

How Organised Crime Operates Illegal Betting, Cyber Scams & Modern Slavery in Southeast Asia



Table of Contents

How Organised Crime Operates Illegal Betting, Cyber Scams and Modern Slavery in Southeast Asia

1

Executive Summary

3

Background

5

About the Asian Racing Federation Council on Anti-Illegal Betting and Financial Crime

5

About the Mekong Club

5

About illegal betting and human trafficking

5

Methodology

5

1. Human Trafficking

6

How does it occur?

6

Fraud and deception

7

Debt/credit bondage

7

Selling of people

8

Kidnapping

8

Threats and violence

9

The 11 Indicators

9

2. Illegal Betting and Organised Crime

11

Definitions and terminology

11

Why Asia is a hub for illegal betting

11

The spread of organised crime linked to illegal betting across Asia

12

3. How Human Trafficking in Asia is Linked to Illegal Betting

15

4. Regional Examples and Case Studies

18

The Philippines

18

Cambodia

22

Myanmar

27

Laos

31

5. Conclusion

36

Acknowledgements

38

Executive Summary

This report examines human trafficking linked to organised crime groups involved in illegal betting and related criminal activity in four key regions in Southeast Asia. Research was primarily via desktop information gathering conducted in 2022/23, supplemented by the expertise and existing knowledge of the Mekong Club and the Asian Racing Federation Council on Anti-Illegal Betting and Related Financial Crime in human trafficking and illegal betting, respectively.

Key findings are:

- Tens of thousands of people are being held in modern slavery conditions to work in organised illegal betting and cyber-scams across Southeast Asia.
- These operations, which are run by individuals with long histories of involvement in illegal betting and organised crime across Asia, are estimated to make at least USD 40 to 100 billion a year in illicit profits from such activity.
- Some individuals are recruited on false job advertisements, have their passports removed and are kept in dormitories attached to fully contained casino compounds as forced labour to promote illegal betting websites and engage in industrial-scale cyber-fraud such as “pig butchering”, romance scams, and cryptocurrency Ponzi schemes.
- Workers are typically not permitted to leave without paying large ransoms to their captors, and can be sold and traded between organised crime groups. Fines for breaking rules or failing to hit monetary targets are added to victims’ ransoms.
- Reports on victim testimony and online video shows “staff” being beaten with iron bars, shocked with cattle prods, tied up, and subject to other forms of torture. Female victims have been forced into sex work for failing to meet targets.
- The groups running such operations have been active in organising and promoting gambling across Asia since at least the 1990s. Because many of the core activities in this business (e.g., movement of money across borders, violent debt collection, bribery of local officials, provision of related “entertainment” such as narcotics and sex), are illicit, such operations have by necessity been closely associated with, or directly run by, individuals with organised crime backgrounds.
- In the early 2000s, this business was supercharged by the development of online gambling (both casino games and sports betting), run directly out of existing casinos or related properties, which massively increased the target market, and has grown to be a trillion-dollar illegal industry funding organised crime.
- Attempts to profit from this by governments in Southeast Asia, typically by licensing operators for a fee, have led to the spread of such operations across the region and had major negative impacts, including widespread corruption. It has also concentrated operations in self-contained compounds and so-called special economic zones which local police are often unwilling or unable to enter or investigate.

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- Hundreds of thousands of workers are required to serve the industry in marketing, customer recruitment, funds transfers, tech support and related fields.
 - Pre-pandemic, demand for workers was usually satisfied by voluntary means, although an unknown percentage of “voluntary” arrivals were held in modern-slavery like conditions, and there were related human trafficking aspects such as trafficking of sex workers to serve the industry.
 - This began to change in 2018 as a result of China’s growing concern over cross-border illegal betting, and change was accelerated massively by travel restrictions due to the pandemic, which cut off the supply of workers.
 - At the same time, the organised criminal groups had a key business line – land-based casinos – essentially closed down because of travel restrictions. As a result, they greatly expanded and developed existing cyber-scam operations, leveraging their expertise and technology in areas such as social media marketing, customer recruitment and cryptocurrency, which were in place from their online illegal betting operations.
 - Now, as the pandemic recedes, the organised crime groups running these operations have, in effect, hugely increased their potential revenue by complementing illegal betting with cyber-scam operations of comparable scale.
 - The success of such operations has been an enormous financial boon to organised crime, for whom cyber scams and illegal betting are just two of many illicit business lines that include money laundering as a service, illicit wildlife trafficking and production and distribution of methamphetamine and heroin.
 - The vast profits from such operations have provided plentiful ammunition to corrupt local authorities, and the operations in this group are frequently protected by powerful politicians and/or armed militias.
 - Global attention on the issue has not eliminated this activity, just displaced it into even more vulnerable jurisdictions, leading some to fear the industry could lead to geopolitical instability.

About the Asian Racing Federation Council on Anti-Illegal Betting and Financial Crime

The Asian Racing Federation Anti-Illegal Betting Taskforce was established in 2017 and now comprises 24 members from organisations engaged in horse racing and sports integrity, law enforcement, the UNODC, and academia.

In 2020, the Taskforce was renamed as the ARF Council on Anti-Illegal Betting and Related Financial Crime (“the ARF Council”), whose purpose is to foster and enhance international cooperation among horse racing operators, regulators, intergovernmental organisations and government agencies in order to better combat the threat of illegal betting and other financial crimes to horse racing integrity in particular, and sport in general.

About the Mekong Club

The Mekong Club is a non-profit organisation founded by CEO Matt Friedman in 2012 that focuses on working with the private sector to address modern slavery and related crimes, such as human trafficking and forced labour.

About illegal betting and human trafficking

This joint report by the ARF Council and Mekong Club focuses on human trafficking connected to organised criminal enterprises in Southeast Asia, highlighting the role of illegal betting as a key revenue stream supporting this criminality.

Illegal betting is one criminal enterprise of such groups, but not the only one – so-called “pig butchering”, cryptocurrency frauds, wildlife trafficking, money laundering as a service, drug manufacturing and distribution are among others.

But a key point is that the vast profits generated by illegal betting support other criminality. And when the traditional illegal betting business model of such operators was disrupted by the pandemic, they had capital and technology from illegal betting to quickly pivot to or expand related modes of criminality, such as online and crypto fraud.

This report explores these factors with case studies from four key regions – the Philippines, Cambodia, Myanmar and Laos.

Methodology

This report is primarily based on open-source desktop research and relies heavily on the excellent work carried out by on-the-ground journalists and NGOs in the region (see Acknowledgements).

1. Human Trafficking

Human trafficking is the recruitment, transportation, transfer, harbouring or receipt of people through force, fraud or deception, with the aim of exploiting them for profit. This global crime involves more than 50 million victims worldwide, including men, women, and children.

Human trafficking victims can be found in a wide range of industries. Many victims are forced into sex work (otherwise known as sex trafficking), while others are forced into labour on construction sites, on farms, in factories, or as cleaners. A significant number of industries across the world are impacted, with victims often hidden in plain sight.

Typically, human traffickers target vulnerable groups within society. These may be migrant workers in low-paid, high-risk industries, refugees or displaced people, or people with mental or physical disabilities. Traffickers will exploit these vulnerabilities for their own gain.

Often, the criminal groups that are engaged in human trafficking are operating cross-border. They are also often involved in multiple criminal activities such as drug smuggling, counterfeit goods, racketeering, and money laundering. In many cases, these criminals will use their victims to facilitate these crimes, for example by forcing victims to assist with dealing drugs, carrying drugs across borders, or laundering funds.

This report primarily focuses on one aspect of human trafficking in Southeast Asia: the trafficking of individuals to support the online illegal betting and related cyber-crime and scam industry.

Due to its nature, human trafficking is also often referred to as “modern day slavery”.

How does it occur?

A survivor’s story – a Bangladeshi victim exploited in Malaysia:

“Back home in Bangladesh, a recruitment agent offered me a job in an oil plantation in Malaysia. He told me that I could easily pay back the USD 1500 recruitment fee that I needed to buy my place on the plantation. While I knew that the work was illegal, I needed the money so I accepted.

“When I arrived at the plantation I had to sleep on the floor. I was forced to work 16 hours a day, seven days a week, using dangerous chemicals with no safety equipment. My boss deducted most of my wages without giving me a reason, I was earning no money. After seven months I developed severe health problems. My family were told, if I was to come home alive, they would have to pay off my debts before I could leave.”

This is one of millions of stories of exploitation and abuse. Each case is different, but most human trafficking cases share common themes and patterns. Traffickers often exploit their victims using the following methods:

Fraud and deception

The most common approach traffickers use to recruit and secure victims is fraud and deception. About 90% of cases fall into this category. Traffickers gain a person's trust and lie about a possible employment or life opportunity. They might offer a young, vulnerable person who faces hardship and poverty the one thing that seems completely out of reach: a better life, an easier life, or a life that will benefit not only them but also their entire family. They offer a dream, with little or nothing asked for in return.

Whether such promises relate to a good-paying job or a good marriage, the messages are nearly always the same: "If you do what I say, if you trust me, then your life will be infinitely better. Not sometime in the distant future, but today! Right now!" For those who seldom have access to any options at all, such offers are too tempting to pass up. They don't realise these fraudulent opportunities come with a price.

A survivor's story – a Hong Kong victim exploited in Myanmar: ⁴

"I was in Thailand and agreed to take a job recommended by a Chinese acquaintance. After I flew to Mae Sot in Thailand in April 2022, armed soldiers took me to a camp in Myanmar.

"There were more than a dozen companies engaged in all sorts of scams, some involving gambling.

"I immediately asked to leave but they demanded a ransom I could not afford. I had to work 13 hours a day for four months ... eventually I got out after a friend paid them tens of thousands of Hong Kong dollars."

Debt/credit bondage

In this situation, traffickers enslave and hold a victim in place through one of two key mechanisms involving money: debt bondage or credit bondage. Debt bondage is a situation where advances in cash are paid from the trafficker to the victim, their family, or to others, which the victim must work to pay off. Whether through force, physical or mental abuse, or other coercion, the victim is maintained at the exploitation site until the debt is satisfactorily paid.

Many times, the lender uses false accounting methods or charges excessive interest, to ensure that the loan cannot be paid off. The bonded labourer, who may not speak the language or may be uneducated, does not know when the lender will consider the debt paid, so the length of service is undefined and arbitrary. Such debts provide the exploiter with justification for maintaining their victim in bondage.

Credit bondage is a situation where, over time, the trafficker does not pay the victim their wage. The victim remains at the exploitation site in the hope of recouping their earnings and minimising their losses. This process of waiting can take months or years. Sadly, many of these employers have no intention of ever paying the employee.

Selling of People

In some cases, a trafficker delivers a person to an exploitation site and then receives a cash payment. In essence, victims are sold to the business. For victims to regain their freedom, they are expected to work off the amount of money the business owner paid for their purchase, along with additional fees added to the original amount. This impossible debt holds the person in place.

A survivor's story – a Chinese person exploited in Cambodia: ⁵

"I received a marketing job offer from a food delivery company in Cambodia in March 2021 promising a monthly salary of USD 1,000 and free air tickets. I flew to Phnom Penh but was taken to a walled-off apartment building to start 'training' on how to scam people online.

"After six months of this 'pig-butchering', I was asked to pay USD 7,000 to leave – I couldn't afford it, so was taken to a hotel-casino in Sihanoukville, where workers were brutally beaten. Weeks later, someone offered to get me out, but sold me to another gang.

"Although I hated my job which involved scamming people to transfer cryptocurrency, the only way to leave was to deceive enough people to get money to pay the ransom.

"I tried to escape but was caught and beaten and sold to another gang – and my ransom increased to USD 15,500. Eventually I managed to escape because the new gang occasionally let workers venture outside."

Kidnapping

While some human trafficking victims are abducted, this tactic is used less than most other approaches. It is much easier to transport a person who is willing, rather than to use force with those who are not. When people can be deceived into believing that they will benefit from going somewhere, transporting them is a much easier task. For example, compliant victims will help traffickers evade border police and customs officials. The victims will be unlikely to attempt an escape until it is too late. In contrast, kidnapping victims tend to fight, kick, and scream. This presents obvious risks for traffickers.

Threats & Violence

Traffickers violate many laws and human rights during the process of recruiting, transporting, harbouring, selling, and maintaining the person. This can include torture, rape, beatings, threats of violence, threats of reprisals against family members, deprivation of food, and physical confinement.

A survivor's story – a Laotian victim exploited in Laos: ⁶

"I was lured by a Facebook advertisement promising a job in Kings Romans Casino paying USD 900 a month.

"I was put in a dormitory near the casino and made to work 14-16 hours a day seven days a week trying to scam rich English speakers. I was given a 'sales quota' and if unsuccessful, my pay was docked and they would threaten to sell me on.

"I was locked in a room, tasered, and beaten when I tried to go outside. I saw other victims thrown into solitary confinement, heard gunshots, saw people taken away who never returned, and other people jump to their deaths.

"I only got out after convincing my captors I knew police in Vientiane [capital of Laos] who could cause them a lot of trouble."

The 11 Indicators

The '11 Indicators' (developed by the International Labour Organisation) can be used to detect a victim of human trafficking. Each victim's story is different; some may display all of these indicators, others just one or two. These can be a useful tool to help identify potential abuse and risk of trafficking.

- 1. Abuse of vulnerability:** Traffickers prey on vulnerability as these people are often more likely to accept an offer that is too good to be true. This may be people vulnerable due to lack of economic opportunity or people who have been displaced from their homes due to war or climate change. There are many factors that may make a person vulnerable to falling prey to human traffickers.
- 2. Deception:** Virtually all trafficking cases involve deception. Most victims have been lied to about the nature of the work they have signed up for, the pay, the conditions, amongst other things.
- 3. Restriction of movement:** Traffickers restrict their victims' freedoms to ensure that they cannot escape and seek help. This may be physical restriction using bars and barbed wire, use of drugs and substances to hold a person in place, as well as psychological restriction caused by fear.
- 4. Isolation:** Isolating a person from their friends, family, and wider community serves to further bring the victim under the traffickers' control.
- 5. Physical & sexual violence:** Victims are often abused and hurt in order to keep them compliant and fearful of their captors.
- 6. Intimidation & threats:** Threats may be made to the safety of the victim but also may be made towards the victims' families. This can be used to hold a person in place and break their resolve.

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- 7. Retention of ID documents:** Often traffickers will take their victims identification documents in order to keep them in place, without their IDs it can be challenging for the victims to seek help, especially when in a foreign location.
 - 8. Withholding of wages:** Victims may be promised that their wages will come after a period of time, but they may never see the money. In other cases, their wages may be deducted for fraudulent means, or they may be forced to hand their wages over shortly after receiving the money.
 - 9. Debt bondage:** High recruitment fees and other forms of monetary bondage can lead victims to fall into a spiral of debt that is controlled by their traffickers.
 - 10. Abusive living & working conditions:** Victims are usually housed in dangerous and unclean conditions with little regard for their humanity.
 - 11. Excessive overtime:** Victims are often forced to work very long hours without breaks and without proper pay.

2. Illegal Betting and Organised Crime

Illegal betting refers to online sports betting and casino gambling made available to customers where such products are illegal / unlawful or heavily restricted – which is most of Asia.

It is one important business line of the organised crime groups behind widespread human trafficking in Asia, but far from the only one. Due to its highly profitable nature, coupled with low priority for law enforcement action, illegal betting is a key pillar supporting such groups.

Definitions and terminology

Due to the globalised nature of online betting, and the patchwork of legislation in different jurisdictions, much of it pre-internet, there is no universal definition of “illegal betting”.

The closest is the Council of Europe’s “betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located,” but this is not unanimously agreed.⁸

The transnational nature of online betting further complicates the issue. A typical operation in this report might involve a Hong Kong registered company with a licence from Cambodia to operate a land-based casino and/or a licence from the Philippines to offer online sports betting. But such licences confer no legality in core target markets such as Greater China,⁹ Thailand, Vietnam, Indonesia, Malaysia, Singapore, South Korea and Japan.

The ARF Council’s State of Illegal Betting Report focused therefore on the key question of whether the betting operator is licensed by the jurisdiction in which its customers are located. ‘Licensed and Regulated’ betting operators only take bets from customers in jurisdictions in which the operator is licensed: legal betting. Illegal betting encompasses operators who have a licence from certain jurisdictions but take bets from anywhere, and operators who have no licence at all.¹⁰ The online illegal betting run by organised criminal groups in this report is in the latter two categories and comprises both sports betting and online casino gambling.

Why Asia is a hub for illegal betting

Around 80% of sports bets worldwide are made illegally¹¹ and the total amount bet annually may be as much as USD 1.7 trillion.¹² Asia is the world’s largest betting market, legal and illegal, representing ~65% of global betting volume.¹³ The illegal market may be as much as 10 times larger than the legal market.¹⁴

Greater China, given its population and cultural appetite¹⁵ for gambling, is the biggest market for illegal betting in the world. Most entities described in this report primarily (but not only) target this market.

Illegal betting is so large in Asia because it has ~60%¹⁶ of the world’s population, many with an appetite for gambling,¹⁷ yet a general lack of competitive legal, well-regulated betting options in many jurisdictions to meet this demand. Illegal operators linked to organised crime have long filled this supply-demand gap; the internet then supercharged a street-level activity into a globalised trillion-dollar industry.

Illegal betting is highly competitive against Licensed and Regulated operators because it can offer better prices (i.e. betting odds) since it is not subject to any taxation, and because it can offer a much wider selection of products (i.e. different sports to bet on, bet types) since it is not subject to any regulation.

Illegal operations heavily market and promote these advantages through, for example, social media 'spam' and chat apps. This marketing and recruitment strategy is one reason why demand for employees is so large; another is that extensive customer support is required to guide bettors to evade internet restrictions on betting websites, crypto apps and related payment processors. This need for employees is one of the key reasons illegal betting is linked to human trafficking.¹⁸

The spread of organised crime linked to illegal betting across Asia

Illegal betting has been described as "a foundation upon which most other illicit activities are supported".¹⁹ Massive wagering turnover coupled with relatively low prosecution priority and penalties from law enforcement make illegal betting both a low-risk profitable enterprise in itself, and also a means to fund other criminal activity and launder their proceeds.^{20 21}

In Asia, online illegal betting has long been associated with Macau casino junket operators, which in turn have close connections with Chinese organised crime groups (triad societies).²² For the last c.30+ years, local illegal betting operations often protected by and/or directly run by triads have expanded from Macau and Hong Kong across Southeast Asia and beyond.

Macau is the only region of China where casino gambling is permitted and the junket industry grew to channel gamblers (and their money) to casinos, particularly the massive number of potential customers from Mainland China.

Because their core activities, such as evasion of capital controls and gambling debt enforcement, are illegal in Mainland China, junkets typically were protected and/or directly run by individuals with organised crime associations.²³ The biggest junkets made profits on the scale of Macau's casino operators and became transnational enterprises involved in a host of legitimate and illegitimate businesses alike.

Case study – Suncity

The scale of the Macau junket / organised crime nexus in transnational illegal betting and money laundering was illustrated in 2022-23 by court cases in Mainland China and Macau, and government inquiries into the casino industry in Australia.

Suncity was the largest Macau junket operator with average annual income equivalent to at least USD 2.3 to 2.6 billion,^{24 25} until the arrest of its CEO, Alvin CHAU Cheok Wa, in November 2021.

In January 2022, CHAU was sentenced to 18 years in jail in Macau after being found guilty of 162 charges related to illegal betting, organised crime, and fraud. The trial followed another in Mainland China, where 36 people connected to Suncity were imprisoned on charges related to illegal betting, including in relation to Suncity's online betting operations in Southeast Asia. According to that trial, Suncity had more than 38,000 agents recruiting bettors across China.²⁶

Previously, in 2019, a state media report had claimed that Suncity's online illegal betting operations in Cambodia, Vietnam and the Philippines had turnover in Mainland China alone that was equivalent to ~USD 145 billion a year, larger than the only legal form of betting in Mainland China, the state lotteries.^{27 28}

The trials followed government inquiries into the casino industry in Australia in which CHAU and associates were named as having links to the 14K triad society. Those inquiries also concluded that cash transactions in the millions of dollars in Suncity's Australian casino VIP rooms were likely money laundering.²⁹

Suncity had casino and online betting operations across the globe including in Australia, Cambodia, Isle of Man, the Philippines, Russia, South Korea, the United Kingdom and Vietnam,^{30 31 32 33} as well as links with individuals, casino compounds and betting websites mentioned in this report which are reportedly connected to human trafficking.^{34 35}

Suncity's Alvin CHAU was reportedly early to spot the potential of online betting. From the early 2000s, junkets have been involved in online illegal betting – both online casino and sports betting – on a huge scale, both operating their own websites for profit, and using online betting as an underground banking channel to move client funds and launder proceeds of crime.³⁶ Such operations have spread and expanded across Asia in the last 20 years in response to various regulatory threats and opportunities.

Illegal betting operators first moved into the Philippines as so-called "licensed" online betting operators to give their operations an air of legitimacy.³⁷ In around 2016, in response to changes to the Philippines' regulatory environment, some expanded into Cambodia, which had legalised casino gambling in certain areas. In 2018, Cambodia suddenly made such activity illegal (although it continues), and operators expanded to even less-regulated jurisdictions such as Myanmar and Laos. And in around 2021-22, some operators have expanded even further afield, such as Dubai, to try to avoid attention from China's ongoing crackdown on illegal betting.

This expansion and displacement of illegal betting and organised crime is not linear but overlapping – organised crime linked illegal betting continues to operate in all of the regions mentioned, and there have been organised crime run casinos and related drug trafficking particularly in border regions along the Mekong since at least the 1990s.

In summary, while illegal betting is far from the only factor facilitating human trafficking across Southeast Asia, it remains an important, and growing illicit business line for many organised criminal groups involved in such trafficking, as the next section explains.

3. How human trafficking in Asia is linked to illegal betting

The vast unmet demand for gambling in Asia has for decades encouraged entrepreneurs (often linked to organised crime) and regional governments (often vulnerable to corruption) to seek to profit from this demand. Online betting supercharged this, often with major negative externalities for societies involved.

According to the United Nations in 2019, there were 230 licensed casinos across Southeast Asia. This number had greatly increased in the previous five years due to the displacement from Macau and elsewhere, and did not include unlicensed operations.³⁸

These casinos also typically offer online betting including sports betting and live-streaming of casino gambling. Online operations are far more lucrative than the land-based casinos on which licences supposedly are based, which makes intuitive sense given the addressable market online is orders of magnitude larger than the number of individuals who can physically travel to visit casinos.

Many casinos, the UN notes, are located in so-called Free Trade or Special Economic Zones (SEZs), often in areas where government authority is challenged by criminal influence; some of these SEZs and their casinos have become key nodes in the illicit trade of drugs, trafficking of illicit goods and laundering of organised crime revenues.

And because the same criminal groups who run the casinos are involved in drug trafficking and other criminal activity, these barely-regulated betting operations provide the perfect means to move, disguise, and legitimise proceeds of crime.³⁹

Since that report⁴⁰ was published, the number of such casinos is estimated at 340,⁴¹ and organised human trafficking can be added to that list of negative impacts.⁴²

For the past c.15 years, there has been a huge demand for workers, especially Chinese speakers, to serve the gambling operators, both in casinos themselves, but also in contact centres hosting customer support and sales and recruitment teams, which also promote online illegal betting websites and sign customers. These individuals mockingly refer to themselves as “spinach farmers”, as ‘spinach’ (菠) sounds similar to ‘gambling’ (博) in Mandarin.

Kidnappings and trafficking have been linked to the Asian gambling industry for decades, but mostly as an adjunct: ransoming individuals to pay gambling debts; providing sex workers for the mostly male teams of ‘spinach farmers’; importing undocumented workers, for example.

Since around 2019, there has been a surge in transnational organised human trafficking linked to gambling compounds across Southeast Asia – while at the same time operators have complemented online betting with online scams in their business model.

The reasons for the growth in human trafficking include China’s crackdown on cross-border gambling pre-pandemic, increased regulatory attention on Macau junket operators, the expansion of operators across Southeast Asia, and then the shutdown of travel from China for three years during the pandemic.

China's crackdown on cross-border gambling pre-pandemic had already seen exit visas for jurisdictions known to be harbouring online betting operators (Cambodia, Philippines, Myanmar, e.g.) to be heavily restricted,^{43 44} tightening the supply of workers necessary to promote online betting websites, recruit customers, and serve as dealers and other staff in land-based operations.

Coupled with increasing law enforcement and geopolitical focus from China on online betting, operators began expanding existing or developing new business lines such as so-called pig-butchering and romance scams, crypto Ponzi schemes, and other cyber-fraud.

These were complementary business lines to online betting, requiring similar skills and technologies, such as distributed online infrastructure, proprietary cryptocurrency exchanges and payment apps, social media promotion, targeted customer relationship building and recruitment through messaging apps. They could also use existing physical infrastructure built to support online betting – the large-scale self-contained compounds with dormitories, call centres, restaurants, supermarkets and more.

The pandemic massively accelerated these developments because travel restrictions, particularly from China, cut off the supply of the core customer market to operators' land-based casinos, but even more importantly the supply of workers. Yet at the same time, demand for online entertainment, including betting^{45 46} and also online social interaction of the type exploited by scams, surged.

*"While governments in the region were preoccupied with vaccine roll-outs, border closures and quarantines, major [crime] syndicates running casinos adapted. They established user-friendly websites and smartphone apps, integrated sophisticated information and blockchain technology, and jumped on board with cryptocurrency trading and fourth-party payment providers to facilitate and obfuscate cross-border payments. And they [did] it at a pace most private companies would envy."*⁴⁷

- Jeremy Douglas, United Nations Office on Drugs and Crime, August 2022

The huge demand for workers led to recruitment via fake job advertisements and even the snatching of Chinese speakers off the streets. There is increasing evidence of other nationalities also being trafficked to target customers across the globe, likely as recruitment tactics became better known in China and as operators began targeted victims across the globe.

For example, in June 2023, INTERPOL took the rare step of issuing a global warning that human trafficking fuelled fraud “is escalating rapidly, taking on a new global dimension, and that the crime trend is likely much more entrenched than previously thought” and represents “a serious and imminent threat to public safety”.⁴⁸

INTERPOL noted that while initial human trafficking victims were Chinese-speaking, drawn from China, Malaysia, Thailand or Singapore, victims have since been trafficked to the region from as far afield as South America, East Africa and Western Europe. “What began as a regional crime threat has become a global human trafficking crisis,” said Jürgen Stock, INTERPOL Secretary General.⁴⁹

Victims report similar experiences: applying for jobs in response to advertisements which turn out to be fake, having their passports confiscated, being forced to work scamming victims / recruiting online betting customers, and being punished with physical, mental and even sexual torture for failing to meet targets. ‘Workers’ are essentially enslaved: they are held against their will and must pay ransoms to be released, and are sold or traded between operators.⁵⁰

The issue has become so large, that several foreign embassies have warned citizens of travel to such regions, and consulates and international bodies have directly criticised certain jurisdictions for seemingly turning a blind eye. Unfortunately, recent global attention appears only to have further displaced such activity into even less well-regulated jurisdictions. The following section outlines some common modes of operations and key actors involved.

4. Regional examples and case studies

This section highlights examples of trafficking linked to the Asian illegal betting industry broadly following the displacement of the industry from the Philippines to Myanmar described above. The intent is not to cover every part of Asia: similar operations exist in Thailand⁵¹ and Vietnam, for example, but are not covered here.

The Philippines

The Philippines has been involved since 2003 in issuing licences for online gambling in SEZs, and in 2016 former Philippines President Rodrigo DUTERTE consolidated this under his own office via state gambling regulator PAGCOR.⁵² It should be noted that these licences do not confer any legality in the core target markets across Asia of such 'licensed operators'.

PAGCOR licences online sports and casino betting operators known as Philippine Offshore Gaming Operators (POGOs), and hundreds of associated technology and business process outsourcing⁵³ companies which support operations.⁵⁴ PAGCOR also operates its own casinos and online betting, which some highlight as a conflict of interest. Some POGO licensees are also Macau junket operators – Suncity's massive illegal online betting operations were POGO-licensed for example.

The liberalisation of gambling benefited some sectors in the Philippines such as commercial real estate owners, but some believe the costs have outweighed the benefits, not least in terms of criminality. There have been repeated calls from some politicians to shut down the offshore betting industry, most recently in 2023.

The Philippines' own Anti-Money Laundering Council has estimated that about a quarter of transactions related to POGOs were linked to suspicious activities,⁵⁵ while for years billions a year in tax revenue has reportedly not been paid by operators.⁵⁶

In 2019, the last normal year of operations pre-pandemic, the government collected the equivalent of USD 154 million from POGO operations,⁵⁷ a sum viewed as relatively paltry by some officials and politicians given the massive turnover of such operations (recall Suncity's annual turnover in Mainland China alone was USD 145 billion), and the costs in terms of criminality, corruption and vice.

There were 35⁵⁸ licensed POGOs as of March 2023, down almost 50% from pre-pandemic⁵⁹ levels, but also reportedly at least 175⁶⁰ unlicensed ones. Both are typically referred to as POGOs in the Philippines, and both have the same business model: promoting online betting to customers in jurisdictions where it is illegal. Unlicensed operators rely solely on illegal workers and pay zero tax, while many licensed operators rely primarily on illegal workers and might pay some tax if unavoidable.

According to a Philippines Senate inquiry, from 2017 to 2020 there were 4 million visitors to the country from China, a marked increase compared to the pre-POGOs norm⁶¹, with the inquiry arguing that these were clearly not tourists, but online betting staff illegally working on tourist visas⁶² thanks to systemic corruption of the immigration process by organised crime.^{63 64} As recently as September 2022,⁶⁵ 40,000 illegal Chinese online betting workers were deported, despite the relative slowdown of the local industry because of the pandemic.

Most of the hundreds of thousands of “spinach farmers” come willingly, but some have been subject to modern slavery-like conditions, even in the licensed sector.

In 2018, Mainland Chinese news outlets reported that thousands of POGO workers in one operation were in modern slavery-like conditions, with their passports seized, one day off per month, housed up to a dozen per room,⁶⁶ and hit with exorbitant fines or even beatings for failing to meet targets, or taking breaks longer than 30 minutes. The specific operator referred to in this report denied the allegations, continues to be licensed, and supplies its gambling software to many thousands of illegal betting websites.⁶⁷

In 2023, PAGCOR cancelled the accreditation of an entire POGO complex in a special economic zone housing multiple operations as well as a casino over alleged criminal activities such as cryptocurrency investment scams, illegal detention and human trafficking activities. The POGO licence of the main service provider was also revoked for illegal activity.⁶⁸ Over 1,000 human trafficking victims were rescued from the property from China, Hong Kong, Indonesia, Malaysia, Myanmar, Nepal, Taiwan, Thailand and Vietnam.⁶⁹

While there is some visibility and public attention on licensed POGOs, there is little on operators licensed in SEZs far from the capital, and zero on unlicensed operations. Given licensed operators such as the above have been accused of human trafficking, it may be assumed that the situation is worse among the unlicensed – in 2016, 1,300 individuals were rescued from one such operation.⁷⁰ The gambling industry also became notorious for kidnappings, with 80 victims abducted (31 involving POGOs,⁷¹ the rest land-based casinos) from c. 2017 to 2020.⁷²

Case study – sex trafficking, forced labour and corruption in POGOs

A Philippines Senate committee report⁷³ in 2022 highlighted organised trafficking of women to serve as sex workers catering to POGOs, forced labour, and systematic corruption of Philippines immigration officials. The two-year probe said it saw “a clear link” between the POGO industry and sex trafficking.

It found that in 2019, 199 women were rescued from prostitution, including one minor,⁷⁴ the majority of whose clientele were POGO employees.⁷⁵ Police officials,⁷⁶ politicians,⁷⁷ non-governmental organisations,⁷⁸ and the Senate concluded that the rise in sex trafficking was directly linked to POGOs.⁷⁹

The inquiry also found forced labour, citing the example of a Taiwanese woman recruited to work for a non-existent advertising company, who arrived on a tourist visa and had her passport taken away. She was moved to an online betting company, whose bosses sexually assaulted her and threatened her with supposed connections to a close associate of President DUTERTE (there is no information to suggest such claims were true).⁸⁰

The Senate report also details claims of systemic corruption of immigration officials, who allegedly received daily lists from superiors of visitors to be let into the country without the usual checks. The price to POGOs was 10,000 pesos (~USD 180) per head.

China has blamed Philippines-based online illegal betting operations for causing huge capital outflows from China,⁸¹ and in late 2019 called on the Philippines to issue a blanket ban on online gambling.⁸² This was rejected,⁸³ but had a chilling effect, with PAGCOR suspending issuance of new licenses and ordering a review of POGO operations.⁸⁴

The build-up of local and international political pressure, coupled with somewhat more vigorous oversight from PAGCOR, pushed some groups to expand / diversify into other Southeast Asian jurisdictions.^{85 86}

As the industry tries to return to its pre-pandemic norm, there have been signs of a return of criminality. There were 17 POGO-related kidnapping cases from January to September in 2022, a report of a group of Vietnamese women being sex trafficked to serve POGO employees.⁸⁸

Many believe that the Philippines is on China's gambling travel blacklist, although the Chinese consulate in Manila denies this.⁸⁹ It does appear as if travel restrictions may be constricting supply of workers and leading to similar trafficking modus operandi as elsewhere.

In two incidents⁹⁰ in September 2022, for example, 162 people including Chinese, Malaysians, Vietnamese and Filipinos were rescued after having been forced to work in two online betting operations, one a licensed POGO and one unlicensed (underlining that there is sometimes little difference in such operations); in the former report, workers had also been forced to engage in online investment scams. The May 2023 case mentioned above is another example.

As of Q1 2023,⁹¹ the Philippines Senate Ways and Means Committee was investigating the implementation of Philippines laws, including taxes collected, in connection to the POGOs industry. As part of this investigation, PAGCOR, the gambling regulator, terminated its relationship⁹² with its accountant responsible for assessing tax owed, after evidence that the auditor was unfit for purpose and had been awarded its PHP 6 billion (USD 110 million) contract in 2017 at least in part through fraud.⁹³

Finally, there is increasing evidence that Filipinos are being targeted by traffickers in other Asian countries to work in gambling compounds. Filipinos are especially attractive because they do not need visas to enter ASEAN countries and often have excellent English and Chinese ability.⁹⁴

Two hundred Filipinos have been rescued from Mekong-region casinos run by organised crime, according to the Philippines government,⁹⁵ with fears many more may still be trapped. Again, the reports point to systemic corruption in the immigration department, only this time in the other direction, with potential recruits instructed to exit via a specific booth at a particular airport – it may be assumed that some of the same organisations so successful at trafficking illegal workers into the Philippines are now employing similar networks and corruption techniques to traffic workers out.⁹⁶

In March 2023, a Philippines senator called for the complete and permanent shutdown of the POGOs industry because of such issues,⁹⁷ calls which were reiterated in May 2023 in the wake of the trafficking case mentioned above.

Cambodia has become an epicentre for trafficking linked to organised-crime run online betting and cyberscams, although in late 2022 authorities finally took some action, perhaps prompted by global media coverage.

Beginning in around 2016⁹⁸ and accelerating in 2018,⁹⁹ organised crime groups operating online betting began relocating/expanding to Cambodia from the Philippines.

The SEZ of Sihanoukville was an extremely popular (but not the only) location¹⁰⁰ because casino licences were easy to obtain and taxation was low. This transformed the beachside town,¹⁰¹ and by early 2019, there were close to 100 casinos,¹⁰² huge, often poorly regulated construction projects, and a massive influx of mostly Chinese people,^{103 104} – 500,000 at the peak according to one report.^{105 106}

The Cambodia licence in theory is for land-based casinos, but operators typically also operate online betting and/or provide technical and customer support for betting websites in large self-contained compounds. Several are run by people convicted of illegal betting in China, who have close ties to Cambodian elites (examples below).

With casinos and online betting came the same sort of negative impacts as discussed in relation to Philippines: kidnappings, debt bondage, trafficking of workers, and ancillary violence / prostitution and other criminality. Cambodia's 2019 decision to suddenly declare online betting illegal (under pressure from China), followed by the impact of COVID, radically altered industry dynamics.

The ban was perfunctory and short-lived at best, but drove activity at least temporarily underground; betting operators used their staff and infrastructure to pivot to / expand cyber scams.^{107 108} This became so profitable that more and more workers were required which were difficult to obtain because of pandemic-related travel restrictions.

Around 2021, the scale of trafficking and modern slavery to serve these operations started to become apparent from news reports, first in Chinese then in global media. A lurid example was the claim that a man in one compound was held prisoner to harvest his blood.^{109 110}

This was denied by authorities although one month later Thai police described a separate similar case involving a Thai victim who had escaped.¹¹¹

Again, Cambodian authorities denied that claim, but regardless, the shocking nature of the claims drew international attention, and the sheer volume of victim testimony of trafficking and enslavement became too much for local authorities to ignore. Officials admit as many as 100,000 people may have been involved in illegal betting.

Case Study: Sihanoukville's China Project

(Note: this section draws heavily on investigative work at cyberscammonitor.net)

An area of Sihanoukville named Otres is home to sprawling casino compounds mainly staffed by Chinese people, which has led to the district being labelled Chinatown or 'the China Project' locally. The area is centred around a massive hotel development known as Golden Sky, flanked by several compounds which have been source of many public reports of trafficking, enslavement and other criminality.¹¹²

Two, Jinshui (金水), and Kaibo (凱博), are among the most notorious. The walled-off complexes have apartments, offices, supermarkets and other facilities, and are guarded by armed security whose job is to keep people in, according to reports in Chinese state media and elsewhere.

According to victim testimony, staff must work 12 hours a day, six days a week and cannot leave without a ransom. Staff are sold between operators, with ransoms increasing on each occasion. Videos and photographs online in 2021 showed people being physically threatened, beaten with sticks, and struck with electric batons.¹¹³

Among the duties of staff are to support operations for betting websites, including according to reports, Yabo Sports (博体育) (which some believe is the biggest illegal betting operation targeting Greater China), BOB Sports and Boya Group (博雅集), also known as KOK Sports (KOK体育).¹¹⁴

One report¹¹⁵ details a mode of operation of the sports betting groups. Operating in teams of 8-10, some co-ordinate with commentators and broadcasters of live sport (presumably on pirate streams) to promote live chat groups marketing betting websites during games. Others act as relationship managers to encourage customers to continue betting and others as direct customer recruitment agents.

Separately,¹¹⁶ an online post from one individual shows the importance of sports betting: he claims he was held against his will in summer 2021 because the Euro 2020 football championship – a major betting demand driver – was taking place.¹¹⁷

As well as online betting, staff promote "pig-butcher" scams and crypto frauds. Reports on these mode of operations describe highly sophisticated technologies involving customised software to output every phone number in a city, and the ability to simultaneously log into 20 to 30 messaging accounts and instantaneously translate messages into victims' languages.

According to one report, at its peak the Chinatown complex held as many as 12,000 people and depending on the season as many as 8-10,000 people might be in "bonded captivity",¹¹⁸ most of whom are Chinese, but also nationals from all over Asia and Africa.

At the heart of the development, is Golden Sun Sky, a massive casino and hotel complex developed by a Chinese property company. The development covers 23 hectares, or 40+ football fields. Media reports¹¹⁹ claim the chairman of the company developing this casino is also the ultimate owner of some or all of the gambling/scam compounds around it, but the company strenuously denies being involved in illegal activity.^{120 121}

Public information does show that this individual has a history of links to betting, as do his associates.

According to the Beijing Youth Daily, this individual was involved with Hong Kong investors in casinos in the border regions of Myanmar-Yunnan as early as 1998, which also operated online illegal betting, and was convicted of operating an illegal casino in his hotel in 2007,¹²² yet only received a suspended sentence. Chinese court records show he has been linked in at least seven cases^{123 124 125 126 127 128 129} involving illegal betting and bribing public officials, yet never prosecuted.¹³⁰

He became a Cambodian citizen in 2014, has been photographed multiple times with Cambodian Prime Minister HUN Sen, and provided a private jet to fly HUN to a United Nations meeting in 2018.¹³² He has close ties with family of a late Cambodian senator who are involved in several of the gambling compounds.¹³³

Other close associates of these individuals have similar backgrounds. One is Suncity's Alvin CHAU, the imprisoned Macau junket leader mentioned earlier, who in 2018 signed a USD 360 million agreement for Suncity to provide "consultancy and management services" of unknown nature to the Golden Sun Sky casino.¹³⁴

Another was a partner in the above-mentioned Myanmar border casinos^{135 136 137 138} and is currently associated with at least two border-town casinos in Cambodia, on the borders with Thailand and Vietnam.¹³⁹ These have been subject of many allegations of trafficking and modern-day slavery.^{140 141 142} Born in Guangdong Province, in China, this individual has both Myanmar and Cambodian citizenship^{143 144 145} and has been linked to court cases in Mainland China in Hong Kong involving illegal betting out of these casinos. One of which in 2008 was described by Chinese media as (then) the biggest illegal betting case in the country's history, involving the equivalent of around USD 1.2 billion. Social media pages and court judgements show promotion of online football betting and casino betting via these casinos.¹⁴⁶ One casino is possibly linked to Citibet,¹⁴⁷ the largest illegal betting exchange specialising in racing, but this is not confirmed.

Still another is XU Aimin, born in Guangzhou, China, but who became a Cambodian citizen in 2005. According to a Hong Kong High Court judgment, he is a fugitive who in 2013 was sentenced by China (in absentia) to 10 years in jail for an illegal betting operation worth USD 1.75 billion operated out of Cambodia, is wanted in Hong Kong on related money laundering charges,¹⁴⁸ and was subject of an INTERPOL 'Red Notice' (essentially an international arrest warrant).

He is linked through corporate records to the Kaibo compound^{149 150} mentioned above. Chinese authorities are seeking his arrest and deportation, according to an investigative report in 2021.¹⁵¹

Throughout 2021-2022, the scale of the trafficking and modern slavery linked to such casino compounds received widespread international attention, leading to Cambodia being downgraded to the lowest tier on the United States Trafficking in Persons Report,¹⁵² and demands from the China embassy in Cambodia¹⁵³ for action.

In response, authorities began to take action in August 2022, raiding many small 'gambling dens'. In late September, government officials began admitting that as many as 100,000 people may have been working in illegal gambling, and were claiming that "90% or more" of such operations had stopped.

Those on the ground are sceptical, with sources claiming that these raids were only against small operators and that the largest compounds likely received advance warning of raids. According to reports, the Jinshui and Kaibo compounds described above appeared to halt operations and clear out overnight and appeared empty as of September 2022,¹⁵⁴ though as of May 2023 reporters on the ground indicated that they may have reactivated.¹⁵⁵ Several reports suggest operations have moved to Myanmar and Laos.¹⁵⁶

Several of Myanmar's China border towns have since at least the 1990s housed casinos targeting Chinese customers, which also offered online betting when the technology became available.

Beginning around the 2010s, operators with experience and local relationships from such developments began developing Cambodia-style gambling and cyber-scam compounds in Myanmar, and this was accelerated by Cambodia's brief crackdown on online gambling, then the Myanmar coup in 2021. Some see in this a dangerous combination of organised crime and armed militias acting in concert which has been taking place since before the coup.¹⁵⁷

In 2019, for example, the regional representative of the United Nations Office on Drugs and Crime (UNODC) in Southeast Asia and the Pacific warned that the "displacement" of organised crime linked to Macau was a threat to the rule of law in Southeast Asian countries with "the most visible example [in] Myanmar, where organised crime groups collaborate extensively with militias and armed groups that operate in the country's lawless border regions."¹⁵⁸

As noted by the UNODC in a 2019 report on Transnational Organised Crime, "SEZs in Lao PDR and Myanmar have become major gambling centres identified as key nodes in the illicit trade of drugs, precursors, and wildlife products."¹⁵⁹

A 2020 report by a U.S. NGO¹⁶⁰ highlighted three "spinach cities" in Myanmar operating in SEZs and run by organised crime – Yatai New City in Shwe Kokko, and Huanya International and Saixigang in Myawaddy. There are links between these and triad societies, corporate entities in Hong Kong, casino operators in Cambodia, blockchain developers in Singapore and elsewhere, and armed militia groups.¹⁶¹

The mode of operation of these compounds is the same as detailed in the Cambodia section and there have been many similar reports of trafficking and enslavement. Individual victim accounts tell a depressingly familiar story: a Burmese man who believed he was starting a casino job but was ushered into a building guarded by soldiers and private Chinese security guards and forced to scam people;¹⁶² Malaysian victims only released after paying ransoms;¹⁶³ Laotian victims regularly beaten with tasers, iron rods and heavy ropes;¹⁶⁴ a young man lured to meet his 'girlfriend' in a romance scam, then forced to work in online scams at a casino, who died of an infection in his heart and lungs.¹⁶⁵

Case study – Shwe Kokko SEZ and SHE Zhijiang

In August 2022, a Chinese national named SHE Zhijiang who also has Cambodian citizenship and has been a fugitive from an illegal betting conviction in China since 2014, was arrested in Thailand.

SHE, who has at least four aliases,^{166 167} was a key principal in one of Myanmar's most notorious "spinach cities", Myanmar Yatai Shwe Kokko Special Economic Zone ('Shwe Kokko').

The project, in development since 2017^{168 169} and falsely claimed to be part of China's 'Belt and Road' global infrastructure plan,^{170 171} lies on the banks of the Moei River, separating Thailand from Myanmar. Investors are the Karen State Border Guard Force ('BGF'), an ethnic militia aligned with Myanmar's army, and Yatai International Holdings Group ('Yatai'), the Myanmar subsidiary of a Hong Kong company ultimately owned by SHE Zhijiang.¹⁷²

The development is in Karen State, which has seen conflict between the military and ethnic minority rebels for more than six decades. According to reports, SHE Zhijiang secured rights to the land on the spot by making a down payment of USD 300,000 in cash to the BGF leader in 2017, after which land began to be confiscated from villagers.¹⁷³

The project was launched with great fanfare amid promises of a USD 15 billion "blockchain smart city" with industrial, tourism, entertainment and ecological zones, but reports state that it is little more than a centre for dozens of betting operators, many of whom appear to be the same or linked to the Cambodia-based operators – Yatai had advertised to such operators inviting them to relocate during Cambodia's 2019 crackdown.^{174 175 176 177}

The trafficking and exploitation of workers in Shwe Kokko emulates that in Cambodia, although may be, if anything, even more egregious and the 2021 coup gave local militia latitude to greatly expand operations, local media and NGOs state.¹⁷⁸ An estimated 10,000 people may be housed in the development.¹⁷⁹

Victims are trafficked from across Asia and beyond, given precise instructions on how to find scam targets on social media, win their trust, and convince them to transfer funds. They face beatings, electric shocks or starvation for failing to meet targets.¹⁸⁰ Women may be forced into sex work to pay for their freedom,¹⁸¹ with two Thai women who escaped across the river to Thailand claiming that around 300 women were held in such circumstances.

Yatai partnered with a Singapore company to develop its own encrypted payment app and blockchain protocol. This was also used in Yatai's Philippines operations and in Cambodia,¹⁸² and in 2018 claimed to be the "leading player in cross-border payments for online gambling in Macau, Laos, Cambodia, and the Philippines."¹⁸³

Supposedly, this would provide the "blockchain infrastructure" for all of Yatai's "smart city" technology.¹⁸⁴ In reality, it seems likely that the "smart city" only used blockchain technology to launder profits from online betting, crypto scams and other illicit activities.¹⁸⁵ Developers of this specific app insist they exited Myanmar as soon as there was any suspicion of illegal activity.

In August 2022, Thai authorities arrested Yatai's key figure SHE Zhijiang under an INTERPOL Red Notice. Chinese investigative magazine Caixin in 2020¹⁸⁶ had detailed his extensive criminal background in relation to illegal betting.

Part of the reason SHE Zhijiang is wanted by China is the setting up of illegal betting websites which recruited 330,000 bettors. SHE was convicted in 2014 in China for operating an illegal betting platform out of the Philippines which earned him profits equivalent to USD 298 million.¹⁸⁷

Despite being a fugitive, he became a Cambodian citizen, and in 2017 established a similar "development" to Yatai in the coastal province of Koh Kong. This was subject to many similar allegations of online scams and trafficking,¹⁸⁸ and a similar MO of evicting natives, bespoke payment apps, and false claims to be associated with China's Belt and Road. As an aside, Macau junket operator Century Entertainment, run by alleged triad NG Man Sun, is active in this development.¹⁸⁹

In May 2023, SHE was reportedly set to be extradited to China.¹⁹⁰ Regardless, operations at Shwe Kokko appear not to have been impacted, according to multiple reports,¹⁹¹ notably a June 2023 first-hand testimony from a worker in the online betting operations.¹⁹²

Shwe Kokko is far from the only example of the confluence of organised crime, illegal betting, trafficking and scams in Myanmar.

SHE Zhijiang is also associated with a separate "digital industrial park" nicknamed KK Park downriver from Shwe Kokko. This compound, according to reports, has an estimated population of up to 8,000, and it has been claimed that it is involved in organ harvesting.¹⁹⁴ The police force in Yunnan, China, bordering northeast Myanmar, revealed images of victims who had escaped from detention, with one having had four fingers and half of his palm chopped off.¹⁹⁵

Still another operation is Saixigang Industrial Zone, which is run by convicted triad leader WAN Kuok Koi, also known as Broken Tooth.¹⁹⁶ Saixigang's name in Chinese characters (賽西港) means "surpass Sihanoukville" and it explicitly aims to emulate the Cambodian model. WAN is chairman of the zone's key company, Dongmei Group, which has pledged a total investment of USD 18 billion into projects that include a casino, nightclub, and various entertainment facilities.¹⁹⁷

WAN was Macau's most notorious triad leader, who was imprisoned by Macau authorities in 1999 for, among other crimes, suspicion of trying to assassinate the head of Macau's police with a car bomb.

WAN and his company Dongmei Group have been sanctioned by the United States for his alleged role as leader of the 14k triad society, which engages in drug trafficking, illegal gambling, human trafficking, and other criminal activities.¹⁹⁸

He has long-standing links to Southeast Asia, including alleged arms-trafficking in Cambodia¹⁹⁹ and a reported relationship with a local militia in Myanmar.²⁰⁰ He has also been involved in crypto / gambling schemes in Malaysia and as far afield as Palau in the South Pacific, to the point where some see him as a “super-connector” linking transnational organised crime across the region. He reportedly received USD 750 million in a cryptocurrency launch in 2018.²⁰¹

One NGO estimates as many as 100,000 foreign nationals could be trapped inside Myanmar along the Moei River, though some are incredulous that the number could be so high.²⁰²

“It is next to impossible to help these trapped people,” Jeremy Douglas, the regional representative in Bangkok of the UNODC, told Nikkei Asia. “The other side of the Moei might as well be on another planet. The situation is a governance nightmare – it is out of control.”²⁰³

In March 2023, according to Chinese media, the Chinese Ambassador to Myanmar met with Myanmar’s Home Affairs Minister to urge a crackdown on online gambling and internet fraud; it remains to be seen if such pressure will be successful.²⁰⁴

Laos is a long-standing facilitator of trafficking and other illicit activity, but also a potential future expanded threat / hub. For 15 years, Laos's Golden Triangle Special Economic Zone has been a reported haven of criminality, and US sanctions on its key principal have seemingly had zero impact.

Laos is also reportedly considering a POGOs-style online betting licensing regime, which would instantly attract operators because regulatory oversight would in all likelihood be even more lax than in the Philippines or Cambodia, yet with a more stable environment than Myanmar. Such relocation has already been seen in response to illegal betting and trafficking crackdowns in Manila and Sihanoukville.^{205 206}

Case study: The Golden Triangle SEZ and ZHAO Wei

The Golden Triangle SEZ is a 100-square kilometre area established in 2007 bordering Thailand and Myanmar which has been described as "the world's worst SEZ" and "a one-stop shop for criminals".^{207 208}

Its key principal is ZHAO Wei, a Chinese national, and his Hong Kong registered company Kings Roman Group. According to the US Department of the Treasury's Office of Foreign Assets Control, these are part of a transnational criminal organisation which engages "in drug trafficking, human trafficking, money laundering, bribery, and wildlife trafficking, much of which is facilitated through the Kings Romans Casino located within the SEZ."²⁰⁹

Reported trafficking and exploitation of workers follow familiar modes as discussed in previous sections, although local authorities appear even more unwilling to take action than in other jurisdictions. The US sanctions state that trafficking – including child prostitution – has been taking place in the SEZ for years. Examples from the past two years alone include:

- In February 2021, at least 430 women were employed as sex workers inside Kings Romans Casino;²¹⁰
- In December 2021, a Laos woman who escaped claimed she was duped into a call centre job pitching shares in SEZ companies to casino customers, then threatened with forced prostitution for failing to meet sales targets, and that hundreds of women were in the same situation.²¹¹ Those not deemed suitable for sex work were subjected to other forms of slavery such as menial labour. The SEZ also holds employees liable for so-called debts for the fees paid for middlemen to recruit them, COVID-19 tests and quarantine, fines for 'misbehaviour' and more.²¹²
- In February 2022, more than a dozen women were rescued after escaping through a fence and told the same story about conditions inside.²¹³
- In March 2022, new evidence claimed that if enslaved workers in the SEZ were uncooperative, they would be fined, physically abused, sold to another employer, have their documents confiscated, thrown into solitary confinement without food, or even shot.^{214 215 216}

- In May 2022, police said they rescued 477 trapped workers, including around 200 women, over the previous year. Most reported being lured to the area and being forced to work as scammers and detained against their will, with women forced into sex work for failing to meet targets or pay off 'debts'.^{217 218}
- In May 2022, a male escapee told reporters that victims were locked in rooms and tasered or beaten for failing to hit romance scam targets or breaking rules such as taking photographs.
- In October 2022, it was estimated that around 700 Malaysian migrant workers are forcefully detained in the area.²¹⁹

Police seem unwilling to enter the SEZ, although on occasion appear to have been spurred into action by public criticism. Various reports describe the SEZ as controlled by ZHAO's own security forces,²²⁰ with police requiring permission to enter.²²¹

ZHAO Wei is from Heilongjiang in China's northeast and reportedly was involved in the timber trade before becoming involved in casinos in Macau in the 1990s, and then in the early 2000s in the rebel-held Myanmar region of Mong La on the border with China, which has been controlled by a warlord drug trafficker since the 1990s.^{222 223 224}

Like the other Myanmar border casinos run by individuals mentioned in the previous section on Cambodia, these catered exclusively to Chinese citizens who could travel across the border without visas and access a vast range of illicit products such as gambling, narcotics, endangered wildlife and underage prostitutes.^{225 226} These casinos also provide(d) online gambling to customers across China.²²⁷

In 2005, China sent soldiers across the border to shut down these casinos, and ZHAO²²⁸ moved to Laos. He signed an agreement with the Laotian government in 2007 to begin developing the SEZ and in 2010 a 99-year lease was signed by Laos's Prime Minister, with ZHAO's Kings Romans Group having an 80% stake and the government the remaining 20%.²²⁹

It is not clear where ZHAO's funds came from. The United States claims he stores and distributes narcotics for illicit networks including the United Wa State Army,²³⁰ the rebel militia which controls the region of Myanmar where ZHAO's casinos were.²³¹

ZHAO says such claims are "malicious rumour-mongering",²³² although the expansion of the Golden Triangle SEZ does correlate with a rise in the methamphetamine trade. The UNODC estimates that the East Asian and Pacific trade rose from about USD 15 billion in 2010 to between USD 30 billion and USD 61 billion in 2019, with most coming from the Golden Triangle region.

Many reports show evidence that other illicit activities take place openly in the SEZ and its casino, including a tiger and bear farm raising the animals for slaughter for customers to consume (some traditional Chinese medicine beliefs ascribe rejuvenating and aphrodisiac properties to parts of these and other endangered animals).²³³ ZHAO stated in an interview in 2011 that sports betting would be one business line within the development, although it is unclear if this ever came to pass.

Despite the US sanctions in January 2018, and extensive international media coverage of apparent criminal activity in the SEZ for years, ZHAO and the SEZ appear to have been completely unaffected.

ZHAO has met Laos's president²³⁴ and other government officials²³⁵ on several public occasions since the sanctions were announced – and even received a Medal of Bravery from the government in October 2022.²³⁶

The Golden Triangle SEZ is not the only such project in Laos, but is highlighted as the most egregious. Laos's government does not seem concerned by reports of illegal activity there, and key infrastructure in the region is expanding.

These include a USD 50 million river port further up the Mekong in the heart of the Golden Triangle, which campaigners insist makes little business sense except as a transshipment point for heroin and methamphetamine,^{237 238} and an international airport near the SEZ which was scheduled to open in May 2023,²³⁹ financed at a cost of USD 175 million by a Hong Kong company. It appears that ZHAO Wei is behind these projects – he attended the ground-breaking ceremony for the port alongside the provincial governor,²⁴⁰ and a Hong Kong entity linked to him has been named as an investor in the airport.²⁴¹

Finally, reports in July 2022 suggest that Laos established the 'Laos Offshore Gaming Authority' to set up an offshore online betting licensing regime on similar lines to the Philippines POGOs system.²⁴² It is not clear what the current status of these plans are, nor if any licences have been issued, but if plans develop such a licence would be attractive to the type of organised crime-linked illegal betting operators who prefer a lax regulatory environment in which to conduct their business.

5. Conclusion

Given the covert nature of modern slavery, it is impossible to know exactly how many people may currently be held in the type of conditions described above in Southeast Asia, nor to accurately estimate the dollar amount of the illegal betting, cyber-fraud, crypto scams and related scams. What is clear is that both numbers are very large, with tens of thousands of people likely working against their will in the four jurisdictions discussed in this paper alone, in an industry making tens of billions of dollars a year in profits for organised crime groups.

From various public estimates, somewhere between 75,000 to 250,000 people likely work in the offshore betting and related cyber-scam industry across these four jurisdictions in Southeast Asia alone.^{243 244 245 246} This does not account for similar operations elsewhere in Asia, and beyond.

Most of these individuals will be working voluntarily, although there are blurred lines and exploitative practices even in supposedly licensed operations. If even 10% are in modern slavery conditions, which seems reasonable if not conservative given the size and scale of the type of compounds mentioned (the Laos SEZ is larger in area than the entire city of Macau, which has a population of nearly 700,000), then the baseline is 7,500 to 25,000 people.

In terms of profits involved, the global illegal betting market has been estimated as high as USD 1.7 trillion a year in total turnover. Sources believe Greater China accounts for at least 50% of this volume. If the operations in jurisdictions described in this report drive half again – likely a small estimate – turnover could be in the region of USD 425 billion (USD 1.7 trillion * 50% * 50%).

Since one individual operation (Suncity's) in Mainland China alone was reported to have turnover in the region of USD 145 billion, the estimate of USD 425 billion does not seem unreasonable and may understate the scale. Assuming a very simplified profit margin on betting turnover of 4-9%, this would equate to ~ USD 12 to 38 billion a year in illegal profits from online betting in these four jurisdictions alone.

The related scam and fraud operations contribute further billions. Using details of staff targets reported by victims, we can estimate average revenue per employee – according to reports, the targets for each employee range from USD 15,000 to USD 30,000 of scammed 'investments' per month.²⁴⁷ If 100,000 people are hitting such targets, that could equate to USD 27 billion a year. The Global Anti-scam Alliance estimates that USD 55 billion²⁴⁸ was lost to cyber-scams in 2022, although their methodology is not clear.

In summary, it is highly likely that combined profits from online illegal betting and related cyber fraud in the type of trafficking compounds described in this report are in the region of USD 40 to 100 billion a year in these four jurisdictions alone. In 2023, indications are that this overlap of online betting, fraud, modern slavery, forced prostitution, drug trafficking and other criminality is not only continuing, but likely expanding across Asia and beyond.

A further worry is that these operations have potentially destabilising effects on the entire region, and even beyond. Operators often falsely claim to be associated with state-level projects such as China's Belt and Road project to lend themselves credibility, which has led to geopolitical issues such as US lawmakers branding such operations (wrongly) as state-sponsored.

Meanwhile, the vast sums of money flowing into the hands of warlords, sanctioned individuals, corrupt officials and criminals has already had corrosive effects in terms of corruption, and some regional NGOs even fear could lead to further turmoil in regions such as Myanmar and Laos.

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Acknowledgements

Primary author - James Porteous, ARF Council Research Head. Phoebe Ewen, Viral Bhuta, CG Lim, Caterina Foti, Doris Mao and Adrienne Yu were essential to the production of this report.

The report essentially summarises the excellent work done by journalists and NGOs across the region, who are too numerous to mention individually but are cited in the footnotes. Specific reports heavily relied on included those by Jeremy Douglas (United Nations Office on Drugs and Crime), Jason Tower and Priscilla A Clapp (United States Institutes of Peace), Lindsey Kennedy and Nathan Paul Southern (Global Initiative against Transnational Organised Crime) and the anonymous individual(s) behind the website www.cyberscammonitor.org.

