

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



Asian Racing Federation
Council on Anti-Illegal Betting
& Related Financial Crime

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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-scam operations 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”,¹ 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, has 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.

¹ wwA Chinese term for the ‘fattening up’ of victims by careful long-term relationship building typically over chat apps, encouraging them to transfer money, then cutting off all contact

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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 supports 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.² This global crime involves more than 50 million victims worldwide,³ 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:

² United Nations Office on Drugs and Crime (UNODC) <https://www.unodc.org/unodc/en/human-trafficking/human-trafficking.html>

³ International Labour Organisation (ILO) press release, 12 September 2022 https://www.ilo.org/global/about-the-ilo/newsroom/news/WCMS_855019/lang--en/index.htm

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-butcher'ing', 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.

5 Case study adapted from media report: Tara Anand, 'Human Trafficking's Newest Abuse: Forcing Victims Into Cyberscamming', ProPublica, 13 September 2022 (<https://www.propublica.org/article/human-traffickers-force-victims-into-cyberscamming> accessed 7 November 2022)

Threats and 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 Organization 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, and 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.

6 Case study adapted from media report: Nathan Paul Southern and Lindsey Kennedy, 'Laos' criminal casino empire: Chinese gangsters suspected of running brothels and online scams, and trafficking humans, animal parts and drugs', South China Morning Post, 15 October 2022 (<https://www.scmp.com/magazines/post-magazine/long-reads/article/3195932/laos-criminal-casino-empire-chinese-gangsters> accessed 3 November 2022)

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- 4. Isolation:** Isolating a person from their friends, family, and wider community serves to further bring the victim under the traffickers' control.
 - 5. Physical and sexual violence:** Victims are often abused and hurt in order to keep them compliant and fearful of their captors.
 - 6. Intimidation and threats:** Threats may be made to the safety of the victim and also may be made towards the victims' families. This can be used to hold a person in place and break their resolve.
 - 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 them.
 - 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 and 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 unlawful or heavily restricted – which it is in 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”.⁷ 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 about 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.

7 Council of Europe Convention on the Manipulation of Sports Competitions, p.4 (<https://rm.coe.int/16801cdd7e> accessed 23 September 2022)

8 ‘Time to act: Europe’s political response to fighting the manipulation of sports competitions’, Parliamentary Assembly of the Council of Europe, Doc. 15116, 15 June 2020 (<https://assembly.coe.int/nw/xml/XRef/Xref-XML2HT-ML-en.asp?fileid=28648&lang=en> accessed 8 December 2022)

9 For the purposes of this report, encompassing Mainland China, Hong Kong, Macau and Taiwan, as well as the huge Chinese speaking diaspora across Southeast Asia. No political viewpoint is intended or implied.

10 ‘State of Illegal Betting Report’, Asian Facing Federation, 18 May 2022, p.18 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/62844a249c7d1e17ec718f02_State-of-Illegal-Betting-2022_v11-RGB-opt.pdf accessed 29 September 2022)

11 Laurent Vidal, ‘Protecting the Integrity of Sport Competition - The Last Bet for Modern Sport’, May 2014, p.22 (https://www.researchgate.net/publication/280112161_Protecting_the_Integrity_of_Sport_Competition_-_The_Last_Bet_for_Modern_Sport accessed 23 September 2022)

12 ‘Global Report on Corruption in Sport’, United Nations Office on Drugs and Crime, 2021, p.259 (https://www.unodc.org/res/safeguardingsport/grcs/22-03221_SPORTS_CORRUPTION_2021_Full_report.pdf accessed 6 September 2022)

13 ‘Global Report on Corruption in Sport’, United Nations Office on Drugs and Crime, 2021, p.259 (https://www.unodc.org/res/safeguardingsport/grcs/22-03221_SPORTS_CORRUPTION_2021_Full_report.pdf accessed 6 September 2022)

14 Ibid.

15 Sam Loule, ‘Asian Gambling Addiction’, Psychology Today, 10 July 2014 (<https://www.psychologytoday.com/us/blog/minority-report/201407/asian-gambling-addiction> accessed 29 September 2022)

Illegal betting is so large in Asia because it has about 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 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.

16 'World Population Prospects 2022: Summary of Results', United Nations Department of Economic and Social Affairs, Population Division, 2022, p.9 (https://www.un.org/development/desa/pd/sites/www.un.org.development.desa.pd/files/wpp2022_summary_of_results.pdf accessed 29 September 2022)

17 Sam Loule, 'Asian Gambling Addiction', Psychology Today, 10 July 2014 (<https://www.psychologytoday.com/us/blog/minority-report/201407/asian-gambling-addiction> accessed 29 September 2022)

18 'Good Practices in Addressing Illegal Betting: A Handbook for Racing and Sports Organisations to Uphold Integrity', Asian Racing Federation, 19 October 2020, p.21, 29, 33 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/602da29ac73f8df753e6eac6_Good%20practices%20in%20addressing%20illegal%20betting_FINAL_19%20Oct%202020.pdf accessed 7 September 2022)

19 L Moodie, Organized Crime Section. Illegal Gambling, Paper presented at the Gambling, Law Enforcement Systems Issues Conference, University of Alberta, Edmonton, March 8 2002. As cited in Banks, Gambling Crime and Society, 2017

20 Australian Criminal Intelligence Commission – Organised Crime in Australia 2017, p.3 (https://www.acic.gov.au/sites/default/files/2020-08/oca_2017_key_enablers.pdf accessed 27 September 2022)

21 'Illegal betting in an Asian context', Asian Racing Federation, 18 December 2018, p.14 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/5fd822759fef2e07d6c91c99_Illegal%20Betting%20in%20an%20Asian%20Context.pdf accessed 27 September 2022)

22 'State of Illegal Betting Report', Asian Facing Federation, 18 May 2022, p.11, 89 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/62844a249c7d1e17ec718f02_State-of-Illegal-Betting-2022_v11-RGB-opt.pdf accessed 7 September 2022)

23 T. Wing Lo and Sharon Ingrid Kwok, 'Triad Organized Crime In Macau Casinos: Extra-Legal Governance And Entrepreneurship', British Journal of Criminology, 8 February 2016, p.7 (https://www.academia.edu/36835699/TRIAD_ORGANIZED_CRIME_IN_MACAU_CASINOS_EXTRA_LEGAL_GOVERNANCE_AND_ENTREPRENEURSHIP accessed 27 September 2022)

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 a turnover in Mainland China alone that was equivalent to about 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}

24 'How China's Crackdown on Illegal Betting Impacts Global Betting Markets', Asian Racing Federation, 1 September 2021, p.6, 10 (https://assets-global.website-files.com/5f5be2bde2b2ef4841cd-6639c/61aed489a8a2fec2117b1184_How%20China%27s%20Crackdown%20on%20Illegal%20Betting%20Impacts%20Global%20Betting%20Markets_final_new%20cover.pdf accessed 8 September 2022)

25 Kelsey Wilhelm, 'Alvin Chau defense: proxy betting revenue so low, illogical to risk conducting illegal operation', Asia Gaming Brief, 30 November 2022 (<https://bit.ly/3XOYine>)

26 '周焯华跨境赌博犯罪集团骨干所涉三起案件一审宣判, 36人被判刑', new.qq.com, 30 September 2022 (<https://new.qq.com/rain/a/20220930A06G6T00> accessed 27 October 2022)

27 王文志, '特大国际网络赌博平台深度渗透国内', Economic Information Daily, 8 July 2019 (http://www.jjckb.cn/2019-07/08/c_138207462.htm accessed 12 December 2022)

28 '特大国际网络赌博平台深度渗透国内', people.cn, 8 July 2019 (<http://finance.people.com.cn/n1/2019/0708/c1004-31218699.html> accessed 27 October 2022)

29 Report of the Inquiry under section 143 of the Casino Control Act 1992 (NSW), dated 1 February 2021 (Volumes One and Two) 'Bergin Report' <https://www.parliament.nsw.gov.au/la/papers/Pages/tabled-paper-details.aspx?pk=79129&houseCode=la>, Volume 1 page 232 paragraph 154 & page 237 paragraph 193&195

30 'Successful conclusion of the 'Suncity Group 10th Anniversary Night of Legends'', Hong Kong Business, 2018 (<https://web.archive.org/web/20211017061400/https://hongkongbusiness.hk/leisure-entertainment/more-news/successful-conclusion-%25E2%2580%259Csuncity-group-10th-anniversary-night-legends%25E2%2580%259D> accessed 12 December 2022)

31 Adam Luck and Nick Harris, 'MPs call for investigation into extraordinary story of 10 Premier League clubs with eight online betting partners targeting Asia, all linked to one company in the Isle of Man - and its mysterious ties to Chinese 'triad' who's just been jailed for 18 years', Daily Mail, 21 January 2023 (<https://www.dailymail.co.uk/sport/football/article-11661895/MPs-want-investigation-links-jailed-Chinese-billionaire-clubs-betting-partners.html> accessed 9 June 2023)

32 Philippe Auclair, 'Meet Mr Chau', Josimar, 16 June 2022 (<https://josimarfootball.com/2022/06/16/meet-mr-chau/> accessed 9 June 2023)

33 Steven Stradbroke, 'Online gambling mystery as 138.com shuts down', CalvinAyre.com, 28 May 2020 (<https://calvinayre.com/2020/05/28/business/online-gambling-mystery-138-com-shuts-down/> accessed 12 December 2022)

34 Newdesk, 'Suncity Group to provide consultancy services for new Cambodian casino resort', Inside Asian Gaming, 5 September 2018 (<https://www.asgam.com/index.php/2018/09/05/suncity-group-to-provide-consultancy-services-for-new-cambodian-casino-resort/> accessed 14 April 2023)

35 'K99 Group Triumph City', Cyber Scam Monitor, 23 February 2023 (<https://cyberscammonitor.net/profile/k99-group-triumph-city/> accessed 14 April 2023)

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 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.

36 'A Report of Illegal Betting Growth During the COVID-19 Pandemic', Asian Racing Federation, 1 May 2021, p.14 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/61aed77b9cf4e8a8c96f8e65_ARF%20AIB%20Report%20Illegal%20Betting%20Growth%20During%20the%20COVID-19%20Pandemic_May%202021.pdf accessed 7 September 2022)

37 'The Displacement of Illegal Betting and Transnational Organised Crime', Martin Purbrick, Asian Racing Federation, 31 January 2023 (<https://www.asianracing.org/email/202301qb-the-displacement-of-illegal-betting-and-transnational-organised-crime> accessed 13 April 2023)

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 15 years or so, there has been a huge demand for workers, especially Chinese speakers, to serve the gambling operators, not only 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” because “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.

38 UNODC, ‘Transnational Organized Crime in Southeast Asia: Evolution, Growth and Impact’, UNODC Research, 2019 (https://www.unodc.org/roseap/uploads/documents/Publications/2019/SEA_TOCTA_2019_web.pdf accessed 13 April 2023)

39 Zsombor Peter, ‘UN Warns of Growing Criminal Threat from Mekong Region Casinos, SEZs’, Voice of America, 25 September 2022 (<https://www.voanews.com/a/un-warns-of-growing-criminal-threat-from-mekong-region-casinos-sezs/6762228.html> accessed 16 November 2022)

40 Ibid footnote 37

41 Ibid footnote 38.

42 Priscilla A. Clapp and Jason Tower, ‘Myanmar’s Criminal Zones: A Growing Threat to Global Security’, United States Institute of Peace, 9 November 2022 (<https://www.usip.org/publications/2022/11/myanmars-criminal-zones-growing-threat-global-security> accessed 16 November 2022)

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, for example) 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-butcher 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

43 'How China's Crackdown on Illegal Betting Impacts Global Betting Markets', Asian Racing Federation, 1 September 2021, p.6, 10 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/61aed489a8a2fec2117b1184_How%20China%27s%20Crackdown%20on%20Illegal%20Betting%20Impacts%20Global%20Betting%20Markets_final_new%20cover.pdf accessed 8 September 2022)

44 James Porteous, 'Notable recent Asian illegal betting cases and typologies - Bulletin of the ARF Council on Anti-Illegal Betting & Related Financial Crime October 2022', Asian Racing Federation, October 2022, p.18 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/63560668509457073b7f6791_October%20Bulletin_final.pdf accessed 9 December 2022)

45 'A Report of Illegal Betting Growth During the COVID-19 Pandemic', Asian Racing Federation, 1 May 2021, p.4, 5, 7, 12, (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/61aed77b9cf4e8a8c96f8e65_ARF%20AIB%20Report%20Illegal%20Betting%20Growth%20During%20the%20COVID-19%20Pandemic_May%202021.pdf accessed 7 September 2022)

46 'State of Illegal Betting Report', Asian Facing Federation, 18 May 2022, p.57 (https://assets-global.website-files.com/5f8e2bde2b2ef4841cd6639c/62844a249c7d1e17ec718f02_State-of-Illegal-Betting-2022_v11-RGB-opt.pdf accessed 8 September 2022)

47 Jeremy Douglas, 'How Covid-19 pandemic forced Southeast Asia's casino criminals to be on tech – and win', South China Morning Post, 7 August 2022 (<https://www.scmp.com/comment/opinion/asia/article/3187800/how-covid-19-pandemic-forced-southeast-asias-casino-criminals> accessed 14 December 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, likely as recruitment tactics became better known in China and as operators began to target 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.

48 INTERPOL issues global warning on human trafficking-fueled fraud, 7 June 2023, <https://www.interpol.int/en/News-and-Events/News/2023/INTERPOL-issues-global-warning-on-human-trafficking-fueled-fraud>

49 ibid

50 Zsombor Peter, ‘UN Warns of Growing Criminal Threat from Mekong Region Casinos, SEZs’, Voice of America, 25 September 2022 (<https://www.voanws.com/a/un-warns-of-growing-criminal-threat-from-mekong-region-casinos-sezs/6762228.html> accessed 16 November 2022)

51 ‘China’s triads and corrupt Thai cops undermined national security’, ThaiPBS World, 13 March 2023 (<https://www.thaipbsworld.com/chinas-triads-and-corrupt-thai-cops-undermined-national-security/> accessed 13 April 2023)

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 (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.

52 Martin Purbrick, 'The Displacement of Illegal Betting and Transnational Organised Crime', Asian Racing Federation, February 2023 (<https://www.asianracing.org/email/202301qb-the-displacement-of-illegal-betting-and-transnational-organised-crime> accessed 25 April 2023)

53 i.e., Call centres, customer support, accounting, etc. This is a major industry in the Philippines, providing cheap labour to overseas companies

54 'What are POGOs and who is allowed to play on them?', Focus Gaming News, 31 March 2021 (<https://focusgn.com/asia-pacific/what-are-pogos-and-who-is-allowed-to-play-on-them> accessed 15 December 2022)

55 Republic of the Philippines Anti-Money Laundering Council announcement, 11 February 2020 (<http://www.amlc.gov.ph/16-news-and-announcements/202-statement-on-philippine-offshore-gaming-operators-pogos>)

56 Alexander B. Cabrera, 'Is P200 billion in taxes yearly leaking from POGOs?', PWC Philippines, 14 June 2020 (<https://www.pwc.com/ph/en/as-easy-as-abc/column/is-phil200bn-in-taxes-yearly-leaking-from-pogos.html> accessed 21 April 2023)

57 'Philippines rejects China's call to ban online gambling', Inside Asian Gaming, 6 September 2019 (<https://www.asgam.com/index.php/2019/09/06/philippines-rejects-chinas-call-to-ban-online-gambling/> accessed 19 December 2022)

58 'List of Offshore Gaming Licensees', The Philippine Amusement and Gaming Corporation (PAGCOR), 31 March 2023 (<https://www.pagcor.ph/regulatory/pdf/offshore/List-of-Approved-Philippine-Offshore-Gaming-Operators.pdf>)

59 In November 2019 the number was 60

60 Joyce Balancio, 'DOJ says shutdown ordered of 175 POGOs linked to crimes', ABS-CBN News, 26 September 2022 (<https://news.abs-cbn.com/business/09/26/22/175-pogos-linked-to-crimes-ordered-shut-says-doj> accessed 13 April 2023)

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

61 Senate of the Philippines press release, October 20, 2020 https://legacy.senate.gov.ph/press_release/2020/1020_hontiveros4.asp

62 Michael Abad, “Magkano at hanggang kanino?": Hontiveros reveals bribery in entry of POGO workers”, The Rappler, 17 February 2020 (<https://www.rappler.com/nation/252003-hontiveros-reveals-bribery-entry-pogo-workers/> accessed 19 December 2022)

63 Michael Abad, ‘LOOK: How syndicates, airport officials split P10,000 bribe from POGO workers’, The Rappler, 17 February 2020 (<https://www.rappler.com/nation/252049-how-syndicates-airport-officials-split-bribe-pogo-workers/> accessed 19 December 2022)

64 Paolo Romero, ‘POGOs abet human trafficking – Ang-See’, Philstar, 13 February 2020 (<https://www.philstar.com/headlines/2020/02/13/1992779/pogos-abet-human-trafficking-ang-see> accessed 15 December 2022)

65 ‘Philippines to deport 40,000 Chinese workers in online gaming crackdown’, ABS-CBN News, 27 September 2022 (<https://news.abs-cbn.com/news/09/27/22/ph-to-deport-40000-chinese-workers-in-gambling-crackdown> accessed 13 April 2023)

66 Chenyu Liang, ‘Report: Chinese in Philippines Forced to Work in Gambling Dens’, Sixth Tone, 15 August 2018 (<https://www.sixthtone.com/news/1002760> accessed 13 April 2023)

67 Chenyu Liang, ‘Report: Chinese in Philippines Forced to Work in Gambling Dens’, Sixth Tone, 15 August 2018 (<https://www.sixthtone.com/news/1002760> accessed 13 April 2023)

68 Ben Blaschke, ‘PAGCOR cancels accreditation of entire Sun Valley Clark POGO hub’, Inside Asian Gaming, 31 May 2023 (<https://www.asgam.com/index.php/2023/05/31/pagcor-cancels-accreditation-of-entire-sun-valley-clark-pogo-hub/> accessed 9 June 2023)

69 Kelsey Wilhelm, ‘PAGCOR cancels CGC Tech POGO license and ends Sun Valley Clark hub’, Asia Gaming Brief, 30 May 2023 <https://agbrief.com/news/philippines/30/05/2023/pagcor-cancels-cgc-tech-pogo-license-and-ends-sun-valley-clark-hub/> accessed June 9 2023)

70 ‘Philippines detains hundreds of Chinese in casino raid’, Rappler, 29 November 2016 (<https://www.rappler.com/nation/153998-philippines-detain-chinese-casino-raid/> accessed 13 April 2023)

71 Sheila Crisostomo, ‘POGO Piracy War Behind ‘Fake’ Kidnap Claims’, One News, 29 September 2022 (<https://www.onenews.ph/articles/pogo-piracy-war-behind-fake-kidnap-claims> accessed 16 December 2022)

72 Katrina Domingo, ‘POGO workers’ influx to PH ‘directly’ linked to rise in criminality – police’, ABS-CBN, 5 March 2020 (<https://news.abs-cbn.com/news/03/05/20/senate-hearing-on-pogos-police-count-215-victims-of-crimes-related-to-offshore-gaming> accessed 19 December 2022)

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 licences 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}

73 ‘A Resolution Urging The Senate Committee On Women, Children And Family Relations And Gender Equality To Conduct An Investigation In Aid Of Legislation On The Recent Rescues Of Sexual Trafficking Victims And Probe Into The Prostitution Rings In The Country And To Examine The Circumstances That Push Women To Work Under Exploitative Conditions With The End In View Of Crafting Legislation And Policies That Will Address The Root Cause That Drove These Women Into Employment That Does Not Respect And Fully Utilize Their Potential’ (<https://Legacy.Senate.Gov.Ph/Lisdata/3716233512!.Pdf> Accessed 14 April 2023)

74 Katrina Domingo, ‘POGO workers’ influx to PH ‘directly’ linked to rise in criminality – police’, ABS-CBN, 5 March 2020 (<https://news.abs-cbn.com/news/03/05/20/senate-hearing-on-pogos-police-count-215-victims-of-crimes-related-to-offshore-gaming> accessed 19 December 2022)

75 Nosa Omoigui, ‘Phillipine report finds “clear link” between POGOs and human trafficking’, iGB, 1 February 2022 (<https://igamingbusiness.com/legal-compliance/legal/phillipine-report-finds-clear-link-between-pogos-and-human-trafficking/> accessed 15 December 2022)

76 Katrina Domingo, ‘POGO workers’ influx to PH ‘directly’ linked to rise in criminality – police’, ABS-CBN, 5 March 2020 (<https://news.abs-cbn.com/news/03/05/20/senate-hearing-on-pogos-police-count-215-victims-of-crimes-related-to-offshore-gaming> accessed 19 December 2022)

77 Janella Paris, ‘Hontiveros sees link between influx of POGO workers, rise of sex trafficking in Manila’, Rappler, 28 January 2020 (<https://www.rappler.com/nation/250444-hontiveros-sees-link-influx-pogo-workers-sex-trafficking/> accessed 19 December 2022)

78 Ratzel San Juan, ‘Rise in sex trafficking coincides with POGO boom — NGO’, Phil Star, 28 January 2020 (<https://www.philstar.com/headlines/2020/01/28/1988474/rise-sex-trafficking-coincides-pogo-boom-ngo> accessed 19 December 2022)

79 Nosa Omoigui, ‘Phillipine report finds “clear link” between POGOs and human trafficking’, iGB, 1 February 2022 (<https://igamingbusiness.com/legal-compliance/legal/phillipine-report-finds-clear-link-between-pogos-and-human-trafficking/> accessed 15 December 2022)

80 Katrina Domingo, ‘Taiwanese POGO worker cries trafficking, tags ‘protector’ in gov’t’, ABS-CBN News, 12 February 2020 (<https://news.abs-cbn.com/news/02/12/20/taiwanese-pogo-worker-cries-trafficking-tags-protector-in-govt> accessed 13 April 2023)

81 ‘China threat to crackdown on Philippines gaming industry “could be a positive for Macau”’, Inside Asian Gaming, 11 August 2019 (<https://www.asgam.com/index.php/2019/08/11/china-threat-to-crackdown-on-philippines-gaming-industry-could-be-a-positive-for-macau/> accessed 19 December 2022)

82 ‘Philippines rejects China’s call to ban online gambling’, Inside Asian Gaming, 6 September 2019 (<https://www.asgam.com/index.php/2019/09/06/philippines-rejects-chinas-call-to-ban-online-gambling/> accessed 19 December 2022)

83 *ibid*

84 Muhammad Cohen, ‘Online outage’, Inside Asian Gaming, 1 October 2019 (<https://www.asgam.com/index.php/2019/10/01/online-outage/> accessed 19 December 2022)

85 Martin Purbrick, ‘The Displacement of Illegal Betting and Transnational Organised Crime’, Asian Racing Federation Quarterly Bulletin, February 2023 (<https://www.asianracing.org/email/202301qb-the-displacement-of-illegal-betting-and-transnational-organised-crime>)

86 Kelsey Wilhelm, ‘PAGCOR head says POGOs left country for Cambodia, Vietnam and Laos’, Asia Gaming Brief, 27 August 2021 (<https://agbrief.com/news/philippines/27/08/2021/pagcor-head-says-pogos-left-country-for-cambodia-vietnam-and-laos/>)

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 2022⁸⁷ and 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 with 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.

accessed 20 December 2022)

87 Kurt Dela Peña, "Burning the house to kill the rat?": Lawmakers weigh Pogo pros, cons', Inquirer.net, 5 October 2022 (<https://newsinfo.inquirer.net/1675622/burning-the-house-to-kill-the-rat-lawmakers-weigh-pogo-pros-cons> accessed 15 December 2022)

88 '5 Vietnamese women victims of alleged sex trafficking rescued; Chinese suspect arrested', PLN Media, 30 November 2022 (<https://plnmedia.com/5-vietnamese-sex-trafficking-rescued-chinese-arrested/> accessed 19 December 2022)

89 Jauhn Etienne Villaruel, 'Zubiri on Chinese embassy's remark on blacklist issue: 'Misinformation' tag is incorrect', ABS-CBN News, 12 October 2022 (<https://news.abs-cbn.com/news/10/12/22/as-china-denies-blacklisting-ph-zubiri-says-maybe-lost-in-translation> accessed 13 April 2023)

90 Ben Blaschke, 'PAGCOR shuts down two POGOS as 140 more foreign workers rescued from detainment', Inside Asian Gaming, 19 September 2022 (<https://www.asgam.com/index.php/2022/09/19/pagcor-shuts-down-two-pog-os-as-140-more-foreign-workers-rescued-from-detainment/> accessed 24 April 2023)

91 'Senate resumes hearing on POGOs; Gatchalian to dig deeper into implementation of laws', Senate of the Philippines, 23 January 2023 (https://legacy.senate.gov.ph/press_release/2023/0123_gatchalian1.asp accessed 13 April 2023)

92 'Press statement on GLOBAL COMRCI Notice of Termination', The Philippine Amusement and Gaming Corporation (PAGCOR), 9 March 2023 (<https://www.pagcor.ph/press-releases/press-statement-on-global-comrci-notice-of-termination.php> accessed 13 April 2023)

93 Hannah Torregoza, 'Gatchalian: Senate to pursue probe on POGOs despite termination of PAGCOR, third party auditor contract', Manila Bulletin, 12 March 2023 (<https://mb.com.ph/2023/3/12/gatchalian-senate-to-pursue-probe-on-pog-os-amid-termination-of-pagcor-third-party-auditor-contract> accessed 13 April 2023)

94 Raissa Robles, 'English-speaking Filipinos tricked into working at Chinese-run crypto scams: whistle-blowers', South China Morning Post, 2 February 2023 (<https://www.scmp.com/week-asia/people/article/3208905/english-speaking-filipinos-tricked-working-chinese-run-crypto-scams-whistle-blowers> accessed 13 April 2023)

95 'Press statement on GLOBAL COMRCI Notice of Termination', The Philippine Amusement and Gaming Corporation (PAGCOR), 9 March 2023 (<https://www.pagcor.ph/press-releases/press-statement-on-global-comrci-notice-of-termination.php> accessed 13 April 2023)

96 Raissa Robles, 'English-speaking Filipinos tricked into working at Chinese-run crypto scams: whistle-blowers', South China Morning Post, 2 February 2023 (<https://www.scmp.com/week-asia/people/article/3208905/english-speaking-filipinos-tricked-working-chinese-run-crypto-scams-whistle-blowers> accessed 13 April 2023)

97 Newsdesk, 'Push for immediate ban on POGOs gains momentum', Inside Asian Gaming, 27 March 2023 (<https://www.asgam.com/index.php/2023/03/27/push-for-immediate-ban-on-pog-os-gains-momentum/> accessed 13 April 2023)

Cambodia has become an epicentre for trafficking linked to organised-crime-run online betting and cyber scams, 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, and they were difficult to obtain because of pandemic-related travel restrictions.

98 Martin Purbrick, 'The Displacement of Illegal Betting and Transnational Organised Crime', Asian Racing Federation Quarterly Bulletin, February 2023 (<https://www.asianracing.org/email/202301qb-the-displacement-of-illegal-betting-and-transnational-organised-crime>)

99 'South-East Asia is sprouting Chinese enclaves', The Economist, 30 January 2020 (<https://www.economist.com/asia/2020/01/30/south-east-asia-is-sprouting-chinese-enclaves> accessed 14 April 2023)

100 Sihanoukville is a city in the Preah Sihanouk Province in Cambodia but media has also used 'Sihanoukville' to refer to the province.

101 Julie Zaugg, 'How Cambodia's backpacker haven became a Chinese casino mecca', CNN, 4 October 2019 (<https://edition.cnn.com/2019/10/04/asia/cambodia-chinese-investment-intl-hnk/index.html> accessed 20 December 2022)

102 Daryl Lim, 'The revival of Sihanoukville, Cambodia's "Gold Rush" city', Think China, 18 July 2022 (<https://www.thinkchina.sg/revival-sihanoukville-cambodias-gold-rush-city> accessed 19 December 2022)

103 Lan Hui, 'Sihanoukville eyes a bright future to become "Shenzhen of Cambodia"', Global Times, 24 February 2020 (<https://www.globaltimes.cn/content/1180622.shtml> accessed 20 December 2022)

104 Amanda Gore, Lindsey Kennedy, Nathan Southern, Daan van Uhm, 'ASIAN ROULETTE Criminogenic casinos and illicit trade in environmental commodities in South East Asia', Global Initiative against Transnational Organized Crime, July 2022 (<https://globalinitiative.net/wp-content/uploads/2022/08/GITOC-APA-Obs-Asian-roulette-Criminogenic-casinos-and-illicit-trade-in-environmental-commodities-in-South-East-Asia.pdf> accessed 14 April 2023)

105 Hannah Ellis-Petersen, 'No Cambodia left': how Chinese money is changing Sihanoukville', The Guardian, 31 July 2018 (<https://www.theguardian.com/cities/2018/jul/31/no-cambodia-left-chinese-money-changing-sihanoukville> accessed 14 April 2023)

106 Yuebing Gu, '逃离柬埔寨"网赌之城"', Sina News, 17 February 2023 (<https://web.archive.org/web/20220319180052/https://news.sina.com.cn/c/2022-02-17/doc-ikyaky6420297.shtml> accessed 14 April 2023)

107 'Report claims 63 Sihanoukville casinos have closed down or temporarily suspended staff in 2020', Inside Asian Gaming, 8 October 2020 (<https://www.asgam.com/index.php/2020/10/08/report-claims-63-sihanoukville-casinos-have-closed-down-or-temporarily-suspended-staff-in-2020/> accessed 14 November 2022)

108 Enno Hinz, 'Cambodia: Human trafficking crisis driven by cyberscams', Deutsche Welle, 12 September 2022 (<https://www.dw.com/en/cambodia-human-trafficking-crisis-driven-by-cyberscams/a-63092938> accessed 14 November 2022)

Around 2021, the scale of trafficking and modern slavery to serve these operations started to become apparent from news reports, first in Chinese media, 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 the source of many public reports of trafficking, enslavement and other criminality.¹¹²

Two of these, Jinshui (金水), and Kaibo (凯博), 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 (亚博体育) (which some believe is the biggest illegal betting operation targeting Greater China), BOB Sports and Boya Group (博雅集团), 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 eight to ten, 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.

109 Mech Dara, Cindy Liu, ‘Trafficking Victim Alleges His Blood Was Harvested in Sihanoukville’, VOD, 17 February 2023 (<https://vodenglish.news/trafficking-victim-alleges-his-blood-was-harvested-in-sihanoukville/> accessed 14 April 2023)

110 Mech Dara, Danielle Keeton-Olsen, ‘Crimes in Shadows: Sihanoukville’s Grisly Reports, Pressure on Journalists’, VOD, 11 March 2023 (<https://vodenglish.news/crimes-in-shadows-sihanoukville-grisly-reports-pressure-on-journalists/> accessed 14 April 2023)

111 Mech Dara, ‘Thai Police Tell of Another ‘Blood Slave’ Case in Cambodia’, VOD, 11 March 2023 (<https://vodenglish.news/crimes-in-shadows-sihanoukville-grisly-reports-pressure-on-journalists/> accessed 14 April 2023)

112 Yuebing Gu, ‘逃离柬埔寨“网赌之城”’, Sina News 17 February 2023 (<https://web.archive.org/web/20220319180052/https://news.sina.com.cn/c/2022-02-17/doc-ikyakumy6420297.shtml> accessed 14 April 2023)

113 Mary Ann Jolley, David Boyle, ‘Cambodia’s Cyber Slaves’, AL JAZEERA, 11 August 2022 (<https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves> accessed 14 April 2023)

114 ‘淘金者想逃離「中國城」: 沒人用真名 不賺錢就被賣’, Beijing Youth Daily, 2 April 2022 (<https://mrnews.cc/220402/57.html> accessed 14 April 2023)

115 ‘淘金者想逃離「中國城」: 沒人用真名 不賺錢就被賣’, Beijing Youth Daily, 2 April 2022 (<https://mrnews.cc/220402/57.html> accessed 14 April 2023)

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 modes of operations describe highly sophisticated technologies involving customised software to output every phone number in a city, and the ability to simultaneously log in to 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 with at least seven cases^{123 124 125 126 127 128 129} involving illegal betting and bribing public officials, yet never prosecuted.¹³⁰

116 ‘公司哪管你急不急着想走? 不仅赔付还要卡护照!’, phhua, 15 June 2021 (<https://bbs.phhua.com/thread-180720-1-1.html> accessed 14 April 2023)

117 ‘公司哪管你急不急着想走? 不仅赔付还要卡护照!’, phhua, 15 June 2021 (<https://bbs.phhua.com/thread-180720-1-1.html> accessed 14 April 2023)

118 Husain Haider, ‘Sihanoukville’s dirty secret: Dark rumours and inside information raise questions about The China Project’, Khmer Times, 6 September 2021 (<https://www.khmertimeskh.com/50929672/sihanoukville-dirty-secret-dark-rumours-and-inside-information-raise-questions-about-the-china-project> accessed 14 April 2023)

119 Mary Ann Jolley, David Boyle, ‘Cambodia’s Cyber Slaves’, AL JAZEERA, 11 August 2022 (<https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves> accessed 14 April 2023)

120 ‘Yunnan Jingcheng Group Co., Ltd strongly deny charges of “human trafficking, fraud, cyber fraud”’, Khmer Times, 23 August 2022 (<https://www.khmertimeskh.com/501137150/yunnan-jingcheng-group-co-ltd-strongly-deny-charges-of-human-trafficking-fraud-cyber-fraud/> accessed 14 April 2023)

121 ‘Association Disputes ‘Crime Haven’ Tag as Trafficking Reports Mount’, VOD, 24 August 2022, (<https://voden-glish.news/association-disputes-crime-haven-tag-as-trafficking-reports-mount/> accessed 14 April 2023)

122 Pei Liu, Yinling Lü, ‘风暴眼 | “边境王” 帝国垮塌 豪车豹子号车牌覆盖“云N11111”到“云N99999”’, ifeng, 16 December 2022 (<https://finance.ifeng.com/c/8LmnPd7ZOuJ> accessed 14 April 2023)

123 ‘楊躍國貪污受賄案一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-001.pdf> accessed 14 April 2023)

124 ‘李某甲等四人開設賭場一案判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-002.pdf> accessed 14 April 2023)

125 ‘孟必光受賄案一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-003.pdf> accessed 14 April 2023)

126 ‘尹寧華受賄一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-004.pdf> accessed 14 April 2023)

127 ‘劉新光一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-005.pdf> accessed 14 April 2023)

128 ‘劉啓明受賄一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-006.pdf> accessed 14 April 2023)

129 ‘段培相受賄一審刑事判決書’, China Judgments Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-007.pdf> accessed 14 April 2023)

130 Guanqi Zhao, ‘柬埔寨詐騙 | 曾在中國捲入賭博詐騙案 轉投西港成黑金勢力三巨頭’, HK01, 18 August 2022 (https://www.hk01.com/%E5%8D%B3%E6%99%82%E4%B8%AD%E5%9C%8B/805328/%E6%9F%AC%E5%9F%94%E5%AF%A8%E8%A9%90%E9%A8%99-%E6%9B%BE%E5%9C%A8%E4%B8%AD%E5%9C%8B%E6%8D%B2%E5%85%A5%E8%B3%AD%E5%8D%9A%E8%A9%90%E9%A8%99%E6%A1%88-%E8%BD%89%E6%8A%95%E8%A5%BF%E6%B8%AF%E6%88%90%E9%BB%91%E9%87%91%E5%8B%A2%E5%8A%9B%E4%B8%89%E5%B7%A8%E-9%A0%AD?utm_medium=Social&utm_source=fbpost&utm_campaign=mama&fbclid=IwAR1e3g5bzw3zjRo7v8za5s-NoSsdwcB7X1SGpZvGUQonnuawQd8ZVaiJtcy8 accessed 14 April 2023)

He became a Cambodian citizen in 2014, has been photographed multiple times with Cambodian Prime Minister HUN Sen,¹³¹ 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 these was described in 2008 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.

131 '董勒成董事长拜会柬埔寨首相洪森夫人文拉妮', Jingcheng Group, 11 June 2018 (<https://web.archive.org/web/20190113224211/http://www.jcjtgs.com/content-9-1154-1.html> accessed 14 April 2023)

132 '柬埔寨首相洪森致感谢信董勒成董事长', Jingcheng Group, 18 October 2018 (<https://web.archive.org/web/20220516060737/http://www.jcjtgs.com/content-9-1244-1.html> accessed 14 April 2023)

133 ANTHONY SPAETH, 'Sex, Drugs and The Roll of Dice', Time Asia, 27 September 1999 (<https://web.archive.org/web/20010125004800/http://www.time.com/time/asia/magazine/99/0927/ruii.html> accessed 14 April 2023)

134 VOLUNTARY ANNOUNCEMENT STRATEGIC PARTNERSHIP WITH GOLDEN SUN SKY ENTERTAINMENT CO., LTD. (<https://www1.hkexnews.hk/listedco/listconews/sehk/2018/0905/lt20180905525.pdf> accessed 14 April 2023)

135 '走进金三角:在佉邦抢东西者枪毙每个男人都有枪', Sina News, 18 February 2003 (<https://news.sina.com.cn/c/2003-02-18/0311911800.html> accessed 14 April 2023)

136 '边境赌城:难以割舍的体外毒瘤', Sina News, 12 March 2009 (<http://news.sina.com.cn/o/2009-03-12/150715299321s.shtml> accessed 14 April 2023)

137 '形形色色洗钱', People's Bank of China, 2013 (<https://www.wooribankchina.com/data/tosend/resource/upload/20210610/2013%E5%B9%B4%E5%8F%8D%E6%B4%97%E9%92%B1%E5%AE%A3%E4%BC%A0%E8%B5%84%E6%96%99-%E4%BA%BA%E8%A1%8C%E5%8D%B0%E5%88%B6.pdf> accessed 14 April 2023)

138 Yanting Mai, '一港男中緬邊境非法經營賭場洗黑被判監四年', RFI, 10 April 2010 (<https://www.10Apfffff.fr/tw/口國/20100410-一港男中緬邊境非法經營賭場洗黑被判監四年> accessed 14 April 2023)

139 'Yongyuan Casino', Cyber Scam Monitor, 31 January 2023 (<https://cyberscammonitor.net/profile/yongyuan-casino/> accessed 14 April 2023)

140 Thanh Ha, Tien Trinh, Dan Thuan, 'Hell 4.0': Exploited Vietnamese workers escape Cambodia, implicate compatriots', Tuoi Tre News, 25 August 2022 (<https://tuoitrenews.vn/news/society/20220825/hell-40-exploited-vietnamese-workers-escape-cambodia-implicate-compatriots/68768.html> accessed 14 April 2023)

141 Le Tan, 'Vietnamese parents buy back children from Cambodian casino mafia', VnExpress, 28 August 2022 (<https://e.vnexpress.net/news/news/families-pay-ransom-to-buy-back-teens-from-cambodian-mafia-4504965.html> accessed 14 April 2023)

142 Vinh Tho, Dan Thuan, Tien Trinh, 'Man prosecuted for allegedly trafficking 4 Vietnamese teens to Cambodia', Tuoi Tre News, 31 August 2022 (<https://tuoitrenews.vn/news/society/20220831/man-prosecuted-for-allegedly-trafficking-4-vietnamese-teens-to-cambodia/68845.html> accessed 14 April 2023)

143 Ping Xie, '缅甸侨胞王勇捐款百万建家乡村道 促文明村建设', chinaqw, 29 March 2006 (<http://www.chinaqw.com/news/2006/0329/68/22152.shtml> accessed 14 April 2023)

144 '他是电白首富,白手起家变身亿万富豪,为家乡捐资2000万!', Sohu, 21 January 2018 (https://www.sohu.com/a/218068753_641885 accessed 14 April 2023)

145 '粤西首富的金三角往事', 163, 13 August 2021 (<https://www.163.com/dy/article/GH9H672M0541MN0Z.html> accessed 14 April 2023)

146 '李某甲等四人開設賭場一案判決書', China Judgements Online, 8 October 2020 (<https://cyberscammonitor.net/wp-content/uploads/2022/09/jinshui-Case-002.pdf>)

147 'Bavet Moc Bai Casino', Cyber Scam Monitor, 31 January 2023 (<https://cyberscammonitor.net/profile/bavet-moc-bai-casino/> accessed 14 April 2023)

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 compound¹⁴⁹ 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

148 MISCELLANEOUS PROCEEDINGS NO 1072 OF 2016 (ON INTENDED APPEAL FROM HCMP 3237 OF 2013) (https://legalref.judiciary.hk/lrs/common/search/search_result_detail_frame.jsp?DIS=105697&QS=%2B%7C%28H-CMP%2C1072%2F2016%29&TP=JU)

149 'Cambodian Minister of Interior says efforts underway to rescue human trafficking victims, three Chinese fugitive tycoons behind major underground gambling hubs in Southeast Asia', Dimsumdaily Hong Kong, accessed 20 August 2022 (<https://www.dimsumdaily.hk/cambodian-minister-of-interior-says-efforts-underway-to-rescue-human-trafficking-victims-three-chinese-fugitive-tycoons-behind-major-underground-gambling-hubs-in-southeast-asia/> accessed 14 April 2023)

150 Jack Davies et al., 'Wanted Chinese Kingpin Owns Casino With Cambodian Senator's Son-In-Law', Radio Free Asia, 22 June 2021 (<https://www.rfa.org/english/news/special/hunsen-family/xu-aimin.html> accessed 15 November 2022)

151 Jack Davies et al., 'Wanted Chinese Kingpin Owns Casino With Cambodian Senator's Son-In-Law', Radio Free Asia, 22 June 2021 (<https://www.rfa.org/english/news/special/hunsen-family/xu-aimin.html> accessed 15 November 2022)

152 'TRAFFICKING IN PERSONS REPORT', United States Department of State Office to Monitor and Combat Trafficking in Persons, July 2022 (<https://www.state.gov/wp-content/uploads/2022/10/20221020-2022-TIP-Report.pdf> accessed 14 April 2023)

153 '中国驻柬埔寨使馆发言人就柬媒体报道西哈努克省“中国城”有关情况发表谈话', Embassy of the People's Republic of China in the Kingdom of Cambodia, 8 September 2021 (http://kh.china-embassy.gov.cn/dssghd/202109/t20210908_9614236.htm accessed 14 April 2023)

154 '独家重磅! 西港中国城凯博金水全部对外开放', The Diplomat, 19 September 2022 (<https://thediplomat.com/2023/02/focus-on-human-trafficking-shifts-from-cambodia-to-myanmar/> accessed 14 April 2023)

155 Nathan Paul Southern 'Just months after Kaibo/Chinatown slavery compound was shut down by Cambodian authorities. At least two buildings in this mega complex are in operation again. We were chased out quick by some delightful Chinese gangsters and Cambodian guards. Cyber slavery continues to grow.' April 24 2023 <https://twitter.com/NathanPSouthern/status/1650467656989044736>

156 Luke Hunt, 'Focus on Human Trafficking Shifts From Cambodia to Myanmar', The Diplomat, 7 February 2023 (<https://thediplomat.com/2023/02/focus-on-human-trafficking-shifts-from-cambodia-to-myanmar/> accessed 14 April 2023)

Since at least the 1990s, several of Myanmar's China border towns have 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

157 Priscilla A. Clapp & Jason Tower, 'Myanmar's Criminal Zones: A Growing Threat to Global Security', United States Institute of Peace, 9 November 2022 (<https://www.usip.org/publications/2022/11/myanmars-criminal-zones-growing-threat-global-security> accessed 20 December 2022)

158 Jeremy Douglas, 'Asian organized crime doubles down on casinos', CNN International, 14 February 2019 (<https://edition.cnn.com/2019/02/13/opinions/casinos-southeast-asia-intl/index.html> accessed 14 April 2023)

159 UNODC, 'Transnational Organized Crime in Southeast Asia: Evolution, Growth and Impact', UNODC Research, 2019 (https://www.unodc.org/roseap/uploads/documents/Publications/2019/SEA_TOCTA_2019_web.pdf accessed 14 April 2023)

160 Jason Tower, Priscilla Clapp, 'Myanmar's Casino Cities: The Role of China and Transnational Criminal Networks', July 2020 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 14 April 2023)

161 Jason Tower, Priscilla Clapp, 'Myanmar's Casino Cities: The Role of China and Transnational Criminal Networks', July 2020 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 14 April 2023)

162 Frontier and Gavin Gao, 'Scam City: How the coup brought Shwe Kokko back to life', Frontier Myanmar, 23 June 2022 (<https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/> accessed 7 November 2022)

163 The Associated Press, 'Malaysian dad pleads help for scam victims after son died', The Associated Press, 22 September 2022 (<https://www.asahi.com/ajw/articles/14724950> accessed 7 November 2022)

164 'Four Laotian trafficking victims freed from Myanmar casino faced regular beatings', Radio Free Asia, 16 February 2023 (<https://www.rfa.org/english/news/laos/casino-02162023163151.html> accessed 14 April 2023)

165 The Associated Press, 'Malaysian dad pleads help for scam victims after son died', The Associated Press, 22 September 2022 (<https://www.asahi.com/ajw/articles/14724950> accessed 7 November 2022)

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, according to local media and NGOs.¹⁷⁸ An estimated 10,000 people may be housed in the development.¹⁷⁹

166 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.29 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

167 Andrew Nachemson, 'The mystery man behind the Shwe Kokko project', Frontier Myanmar, 7 July 2020 (<https://www.frontiermyanmar.net/en/the-mystery-man-behind-the-shwe-kokko-project/> accessed 9 November 2022)

168 Plato Cheng, 'Shwe Kokko Special Economic Zone / Yatai New City', The People's Map of Global China, 31 March 2021 (<https://thepeoplesmap.net/project/shwe-kokko-special-economic-zone-yatai-new-city/> accessed 7 November 2022)

169 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.5 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

170 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.29-31 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

171 'China supports Myanmar in handling the Shwe Kokko New City issue in accordance with laws and regulations', Embassy of the People's Republic of China in the Republic of the Union of Myanmar, 25 August 2020 (http://mm.china-embassy.gov.cn/eng/xwdt/202008/t20200825_1391985.htm accessed 9 November 2022)

172 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.5 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

173 Jason Tower, Priscilla Clapp, 'Myanmar's Casino Cities: The Role of China and Transnational Criminal Networks', Fox News, July 2020 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 14 April 2023)

174 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.6, 25 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

175 Freddie Carver et al., 'Border Towns, Markets and Conflict', Cross-Border Conflict: Evidence, Policy and Trends, March 2022, p.65 (https://asiafoundation.org/wp-content/uploads/2022/06/Border-Towns-Markets-and-Conflict_report.pdf accessed 9 November 2022)

176 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.17-18 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

177 'Gambling Away Our Lands – Naypyidaw's 'Battlefields to Casinos' Strategy in Shwe Kokko', Karen Peace Support Network, March 2020, p.32-33 (<https://progressivevoicemyanmar.org/wp-content/uploads/2020/03/Gambling-Away-Our-Lands-English.pdf> accessed 7 November 2022)

178 Gavin Gao, 'Scam City: How the coup brought Shwe Kokko back to life', Frontier Myanmar, 23 June 2022 (<https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/> accessed 14 April 2023)

179 NAING YAN, 'Controversial China-Backed New City is Myanmar's Human Trafficking Hub', The Irrawaddy, 6 September 2022 (<https://www.irrawaddy.com/opinion/guest-column/controversial-china-backed-new-city-is-myanmars-human-trafficking->

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.

hub.html accessed 14 April 2023)

180 Chris Lau, Tony Cheung, 'Human-trafficking crisis: captive Hongkonger tells how trip to Thailand turned into 3-month nightmare under forced labour', South China Morning Post, 25 August 2022 (<https://www.scmp.com/news/hong-kong/law-and-crime/article/3190076/human-trafficking-crisis-captive-hongkonger-tells-how> accessed 14 April 2023)

181 Gavin Gao, 'Scam City: How the coup brought Shwe Kokko back to life', Frontier Myanmar, 23 June 2022 (<https://www.frontiermyanmar.net/en/scam-city-how-the-coup-brought-shwe-kokko-back-to-life/> accessed 14 April 2023)

182 Zwan Ross Lee, 'Fincy Helps Leapfrog Cambodia's Fintech Industry', B2B CAMBODIA, 3 November 2020 (<https://www.b2b-cambodia.com/articles/fincy-helps-leapfrog-cambodias-fintech-industry/> accessed 14 April 2023)

183 Jason Tower and Priscilla Clapp, 'Myanmar: Casino Cities Run on Blockchain Threaten Nation's Sovereignty', United States Institute of Peace, 30 July 2020 (<https://www.usip.org/publications/2020/07/myanmar-casino-cities-run-blockchain-threat-en-nations-sovereignty> accessed 14 April 2023)

184 THIIHA, 'This Singapore startup is set to turn Myanmar's Yatai City to a blockchain-powered smart city', 8 October 2019, Consult Myanmar, 6 October 2019 (<https://www.consult-myanmar.com/2019/10/08/this-singapore-startup-is-set-to-turn-myanmars-yatai-city-to-a-blockchain-powered-smart-city/> accessed 14 April 2023)

185 Andrew Ong, 'Shadow Capital at Myanmar's Margins: Shwe Kokko New City and its Predecessors', ISEAS-Yusof Ishak Institute, 1 December 2020 (https://www.iseas.edu.sg/wp-content/uploads/2020/11/ISEAS_Perspective_2020_136.pdf accessed 14 April 2023)

186 TANG AILIN, FAN WENJUN, LIANG SHUTING, HAN WEI, 'A fugitive Chinese businessman's high-profile bet in Myanmar', Nikkei Asia, 27 October 2020 (<https://asia.nikkei.com/Spotlight/Caixin/A-fugitive-Chinese-businessman-s-high-profile-bet-in-Myanmar> accessed 14 April 2023)

187 Gareth McNamee, 'Race fixing and money laundering: How the horse racing industry fights back against criminal cartels' Journal.ie, 23 July 2017, available at <https://www.thejournal.ie/horseracing-crime-gangland-3500986-Jul2017/>

188 'Long Bay', Cyber Scam Monitor, 31 January 2023 (<https://cyberscammonitor.net/profile/long-bay/> accessed 14 April 2023)

189 'Macau's seedy casino war turns to gold', Sydney Morning Herald, 22 September 2009 (<https://www.smh.com.au/business/macaus-seedy-casino-war-turns-to-gold-20090921-fyn5.html> accessed 14 April 2023)

190 '泰法院判决 佘智江引渡回中国' UDNThai, 26 May 2023 (https://mp.weixin.qq.com/s/hL9OAOLE1drob_PLxuoKZA)

191 DOMINIC FAULDER, 'Chinese underworld floods to Thailand-Myanmar river border', Nikkei Asia, 13 December 2022 (<https://asia.nikkei.com/Spotlight/Asia-Insight/Chinese-underworld-floods-to-Thailand-Myanmar-river-border> accessed 14 April 2023)

192 Frontier Myanmar, 'A day in the life of a Shwe Kokko scammer', 1 June 2023 (<https://www.frontiermyanmar.net/en/a-day-in-the-life-of-a-shwe-kokko-scammer/> accessed 9 June 2023)

SHE Zhijiang is also associated with a separate “digital industrial park”¹⁹³ 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 (□□□) 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, a nightclub, and various entertainment facilities.¹⁹⁷

WAN was Macau’s most notorious triad leader, and 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

193 John Ai, ‘Casino tycoon arrested as human trafficking casts shadow on the new silk road’, Pime AsiaNews, 19 August 2022 (<https://www.asianews.it/news-en/Casino-tycoon-arrested-as-human-trafficking-casts-shadow-on-the-‘new-silk-road’-56482.html> accessed 5 September 2022)

194 Eunice Lam, ‘Five arrested in human trafficking jobs scam’, The Standard, 22 August 2022 (<https://www.thestandard.com.hk/section-news/section/11/244833/Five-arrested-in-human-trafficking-jobs-scam> accessed 14 April 2023)

195 Ezra Cheung, ‘At least 38 Hong Kong victims in growing human-trafficking trend, with seventh suspect arrested over job scams luring people to Southeast Asia’, South China Morning Post, 23 August 2022 (<https://www.scmp.com/news/hong-kong/law-and-crime/article/3189841/least-38-hong-kong-victims-growing-human-trafficking> accessed 14 April 2023)

196 Jason Tower and Priscilla Clapp, ‘Myanmar’s’ Casino Cities: The Role of China and Transnational Criminal Networks’, United States Institute of Peace, July 2020, p.6 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 28 December 2022)

197 Jason Tower and Priscilla Clapp, ‘Myanmar’s’ Casino Cities: The Role of China and Transnational Criminal Networks’, United States Institute of Peace, July 2020, p.11 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 28 December 2022)

198 ‘Treasury Sanctions Corrupt Actors in Africa and Asia’, U.S. Department of the Treasury, 9 December 2020 (<https://home.treasury.gov/news/press-releases/sm1206> accessed 28 December 2022)

199 Bertil Lintner, ‘Why the US bit back at China’s ‘Broken Tooth’’, Asia Times, 12 December 2020 (<https://asiatimes.com/2020/12/why-the-us-bit-back-at-chinas-broken-tooth/> accessed 21 April 2023)

200 Jason Tower and Priscilla Clapp, ‘Myanmar’s’ Casino Cities: The Role of China and Transnational Criminal Networks’, United States Institute of Peace, July 2020, p.11 (https://www.usip.org/sites/default/files/2020-07/20200727-sr_471-myanmars_casino_cities_the_role_of_china_and_transnational_criminal_networks-sr.pdf accessed 28 December 2022)

201 Karen Zhang, ‘Former Macau gangster ‘Broken Tooth’ signs poker deal with secretive Chinese firm after raising US\$750 million in ICO’, South China Morning Post, 14 July 2018 (https://www.scmp.com/news/hong-kong/community/article/2155218/former-macau-gangster-broken-tooth-signs-poker-deal?module=perpetual_scroll_0&pgtype=article&campaign=2155218 accessed 21 April 2023)

202 DOMINIC FAULDER, ‘Chinese underworld floods to Thailand-Myanmar river border’, Nikkei Asia, 13 December 2022 (<https://asia.nikkei.com/Spotlight/Asia-Insight/Chinese-underworld-floods-to-Thailand-Myanmar-river-border> accessed 14 April 2023)

203 DOMINIC FAULDER, ‘Chinese underworld floods to Thailand-Myanmar river border’, Nikkei Asia, 13 December 2022 (<https://asia.nikkei.com/Spotlight/Asia-Insight/Chinese-underworld-floods-to-Thailand-Myanmar-river-border> accessed 14 April 2023)

204 ‘China, Myanmar eye greater cooperation in fight against cross-border internet fraud, gambling’, Global Times, 24 March 2023 (<https://www.globaltimes.cn/page/202303/1287893.shtml> accessed 14 April 2023)

Laos is not only 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 that 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

205 Kelsey Wilhelm, ‘PAGCOR head says POGOs left country for Cambodia, Vietnam and Laos’, Asia Gaming Brief, 27 August 2021 (<https://agbrief.com/news/philippines/27/08/2021/pagcor-head-says-pogos-left-country-for-cambodia-vietnam-and-laos/> accessed 20 December 2022)

206 Jintamas Saksornchai and Cindy Liu, ‘Scam Workers Relocated From Cambodia to Laos, Myanmar’, VOD, 24 October 2022 (<https://vodenglish.news/scam-workers-relocated-from-cambodia-to-laos-myanmar/> accessed 20 December 2022)

207 Amanda Gore, Linsey Kennedy, Nathan Southern, Daan van Uhm, ‘Asian Roulette – Criminogenic casinos and illicit trade in environmental commodities in South East Asia’, Global Initiative, July 2022, p.22 (<https://globalinitiative.net/wp-content/uploads/2022/08/GITOC-APA-Obs-Asian-roulette-Criminogenic-casinos-and-illicit-trade-in-environmental-commodities-in-South-East-Asia.pdf> accessed 17 October 2022)

208 ‘Golden Triangle Special Economic Zone’, Investment Promotion Department (<https://investlaos.gov.la/where-to-invest/special-economic-zone-sez/golden-triangle-special-economic-zone/> accessed 31 October 2022)

209 ‘Treasury Sanctions the Zhao Wei Transnational Criminal Organization’, U.S. Department of the Treasury, 30 January 2018 (<https://home.treasury.gov/news/press-releases/sm0272> accessed 17 October 2022)

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 were forcefully detained in the area.²¹⁹

210 Nathan Paul Southern and Lindsey Kennedy, ‘Laos’ criminal casino empire: Chinese gangsters suspected of running brothels and online scams, and trafficking humans, animal parts and drugs’, South China Morning Post, 15 October 2022 (<https://www.scmp.com/magazines/post-magazine/long-reads/article/3195932/laos-criminal-casino-empire-chinese-gangsters> accessed 14 April 2023)

211 Philip Conneller, ‘Kings Romans Casino in Laos Scams Call Center Women into Prostitution: Report’, Casino.org, 21 December 2021 (<https://www.casino.org/news/notorious-kings-romans-casino-laos-scamming-women-into-prostitution/> accessed 17 October 2022)

212 ‘Debt-trapped Lao ‘chat girls’ forced to sell sex in China-run economic zone’, Radio Free Asia, 19 December 2022 (<https://www.rfa.org/english/news/laos/sez-trafficking-12192021113055.html> accessed 14 April 2023)

213 ‘Lao authorities rescue women trapped in Chinese-run economic zone’, Radio Free Asia, 8 February 2022 (<https://www.rfa.org/english/news/laos/rescues-escapes-02082022170241.html> accessed 14 April 2023)

214 Eugene Whong, ‘Another 3 Thais rescued from Laos’ Golden Triangle’, Radio Free Asia, 18 March 2022 (<https://www.rfa.org/english/news/laos/sez-03182022202222.html> accessed)

215 Nathan Paul Southern and Lindsey Kennedy, ‘Laos’ criminal casino empire: Chinese gangsters suspected of running brothels and online scams, and trafficking humans, animal parts and drugs’, South China Morning Post, 15 October 2022 (<https://www.scmp.com/magazines/post-magazine/long-reads/article/3195932/laos-criminal-casino-empire-chinese-gangsters> accessed 3 November 2022)

216 Richard Finney, ‘700 Malaysian workers stranded, held for ransom in Lao SEZ’, Radio Free Asia, 3 October 2022 (<https://www.rfa.org/english/news/laos/ransom-10032022143444.html> accessed 3 November 2022)

217 Roseanna Gerin, ‘Lao authorities rescue nearly 500 workers from Golden Triangle SEZ’, Radio Free Asia, 21 June 2022 (<https://www.rfa.org/english/news/laos/human-trafficking-06212022163113.html> accessed 31 October 2022)

218 Roseanne Gerin, ‘Lao authorities rescue women trapped in Chinese-run economic zone’, Radio Free Asia, 8 February 2022 (<https://www.rfa.org/english/news/laos/rescues-escapes-02082022170241.html> accessed 31 October 2022)

219 Richard Finney, ‘700 Malaysian workers stranded, held for ransom in Lao SEZ’, Radio Free Asia, 3 October 2022 (<https://www.rfa.org/english/news/laos/ransom-10032022143444.html> accessed 3 November 2022)

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 have also provided 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

220 Roseanna Gerin, 'Lao authorities rescue nearly 500 workers from Golden Triangle SEZ', Radio Free Asia, 21 June 2022 (<https://www.rfa.org/english/news/laos/human-trafficking-06212022163113.html> accessed 31 October 2022)

221 Jim Pollard, 'Crime Gangs Control Some Myanmar, Laos Economic Zones: UN', Asia Financial, 26 June 2022 (<https://www.asiafinancial.com/crime-gangs-control-some-myanmar-laos-economic-zones-un> accessed 1 November 2022)

222 Joshua Berlinger, 'Is an alleged drug kingpin from China investing millions in a port in Laos?', CNN International, 7 December 2020 (<https://edition.cnn.com/2020/12/07/asia/laos-ban-mom-port-zhao-wei-intl-hnk-dst/index.html> accessed 14 April 2023)

223 Paul Vrieze, 'Inside Mong La, the Myanmar Town Where You Can Buy Drugs, Sex, and Endangered Animals', VICE NEWS, 14 December 2015 (<https://www.vice.com/en/article/avyq3g/inside-mong-la-the-myanmar-town-where-you-can-buy-drugs-sex-and-endangered-animals> accessed 14 April 2023)

224 Tom Fawthrop, 'High stakes as Laos turns to casinos', South China Morning Post, 23 January 2011 (<https://www.scmp.com/article/736471/high-stakes-laos-turns-casinos> accessed 14 April 2023)

225 STEVE FINCH and MONG LA, 'Burma's 'Wild East' Is a Debauched Land of Drugs and Vice That Reforms Forgot', Time, 9 March 2014 (<https://time.com/17651/burmas-wild-east-is-a-debauched-land-of-drugs-and-vice-that-reforms-forgot/> accessed 14 April 2023)

226 Andrew Jacobs, 'A Border City on the Edge of the Law', The New York Times International, 24 February 2014 (<https://www.nytimes.com/2014/02/25/world/asia/a-border-city-on-the-edge-of-the-law.html> accessed 14 April 2023)

227 Michael Black and Roland Fields, 'Virtual gambling in Myanmar's drug country', Asia Times, 26 August 2006 (https://web.archive.org/web/20061019063956/http://www.atimes.com/atimes/Southeast_Asia/HH26Ae01.html accessed 14 April 2023)

228 Paul Vrieze, 'Inside Mong La, the Myanmar Town Where You Can Buy Drugs, Sex, and Endangered Animals', VICE NEWS, 14 December 2015 (<https://www.vice.com/en/article/avyq3g/inside-mong-la-the-myanmar-town-where-you-can-buy-drugs-sex-and-endangered-animals> accessed 14 April 2023)

229 'Sin City – Illegal wildlife trade in Laos' Golden Triangle Special Economic Zone', Environmental Investigation Agency, March 2015, p.3 (<https://eia-international.org/wp-content/uploads/EIA-Sin-City-FINAL-med-res.pdf> accessed 17 October 2022)

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 that 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.²³⁴

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 president²³⁵ and other government officials²³⁶ on several public occasions since the sanctions were announced – and even received a Medal of Bravery from the government in October 2022.²³⁷

230 'Treasury Sanctions the Zhao Wei Transnational Criminal Organization', U.S. Department of the Treasury, 30 January 2018 (<https://home.treasury.gov/news/press-releases/sm0272> accessed 17 October 2022)

231 JOE KUMBUN, 'Protected by China, Wa Is Now a de Facto Independent State', The Irrawaddy, 23 April 2019 (<https://www.irrawaddy.com/opinion/guest-column/protected-by-china-wa-is-now-a-de-facto-independent-state.html> accessed 14 April 2023)

232 Jasmina Yap, 'Lao Casino Operator Zhao Wei Rejects US Sanctions', The Laotian Times, 7 February 2018 (<https://laotiantimes.com/2018/02/07/lao-casino-operator-zhao-wei-rejects-us-sanctions/> accessed 31 October 2022)

233 'Sin City: Illegal wildlife trade in Laos' Special Economic Zone', Environmental Investigation Agency, March 2015 (<https://eia-international.org/wp-content/uploads/EIA-Sin-City-FINAL-med-res.pdf> accessed 14 April 2023)

234 '赵伟: 奋斗在金三角经济特区', China Talk, 4 May 2011 (http://fangtan.china.com.cn/2011-05/04/content_22492727.htm?show=t accessed 14 April 2023)

235 Xiao Cui, '金三角经济特区赵伟主席赴万象拜会老挝国家领导人并赴川圹等省开展投资考察', The Global Online, 22 August 2020 (<https://bit.ly/3U5X9VE> accessed 31 October 2022)

236 Joshua Berlinger, 'Is an alleged drug kingpin from China investing millions in a port in Laos?', CNN World, 7 December 2020 (<https://edition.cnn.com/2020/12/07/asia/laos-ban-mom-port-zhao-wei-intl-hnk-dst/index.html> accessed 31 October 2022)

237 Phontham Visapra, 'Laos Government Presents Medal to Chinese Casino Operator', The Laotian Times, 3 October 2022 (<https://laotiantimes.com/2022/10/03/laos-government-presents-medal-to-chinese-casino-operator/> accessed 31 October 2022)

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,^{238 239} and an international airport near the SEZ which was scheduled to open in May 2023,²⁴⁰ 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,²⁴¹ and a Hong Kong entity linked to him has been named as an investor in the airport.²⁴²

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.²⁴³ 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.

238 Joshua Berlinger, 'Is an alleged drug kingpin from China investing millions in a port in Laos?', CNN International, 7 December 2020 (<https://edition.cnn.com/2020/12/07/asia/laos-ban-mom-port-zhao-wei-intl-hnk-dst/index.html> accessed 14 April 2023)

239 Eugene Whong, 'Chinese Casino Kingpin Behind New Mekong Port to Serve Golden Triangle SEZ in Laos', Radio Free Asia, 7 October 2020 (<https://www.rfa.org/english/news/laos/port-10072020195319.html> accessed 17 October 2022)

240 'Golden Triangle airport opens this year', TTR WEEKLY, 21 March 2023 (<https://www.ttrweekly.com/site/2023/03/golden-triangle-airport-opens-this-year/> accessed 14 April 2023)

241 Jasmina Yap, 'Osiano Trading to Develop Port at Ban Mom', Laotian Times, 6 October 2020 (<https://laotian-times.com/2020/10/06/osiano-trading-to-develop-port-at-ban-mom/> accessed 14 April 2023)

242 CAPA Profiles (<https://centreforaviation.com/data/profiles/newairports/bokeo-international-airport> accessed 14 April 2023)

243 'Laos move to take share of Philippines' POGO pie', INTERGAMING, July 2022, p.36 (<https://edition.pagesuite.com/html5/reader/production/default.aspx?pubname=&edid=fd9bdd3-8e60-48cd-8782-56b620e6d419&pnum=36> accessed 21 December 2022)

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.^{244 245 246 247} 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 about USD 12 to 38 billion a year in illegal profits from online betting in these four jurisdictions alone.

244 Based on estimates from public officials where possible and NGOs / media reports where not available. Numbers of people at peak (i.e., not concurrently but overlapping): Philippines: 100,000 to 376,000 people, Cambodia, 100,000 to 500,000, Myanmar and Laos 50,000 to 100,000, combined estimate rounded down = 75,000 to 250,000.

245 Iris Gonzales, 'Special Report : Inside a Philippine offshore gaming company', Philstar, 17 June 2019 (<https://www.philstar.com/business/2019/06/17/1927013/special-report-inside-philippine-offshore-gaming-company> accessed 14 April 2023)

246 Gabriel Pabico Lalu, 'Banning POGOs will just push workers underground – Salceda', INQUIRER, 27 September 2022 (<https://newsinfo.inquirer.net/1671650/banning-pogos-would-just-push-workers-underground-salceda> accessed 14 April 2023)

247 Mech Dara, 'Officials Speak Out on Compounds: As Many as 100,000 Foreign Nationals Came to Cambodia', VOD, 30 September 2022 (<https://vodenglish.news/officials-speak-out-on-compounds-as-many-as-100000-foreign-nationals-came-to-cambodia/#:~:text=Though%20reluctant%20to%20call%20the,in%20Cambodia%20for%20the%20work.> accessed 14 April 2023)

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.²⁴⁸ 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 billion²⁴⁹ 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 fear this could lead to further turmoil in regions such as Myanmar and Laos.

248 Mary Ann Jolley and David Boyle, ‘Cambodia’s Cyber Slaves’, Al Jazeera, 11 August 2022 (<https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves> accessed 21 April 2023)

249 ‘About GASA’, Global Anti-Scam Alliance (<https://www.gasa.org/about-1> accessed 14 April 2023)

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