Using Closed Case Reviews in Financial Investigation of the Illegal Wildlife Trade

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Between October 2021 and March 2023, researchers in the Organised Crime and Policing team at RUSI led the design and implementation of four closed case review workshops in Malawi, Namibia, Uganda and Zambia. The workshops were designed to support capacity building for law enforcement and criminal justice actors in the financial investigation of illegal wildlife trade cases and to generate new financial intelligence by evaluating old or closed cases. All events and outputs were funded by the UK government through the Illegal Wildlife Trade Challenge Fund.

The workshops were delivered with the help and support of various civil society partners, including the Environmental Investigation Agency, Refinitiv, the Rooikat Trust, TRAFFIC, United for Wildlife, Western Union, and Wildlife Crime Prevention. They were co-hosted in close collaboration with key government stakeholders, such as the Financial Intelligence Authority (FIA) in Malawi, the Financial Intelligence Centre and Blue Rhino Task Force in Namibia, the FIA and Uganda Wildlife Authority in Uganda, and the Department of National Parks and Wildlife in Zambia. The authors are indebted to these partners, all of whom were integral to the success of the workshops.

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This report is dedicated to the memory of Lucy Njuka.
Executive Summary

The importance of ‘following the money’ in illegal wildlife trade (IWT) investigations is increasingly clearly recognised, given the need to isolate ‘upstream’ criminal actors – higher-level threat actors who control and drive illicit activity – as opposed to the low-level, downstream offenders who can easily be replaced. In 2019, RUSI’s Organised Crime and Policing team, working with the government of the Lao People’s Democratic Republic (Lao PDR), pioneered a new technique in the environmental crime domain to support capacity building in this area: the use of multi-agency reviews of closed IWT cases – the Closed Case Method.

Based on the pilot exercise’s success, this novel capacity-building methodology was subsequently adopted as a recommendation by the Financial Action Task Force, which urged affected countries to ‘undertake (multi-agency) case reviews of historic/closed IWT cases that focus on the unexplored financial elements of a case’, arguing that such reviews can identify typologies of IWT-related financial crime, develop risk indicators, and potentially reveal new leads.

The RUSI team has since refined the Closed Case Method through multi-agency capacity-building workshops held in Malawi, Namibia, Uganda and Zambia in 2022–23. These workshops were designed and delivered as part of the RUSI project, ‘Case Closed? Using Historic Cases to Enable New Financial Investigations’, funded by the UK government under the Illegal Wildlife Trade Challenge Fund.

This Whitehall Report summarises the lessons learned from this workshop activity, presenting a best practice guide for the use of closed case reviews to support financial investigation in IWT cases. This approach involves the retroactive analysis of previous IWT cases to identify fresh opportunities to gather and act on financial intelligence.

The team’s methodology for using closed case reviews in capacity building can be broken down into three different stages:

- First, the ‘research and preparation stage’ involves context-specific literature reviews, targeted stakeholder engagement, case criteria development, case selection and development of training materials.
- Second, the ‘capacity building stage’ comprises delivery of multi-agency workshops, involving baseline financial investigative skills training and small group case reviews, in which all relevant agencies are charged with re-examining the details of the case and developing missed opportunities to follow financial leads.
Third, the ‘learning and dissemination stage’ involves the development of red flags (risk indicators for suspected money laundering activity), the dissemination of financial intelligence to both the private and the public sector, and monitoring and evaluation.

The most recent experience using RUSI’s Closed Case Method in Malawi, Namibia, Uganda and Zambia permitted the identification of the following lessons and best practice principles:

- **Adaptability**: The Closed Case Method is applicable to national entities possessing significantly different levels of financial investigative experience. Notably, relevant agencies in the four focal countries demonstrated different baseline competencies in conducting financial investigations in IWT cases prior to the intervention, which could be mitigated by tailoring the methodology. The malleability of the method is one of its greatest strengths, guaranteeing universal applicability. This was evidenced by measurable and demonstrable improvements in workshop participant capacity and knowledge across all four countries, despite significantly varied context-specific baseline competencies.

- **National ownership**: The Closed Case Method is best implemented when workshop activities are led by in-country stakeholders. Efforts should be made to ensure that ownership of closed case activities is vested in national entities, with co-creation of case selection criteria being key to the exercise’s success.

- **Multi-agency approach**: Experience of using RUSI’s Closed Case Method clearly demonstrates that multi-agency capacity building in this area must span the full breadth of the public sector institutions tasked with countering IWT, and include other parties that can affect an IWT investigation or subsequent prosecution. Crucially, judicial actors, including judges and magistrates, should not be excluded from IWT closed case reviews.

- **Private sector involvement**: Information held by private sector financial institutions is vital in detecting suspicious transactions and supporting effective financial investigations. It is therefore crucial that the role of the private sector in combatting IWT-related money laundering is communicated to workshop participants, including through guest speakers or trainers representing national banks and international money transfer platforms and services. This will help ensure an effective closed case review and future cross-sector collaboration.

- **Financial intelligence unit (FIU) engagement**: The specific type and role of the relevant national FIU must be clearly understood and accounted for in designing and delivering closed case review exercises in any given country.
The buy-in and support of the national FIU, among other key agencies, is key to the sustainability of the approach.
Illegal wildlife trade (IWT) affects thousands of species of flora and fauna around the world.\(^1\) Notwithstanding the challenges involved in evaluating the scale of this activity, attempts to do so place its value at $7–$23 billion per year.\(^2\) However, the wider damage sustained by ecosystem services from the combined impacts of timber trafficking, illegal fishing and wildlife crime is estimated to cost $1 trillion, depriving source jurisdictions of billions in lost revenue every year.\(^3\)

The past decade has seen a growing international consensus around the need to ‘follow the money’ in wildlife investigations, to identify and prosecute the ‘upstream’ criminal actors involved in this pernicious crime. In 2020, the Financial Action Task Force (FATF) – the global standard-setting body on money laundering and terrorist financing – published guidance on the measures that countries should take to combat money laundering risks linked to IWT. This guidance included a recommendation that parallel financial investigations should be conducted for wildlife cases, and that IWT offenders should be prosecuted using anti-money laundering (AML) legislation where possible.\(^4\)

Financial investigations are a standard approach for other serious crimes like drugs or weapons trafficking but are seldom undertaken in IWT cases. This inhibits the identification, apprehension and sanctioning of high-level wildlife traffickers,\(^5\) and risks a disproportionate and harmful focus on low-level,
opportunistic poachers who operate only at the entry level of IWT supply chains. Without a comprehensive counter-IWT response, wildlife resources – on which vulnerable communities depend – are threatened. Further, and owing to IWT’s convergence with other crimes, the absence of routine financial investigations undermines meaningful disruption of organised crime.

East and Southern Africa boast an abundance of natural resources, including seven of the 34 biodiversity hotspots on the planet. Knowledge of the criminal networks involved in IWT is growing throughout the region. However, except in South Africa and Malawi, which have made significant progress in prosecuting IWT threat actors for money laundering, there is scant understanding of the typologies of IWT-related illicit financial flows across the region, and there are also gaps in the national capacity to investigate them.

RUSI has advocated ‘following the money’ in its counter-IWT programmes since 2016, seeking not only to improve understanding of wildlife-related illicit finance, but also to raise awareness and build financial investigation capacity among public and private sector actors to combat both IWT and associated illicit finance. This has resulted in the publication of strategic analysis, the development of training materials tailored to six different jurisdictions, and capacity-building activities which have reached 398 beneficiaries across the public and private sectors to date.


In 2019, RUSI pioneered a new training technique – developed with the government of Lao PDR – to support capacity-building work in wildlife-related financial investigations by conducting multi-agency reviews of closed cases. This approach involves the analysis of historic IWT cases to identify financial intelligence leads in order to identify fresh opportunities for investigations and improve skills to enhance future case work.

In line with this, when the FATF published a 2020 study on the money laundering risks of IWT, it included practical recommendations for best practice in financial investigation and asset recovery. Based on the success of the RUSI pilot exercise in Lao PDR, the FATF recommended that affected countries ‘undertake (multi-agency) case reviews of historic/closed IWT cases that focus on the unexplored financial elements of a case’. The FATF also argued that such reviews can identify typologies of wildlife-related financial crime, develop risk indicators and potentially reveal new leads.

Following this, RUSI sought to further refine the case review methodology in multi-agency capacity-building workshops in Malawi, Namibia, Uganda and Zambia. These workshops were delivered as part of the RUSI project, ‘Case Closed? Using Historic Cases to Enable New Financial Investigations’, funded by the UK government through the Illegal Wildlife Trade Challenge Fund. The overarching, long-term goal of this project was to reduce IWT and poverty in the focal countries through more effective public sector investigation/prosecution and private sector disruption of financial crimes linked to IWT. To achieve this, the project aimed to use multi-agency case reviews and develop best practice guidance to strengthen enforcement capacity and develop peer-to-peer training skills, while generating new financial intelligence.

This Whitehall Report presents these best practices, while summarising emerging challenges and opportunities alongside the lessons learned from the application of the case review methodology in the RUSI workshops conducted in the four countries.

This report is comprised of three chapters. The first chapter provides a detailed explanation of RUSI’s Closed Case Method, its origins and its limitations. The second chapter summarises the proceedings of the workshops delivered in Malawi, Namibia, Uganda and Zambia, while the third chapter summarises the main lessons learned and presents considerations and recommendations for

the delivery of future closed case exercises. The report ends with a conclusion and some final remarks.

Definitions and Caveats

For the purposes of this report, IWT is defined as encompassing the unlawful sourcing, smuggling, trading, exporting or trafficking of protected species of flora and fauna, including their derivatives, for financial gain.

A ‘closed (criminal) case’ is defined as one which has been finalised in the eyes of the law, with no further legal proceedings anticipated. This is distinct from a ‘cold’ case, treated here as an unsolved criminal investigation pending the discovery of novel evidence.14

This report makes numerous references to RUSI’s application of the Closed Case Method. As discussed in the first chapter below, case studies have been used as a teaching tool in a variety of fields for many decades; in the criminal domain, this includes conducting closed case reviews to evaluate the success of law enforcement strategies to counter human trafficking, review what works in criminal prosecutions, and assess national competence to tackle drug trafficking networks.15 However, the use of case reviews to investigate IWT’s financial components had not, to the authors’ knowledge, taken place prior to RUSI’s 2019 activity in Lao PDR. As such, the authors contend that RUSI has pioneered this teaching approach in the global IWT context.

I. ‘Case Closed’: An Innovative Methodology

Origins and Objectives

Case studies have been used as a teaching tool for over a century, mainly in law, business and medicine. A form of active learning, the case study approach offers a chance for students to ‘learn by doing’. It is considered to be a more effective way of learning and enhancing students’ ability to consider diverse opinions and perspectives, honing critical thinking skills. This approach involves real-world scenarios, wherein trainees are asked to challenge information provided about a case, unpack the details, analyse the facts and make decisions about the various courses of action open to them, linking theory to practice while interacting with – and learning from – their peers. ‘Problem-based learning’ is more impactful than lecture-based learning, with experts arguing that small group case reviews – where students cooperate in intimate debate on specific cases – result in significantly higher knowledge-retention rates compared with case studies based solely on lectures. Additionally, peer-to-peer learning activities foster collaborative relationships between actors, which – in the case of the multifarious and often overlapping stakeholders within the law enforcement and criminal justice systems – can be vital to unlocking real-world success.

In the IWT context, RUSI theorised that case-study-based teaching presented a unique opportunity to bridge the gap between theory and practice. By bringing together the relevant institutions – some of which are not accustomed to joint working – the teaching method systematically enables decision-makers to ‘trial run’ their investigative processes in a controlled environment. RUSI also hypothesised that, delivered effectively and in a tailored manner, this teaching method would confer ‘ownership’ of lessons learned and examples of best practice onto the national entities charged with combatting IWT.

19. Herreid, ‘Case Study Teaching’.
20. Ibid.
Against this backdrop, and following amendments to domestic legislation in Lao PDR which introduced stronger penalties for wildlife offences, RUSI was invited to work with the country’s Department of Forestry Inspection in 2019 to pilot a multi-agency case review. The case review exercise, delivered in collaboration with the World Wide Fund for Nature (WWF) and TRAFFIC, brought together law enforcement actors and AML intelligence officers to realise seven objectives that have become the cornerstone of the case review methodology outlined in this report. These objectives are to:

- Identify opportunities for financial action that were missed during the original investigation.
- Discuss the application of Lao PDR’s AML and financial crime architecture to IWT.
- Encourage further use of financial investigation by relevant agencies.
- Explore the role of domestic agencies in combatting IWT as a financial crime.
- Establish first steps for triggering a financial investigation.
- Encourage inter-agency working across government.
- Demonstrate the effectiveness and impact of financial investigations to encourage and support further policy development.

Two cases were selected for the exercise in Lao PDR, both featuring seizures from retail establishments: one of these included under 100 kg of ivory as well as small quantities of pangolin scales and rhino horn, and the other included less than 5 kg of ivory. Selecting cases typical of those normally encountered by Lao PDR authorities and examining them in a closed-door training environment allowed participants to talk candidly and work together to identify fresh opportunities to collect financial intelligence. This approach prompted trainees to observe that investigators working on future cases involving retailers should prioritise obtaining key financial intelligence, such as receipts, logbooks, stock inventories and invoice records, as well as card readers and QR codes used to take WeChat payments. They also reflected on the value of these forms of financial intelligence in improving understanding of the operations of criminal networks, even if the information does not form part of the evidence for immediate prosecutions.

As well as improving capacity in financial investigation skills among participants, the exercise strengthened inter-agency cooperation and improved understandings of roles and responsibilities within the wildlife criminal justice value chain. The exercise also led to policy recommendations: specifically, that the national AML investigation unit join the Lao Wildlife Enforcement Network – a multi-agency national taskforce that brings together all institutions that are mandated

21. Reid and Keatinge, ‘Case Closed?’.
to combat wildlife crime – to provide guidance on the application of AML legislation to IWT cases, help train other members on the use of financial investigation tools, and engage the private sector to report on suspicious transactions linked to IWT. Crucially, the exercise also resulted in formal requests to reopen and allow financial investigations to take place in both cases used in the review exercise.\textsuperscript{22}

Methodology

RUSI’s methodology for using closed case reviews in capacity building can be broken down into three different stages, as shown in Figure 1. Each stage includes different activities, and these are described below, illustrated by the practical implementation experience gleaned from the workshops.

Figure 1: Using Case Reviews in Capacity Building: A Three-Stage Methodology

![Figure 1: Using Case Reviews in Capacity Building: A Three-Stage Methodology](image)

Stage 1: Research and Preparation

1. Context-Specific Literature Reviews

A desk-based literature review was conducted for each focal country, covering academic publications, policy documents, law enforcement strategies, reports by NGOs, intergovernmental organisations and the private sector, and media reporting. Specifically, the review served to identify existing literature on:

- IWT challenges faced by each focal country.
- Money laundering threats linked to IWT in each focal country.
- Capacity to conduct financial investigations and asset recovery in each focal country.

\textsuperscript{22} Ibid.
• Relevant legislation and policy frameworks in each focal country.
• Key actors and agencies in a position to detect, investigate and prosecute wildlife-related financial crime in each focal country – and the power dynamics between these actors and agencies.

2. Stakeholder Engagement

Stakeholders were mapped to identify key actors involved in the investigation and prosecution of IWT and related financial offences in each country. This activity also aimed to identify the appropriate number and mix of participants for the workshops. In some of the workshops, bilateral engagement with a single authority was appropriate – for example, the national financial intelligence unit (FIU) or wildlife management authority – but in other jurisdictions it was advisable for multiple agencies to be engaged, potentially with the support of an in-country NGO partner with existing government memorandums of understanding in place. The decision about which agencies to include in the workshops was informed by knowledge of the local political economy and driven by a desire to ensure domestic buy-in and ownership of the workshop method. Crucially, the project team used this stage of the method to identify potential barriers to a cohesive and collaborative workshop, and to design mitigation strategies in concert with in-country partners.

3. Case Criteria Development

The key actors identified in Activity 2 were then engaged to co-create case selection criteria. Co-creation is an important aspect of ensuring that capacity-building materials are designed and informed by in-country expertise, and helps to garner support for financial investigation of IWT at a management level. Both of these factors contribute to ensuring a sense of national buy-in of closed case activities. Case selection criteria were articulated using a working document outlining generic criteria for cases suitable for financial investigation. These criteria were informed by insights from the financial investigations expert trainer and experiences drawn from previous implementation of the Closed Case Method. Subsequent reviews by local stakeholders provided feedback and guidance on tailoring these criteria to suit the specific nature and thresholds of IWT in each country. The final criteria were then agreed and used to guide case selection. The list of generic criteria is outlined in Table 1 in Chapter II. Finally, in countries with an established classification system for IWT suspects, the selection of cases was facilitated by shortlisting all suspects classified as Tier 3 or above (see Figure 2).
4. Case Selection

The next stage involved shortlisting suitable cases based on the agreed selection criteria. This was conducted by RUSI in partnership with both international and in-country stakeholders. The criteria were not rigidly enforced, but rather used to help guide the process and discussion around case selection: a case matrix was created, on which shortlisted cases were mapped against the various criteria. By assigning weighted values to each criterion, cases could be scored against the overall list of criteria before a final selection of two cases was agreed with the relevant partners in each focal country.

5. Development of Training Materials

This activity comprised several key steps, including the identification and secure sharing of (sometimes sensitive) case materials, analysis of those materials and preparation of workshop content. The sharing of case data was conducted using secure handling, storage and archive protocols, with careful consideration of both UK and focal country data protection legislation. In some instances, the data available on the selected cases constituted secondary sources already in the public domain (e.g., court monitoring and other NGO reports, media articles). In others, it included excerpts from primary case files (e.g., witness statements, charge sheets, exhibit forms). For each case, summaries were prepared.
Individuals with first-hand knowledge of the cases were involved in the preparation of summaries as far as possible.

In addition to case review summaries, other training materials were also developed for the workshops, including further case studies of transnational IWT investigations. These included a case study on the Environmental Investigation Agency (EIA) investigation into the ‘Shuidong Connection’, which showcased typologies of bank transactions and ‘flying money’ – a type of underground global money transfer system. Another case study focused on the ‘Teo Boon Ching’ case, which featured rich data on ivory and bribe prices. Both case summaries exemplify key facets of transnational IWT supply chains from Africa to Asia. In order to maximise participant engagement, materials included images, video and graphics. These materials were prepared alongside other presentations and inputs from key wildlife enforcement, criminal justice and private sector stakeholders from the financial sector, building a baseline understanding of the fundamentals of financial investigation of IWT cases.

Stage 2: Capacity Building

6. Delivery of Multi-agency Workshops

This stage included the planning and delivery of four multi-agency workshops in Malawi, Namibia, Uganda and Zambia, in close consultation with both national government stakeholders and international partners. In each country, workshops were held in partnership with at least one key government stakeholder and/or civil society partner as appropriate: in Malawi, the workshop was delivered in partnership with the Malawi Financial Intelligence Authority (FIA); in Namibia, it was co-hosted with the Rooikat Trust and the Namibia Financial Intelligence Centre (FIC); in Zambia, it was held with Wildlife Crime Prevention and the Department of National Parks and Wildlife; and in Uganda, RUSI co-hosted the workshop with the Uganda FIA and the Uganda Wildlife Authority. This collaborative approach was made possible by RUSI’s pre-existing relationships with public sector institutions in the focal countries.


The range of agencies involved in each workshop was guided by the earlier stakeholder mapping and engagement. Attendees were usually drawn from the national FIU, police, wildlife management and/or forestry authorities, customs and revenue authorities, public prosecutors and anti-corruption bodies. Where appropriate, the workshops included representatives of ministries or selected private sector bodies – such as the Bankers Association of Namibia – or members of civil society working closely with law enforcement on IWT. Each workshop was delivered over four consecutive days.

7. Baseline Skills Training

The workshops included sessions designed to support all participants’ levels of understanding and skills in financial investigation, including awareness of the benefits and key actors involved. To this end, RUSI designed bespoke agendas that were subsequently implemented by the workshop team comprising RUSI experts, a dedicated financial investigations expert, a representative from Western Union Law Enforcement Unit (WULEU) and an expert from one of RUSI’s international partners. These sessions included inputs on the national, regional and international threat landscape, IWT supply chains, the role of the private sector in generating financial intelligence and supporting financial investigations, and the role of prosecuting authorities and other key actors in the wildlife justice process. This approach ensured that all participants then approached the case review exercises from the same baseline.

8. Small Group Case Reviews

A full day of the workshops was dedicated to small group case reviews, incorporating peer-to-peer presentations. As noted, such small group exercises constitute an effective form of collaborative learning and means of maximising student retention. Each workshop was attended by 15–29 participants, divided into groups of four to six. Each group included representation from multiple agencies to maximise the interaction between them. A financial investigation trainer was engaged to take participants through the selected case studies, helping groups to engage in debate on key facets of the closed case and identify fresh opportunities to develop actionable financial intelligence. Support was provided to identify loopholes and process faults, and these were logged to inform future capacity-building activity. The groups then agreed a financial investigation strategy and presented this back to the wider group. Making peer-to-peer presentations in this way was also used to support the development of train-the-trainer skills, improving participant confidence in presenting on financial investigation strategies.
Stage 3: Learning and Dissemination

9. Development of Red Flags and Risk Indicators

During the creation of case summaries, and during workshop discussions of other cases suggested by participants as relevant to financial investigation of IWT, various red flags and risk indicators for IWT-related illicit finance were identified. These were then extrapolated and anonymised for development into non-nominal financial intelligence risk alerts, which could be shared through several channels (as outlined below). Notably, financial intelligence of this nature is vital in enabling transport and financial authorities and private sector companies to manage risks and optimise their monitoring of suspicious product and money flows.

10. Dissemination of Financial Intelligence to the Public and Private Sectors

The red flags and risk indicators identified during workshops in Malawi, Namibia, Uganda and Zambia were disseminated to the public and private sectors through a number of channels, including in person and via online seminars and workshops targeting national and regional authorities and private sector actors. Channels for dissemination can include private sector and civil society global intelligence distribution services such as the United for Wildlife Risk Alerts,26 the EIA Media Monitoring Database27 and the Refinitiv World-Check database.28 This approach ensures that maximum distribution can be achieved for any fresh financial intelligence identified as appropriate during the case review process.

11. Monitoring and Evaluation

The workshops were bookended by pre- and post-workshop questionnaires. Pre-workshop surveys were used to assess baseline knowledge of and capacity to undertake IWT-related financial investigations, and to assess general awareness of illicit finance linked to IWT. The questionnaire responses were used to help tailor workshop design (to ensure context specificity) and to identify the knowledge gaps to be addressed during the workshop. Post-workshop surveys were used to assess any changes against the baseline, to codify specific capacity-building needs identified by participants, and to highlight any strengths and shortcomings in the Closed Case Method. RUSI designed both questionnaires with support from international partner organisations and financial investigation experts.

The Closed Case Method: Limitations and Key Points

The primary benefit of the case review method is that it simulates real-world investigations within a controlled environment, promoting the use of the small group method to encourage critical thinking. This allows law enforcement and criminal justice actors to identify fresh entry points for financial investigation, while simultaneously strengthening inter-agency relationships. These benefits notwithstanding, there are inevitably some factors that can constrain the success of the Closed Case Method:

1. Levels of Participation and Openness

At the core of the case review method is the ambition to enhance institutional working relationships and optimise interactions across the various roles that key agencies play in IWT-related financial investigations. Achieving this ambition depends on a clear understanding of the political economy of the sector in each focal country, and on participants’ willingness to work together. While it may be clear which agency is mandated to investigate and prosecute IWT in many countries, it may be less clear which agency is responsible for investigating and prosecuting IWT-related financial crime, and it is often an inter-agency undertaking.

A workshop’s success is entirely predicated on the right actors being in the room: that is, those with the mandate and influence to actively support parallel financial investigations of IWT cases. Selecting the appropriate in-country partners – including those entities with trusted relationships with government agencies – is critical in this regard. In terms of governmental entities, all relevant agencies should be involved, including judicial actors (whose role in the process should not be overlooked). Beyond this, it is crucial to consider the national FIU’s role in the process, and to understand and account clearly for the FIU’s characteristics during the research and preparation stage of the Closed Case Method. Finally, success also depends on the involvement of the private sector, including financial institutions and international money transfer platforms and services, especially in national contexts where mechanisms exist for sharing information between public and private sector entities.

2. Issues Related to Case Selection

A range of factors can inhibit appropriate case selection, including: a lack of widespread financial investigation in the country; misconceptions about what comprises financial evidence and intelligence; and common issues concerning closed/cold cases.
The selection of closed or dormant cases suitable for financial review can be intrinsically hampered by a lack of financial investigations in general being conducted across a jurisdiction. This can mean that the vast majority of IWT cases fail to meet the ‘evidence’ criteria outlined in Table 1 below. In discussions with partners during the case selection process for the workshops, it was often necessary to broaden management perceptions of what constitutes financial intelligence (for example, highlighting how simple budgetary notes on a phone application, or receipts for the purchase of petrol, could provide an entry point for financial investigation).

Closed or cold cases can also be subject to extensive political or legal sensitivities. While a closed case may have been concluded in terms of formal legal proceedings, the adjudication may have been controversial, or the suspects – or their associates – might be under ongoing investigation or have absconded. For example, the Lin-Zhang case in Malawi met the selection criteria but it was not included in the workshop as it was part of an ongoing investigation. Another potential closed case in Malawi – the complex Kaunda brothers’ case – was considered unsuitable for selection due to the suspects remaining at large despite the court handing down an eight-year sentence in 2019. Furthermore, cold cases can remain dormant for hidden reasons, such as the influence of powerful patronage systems or other forms of corruption. Conducting due diligence on the shortlisted cases is therefore of paramount importance, and the role of national partners crucial. It is important to consider that not only should ongoing investigations be protected from legal jeopardy, and the risks to and liability of training personnel and organisations minimised, but also that participants will be less comfortable engaging with ‘live’ or sensitive cases.

3. Issues Related to Sharing Information

Legal or organisational concerns about data sharing and data privacy may be encountered at various stages. This is inevitable when handling personal data, especially if it encompasses information on criminal activity, where higher data protection standards apply. It is important to be familiar with the relevant data privacy legislation of the focal country, as well as that of the jurisdiction where the analysis and preparation of materials is taking place.


The data sharing conducted during this project was implemented in accordance with relevant UK legislation and guidance, as well as the regulations of each focal country. However, partners might still be reticent about sharing primary data from case files, even under such favourable conditions. In such instances, it may be more appropriate to support partners in creating a synopsis of the case to aid the development of case summaries. Such synopses could be based on public access records like charge sheets and court judgements, but, wherever possible, case synopses should be drafted by an individual familiar with the case and then rewritten by an experienced trainer for the purposes of developing case summaries for use in workshops.

4. Challenges in Maximising Candour and Ensuring Trust

The subject matter’s sensitive nature means there is a risk that participants will be unwilling to engage with the material openly and candidly during workshops. Another risk is that attendees who do engage might still be reluctant to highlight personal or institutional failings linked to their own organisations (or to others in the room), thus depriving the workshop of insights that might be constructive in overcoming such challenges in the future.

Another issue is that the number of national institutions and actors in a position to work on financial investigation in IWT cases is typically low; it is therefore likely that some workshop participants will have worked on the selected case studies or know others who have. To overcome this, it is important to avoid any overtones of judgement or blame during the case review process and to focus on the need to identify ‘fresh’ (rather than ‘missed’) opportunities for financial investigation. This approach can be further supported by trainers, who can draw on personal experience and illustrative examples from other jurisdictions to create a ‘safe space’ for critical thinking to flourish. Ultimately, the success of the process depends on participants’ comfort and openness, and on the level of trust they have in the workshop facilitators and other attendees.
II. Implementation and Findings

Case Selection

As outlined in the methodology chapter, case selection for the workshops was based on extensive engagement with relevant partners and stakeholders, leading to the development of co-created criteria to guide the shortlisting and selection of cases. The criteria included the age and novelty of the case, as well as its estimated value and volume, the species impacted, the type of evidence available that would provide opportunities for financial investigation, and practical considerations such as case file accessibility. These criteria, summarised in Table 1, were tailored for each jurisdiction in consultation with key stakeholders.

It should be noted that the cases finally selected did not have to meet all the criteria in full. Instead, the criteria were designed to help guide the selection process, and reflect known indicators that might make a particular case more suitable for demonstrating key points and building participants’ capacity in techniques relevant to financial investigation, prosecution or asset recovery. Cognisant of the issues outlined in the previous chapter, a pragmatic approach was employed to ensure that in-country partners, stakeholders and participants would feel at ease working with the selected cases.

Table 1: Generic Case Selection Criteria

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Age of case</td>
<td>Ideally less than seven years old.</td>
</tr>
<tr>
<td>Value</td>
<td>Intelligence/evidence of either high-value product flows or high-value money flows (thresholds can vary by country).</td>
</tr>
<tr>
<td>Volume</td>
<td>Intelligence/evidence of high-volume product flows, noting that value trumps volume (for example, a small volume of rhino horn carries a large value). Sometimes volume is not apparent from case files and is rooted instead in intelligence (for example, in the case of suspects who might trade in high volumes but who were in possession of only a small volume of product when arrested).</td>
</tr>
<tr>
<td>Species</td>
<td>Consignments featuring rhino, elephant, lion, pangolin and other high-value endangered species should be prioritised. Lower-value products traded in large volumes (e.g., hippo teeth) may also be good candidates. The species will vary by country, but the priority should remain on products which, by volume or value, generate significant illicit financial flows.</td>
</tr>
</tbody>
</table>
Using Closed Case Reviews in Financial Investigation of the Illegal Wildlife Trade
Weeden, Williams, Haenlein and Glantz

<table>
<thead>
<tr>
<th>Criterion</th>
<th>Detail</th>
</tr>
</thead>
<tbody>
<tr>
<td>Accessibility</td>
<td>Case files exist, can be obtained from sister agencies where relevant, and files (or synopses) can be securely shared and stored for expert analysis.</td>
</tr>
<tr>
<td>Novelty</td>
<td>Ideally, the case is concluded or dormant and has not been the specific focus of any previous financial investigation activity (unless there is a novel dimension).</td>
</tr>
<tr>
<td>Evidence</td>
<td>Evidence exists about the suspect(s) which could support financial investigation and intelligence gathering, such as: • Financial data (deposit slips, ATM/other receipts, foreign exchange, mobile money, account numbers, funds transfers, statements, etc.). • Transactional and budgeting evidence (photos or notes on suspects’ phones, spreadsheets, lists of names, etc.). • Details of personal or corporate assets (property deeds, vehicle ownership, contracts, cash, luxury items, etc.). • Corporate data (registration documents, shareholder data, invoices, etc.). • Travel and logistics (air tickets, hotel bills, itineraries, waybills, freight forwarding paperwork, etc.). • Personal connections to high-risk entities under the relevant national risk assessment for the focal country.</td>
</tr>
</tbody>
</table>

Source: Author generated.

Case Summaries

Short summaries were prepared for each case. These included, where possible, photographs of suspects and evidence to add interest and verisimilitude. For some workshops, case summaries were prepared as ‘Analysis Cases’, where narratives included the basic facts of the case as well as its outcomes, and workshop participants were encouraged to analyse the outlined scenario in small group discussions and to identify what additional steps might have been taken if a parallel financial investigation had been conducted at the time. This approach was designed to strengthen analytical skills. The Case 1 box below includes an example of such a case.

Alternatively, where cases were rich in financial intelligence, summaries followed the ‘Dilemma’ model for case method teaching, presenting trainees with a ‘breadcrumb trail’ of prompts and tasking them to work together as an inter-agency unit to agree and present a financial investigation plan. This approach hones problem-solving and decision-making skills and is reflected in the example in the Case 2 box. Both examples have been anonymised for the purposes of this report but are based on the real-world cases used in the workshops.

32. Ibid.
Case 1: Analysis Case (Rhino Horn)

A1 and A2 are self-employed businessmen who own and operate legitimate businesses in Townsville, the capital city of Lukandia. Each man is accused of possession and dealing in controlled wildlife products – specifically rhino horn.

On 14 June 2016, the Lukandia police, working alongside the National Wildlife Authority, were alerted to a potential sale of illegal wildlife products in central Townsville. Plainclothes officers waited at a service station and saw A1 drive into the forecourt in a luxury Mercedes vehicle. Lukandia police officers questioned A1, observing a large bag on the floor of the vehicle, which A1 claimed not to know the contents of. Officers found four suspected rhino horns inside the bag. Officers arrested A1 under suspicion of possession of controlled wildlife products. Upon arrest, A1 admitted that he worked for another man, A2, whom he was to call once the sale of the rhino horns had been completed. In the presence of the officers, A1 called A2 and advised him to come and meet him, under the pretence that the sale had been completed. Upon arrival, A2 was also arrested.

The products were later evaluated by an expert from the Ministry of the Environment, who confirmed they were rhino horns weighing a total of 9.86 kg, worth $41,000. During their investigations, the Lukandia police ascertained that A1's monthly salary was around $1,800 but that, in addition to owning the Mercedes vehicle that the rhino horn was found in, he also owned a BMW, a Toyota Hilux, a commercial truck and private property. Investigations showed that A2, who earned around $5,000 per month from his business, owned a Range Rover, a Ford Ranger, a Toyota Corolla and a commercial truck, as well as private property.

A1 was charged with possession of controlled wildlife products. A2 was charged with dealing in controlled wildlife products. In 2021, A1 was convicted and sentenced to four years in prison in addition to a two-year suspended sentence, a penalty fine of 20,000 Lukandia dollars and the seizure of the Mercedes in which the contraband was found. Charges against A2 were dropped due to a lack of evidence.

Analyse the above case study to identify fresh opportunities for financial investigation.

Source: Adapted from case data.
Case 2: Dilemma Case (Ivory and Pangolin)

In January 2019, officers from Lukandia Customs Authority inspected a truck at the Omugana border crossing with neighbouring country Zandira. The search detected illegal elephant ivory and pangolin scales concealed within the licit timber consignment. Three Vietnamese suspects were arrested at the scene: A1, A2 and A3. The suspects had resided in Lukandia since 2017, engaging in timber exports through various companies. The truck carrying the containers (with a Zandira registration plate, number ZN 555) was driven by a Lukandian national, employed by a freight company called Global Haulage Ltd. The truck had travelled from a third country, the Kirunga Republic, where the timber had been loaded.

One of the containers on board the truck contained nine logs that had been hollowed out to conceal pangolin scales and ivory. The illicit products were sealed inside the logs, encased in paraffin wax and hidden under well-crafted wooden lids, giving the appearance of intact timber. The contraband was calculated as 500 kg of pangolin scales valued at $1,300,000 and 3,500 kg of ivory valued at $2,500,000.

All the suspects had their smartphones, passports and cash confiscated, and phone forensics were conducted. Searches of the suspects’ residential addresses in Townsville led to the arrest of A4, a female suspect, and uncovered a copy of a passport for a Vietnamese man who had been deported two years prior for attempting to smuggle rhino horn through Townsville airport. The house search also resulted in the seizure of approximately 300 items of corporate paperwork and correspondence, revealing associations between A1–A3 and the following companies:

• A Vietnamese-owned Lukandia-based timber export company.
• A Vietnamese-owned Townsville-based restaurant.
• A Vietnamese-owned Lukandia-based investment company.

Intelligence received from civil society identified a further 18 Vietnamese nationals that might be linked to the case. Many of the suspects – either those arrested or those named in the wanted poster – had a social media presence, and their profiles included multiple pictures of shipping containers loaded with logs. Two of these further suspects – A5 and A6 – were apprehended by law enforcement as they tried to board an international departure at Townsville airport. They were also arrested.

Financial intelligence received from Western Union showed regular payments between six of the suspects still at large, with funds flowing from Lukandia, Qatar, the UAE and Singapore to individuals in Lukandia and Vietnam. There were also regular payments between A1–A3 and the female defendant, A4. The latter claimed she was a masseuse, and that the money was payment for massages.

The case will soon be heard in the High Court. The defence lawyer is known for pushing for bail for his clients. What charges would you seek to have sanctioned, what strategies would you use to argue against bail, and how would you design your investigation strategy?

Source: Adapted from case data.

Workshop Structure and Participants

Between October 2023 and March 2024, the four closed case review workshops held by RUSI in Malawi, Namibia, Uganda and Zambia hosted a total of 88 attendees (41% of whom were female) drawn predominantly from the public sector, complemented by a variety of public, private and NGO guest speakers. Workshop participants were drawn from a variety of national government agencies, including representatives from:

• National FIUs.
• Wildlife crime task forces or equivalent (including accompanying agencies).
• Wildlife management authorities.
• Customs and revenue authorities.
• Police forces.
• Anti-corruption units.
• Departments of public prosecutions.

The implementing workshop team in each country was as outlined in Table 2.
**Table 2:** Breakdown of Workshop Delivery Teams

<table>
<thead>
<tr>
<th>Personnel</th>
<th>Workshop Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Senior financial investigations expert</td>
<td>Lead the technical training of all participants.</td>
</tr>
<tr>
<td>RUSI thematic expert</td>
<td>Provide transnational thematic experience.</td>
</tr>
<tr>
<td>International NGO IWT expert</td>
<td>Provide regional and international IWT context, plus international investigative experience.</td>
</tr>
<tr>
<td>Local and international financial sector</td>
<td>Detail the role of commercial banks and international money transfer agents in regional and global IWT, and identify opportunities for collaboration with the public sector.</td>
</tr>
<tr>
<td>representatives</td>
<td></td>
</tr>
<tr>
<td>National IWT expert</td>
<td>Provide national IWT context and insights into context-specific challenges to financial investigations.</td>
</tr>
</tbody>
</table>

Source: Author generated.

Speakers were engaged from across the workshop team as outlined in Table 2, with the addition of representatives from local authorities and the financial sector. In addition to the presence of the WULEU representative, commercial banks from the national financial sector also provided inputs. In Malawi, presentations from the financial sector were given by NBS Bank; in Zambia and Uganda, the workshop benefited from presentations by local Standard Chartered Bank representatives; and in Namibia, presentations were given by the Bankers Association of Namibia. These contributions, among others, were vital in promoting cross-sector understanding of roles and responsibilities with regard to financial investigation in IWT cases.

Workshop content was tailored to allow participants to develop a common baseline of financial investigation skills and to enhance existing knowledge of the nature of IWT product and financial supply chains to ensure meaningful, informed engagement with the cases chosen for review. A sample agenda is outlined in Table 3.
### Table 3: Closed Case Review Workshop Schedule

<table>
<thead>
<tr>
<th>Day</th>
<th>Time Block</th>
<th>0900 – 1030</th>
<th>1100 – 1230</th>
<th>1330 – 1430</th>
<th>1500 – 1630</th>
</tr>
</thead>
<tbody>
<tr>
<td>Day 1</td>
<td>Opening Remarks</td>
<td>Opening Remarks Introductions Course Overview</td>
<td>International and Regional Threat Landscape</td>
<td>Importance of IWT Supply Chains Applying Financial Investigation in IWT Cases</td>
<td>Case Study – The Shuidong Connection</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>National IWT and AML Landscape</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Day 2</td>
<td>Role of the Financial Sector (Commercial Bank)</td>
<td>Money or Value Transfer Service (Western Union)</td>
<td>Case Study – Teo Boon Ching</td>
<td>Prosecuting IWT (Prosecution Authority)</td>
<td></td>
</tr>
<tr>
<td>Day 3</td>
<td>Financial Investigation Small Group Case Review</td>
<td>Financial Investigation Small Group Case Review</td>
<td>Peer-to-Peer Feedback (Training the Trainer)</td>
<td>Peer-to-Peer Feedback (Training the Trainer)</td>
<td></td>
</tr>
<tr>
<td>Day 4</td>
<td>A View from the Judiciary (Chief Magistrate)</td>
<td>Plenary Discussion Evaluation Closing Ceremony</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Source: Author generated.

### Monitoring and Evaluation

Ahead of each workshop, participants completed questionnaires designed to gauge pre-workshop awareness of illicit finance linked to IWT and levels of capacity to conduct financial investigations. Following each workshop, participants completed questionnaires designed to assess progress against the baseline and identify avenues for future support. Both questionnaires included questions about their experience of working on IWT cases and financial investigations into wildlife offences, as well as broader attitudinal questions exploring perceptions of and approaches to IWT. These were supplemented by further questions allowing participants to self-assess their own awareness of IWT cases, their ability to use financial investigations in such cases, and their confidence in sharing relevant knowledge with peers. Also included were questions to assess how well participants understood the role and functions of their country’s FIU, and which entities were required to report to it. Collectively, these questions enabled the assessment of:

- Prior experience working on IWT cases, and in what capacity.
• Existing competence to conduct financial investigations and generate financial intelligence.
• Broader knowledge and understanding of the mechanisms by which illicit finance is generated from IWT.
• Perceptions and understanding of national institutional roles and responsibilities for combatting IWT.

Finally, questionnaires presented participants with the opportunity to provide feedback on the workshop design, the usefulness and applicability of case studies, and the workshop team itself, to inform future efforts.

Dependent on the question, participants were asked to respond with a simple yes or no, provide short qualitative inputs, or grade their knowledge and understanding of themes on a five-point scale, allowing the generation of varied, disaggregated data metrics. Several results drawn from the pre- and post-workshop questionnaires speak to the merits and shortcomings of the workshop methodology as applied in the focus countries, as detailed below.

Malawi

Case briefings prepared for the Malawi workshop included:
• A high-profile international case involving East African jurisdictions in ivory flows to China.
• A high-profile international case involving illegal trade in ivory from an East African jurisdiction to Southeast Asia.
• A typology of IWT in ivory between Malawi, an East African jurisdiction and China.

Pre- and Post-workshop Questionnaires

The pre-workshop questionnaires provided insights into the Malawian participants’ existing experience and knowledge of the workshop’s subject matter. The responses (15 in total) indicated a strong self-reported level of experience in financial investigation, as 80% (12/15) of participants reported having used financial investigation skills in their jobs – with many of these relating to IWT cases. Most participants had previously interacted with the financial sector during an investigation, and all 15 reported having been involved in a money laundering case. The self-reported scores relating to their understanding of and confidence in the application of asset recovery techniques, financial investigative tools and money laundering charges in IWT cases were largely reflective of their relative experience of conducting IWT-related financial investigations, gained
during the contemporaneous proceedings in the Lin-Zhang prosecution, which was ongoing at the time of the workshop. For example, the median participant commanded ‘some’ understanding of tools and concepts for financial investigations and most reported at least ‘some’ confidence in sharing this understanding with colleagues. A slight majority of respondents correctly identified the functions of the Malawi FIA and the entities required to report to it.

Post-workshop questionnaire results demonstrated improvement across each of the surveyed metrics. Most of the participants self-reported improved understanding, skills and confidence. The largest leaps – from ‘some’ to ‘a lot’ – occurred in participants’ ability to identify IWT cases for potential financial investigation and, critically, in their self-confidence about sharing this knowledge with colleagues. Regarding FIU-related knowledge, respondents showed greater accuracy and collective certainty on the functions and entities related to the Malawi FIA.

Namibia

Case briefings used during the Namibia workshop included:

- Two renowned closed national cases with transnational elements.
- One hypothetical case exercise utilising a redacted financial statement from one of the workshop team members.
- One hypothetical ‘mind mapping’ exercise developed and led by the national partner.

Pre- and Post-Workshop Questionnaires

Prior to the workshop, attendees in Namibia reported not only near-unanimous belief in the value of financial investigations and involving the financial sector in IWT cases, but also significant self-reported levels of experience in cases of IWT, money laundering and financial investigations. Specifically, 72% (18/25) reported having used financial investigations, and more than 94% (14/15) of attendees who had experience on an IWT case reported having used financial intelligence. Self-assessments of skills and abilities from Namibian participants varied, with nearly as many respondents reporting ‘a little’ understanding of financial tools and money laundering investigations (and their ability to identify opportunities to leverage them) as those reporting ‘quite a lot’. However, in questions relating to abilities, understanding and knowledge, most respondents responded ‘some’. Variation across respondents was also visible in questions pertaining to the function of the Namibia FIC and the entities required to report

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33. Kam, ‘Conviction of Wildlife Trafficking Network for Financial Crime is a Major Milestone in Malawi’.
to it. Though almost all respondents knew of the FIC's responsibility to evaluate suspicious transaction reports and banks’ responsibilities to file them, no consensus on the other functions or entities was apparent.

Post-event questionnaires demonstrated that progress had been achieved as a result of the workshop, with the average respondent self-reporting as having ‘quite a lot’ of knowledge, up from the baseline level of ‘some’ across the seven questions gauging skills, awareness and confidence. Where respondents’ lowest average pre-workshop self-assessment lay with their awareness of global IWT cases in which financial investigations were used, the post-workshop results yielded a median improvement of ‘quite a lot’. Increases in knowledge of FIC-reporting entities and FIC functions were noticeable, although some confusion persisted.

Uganda

Case briefings used during the Uganda workshop included:

- Two renowned closed national cases.
- One cold case involving a network of offenders from Southeast Asia.

Pre- and Post-Workshop Questionnaires

Pre-workshop questionnaire results in Uganda demonstrated relatively little experience in IWT cases and in the use of financial investigations among workshop participants. Despite unanimity in recognising the value of both financial investigations and private sector input in IWT cases, just over 53% (14/26) of respondents had used financial investigations or worked with the private sector, and just under 31% (8/26) reported having used financial tools in IWT cases. The median respondent considered themselves to have ‘some’ level of awareness, skills and confidence in financial investigation tools and private sector partnership. However, a majority of respondents self-reported having only ‘a little’ in the way of awareness, skills and confidence. With respect to awareness of which entities have reporting requirements to the Uganda FIA, the responses demonstrated significant uncertainty, with respondents only clearly identifying banks.

In post-workshop questionnaires, there was an average self-reported increase in confidence in sharing investigation and asset recovery techniques with peers, from ‘some’ to ‘a lot’. Similar growth occurred in awareness of global IWT cases in which financial investigations were used and in how asset forfeiture can be used against offenders. Practical knowledge relating to the Uganda FIA improved, with a greater number of respondents identifying the correct regulated entities,
although some confusion remained around casinos, lawyers, accountants and real estate agents.

Zambia

Case briefings used during the Zambia workshop included:

- One closed national case featuring a high-profile Zambian offender.
- One closed national case featuring a high-profile East Asian offender.

Pre- and Post-Workshop Questionnaires

Participants in Zambia (19 in total) unanimously reported the potential utility of financial investigations and the role of the private sector in IWT investigations. Around half reported experience with financial investigations (47%, or 9/19) and private sector engagement (52%, or 10/19), but their use in IWT cases (11%, or 2/18) proved considerably lower. A self-assessment of conceptual and practical knowledge reflected the limited experience of Zambian participants in this area. The majority of respondents reported no awareness of wildlife cases in which financial investigations were used, with only two respondents having more than ‘some’ awareness. Critically, no Zambian respondents considered themselves to possess more than ‘some’ ability to identify opportunities for using financial investigation in IWT cases. Significant confusion was evident in responses on the responsibilities of the Zambia FIC and entities with reporting requirements, with a clear consensus only on the FIC’s responsibility to review suspicious transaction reports and banks’ requirement to file them.

In post-workshop questionnaires, the median Zambian respondent’s pre-workshop self-report of ‘no knowledge’ of financially investigated IWT cases improved significantly, with the median now reporting ‘quite a lot’ of knowledge. Mirroring this increase, self-reported abilities to identify cases in which financial investigation could be used rose markedly – up from ‘a little’ to ‘a lot’ – and reported self-confidence in sharing knowledge on financial investigations, prosecutions and asset recovery with peers reached an average of ‘a lot’ (up from ‘some’). Improved knowledge was demonstrated in responses relating to FIUs, with respondents demonstrating clearer understanding of which entities must report to the Zambia FIC (although continued confusion, as seen in other workshops, persisted around import/export companies and transport companies in particular).

This review of experience in all four focal countries makes it clear that the Closed Case Method can be used to support agencies with significantly different baseline levels of financial investigative knowledge and experience. At the outset,
participants in the four countries exhibited varying competencies related to IWT financial investigations, but improvement was registered in all countries in post-workshop questionnaires.
III. Lessons Learned and Best Practices

Several lessons can be learned from the research team’s experience using the Closed Case Method in workshops delivered in Malawi, Namibia, Uganda and Zambia.

1. The Closed Case Method can enhance national capacity regardless of differential levels of financial investigative experience.

Ahead of the workshops, participants from the four focal countries demonstrated different baseline competencies related to IWT financial investigations. This did not, however, limit the effectiveness of the workshops in any of the focal countries. Where baseline capacity was low, the workshop successfully identified ‘low-hanging fruit’ and opportunities to immediately catalyse greater financial awareness. For example, participants in Zambia, despite demonstrating the lowest baseline familiarity with IWT financial investigations, also showcased the largest improvement from the baseline in post-workshop questionnaires.

Where baseline capacity was high, the Closed Case Method successfully encouraged participants to tease out and address more granular needs. In Namibia, the process of ‘slowing down’ what are typically speedy and high-intensity investigations by using a mind mapping approach (see Annex I) enabled participants to effectively plan their national investigation process in a way which better identified opportunities to gather financial intelligence.  

2. Efforts should be made to ensure ownership and endorsement of closed case activities by national entities.

The Closed Case Method is best implemented when the workshop activities, as well as the participants undertaking them, mirror real-world events and roles. In countries where hypothetical case studies were included in the workshop, some participants identified minor levels of dissatisfaction about their applicability to the relevant national context. While hypothetical cases can be substituted where no appropriate national case studies exist, or to avoid using scenarios that too closely resemble ongoing live cases, case reviews are significantly more compelling for participants when they represent authentic, local scenarios. The workshops were also most effective when national partners and government institutions led the mock investigation, as this most closely...

34. Author interview with anonymous IWT practitioner, March 2023.
reflected real-world practice. National ownership enables government institutions to own and define their own financial investigative process, using pre-existing knowledge of local responsibilities. This ownership also creates pathways to secure high-level buy-in to future training activities, negating the need for international interventions and increasing the sustainability of the Closed Case Method.

For instance, following the completion of the successful workshop activity in Zambia, RUSI was asked to support an inter-agency task force on asset recovery in conducting a follow-on review of 10 (rising to 14) closed cases to identify missed opportunities to gather financial intelligence. This process culminated in the production of: a financial profile template; two spreadsheets containing the assessed closed cases and a series of active cases to be reviewed; a concrete list of actions to advance the active cases; and a commitment to collaborate with WULEU to build more accurate financial profiles of at-large offenders. This additional activity highlights the sustainability of the case review process.

3. **The judiciary should be given a key role in conducting IWT closed case reviews to bridge the gap between financial investigations and successful court outcomes.**

At different junctures, all of the focal countries identified the merits of including judicial actors in the case review process in some form. Though atypical in law enforcement capacity building, and the inclusion of the judiciary in the small group discussions may jeopardise any court actions that emerge from the review process, the presence of judicial officers as guest speakers or officiants helps to bridge the gap between investigative processes and the likelihood of successful prosecutions. Including judicial actors in the delivery of financial investigative training increases the chance that law enforcement actors will conduct legally proper investigations (avoiding risks of inadmissible or inadequate court evidence), and that judicial actors will hand down proportional sentences due to improved awareness of the money laundering risks relating to IWT.

The Closed Case Method clearly demonstrates that multi-agency training in this area must span the entirety of the IWT supply chain. Excluding any entity involved in the successful investigation and prosecution of IWT offenders perpetuates inadequate processes and impedes effective disruption of money laundering.

4. **The involvement of the financial sector in closed case reviews, including commercial banks and international money transfer platforms and services, improves public–private information sharing by building pathways for future collaboration.**
Financial information held by private sector financial institutions is vital in
detecting and investigating wildlife-related money laundering. Non-existent,
inadequate or inconsistent information-sharing mechanisms between public
and private sector entities were identified as a challenge in all focal countries,
irrespective of the workshop participants’ familiarity with financial investigations.

In the months immediately following the workshops, all countries contacted
WULEU, making 27 fresh information requests that generated more than 500
lines of novel financial intelligence. For three of the focal countries, this
represented the first time they had formalised requests of this kind to WULEU.

5. Efforts should be made to accurately define the role of a jurisdiction’s FIU
during the research and preparation stage of the Closed Case Method.

In all focal countries, the smallest shift from the pre-questionnaire baseline
was seen in an informed and accurate collective understanding of the role of
the national FIU. While respondents showed some improvement in understanding
the roles of their respective FIUs, participants in all workshops seldom reached
a consensus in correctly identifying their functions, suggesting ongoing confusion
between the functions of generating intelligence and undertaking an investigation.
As these can be subtly nuanced by country, efforts should be made prior to case
review workshops to establish the precise mandate of a particular FIU, and this
should also be emphasised throughout the training activities to more clearly
delineate institutional roles and promote accountability for parallel financial
investigations of IWT.

Based on the Closed Case Method as developed by RUSI, and refined under these
workshops, a useful checklist has been created which summarises the
methodology’s key stages and activities. This can be found in Annex II.

35. Author correspondence with Western Union, 26 April 2023.
Conclusion

Using multi-agency reviews of closed cases to identify typologies of IWT-related financial crime, develop risk indicators and potentially reveal new leads is an increasingly well-recognised practice, with the FATF recommending that all affected countries exploit this approach to support financial investigations into IWT cases. This Whitehall Report has outlined the experience gained, lessons learned and best practices derived from recent efforts to refine the Closed Case Method first piloted in Lao PDR in 2019.

The experience of employing the Closed Case Method in multi-agency capacity-building workshops held in Malawi, Namibia, Uganda and Zambia in 2022–23 highlighted a range of challenges and opportunities, and led to refinements of the methodology as it was shared with the workshop participants in the four focal countries. The Closed Case Method was employed with a view to supporting its adoption and use among a wider range of practitioners, all the while tailoring it – as appropriate – to the national context in question.

This methodology involves the retroactive analysis of historical IWT cases to identify fresh opportunities to gather and act on financial intelligence. The team’s methodology for using closed case reviews in capacity building has been broken down into three different stages. First, the ‘research and preparation’ stage involves context-specific literature reviews, targeted stakeholder engagement, case criteria development, case selection and the development of training materials. The second stage, ‘capacity building’, comprises delivery of multi-agency workshops, involving baseline skills training and small group case reviews. Third, the ‘learning and dissemination’ stage involves the development of red flags and risk indicators, the dissemination of financial intelligence to the private and public sectors, and monitoring and evaluation.

A range of lessons have been learned and best practice principles derived from the experience of using the closed case review methodology in Malawi, Namibia, Uganda and Zambia. These include the following:

• **Adaptability**: The Closed Case Method is applicable to national entities possessing significantly different levels of financial investigative experience. Notably, prior to the intervention, the relevant agencies in the four case study countries demonstrated different baseline competencies in conducting financial investigations in IWT cases, which could be catered for by tailoring the methodology.

• **National ownership**: The Closed Case Method is best implemented when workshop activities are led by in-country stakeholders. Efforts should be made to ensure that ownership of closed case activities is vested in national
entities, with the co-creation of case selection criteria being key to the exercise’s success.

- **Multi-agency approach**: Experience of using the Closed Case Method clearly demonstrates that multi-agency training in this area must span the full breadth of the institutional set-up involved in countering IWT. Crucially, judicial actors – including judges and magistrates – should not be excluded from IWT closed case review workshops.

- **Private sector involvement**: Financial information held by private sector financial institutions is vital in enabling effective financial investigations. The involvement of the private sector, including international money transfer platforms and services, is thus essential to the delivery of an effective closed case review.

- **FIU engagement**: The specific type and role of the relevant national FIU must be clearly understood and accounted for in designing and delivering closed case review exercises in any given country. The buy-in and support of the national FIU, among other key agencies, is key to the sustainability of this approach.
About the Authors

**Anne-Marie Weeden** is a Senior Research Fellow in RUSI’s Organised Crime and Policing (OCP) research group. Hailing from a multi-disciplinary background, Anne-Marie has worked in the conservation sector since 2015. She spent 12 years living and working in Uganda, where she ran a conservation NGO, set up a consultancy to provide technical support to conservation, peacebuilding, and security in East, West, and Southern Africa, and supported transnational investigations into organised crime. In 2017, she helped RUSI deliver the first-ever financial investigation capacity-building workshops in East Africa, before moving back to the UK in 2020. She joined RUSI as a consultant and Associate Fellow in 2021 and became a full-time member of the OCP team in 2022, where she leads the Environmental Crime portfolio and has led work on IWT projects with a focus on Cameroon, China, Malawi, Namibia, Nigeria, Uganda and Zambia. She has a fascination with the intersections of organised crime, illicit finance and corruption, and their long-term impacts on social justice. Anne-Marie is a member of the Interpol Wildlife Crime Working Group, the United for Wildlife Financial Taskforce, the University of Portsmouth School of Criminology and Criminal Justice ‘Environmental Justice’ Research Group, and the UN Convention Against Corruption Coalition Environmental Crime and Corruption Working Group. She is a joint guest editor of the journal *Laws*, having worked on a special edition on global IWT threats and advances in the public response. Anne-Marie holds an MSc in Economic Crime from the School of Criminology and Criminal Justice at the University of Portsmouth, where her dissertation focused on the hidden impacts of corruption in wildlife justice, as well as a BA in Film and Media from Stirling University.

**Mark Williams** is the Programme Manager for the Organised Crime and Policing (OCP) research group at RUSI. He provides technical assistance and project management support to the full range of OCP’s projects and programmes. He is also responsible for the administration of the Strategic Hub for Organised Crime Research. Prior to his current position, Mark was a Research Analyst within the same team. His research covered a range of topics related to transnational organised crime, including maritime security, environmental security and illicit financial flows. He has co-authored notable research papers, including the first regional knowledge and capacity assessment on illicit financial flows connected to IWT in West and Central Africa, and writing on the adoption of a human security approach towards illicit trafficking in North Africa. More broadly, he has research interests in transnational law, international criminal legislative frameworks, and the evolution and modernisation of organised criminal groups. Prior to joining RUSI, he was a Programme Officer at the UN Office on Drugs and Crime Regional Office for Eastern Africa. Mark holds an LLM in Transnational Law from King’s College London and an LLB from the University of Birmingham. His LLM dissertation evaluated the failure of international refugee law in protecting internally displaced persons, focusing on Kenya and Somalia as a primary case study.
Cathy Haenlein is a Senior Research Fellow and Director of the Organised Crime and Policing research group at RUSI, with expertise in serious and organised crime, illicit trade, conflict and development. She has a particular focus on transnational environmental crime, with regional expertise across East, West and Southern Africa. Cathy is the editor, with M L R Smith, of *Poaching, Wildlife Trafficking and Security in Africa: Myths and Realities* (Abingdon: Taylor and Francis, 2016). She is also the Chair of RUSI’s Strategic Hub for Organised Crime Research, established in partnership with the Home Office, the National Crime Agency, the then Foreign and Commonwealth Office, and Research Councils UK (now UKRI)’s Partnership for Conflict, Crime and Security. Before joining RUSI in 2012, Cathy worked in Madagascar as a Project Development Specialist for an international NGO. She also spent five years in Italy, working with European publications on EU–African relations, development cooperation and migration. Cathy holds an MSc in African Politics from the School of Oriental and African Studies, University of London, with a focus on crime, conflict and peacekeeping, as well as a BA from Durham University in Combined Social Sciences (Politics, Criminology and Geography).

Elijah Glantz is a Research Analyst and Project Officer for the Organised Crime and Policing (OCP) team at RUSI. His areas of research include sanctions policy and the use of financial investigations in tackling organised crime and corruption. Additionally, Elijah is engaged in OCP’s ongoing work on policing and policy engagement with key private, academic and public sector stakeholders. In addition to supporting the team’s research, he manages projects in OCP’s environmental crime portfolio and is Co-Project Manager and Lead Editor for RUSI’s Strategic Hub for Organised Crime Research. Elijah’s research and project management focuses primarily on sub-Saharan Africa, with several projects spanning West, East and Central Africa throughout his time at RUSI. He holds an MSc in Conflict Studies from the London School of Economics, where his dissertation modelled cartel fragmentation following leadership removals in Mexican states from 2008–13. He also holds a BA in Political Humanities from Sciences Po in France. Elijah previously interned and served as a research assistant at RUSI throughout his studies.
Annex I: Participant-Generated Investigation Planning Mind Map

Background of J
- Namibian citizen
- Social network: Wife, Girlfriend
- Top 10 criminals
- Previous conviction
- Luxury assets
- Deal with wildlife crime products
- Possible transboundary associates
- Lawyer

Open a General Information (GI)
- Through interview of offenders to J
- Through surveillance by undercover officers

Profiling the suspect
- Establish full name of J
- Establish social network
- Analysis of associates/links
- Person of Interest (POI) database
- Establish criminal history
- Check further info in the Wildlife Crime Database
- Consolidate possible ongoing cases
- Find the docket
- Place the docket back on the roll
- Reconstruct the docket

Established businesses
- Tax information
- Import/export information
- Any shareholder?
- Bank details
- Is J signatory of other bank accounts?
- Of the suspect and wife
- Bank statement
- Analysis locations of bank card transactions vs. previous crimes
- Of J’s lawyer (in case money in lawyer’s trust account)
- Western Union
- MoneyGram
- Wise Cambios
- Shoprite Transfer
- ETC

Establish if any transaction with money remitters
- Properties
- Proof of ownership
- Tag # at the Ministry of Agriculture
- If house in town
- If house in the village
- VAT services
- NATIS
- Previous owner?
- Method of payment

Establish assets
- Livestock
- Vehicles
- Etc.

Operation “J”
- Request authorisations prior to investigation
  - Sect. 43 of POCA—Authorisation by Inspector General to investigate any bank account
  - Sect. 37 & 48 of POCA—Sharing of information
  - Sect. 47 of CPA for bank institutions and NATIS
- Civil asset forfeiture
  - Preservation order (90 days)
- Criminal asset forfeiture
  - Under POCA
- Tax evasion investigation
  - Freeze account
- Coordinate with the office of the Prosecutor General about future operations
  - Search J’s house
  - Apply for search warrant
- Monitoring his movements (especially outside of the country)
  - Analysing cellphone data
- Namibia FIC to request financial info from Angola FIC
  - Through East and Southern Africa Anti-Money Laundering Group
- Request from INTERPOL if J is on the Red List
  - Sect. 179 of CPA for bank institutions and NATIS
- Request from Home Affairs
  - Request Home Affairs for travel history of J and his associates
- Conventional Surveillance
  - Covert Human Intelligence Sources
  - Undercover officers
  - Shoprite Transfer

Possible Actions
- For list of relations of J
- For list of associates
- For list of associates
- For travel history of J

Source: Generated by participants at the RUSI ‘Case Closed’ Namibia Workshop, March 2023.
Annex II: The Closed Case Method: Implementation Checklist

Stage 1: Research and Preparation
- Literature review conducted and key themes logged
- Stakeholder map produced
- Stakeholders engaged
- Case selection criteria developed – in concert with experts
- Case selection matrix developed and populated – in concert with national partners
- Locally specific training materials developed and disseminated:
  - Case briefings
  - Questionnaires
  - Agenda and relevant workshop information

Stage 2: Capacity Building
- Pre-workshop questionnaires completed
- Baseline skills training conducted
- Small group case reviews conducted
- Post-workshop questionnaires completed

Stage 3: Learning and Dissemination
- Analysis of workshop quantitative and qualitative data
- Risk indicators and red flags developed for the private sector
- Monitoring and evaluation conducted of exercise success

Source: Author generated.