EGMONT GROUP
OF FINANCIAL INTELLIGENCE UNITS

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INFORMATION EXCHANGE WORKING GROUP

BULLETIN

# ILLEGAL WILDLIFE TRADE

## Egmont Group

Information Exchange Working Group

The purpose of this bulletin is to support Financial Intelligence Units (FIUs) in recognizing financial transactions suspected of being related to the illegal trade in protected wildlife the laundering of associated proceeds. The red flag indicators, typologies/modus operandi, and case studies can help identify suspicious financial activity and high-risk factors linked to these crimes, and in turn to better detect, disrupt, and prevent related money laundering and predicate offences.

# Egmont Group Information Exchange Working Group

## Environmental Crimes Bulletin: Illegal Wildlife Trade

## INTRODUCTION

Illegal Wildlife Trade (IWT) refers to any form of trade, smuggling, hunting, capture, or forced removal of protected or threatened wildlife, along with their derivative products, carried out unlawfully. [1] To clarify the boundaries of what is considered illegal under international governance, it is important to refer to the regulatory framework governing cross-border wildlife trade. The Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) emphasizes that trade is considered illegal when it is conducted without valid permits or in violation of applicable domestic and/or international law, particularly in relation to species listed in the CITES Appendices. [2] This scope includes live animals as well as body parts, specimens, and derivative products, and may also cover other species that are protected or threatened under national regulations.

The motives behind IWT can vary. Some are economic, aimed at generating profit from the sale of wildlife and their derivatives, which are often highly valuable. Other motives include personal consumption, as well as the ownership of exotic animals and their derivatives as status symbols or hobbies, each of which has its own niche market with a continuous flow of transactions. This trade is also often sustained by networks of intermediaries that form long and global supply chains, involving multiple layers of actors ranging from hunters, collectors, and those providing facilities to logistics, cross-border intermediaries, distributors, and end sellers. IWT schemes often go beyond a simple seller-buyer relationship; rather, they constitute a criminal ecosystem that exploits various transaction channels and shipping routes to expand market reach.

Financial Intelligence Units (FIUs) play a critical role in detecting, disrupting, and combating illegal wildlife trade (IWT) by applying a follow-the-money approach that uncovers the financial infrastructure behind these crimes. By analyzing suspicious transaction reports, cross-border financial flows, and beneficial ownership data, FIUs can identify networks that facilitate the laundering of proceeds from wildlife trafficking, often linked to transnational organized crime. This financial intelligence enables authorities to move beyond low-level seizures and target higher-value actors, including financiers, intermediaries, and complicit businesses. Through domestic coordination and international information exchange, particularly within platforms such as the Egmont Group, FIUs enhance the ability to trace illicit profits, freeze assets, and support investigation as well as prosecutions, thereby weakening the economic incentives that sustain illegal wildlife trade.

Based on data from the Wildlife Trade Portal, Asia and Africa have been identified as hotspot regions for illegal wildlife trafficking over the past five years. Southeast Asia itself has a considerable number of hotspots compared with other regions across Asia and Africa. The region serves as a source, transit, and destination for illegal wildlife trade, both domestically and across borders. Referring to an OECD report, criminal networks exploit and take advantage of gaps in

[1] ECOFEL. 2021. *Financial Investigations into Wildlife Crime*.

[2] CITES Secretariat. 2017. *The international dimension of illegal wildlife trade*. Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)

the regulations and legal systems of Southeast Asian countries. In this region, wildlife is also consumed, processed, and then sold to countries such as China and other Asian nations.

## What Makes This Crime Financially Distinct?

From a financial perspective, IWT has a relatively distinctive "fingerprint" compared to other forms of environmental crime. First, the commodities involved are often high value but low volume, making them easy to move and frequently driving payment patterns that are fragmented, staged (e.g., down payments and final settlement), and routed through intermediaries to reduce the exposure of key perpetrators. Second, there is often a significant mark-up from source to destination countries, meaning proceeds of crime tend to rise sharply downstream, and larger-value financial activity may appear closer to end markets or key distribution nodes. Third, IWT supply chains are typically layered (hunters–collectors–brokers–logistics facilitators–buyers), so financial flows often reflect role separation through the use of third-party accounts (nominees/financial keepers), chained transfers, and repeated cash-outs. Fourth, IWT frequently relies on permits and documentation (including domestic authorisations and, for cross-border movements, CITES-related documentation), so inconsistencies between shipping/permit documentation and payment patterns, parties involved, or routing can serve as important financial indicators for early detection.

## Why Disruption is Important

IWT is not merely a conservation issue, but an organized transnational crime that generates substantial proceeds of crime, fuels corruption, and threatens biodiversity. At the same time, perpetrators exploit loopholes in both the financial and non-financial sectors to move, conceal, and launder criminal proceeds, ultimately undermining the integrity of the financial system.

From a law enforcement perspective, enforcement actions that target only field-level perpetrators are often insufficient to break the chain of organized and transnational crime. Therefore, "follow the money" approach is crucial to tracing financial flows, identifying financiers, controllers, and network nodes across different regions or countries, while also reducing the incentives and profitability of the crime. This effort also strengthens the basis for freezing, confiscating, and recovering criminal assets, so that disruption occurs not only at the operational level, but also in the network's financial capacity to survive and adapt.

## Crime Convergence and enviro crime topic

Illegal Wildlife Trade is a transnational crime involving organized cross-border networks. Various reports emphasize that IWT generates substantial profits, fuels corruption, and enables perpetrators to exploit weaknesses in both the financial and non-financial sectors to move, conceal, and launder criminal proceeds, ultimately strengthening the resilience of criminal networks. [3]

IWT networks also often share the same smuggling routes, concealment methods, and logistics infrastructure as other crimes. INTERPOL has noted that wildlife crime networks are often involved in multiple crime areas simultaneously and may use the same routes to smuggle both wildlife and other illegal commodities. [4] In Southeast Asia, an OECD study highlights the high risk of corruption at points of entry and exit, including airports, seaports, and land borders, as well as the potential involvement of both public- and private-sector actors in smuggling schemes. These

[3] FATF. 2020. *Money Laundering and the Illegal Wildlife Trade*. Paris: FATF/OECD.
[4] INTERPOL. 2020. *Wildlife crime: closing ranks on serious crime in the illegal animal trade*.

findings are consistent with the results of PPATK's 2020 strategic analysis entitled *"Risk Assessment of Money Laundering and Terrorism Financing from Flora and Fauna Crimes,"* which identified several indicators of suspicious financial transactions linked to corrupt practices. These indicators include the following:

- A customer or service user with the profile of a pet shop owner or another wildlife-related business owner maintains an account at a financial institution in a currency denomination other than that of the country, despite having no business relationship with the country of that currency.
- The use of Latin names derived from species names, species names themselves, and/or regional names in transaction descriptions. Transactions of this kind are commonly found in invoices for imported goods.
- Routine transactions occurring in areas known for wildlife trade.
- Transfers of funds from parties indicated as part of international illegal wildlife trafficking syndicates to several government officials suspected of receiving bribes related to licensing, trade activities, and field-level actors involved in the trade of protected wildlife.
- The appearance in domestic or foreign media of parties connected to a customer's transactions, indicating that they are involved in wildlife crime.
- A combination of transaction descriptions indicating the purchase and sale of wildlife.

As a complement to the law enforcement process, non-governmental organizations (NGOs) also contribute by serving as an early warning mechanism and as providers of information to map the broader networks involved in illegal wildlife trade, including actors, roles, routes, and facilitators. In one example, a report from an NGO was used to uncover alleged cross-border smuggling between Indonesia and Thailand, involving not only protected wildlife but also their derivative commodities.

NGOs generally work through an OSINT-based approach, complemented by deeper inquiry and field verification, for example through photographic documentation of findings and the collection of information on locations, routes, and smuggling corridors. Information of this kind can enrich the analysis conducted by FIUs and law enforcement agencies in mapping networks, identifying the roles of perpetrators, and understanding patterns in the movement of goods and funds. However, before being used for further action, such findings should still be treated as preliminary indicators and validated through cross-checking against primary data, such as financial transaction reports, licensing data, and other official sources.

# TRENDS AND TYPOLOGIES

## Jurisdictional differences and similarities with respect to enviro crime topic

IWT exhibits different patterns across jurisdictions because each country may occupy a different position in the supply chain, have varying legal frameworks and enforcement capacities, and face different levels of exposure to cross-border trade and financial infrastructure. In Southeast Asia, jurisdictions generally perform a combination of roles as source, transit, and destination countries.

Broadly speaking, differences across jurisdictions can be seen in the following areas:

1. **Position in the trade supply chain**:

   A jurisdiction's position as a source country in the IWT supply chain is generally dominated by the hunting/capture phase and the initial stage of collection. At this stage, wildlife is captured by field-level actors and then handed over to collectors or intermediaries to be passed along to the next network tier, meaning that the capture actors generally do not have direct contact with end buyers. Transaction patterns at this level tend to rely on cash payments due to the limitation of banking access since the supply chain often originate in remote areas, with transaction values ranging from small to medium, in line with the characteristics of upstream transactions.

By contrast, destination countries are characterized by strong end-market demand for wildlife and their derivatives, so the value of commodities at this stage tends to increase and drives a greater circulation of funds than at the upstream level. In the FATF report *Money Laundering and the Illegal Wildlife Trade*, it is noted that significant mark-ups occur between source countries and destination countries, causing the proceeds of crime at the destination stage to become much higher.

2. **Differences in legal frameworks and in the definition of illegality in wildlife trade**:

   Differences exist across jurisdictions in defining protected species, the level of sanctions, licensing obligations, and the extent to which wildlife crimes are treated as predicate offences for money laundering. This arises because CITES is implemented through national law, meaning that standards and the scope of prohibitions may vary from one country to another.

   FATF emphasizes that CITES is implemented in accordance with each country's national legislation, and trade conducted in violation of such legislation is considered illegal. There is also variation among countries, including those that adopt stricter domestic measures; therefore, reference to the national law of the relevant country remains crucial. OECD notes that within the CITES framework there is no obligation to harmonize sanctions, so each country determines its own controls and penalties for CITES enforcement.

   In practice, these differences may be seen in:

   (i) the list of protected species (for example, CITES-listed species that have not yet been included in the national list, making domestic enforcement difficult),

   (ii) the scope of licensing/exemptions and oversight mechanisms, and

   (iii) the strength of the sanctions imposed.

   all of which ultimately weakens the deterrent force of enforcement.

3. **Differences in money laundering methods used for criminal proceeds**:

   These differences are generally influenced by a country's position in the supply chain and ease of access to payment channels and financial services. Many jurisdictions report that IWT perpetrators still rely on common methods that have been widely identified through the formal financial sector, namely cash deposits, e-banking, MVTS, and third-party wire transfers. Perpetrators also frequently use intermediary accounts and structure transactions to avoid threshold-based detection.

Regardless of the differing roles that each jurisdiction plays in the supply chain, there are several recurring patterns commonly found in IWT practices:

- Corruption often serves as an enabling factor that facilitates the smooth operation of the supply chain, particularly at strategic points such as seaports, airports, and border crossings, while also expanding opportunities to exploit legal loopholes and supervisory weaknesses.
- IWT networks consistently use cargo concealment techniques and document manipulation, ranging from false goods declarations to forged or inaccurate shipping documents, to obscure the origin, routes, and parties involved.
- There is a growing tendency to use closed digital channels to accelerate communication and contact between sellers and buyers, expand market reach, and increase the scale of networks as well as the complexity of tracing transactions and shipments.

Regionally, Southeast Asia is regarded as an important hotspot because of its role as a source, transit, and destination region. OECD estimates that the ASEAN region contributes significantly to the global market and serves as a route to major consumer markets in Asia.

Comparable cross-border financial patterns are also observed in other regions, including Latin America. Available financial intelligence indicates that illegal wildlife trade (IWT) transactions frequently involve both domestic and international components, underscoring the transnational nature of the activity. While a significant share of transactions may occur domestically, a notable proportion involves cross-border flows, reflecting the connection between source regions and international demand markets through fragmented and geographically dispersed financial channels.

Analysis also points to consistent financial linkages with jurisdictions in Asia, particularly key trading hubs, alongside connections to Europe, North America, and other parts of Southeast Asia. This distribution highlights the role of global financial systems in facilitating IWT and reinforces the position of Asia as a major destination and financial node within global trafficking networks.

From a financial sector perspective, reporting patterns suggest that formal banking institutions account for the majority of detected transaction values, while money transfer services and other intermediaries play a secondary but still relevant role. This reflects a broader pattern observed across regions, whereby higher-value transactions—typically associated with later stages of the supply chain—are more likely to pass through formal financial channels, even when earlier stages rely on cash or informal methods.

The typologies identified further align with commonly observed global money laundering techniques associated with IWT, including structured deposits and transfers aimed at obscuring the origin of funds, as well as trade-based mechanisms such as fictitious imports or exports and misrepresentation of goods. These methods demonstrate how criminal networks exploit both financial institutions and international trade systems to move and integrate illicit proceeds.

Finally, the use of widely accessible financial products, including savings and checking accounts, alongside transactions linked to asset purchases and notarized activities, illustrates how illicit proceeds are integrated into legitimate economic activity. This reflects a broader global trend in which IWT-related funds are laundered through routine financial instruments and commercial sectors, thereby increasing the complexity of detection and necessitating enhanced cross-sectoral monitoring.

## Industries involved in environmental crime topic

**Key actors/entities (typical roles across cases):**

- **Source country:** hunters, trappers, local collectors, intermediary brokers.
- **Transit country:** transport service providers, couriers, warehouse/storage providers, document handlers.
- **Payment segment:** third-party/nominee account holders, financial keepers, actors conducting layering through intermediary accounts, transfer service providers.
- **Sellers and buyers:** end traders, collectors/exotic animal hobbyists, consumers/users of derivative products.

IWT perpetrators often make use of borrowed or nominee accounts, payment intermediaries, and shipments through legitimate courier services to disguise their activities. They use social media and encrypted applications for transactions and communication. These illegal goods are disguised as lawful goods and are accompanied by falsified documents.

**Sectors/entities that may be unwittingly involved (at-risk):**

- Logistics/courier companies, warehousing service providers, and general import-export traders, particularly where documents and the nature of the goods are easy to manipulate.
- Online platforms that facilitate payments.

# Flow of Funds/Money Laundering Methods

### *1. Layered networks and intermediary-based transactions*

Wildlife trafficking chains generally operate through layered networks with a division of roles ranging from hunters/trappers, collectors, and logistics intermediaries to end buyers. In many cases, key perpetrators deliberately distance themselves from direct transactions by using intermediaries to receive payments and arrange distribution. As a result, communication, price negotiations, and shipping arrangements do not always take place directly between sellers and buyers, nevertheless are often facilitated through intermediaries.

From a financial intelligence standpoint, IWT is characterized by a hybrid laundering architecture:

- Front-end opacity: cash, informal transfers, fragmented payments
- Mid-layer disguise: shell companies, the use of TBML methods
- Back-end integration: assets, cross-border flows, financial system entry

### *2. Shifts in payment patterns and the use of third-party accounts*

At the upstream stage, funds flowing from collectors and end buyers to hunters/trappers or initial collection networks are still generally dominated by cash transactions. As commodities move to higher levels of the network and involve inter-regional and cross-border distribution, payment patterns tend to shift toward formal channels, such as bank transfers, e-banking, payments through virtual accounts, or other instruments that are more practical for long-distance transactions. In this process, syndicates often use third-party (nominee) accounts in the names of family members, relatives, or other individuals to receive sales proceeds, so that the main perpetrators do not appear as the recipients of funds, even though control over the transactions remains with the true beneficial owner. Syndicates also use aliases to disguise the actual goods in transaction descriptions.

### *3. Concealment of financial flows and integration of criminal proceeds*

After funds enter collection accounts, perpetrators conceal financial flows by rapidly transferring funds, within one or several days of receipt, into many other accounts, in amounts ranging from thousands to hundreds of thousands of dollars. In addition, transfers are also made to virtual accounts belonging to related parties, such as family members, close relatives, or other people connected to the illegal wildlife trafficking syndicate. These concealed funds are then withdrawn in cash, used to pay operational expenses such as electricity bills and mobile phone credit, and used to purchase assets, so that the criminal proceeds gradually become integrated into normal economic activity and appear as though they originate from legitimate sources.

### *4. Use of legitimate logistics channels as camouflage.*

Wildlife trafficking is inherently cross-border, thus the IWT perpetrators may apply trade-based money laundering schemes for co-mingling the legal and illegal goods to make detection far more difficult. In terms of, international trading mechanism, shipments may make use of courier services, air or sea cargo, or other delivery channels, accompanied by disguised cargo and/or inaccurate documentation. This means that case detection often requires a combination of financial documentation (bank statements, SWIFT messages, letter of credit, trade finance agreement, proof of payment, etc.), trade documentation (commercial invoices, bill of lading, certificate of origin, customs declaration, shipping manifest, etc.), corporate and beneficial ownership documents, and other related documents. Perpetrators also use transportation services facilitated by shell companies, with formally prepared export-import application documents that do not match the actual cargo. They may also cooperate with cargo carriers, whether by ship, aircraft, or other modes of transport, where cargo is deliberately left unsupervised.

### *5. Further concealment efforts when law enforcement risk increases.*

FATF identifies purchase of high-value assets as a common laundering method. The integration on high-value assets such as real estate, luxury vehicles, gold/jewellery, etc., is a typical way to preserve the value. Furthermore, when the risk of law enforcement action increases, perpetrators engage in further concealment measures to obscure the link between assets and the origin of their funds. In terms of money laundering cases originated from IWT, perpetrators may entrust the proceeds of crime (e.g. property, motorcycles, etc.) and their ownership documents to other parties, then request sale-and-purchase receipts that do not reflect the true circumstances, so that the assets may appear to have been legitimately transferred. And when the assets are sold, yet the sale proceeds are directed into another person's account, and the transaction documentation is made to disguise the beneficial owners. This pattern reflects a post-crime concealment strategy aimed at distancing the principal perpetrators from the assets and proceeds, while obstructing efforts to trace the connection between the property and the predicate offence.

The following is an example of good practice from Indonesia in handling a money laundering case arising from IWT-related crimes, which was proven in court and led to a three-year prison sentence for the defendant, M. Ali Honopiah (MAH), with the case overview as follows:

## CASE STUDY 1 (Indonesia)

## Pangolin Trafficking: The Use of Nominee Accounts, Layered Transfers, and Repeated Cash Withdrawals

Use of Nominee Accounts, Layered Transfers, and Repeated Cash Withdrawals

In an operational case involving the illegal trade in protected wildlife products, financial analysis identified an unusual pattern of fund flows through a bank account held in another person's name. Under the scheme, the principal offender, hereafter referred to as INDIVIDUAL 1 (MAH), obtained wildlife products through supplier and collector networks in a source jurisdiction and sold them to a cross-border buyer, hereafter referred to as FOREIGN BUYER 1. FOREIGN BUYER 1 was found to have exchanged foreign currency into local currency and directed the funds to several domestic accounts, including a nominee account.

The nominee account was held by a relative or close associate of INDIVIDUAL 1, hereafter referred to as INDIVIDUAL 2 (ZAB), and received funds through a combination of cash deposits and electronic transfers from several parties and intermediaries. Although the account was not formally held in the name of INDIVIDUAL 1, the transaction pattern indicated that it was used to receive and manage proceeds derived from the illegal wildlife trade.

Over a period of several months, the nominee account received substantial incoming funds across multiple transactions linked to illegal wildlife trade proceeds. Part of the funds was subsequently transferred from the nominee account to accounts controlled by or connected to INDIVIDUAL 1 through electronic banking channels. This pattern reflected the layering stage, as it helped obscure the direct link between the source of funds and INDIVIDUAL 1 while breaking up the flow of funds across multiple accounts.

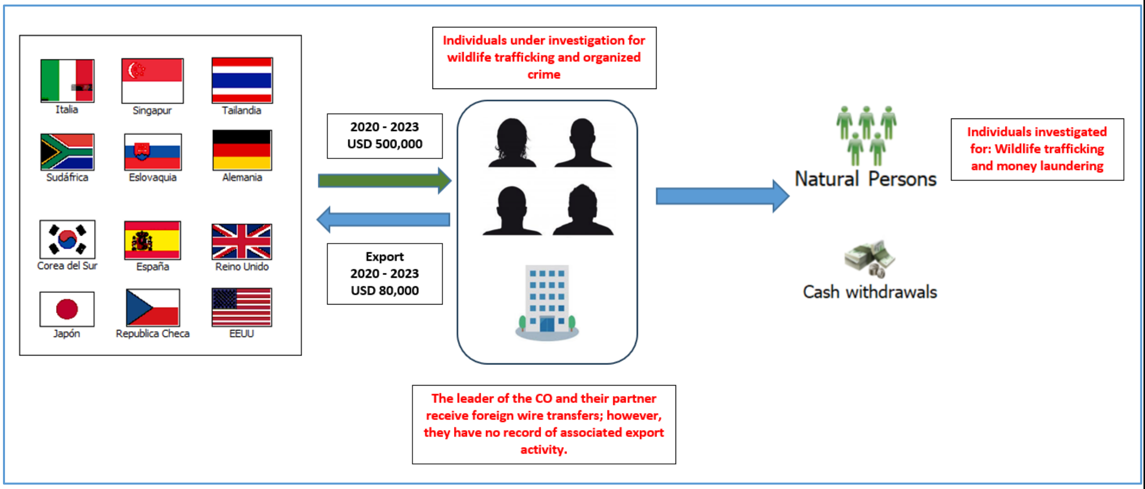
The nominee account was also used for repeated cash withdrawals through ATMs and bank tellers. This cash-out activity converted funds from account-based form into physical cash, making further tracing more difficult. At the integration stage, funds from the nominee account were used for seemingly ordinary expenses and asset-related payments, including vehicle-related payments and accommodation costs. These transactions reflected the integration of criminal proceeds into routine consumptive and asset-related activity.

When the risk of law enforcement action increased, INDIVIDUAL 1 undertook additional steps to obscure the connection between the assets and the origin of the funds. In particular, an asset and its ownership documents were entrusted to another party, and a sale-and-purchase receipt was prepared in a manner that did not reflect the true circumstances of ownership. The asset was later sold, but the sale proceeds were directed into another person's account, with the transaction documentation prepared as if that person were the seller. This pattern demonstrates a post-crime concealment strategy intended to distance INDIVIDUAL 1 from the assets and proceeds, while obstructing efforts to trace the link between the property and the predicate offence.

Relevant ML indicators identified in this case include:
- A personal account held in another person's name received large and repeated credits linked to illegal wildlife trade proceeds.
- The involvement of a foreign party conducting currency exchange and directing transfers to domestic accounts, indicating cross-border value movement.
- Incoming funds through a combination of cash deposits and electronic transfers from parties and intermediaries, suggesting separation of roles between the principal offender, intermediaries, and the receiving account.
- Layered transfers from the nominee account to accounts controlled by or connected to INDIVIDUAL 1 through electronic banking channels.
- Repeated cash withdrawals through ATMs and bank tellers, indicating cash-out activity intended to make further tracing more difficult.

• Use of funds for asset-related payments and routine consumptive expenses, indicating the integration stage.
• Further concealment of assets through inaccurate transaction documentation and the direction of sale proceeds into another person's account when enforcement risk increased.

## CASE STUDY 2 (Peru)




Summary

This typology provides information about a criminal organization (CO) that was investigated for wildlife trafficking and other organized crimes. The network illegally exported sloths, anteaters, capybaras (ronsocos), and other species to Europe and Asia using fraudulent permits from Peru.
Between 2020 and 2023, this criminal organization, along with its corporate vehicles, received foreign wire transfers totaling USD 500,000; however, they only declared exports amounting to USD 80,000. Furthermore, it was detected that the leader of the CO and their partner received foreign wire transfers without any record of associated export activity.
This CO used the received funds to execute transfers to individuals under investigation for wildlife trafficking and money laundering. These individuals are presumed to be the suppliers of the species for the organization. Additionally, some of the funds received from abroad were withdrawn in cash.

Red Flags

- Wire transfers from Asia or Europe (the primary destinations for wildlife trafficking) to individuals or sole proprietorships in Peru that are the subject of ongoing investigations or negative news reports.
- Foreign wire transfers to Peru in favor of individuals or entities with no record of foreign trade activity.
- There are discrepancies between the FOB value of exports and the volume of foreign wire transfers received.
- Immediate cash withdrawals / rapid cash-outs.
- Export of species protected under the CITES convention.
- Shareholder profiles are inconsistent with the volume or value of declared exports.
- Financial transactions involving individuals linked to environmental crimes.

## Red Flags - Financial Indicators

### A. Customer Profile & Behavior

- Individuals are the dominant high-risk profile in money laundering related to the illegal trade in flora and fauna.
- Customers with profiles such as pet shop owners, wildlife business operators, logistics/shipping providers, farmers, or breeders, but who maintain foreign currency accounts that do not correlate with their business activities.
- The use of third parties (nominees/family members/relatives/"financial keepers") to receive payments or hold funds.
- Government Official (wildlife protection, forestry, customs/border authorities) who show large cash deposits/withdrawals or unexplained wealth.
- Convergence with other crimes and shared financial infrastructure. Same IWT accounts/networks are also used for drug trafficking, fraud, corruption or tax evasion.
- Customers profiled as shipping or logistics/delivery companies whose transactions do not reflect their stated business activities.
- Customers who open bank accounts, but whose other identifying information, such as phone contact details and email addresses, are not registered in their own names.

### B. Transaction & Account Activity

- Perpetrators make payments to collectors through "TRF/PAY/TOP-UP ECHANNEL" methods.
- Payments are cash-based at the upstream level (hunters/farmers acting as collectors), but shift to cash, bank transfers, or mobile apps at the end-buyer stage; syndicates pay collectors through unlicensed money remittance services or formal banking channels.
- The use of borrowed accounts, nominee accounts, or "collection accounts" (for example, joint accounts) to receive funds and separate the principal perpetrators from the receipt of proceeds.
- Cash deposits and withdrawals are "structured" into specific amounts and conducted repeatedly.
- Unusual or disguised transaction references, including the use of Latin species names, local species names, or place names in transaction descriptions.
- Routine transaction activity in flora and fauna trade hotspot areas (a geospatial indicator), especially when inconsistent with the customer's employment or business profile.
- Incoming funds are predominantly received from international money transfer service providers in significant amounts that are inconsistent with the customer's profile.
- Transactions with parties linked to transnational illegal wildlife trade networks.
- Outgoing or incoming fund transactions containing descriptions of the wildlife being traded, for example, "bird," "type of bird," "skull," or "bear."

# RESOURCES:

**CITES (2011)**. *Standing Committee 61, Geneva: Conservation of and Trade in African and Asian Rhinoceroses*.

**CITES Secretariat (2017)**. *The International Dimension of Illegal Wildlife Trade*.

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