents a move by Myanmar to bring some elements of illicit GTSEZ activities into its controlled territories.<sup>65</sup>

Current moves to address these problems are not working. In the end, Laos may have few options other than to reconsider the 99-year lease signed with the Kings Romans Group if it wants to address the ongoing crisis in criminality with any degree of effectiveness. One option might be for a broad international partnership aimed at establishing law and order in the zone that focuses on holding the Kings Romans Group accountable, and which advances a crackdown on crime outside of the influence of the group. Strategies that wait for an 'economic transition' or which give the criminal actors a lifeline in neighbouring Myanmar or the space to expand elsewhere in Laos only increase the risks for regional security. ■

# CAMBODIA'S WOMEN STILL VULNERABLE TO BRIDE TRAFFICKING AS FORCED MARRIAGE IN CHINA CONTINUES

**O**n 11 March 2024, a 16-year-old Cambodian girl turned to social media for help. In a one-minute video, the former garment worker described being trafficked to China under the pretence of work, only to be sold into a marriage and confined to a locked room for five to six months.<sup>66</sup> Authorities later confirmed that the teenager had been rescued from a seven-storey building in Zhejiang province in a joint operation with Chinese officials. While her plight captured public attention and was reported in the media,<sup>67</sup> she is only one of several hundred Cambodian women or girls who fall prey to traffickers each year.

Law enforcement officials and NGO representatives say there has been no sign of a decline in this trend. According to anti-trafficking NGOs, Cambodia has become one of the main source countries for women trafficked into forced and exploitative marriages in China.<sup>68</sup> Poverty, high levels of personal debt, and limited opportunities in rural and urban Cambodia make young women vulnerable, while high demand for foreign brides in China has created a lucrative market for brokers and trafficking networks.<sup>69</sup> Similar patterns are also observed across South East Asia, with women from Myanmar, Vietnam and Laos being preyed upon.<sup>70</sup>

Those struggling to find work and repay debts often turn to migration. Each year, thousands leave for China, Thailand, Malaysia, South Korea and Japan. Traffickers exploit this situation, deceiving women and their families with false promises of work or marriage. Once abroad, young women may face coercion into unwanted marriages, sexual exploitation, forced labour and severe restrictions on their freedom of movement.

In China, demographic imbalance – a legacy of the 1979–2015 one-child policy and gender-selective practices – has left millions of men unable to find spouses, fuelling high demand for the market for foreign brides. Brokers exploit the desperation on one side and scarcity on the other. Representatives of NGOs in Cambodia said that traffickers ‘use money like a fishing hook’,<sup>71</sup> capitalizing on women’s financial struggles to lure them into marriages in China. Many women in Cambodia decide to follow brokers after hearing promises of cash or support for their families. Some women may also need to work in factories or are sexually exploited to repay their initial debt.<sup>72</sup>



**Cambodian girl trafficked to China posts a video on social media calling for help.** Photo: CamboJA

Survivors of forced marriage face severe long-term impact, including sexual and physical violence, movement restrictions, economic exploitation, psychological trauma and social stigma upon return.<sup>73</sup> Women with children in China encounter additional barriers, as legal documentation often prevents them from bringing their children back to Cambodia. Some survivors eventually become brokers themselves, perpetuating the cycle.

## No sign of lessening

Bride trafficking from Cambodia to China is not a new trend and has been previously documented. For example, a 2022 report published by the GI-TOC found that trafficking of Cambodian women to China surged after 2016 and spiked during the COVID-19 pandemic.<sup>74</sup> Little appears to have changed since.

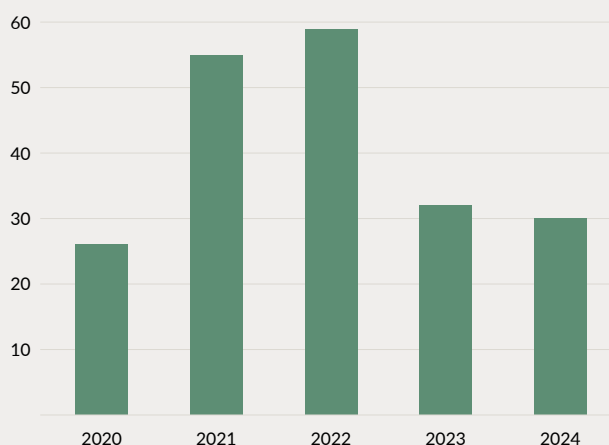
There are currently no comprehensive statistics on the scale of the phenomenon. Authorities rarely publish detailed trafficking statistics, instead citing ‘a few hundred’ cases when questioned by journalists.<sup>75</sup>

According to Cambodia's General Department of Immigration, Cambodian authorities cooperated to assist and repatriate 180 Cambodian women from China who had been deceived and lured into marriages with foreigners in the first six months of 2025.<sup>76</sup> The 2025 US Trafficking in Persons Report states that in 2024, 214 victims were subjected to forced marriage, which



may have included non-trafficking situations.<sup>77</sup> In 2023, the Cambodian government also reported identifying 214 victims of forced marriage, some of whom may have been trafficked.

NGOs and human rights monitors argue that the true numbers of Cambodian women trafficked to China are likely to be much higher, given the clandestine nature of trafficking networks and victims' reluctance to come forward.<sup>78</sup> For example ADHOC, an NGO based in Phnom Penh, assists between 26 and 59 victims every year (see Figure 3).



**FIGURE 3** Number of women rescued by local NGO ADHOC.

SOURCE: Adapted from data from ADHOC, September 2025

According to Chou Bun Eng, Permanent Vice Chairperson of the National Committee for Counter Trafficking and Secretary of State at the Ministry of Interior of Cambodia, between 200 and 300 Cambodian women sought rescue from China over a 10-year period (2015–2025). She noted that many of these women face ‘family disputes, language barriers or work habits, and cannot live under family pressure’.<sup>79</sup> The official said that some women return to China even after being rescued: ‘We are now considering whether they are real victims or not.’ Despite years of interventions, she acknowledged that ‘until 2024, there [was] no sign of [a] decrease. In 2025, there are still women pleading for rescue’.<sup>80</sup> In a speech on 13 November 2025, Chou Bun Eng cited the cases of 10 women who had been rescued and identified, among them six girls as young as 14 and 15.<sup>81</sup> These official reports also seem to be supported by NGO representatives, who also did not observe any evidence of decline, noting they continue to assist women on a case-by-case basis.<sup>82</sup>

## Traffickers diversifying methods

Local NGOs working to rescue women trafficked to China have flagged a shift in victim profiles. For example, traffickers are reported to be increasingly targeting urban women – particularly garment workers and restaurant staff – rather

than those from rural communities who are more aware of the risks.<sup>83</sup> Cambodia’s textiles and footwear industry employs a million workers, 75 per cent of whom are women from rural backgrounds. Low wages, insecure contracts and heavy family debts make them especially vulnerable to traffickers who pose as friends or romantic partners, gradually building trust before deceiving them into migrating to China. In addition, NGOs have warned that following the escalation of the border conflict between Thailand and Cambodia in 2025, and the subsequent return to Cambodia of hundreds of thousands of migrant workers, many more women are likely to be vulnerable to traffickers going forward.



**Trafficked Cambodian women intercepted at the Vietnam border as perpetrators seek less conspicuous routes.** Photo: ADHOC

Recruitment tactics and smuggling routes are also changing. Brokers have turned to Facebook and TikTok (the two most popular platforms in Cambodia) to identify potential victims who post about financial difficulties online. In some cases, they explicitly promise marriage to Chinese men in exchange for money, convincing vulnerable women to accept their offers. Many women accept, unaware of the consequences.<sup>84</sup>

Brokers also shift routes to avoid detection and tighten their grip on victims: they often move women across informal border crossings, including overland through Vietnam to avoid airport scrutiny. In other cases, instead of using the heavily monitored Bavet crossing into Vietnam, they now move women through Laos.<sup>85</sup>

The trafficking of Cambodian women into China is a lucrative business. Many women incur thousands of US dollars of debt to brokers to facilitate the transaction; in other cases, families reportedly receive about 6 to 12 million riel (approximately US\$1 500 to US\$3 000) from marriage brokers to send their daughters to China. In addition, NGO representatives report that Chinese men pay brokers between US\$10 000 and US\$30 000 for the arranged marriage.<sup>86</sup>

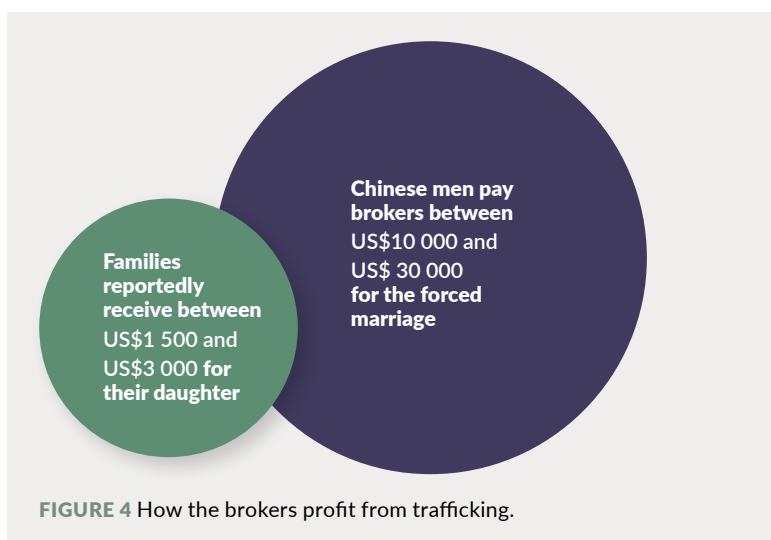
## The challenge of countering the networks

Despite awareness campaigns by NGOs and the government of Cambodia, significant gaps remain in preventing and addressing forced marriage. Cambodia features on Tier 3 of the US Trafficking in Persons Report (for the fourth consecutive year), which means the government of Cambodia does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so.<sup>87</sup> In 2025, it was also designated as a state sponsor of trafficking – underlining the extent to which state-embedded officials are assumed to enable human trafficking.<sup>88</sup> NGOs consulted largely agreed with the assessment, saying ‘the Tier 3 status is deserved, as we have not done enough’ [to counter human trafficking].<sup>89</sup>

Traffickers and brokers exploit weak law enforcement, corruption and loopholes in Cambodia’s legal framework. Although Cambodia has regulations restricting marriages with foreigners – requiring proof of a minimum monthly income of US\$2 500, a clean police record and a single status certificate, traffickers often find ways around this by disguising their services as labour migration or matchmaking.<sup>90</sup>

While the government has taken steps such as opening a victim support centre, conducting joint operations with China and providing additional training to officials, many of these measures appear to have limited or no impact. For example, more joint operations with China led to a higher number of rescued victims but attention to the problem is still ad hoc and inconsistent. In addition, limited transparency in bilateral cooperation with China as well as underfunded and understaffed diplomatic missions reduce the capacity to assist or repatriate victims, further undermining the response.<sup>91</sup>

In Cambodia, NGOs have long played a critical role in providing shelters, psychosocial support, legal aid and reintegration



programmes. They also do prevention work such as awareness raising campaigns. However, NGOs interviewed for this report detailed struggling with the consequences of recent USAID and other donors’ funding cuts. Many organizations have shut down since the beginning of 2025 or are operating at much reduced capacity.

There currently are no signs of abatement in bride trafficking from Cambodia to China. On the contrary, the border conflict, economic vulnerabilities, debt and limited in-country opportunities often push women into the arms of brokers and traffickers.

Stronger victim protection programmes that include safe shelters, psychological care and reintegration support will be crucial. To dismantle trafficking networks effectively, there is a need for stronger institutional frameworks, transparency and accountability in agreements between Cambodia, China and Vietnam. Survivors’ experiences are rarely reported in the media, limiting public understanding and community engagement. Expanded reporting and dissemination of these stories are essential to raise awareness and influence behaviour. ■



# DELIVERY SERVICES IN THAILAND PROVIDE A QUICK AND RELIABLE DISTRIBUTION METHOD FOR DRUG NETWORKS

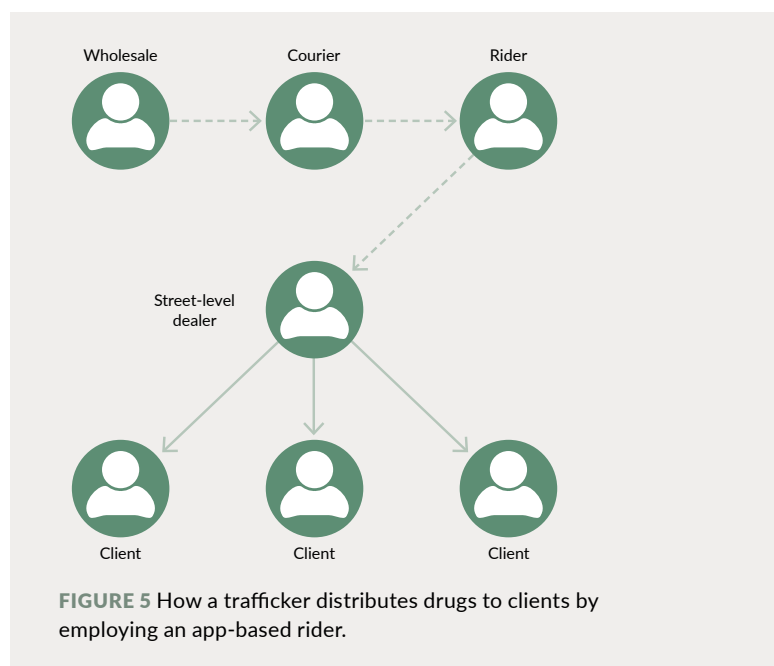
Innovations in mobile phone app technology have led to a boom in motorcycle delivery services in Thailand's urban centres. Transporting everything from passengers to food and household goods, app-based delivery workers now constitute a significant proportion of the Thai labour force. There are approximately 300 000–400 000 riders nationwide,<sup>92</sup> with somewhere between 100 000 and 200 000 operating in Thailand's capital and economic centre, Bangkok.<sup>93</sup>

Criminal networks are exploiting vulnerabilities in these services to extend their distribution systems. News reports and interviews suggest that riders have been involved in drug trafficking, both intentionally and unintentionally, with the most widespread practice appearing to be riders unknowingly transporting packages of drugs ordered online.<sup>94</sup> The problem is such that, in 2019, Grab – a super-app popular in South East Asia – collaborated with the Royal Thai Police to organize a training session for more than 200 Grab driver-partners. The session was designed to enhance participants' understanding of the laws and regulations governing courier services, and enable them to identify suspicious parcels potentially containing narcotics or other contraband goods.<sup>95</sup> Drug distribution through riders is thought to have become more widespread since the COVID-19 pandemic, and riders continue to prove a popular method of drug trafficking, especially in Bangkok.

Available research suggests that the drugs most frequently delivered by riders are methamphetamine (known locally as Ya Ba), crystal methamphetamine (Ya Ice), ketamine (Ya K)<sup>96</sup> and a recently emerging product known as 'Nom' or 'Labubu' – a pill designed in the shape of collectible toys that have recently gone viral and which are produced in colourful, candy-like forms.<sup>97</sup> Smaller packages are most commonly moved by unsuspecting riders, whereas larger consignments seized in police raids have involved 'fake riders' disguised as mainstream delivery service workers. The concealment methods vary widely, with contraband often found inside the packaging of consumer products or hidden in small plastic zip bags inserted into clothing pockets or shoes.<sup>98</sup>

## Modes of distribution

Certain social media platforms, particularly X, Facebook and Instagram, function as online marketplaces for drugs where clients can browse products and place orders. They also serve as marketing tools, employing strategies that facilitate a 'customer value journey', including product descriptions of drugs, promotional sales, customer reviews and campaign-style activities offering discounts to foster engagement and long-term relationships with buyers.<sup>99</sup>



**FIGURE 5** How a trafficker distributes drugs to clients by employing an app-based rider.

Once an order for drugs is placed, delivery is carried out through riders using various methods. Traffickers may employ middlemen to deliver packages to trusted riders, who then transport them to street-level dealers. To cultivate trust and credibility, traffickers provide riders with meals and kratom juice,<sup>100</sup> often arranging initial drop-offs and gatherings at kratom shops. These venues function as meeting points and spaces for socializing. Additionally, traffickers pay bribes to local police stations and receive 'red police patrol boxes', which act as a 'licence', exempting locations from police inspection. One rider interviewed explained that in his community, most arrests were carried out not by local police but by external authorities or special task forces who had not received a bribe or known about the delivery.<sup>101</sup>

## How are delivery riders involved with drug distribution?

Three patterns of rider involvement in drug delivery can be identified. First, some riders work officially as food delivery drivers but simultaneously distribute narcotics, dropping them at designated locations. One illustrative case involved the arrest of a rider who worked both for an app-based delivery service and as a motorcycle taxi operator at Pattavikorn Market, a popular thrift market in the east of the city. Authorities seized a substantial quantity of drugs, including 20 200 methamphetamine pills packaged in tea bags, 6.3 grams of crystal meth and 9 kilograms of ketamine. The rider admitted that he had turned to selling drugs after losing his job and had made 10 deliveries for clients prior to his arrest. According to his testimony, clients contacted him on Instagram and terminated the account once the delivery was completed. A new Instagram account would subsequently be created for each confirmed delivery order, allowing the traffickers to minimize their traceability.<sup>102</sup> It is unclear whether the rider was linked to a wider criminal network.

In another example from Phuket, a prominent tourist location, a food delivery rider was apprehended at his apartment in possession of 1 200 pills of methamphetamine and over 1.4 kilograms of crystal meth. Under interrogation, the rider confessed that he was instructed to deposit drug consignments at specified locations. The trafficker provided him with the narcotics, which he would conceal by burying them at a friend's property, which was monitored by CCTV. He received THB 15 000 (approximately US\$450) for each kilogram sold, with payment disbursed after the assigned stock had been delivered.<sup>103</sup>

The second pattern is more widespread and involves riders unknowingly transporting packages that contain narcotics ordered through app-based delivery services. Drugs may be concealed in various ways, such as in the packaging of consumer products, like cosmetics,<sup>104</sup> or in laptop bags.<sup>105</sup> Although riders are trained to identify suspicious things that might indicate that the goods contain narcotics – for example, the sender refusing to be photographed with the parcel (which is common practice in Thailand),<sup>106</sup> inconsistencies between the parcel's weight and its declared contents,<sup>107</sup> or delivery requests scheduled late at night – this method continues to be common, as drug dealers can simply use app-based systems to request package delivery services, specifying drop-off points and destinations to distribute drugs without leaving a direct trace of their presence.<sup>108</sup>

The third pattern has been identified through collaborative operations involving the Central Investigation Bureau, the Office of the Narcotics Control Board (ONCB, the agency responsible for formulating policies and measures to prevent and combat drug abuse) and the Children and Women Protection Subdivision of the Metropolitan Police Bureau. These efforts have resulted in

the seizure of large quantities of narcotics of various types. A notable case occurred in the Wat Thong Phleng community of Khlong San District in Bangkok, where authorities uncovered a drug network that disguised its operations by decking its riders and motorcycles in the uniform and livery of an established delivery service. This method enables traffickers to distribute drugs within the community while evading detection at police checkpoints.<sup>109</sup>

## What makes these methods so efficient?

Social media has provided an exponential boost to global drug availability and consumption, as drugs can easily be ordered through online platforms. According to a 2021 report, X was the most popular social media platform for online drug sales in Thailand, followed by Facebook and Instagram, with sellers predominantly concentrated in Bangkok.<sup>110</sup> The image below shows a screenshot of a drug seller's account on X. The account's biography included the phrase 'Fast delivery Grab. Bangkok' while its pinned post specifies 'Real delivery, always delivery'. Locating such accounts requires little effort, with a simple search in Thai yielding results. Keywords include 'Tua Yai', meaning 'big one', referring to crystal meth; 'Tua Lek', meaning 'small one', denoting methamphetamine; or 'Nom Nok', meaning 'foreign candy', a street term for MDMA.<sup>111</sup> Clients can then place orders through direct messaging on the social media platform or transition to encrypted messaging applications commonly used in Thailand, such as Line, to finalize transactions.

A distinctive feature of online drug markets is their capacity to provide quick delivery everywhere, thereby eliminating the need for sellers to operate from fixed locations.<sup>112</sup> This makes Thailand's delivery services ideal for trafficking drugs. Another draw is that delivery riders benefit from an ability to evade routine inspections, largely due to the implicit trust conferred by their uniforms and the perceived oversight procedures that service providers have in place. In an interview, a researcher

at Chulalongkorn University who pioneered the study of courier labour in Thailand, said that the rider uniform legitimizes the service, thus minimizing the likelihood of surveillance or questioning by authorities.<sup>113</sup>



Screenshot of a drug seller's account on X, 8 September 2025.



A former leader of the Freedom Rider Union said that the police often assume service providers exercise strict regulation over their riders. For example, riders are required to submit a criminal record check during the application process. However, this is a one-time requirement when they are hired, and service providers may not be aware if riders subsequently engage in criminal activity while working for the company.<sup>114</sup> Couriers in uniform also benefit from police leniency. One rider explained that this trend stems from police sympathy toward riders, who are seen as part of a low-income profession, as well as confidence in the app-based verification system.<sup>115</sup>

With advanced mapping technology, delivery applications provide riders with high geographical accuracy in their deliveries. For example, Maleeya Jotisakulratana, Director of Government Relations at LINE MAN Wongnai, one of Thailand's largest tech companies and super-apps, explained how delivery services reduce the risk of product loss, as opposed to more traditional distribution methods, which cannot be tracked and are more vulnerable to theft. Instead, delivery technology allows the tracing of riders, who are unaware of the illicit contents.<sup>116</sup>

Policy loopholes further facilitate drug deliveries. To protect riders and clients from food contamination or damage to parcels, delivery riders are prohibited from opening or inspecting packages. While this policy is designed to safeguard service

quality in the case of food, it also allows drug traffickers to exploit the system. The fact they are prohibited from opening food packages gives them plausible deniability, hampering law enforcement efforts.<sup>117</sup>

A further enabling factor is that systematic research and news about drug distribution by riders is limited. News reports concerning the involvement of delivery riders in drug trafficking appear periodically,<sup>118</sup> but no official statistics have been released by government bodies such as the ONCB.<sup>119</sup> There is need for more research on the patterns of app-based drug delivery, how drivers connect with middlemen and wholesale networks, and the role that app-based drug distribution plays for the drug market in Thailand and beyond.

While delivery services have become part of the normal routine of life in Bangkok, they are also commonly exploited by criminals. Loopholes that exist to protect consumers are easily exploited by drug traffickers, who utilize delivery systems as an extension of their distribution networks and hide their illicit goods among the millions of legitimate orders. 'Drug dealers seek easy and untraceable channels to distribute their products. This is why delivery platforms are often chosen,' Jotisakulratana said.<sup>120</sup> However, this also points to the main challenges in the response: 'As soon as the package is delivered, the dealer is safe and unlikely to be prosecuted.'

## WHY DOES LAOS STRUGGLE TO CONTROL AND INVESTIGATE ITS CASH SMUGGLING ECONOMY?

In February 2025, the FATF added Laos to the list of 'jurisdictions under increased monitoring'. This so-called 'grey' list is made up of a group of countries that are subject to increased monitoring and enhanced oversight due to deficiencies in their AML/CFT frameworks.<sup>121</sup> Among the reasons provided for this relegation were the significant gaps in the assessment and understanding of the country's risks. In its 2023 mutual evaluation report, the FATF mentioned that Lao 'authorities have low levels of risk understanding across all sectors', as well as an 'absence of a cohesive and coordinated policy, regulatory and enforcement efforts to identify and mitigate risks'.<sup>122</sup>

One of the poorly understood risks flagged in the 2023 mutual evaluation report is the continued widespread use of cash in Laos. Specifically, the report raises concerns about Laos's capacity to respond to border control-related cash smuggling.<sup>123</sup> Despite this, cash smuggling appears to be low on the Lao government's priorities, with most attention paid to reducing the risks of fintech, cryptocurrencies and casinos for organized crime.



**FIGURE 6** Laos's border points and cash smuggling hotspots.

## Cash is still king

According to the GI-TOC's 2025 Global Organized Crime Index, Laos is host to a diverse number of criminal markets that are highly profitable and have a negative influence on nearly all parts of society. This includes widespread human trafficking, environmental crimes, synthetic drugs and financial crimes.<sup>124</sup> Cash is a significant payment modality for criminal networks: it is used to pay bribes to officials, to cover operational expenses for cyber scam operations or to purchase illicit wildlife products and drugs.<sup>125</sup>

Because the origin of cash cannot be easily established, cash transactions escape formal financial monitoring systems and offer criminal networks opportunities to move value in a clandestine manner. Laos's large informal economy (in 2017 the share of informal employment was estimated at 82.9 per cent) also presents significant opportunities for cash smuggling by commingling these funds with legitimate payments to small businesses such as restaurants, bars or entertainment companies.<sup>126</sup> Cash payments are also widely used in casinos, construction and real estate, industries that are considered particularly vulnerable to money laundering in Laos.<sup>127</sup>

The centrality of cash as a payment means for criminal networks is also demonstrated by the large-scale seizures of cash at Laos's borders. An unofficial report received from Lao authorities indicated that between 2024 and 2025, a total of 36 cases of undeclared cash were intercepted at key international border checkpoints in Vientiane, Savannakhet and Khammouane provinces, resulting in the apprehension of 36 individuals involved in smuggling, comprising four Chinese nationals, seven Thai nationals, three Vietnamese nationals and 11 Lao nationals. The most commonly seized currencies included the Thai baht, Chinese renminbi and US dollar, amounting to a total value of US\$614 865. One senior official said that as of September 2025, in that year they had detected 10 cases of undeclared cash 'mostly linked to illegal currency exchange businesses'.<sup>128</sup> These establishments are common in Laos, as the Bank of Laos banned exchange units in commercial banks from selling foreign currency in October 2022 to encourage the use of the kip and halt its depreciation. In January 2023, it revoked the business licences of 113 exchange businesses affiliated with commercial banks.<sup>129</sup>

## Cash smuggling routes and techniques

Laos has 33 international border checkpoints, consisting of land crossings, international airports, railway crossings and waterway checkpoints.<sup>130</sup> Reported incidents indicate that a number of formal checkpoints are commonly used to smuggle cash (see Figure 6). These include the Lao–Thai Friendship Bridges in Vientiane–Nong Khai, Savannakhet–Mukdahan, Khammouane–Nakhon Phanom and Huay Xay–Chiang Khong. Smugglers typically conceal cash in private vehicle compartments, product packaging, engines or luggage.<sup>131</sup>

Wattay International Airport also plays a role in cash smuggling operations, serving as a point where smugglers – primarily Chinese and other foreign nationals – transport undeclared cash to various destinations, often concealing the funds in luggage or on their person.

On the borders with Vietnam and Cambodia, cash smuggling was reported at places such as Cau Treo–Namphao and Naphao–Chalo (both Vietnam) and the Veun Kham–Dom Kralor checkpoint (border with Cambodia). Smugglers frequently conceal money on the bodies of travellers using public transport, as well as in boxes, luggage or hidden compartments within vehicles.<sup>132</sup>

Most of the cash moved into and out of Laos, however, is likely to remain undetected and smuggled across the Mekong River as well as Laos's remote mountainous borders. For example, the Golden Triangle, where Laos, Myanmar and Thailand meet, is known for illegal activities involving large

amounts of cash. Smugglers reportedly move money from Shan State, Myanmar, into Huay Xay, Bokeo Province, near the Wan Pong–Meuangmom checkpoint, taking advantage of the difficult terrain.<sup>133</sup> A former Lao border official explained that organized criminal groups often hire couriers to move Chinese and US currency into Laos, possibly to be used as operating capital or for laundering purposes, while avoiding official border checks.<sup>134</sup> Small boats are used at night along narrow stretches of the river, with the money coming mainly from casinos and drug trafficking in Myanmar. Although both Lao and Myanmar border patrols monitor the river, a Lao senior customs officer said he was aware that smugglers pay bribes to facilitate passage.<sup>135</sup> The payment of bribes at border checkpoints is considered to be common and has been previously reported.<sup>136</sup> Once in Laos, the cash is collected by accomplices and taken by car to cities such as Luang Prabang and Vientiane. A similar method is employed along the Thailand–Laos corridor, with a slight variation: Thai individuals often conceal cash in parcels, which are transported by shuttle boats from Chiang Saen to Huay Xay, where accomplices collect the parcels upon arrival on the Lao side and subsequently transport them to the Golden Triangle Special Economic Zone.<sup>137</sup>

## Laos's regulatory framework

Laos permits individuals to bring cash into and out of the country up to 1 500 000 000 kip, the equivalent of approximately US\$6 934, a figure below international standards of roughly US\$10 000.<sup>138</sup> The Lao Customs Department has the authority to stop, check and seize, and to investigate instances of cash smuggling. It is also obligated to report all suspicious cash smuggling activities with potential links to money laundering, and to communicate investigation results to the Anti-Money Laundering Intelligence Office.

In theory, any amount of money exceeding the legal limit brought into Laos must be declared to customs officers at the border checkpoint. Likewise, taking large sums of money out of Laos requires prior approval from the Bank of Laos.

The Ministry of Finance's 2025 Instruction on Anti-Bulk Cash Smuggling and Money Laundering Measures, No. 0276/MOF, states that individuals who violate these regulations or wilfully fail to report cash will be fined 50 per cent of the excess amount for a first offence, with the penalty doubling for repeated offences. However, this appears to be in conflict with the Law on Foreign Currency Control (2022), which stipulates a fine of 10 per cent of the excess amount when the total cash exceeds 10 000 000 kip (approximately US\$450). In addition, the Penal Code (2017) states that offenders may face imprisonment for a term of six months to two years for misdeclaration (penalties for money laundering are higher).<sup>139</sup>



In practice, if a false declaration at a border is made, authorities may ask travellers to prove the lawful origin of their funds in the form of bank statements, invoices, contracts or employment records to determine connections to money laundering or terrorist financing. As one customs officer explained, 'When we detect a case of cash smuggling, we first detain the individual and record all details of the incident. The undeclared money is temporarily seized for investigation and, if not linked to money laundering, we impose a fine and return the remainder.'<sup>140</sup> Fines seem the most common practice, as all 36 seizures made between 2024 and 2025 were resolved through the imposition of administrative fines.

Cases with potential links to money laundering are supposed to be referred to the police or other relevant authorities. However, to date, no detected cash smuggling case has been found to be associated with money laundering or the financing of terrorism, and no case has been fully investigated or prosecuted. This observation is corroborated by a Lao senior justice official, who said that fines are typically applied as a 'friendly' measure.<sup>141</sup> Another officer explained that although the law grants authorities the power to pursue criminal prosecution, 'since 2020, no cash smuggling case files have been referred to the Economic Police Department'.<sup>142</sup>

## Keeping cash smuggling on the agenda

The FATF grey-listing has created a much-needed incentive to strengthen cooperation on anti-money laundering issues, and a working group is supporting Laos through this process. Going forward, when laws are updated in accordance with FATF guidelines, it is critical that these are harmonized and responsible officers fully understand the applicable regulations. There is an urgent need to build the capacity of border control agencies, particularly customs, to conduct stops, checks and seizures and to investigate cases of cash smuggling, corruption and related money laundering.

Laos has much to achieve in terms of anti-money laundering measures and cash is just one of many vulnerabilities. Any progress made internally needs to go hand in hand with international support that helps authorities investigate cash smuggling and trace seizures, to better understand how criminal groups obtain such large quantities of local currencies and how the cash is subsequently used. Promoting financial inclusion by increasing availability of formal banking services can also help reduce the informal economy and thereby reduce the opportunities for criminal groups to exploit it. ■

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## **GLOBAL INITIATIVE**

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