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# Follow the Money

**Using Financial Intelligence  
Against the Illegal Wildlife Trade  
in Malawi**

**A Handbook**  
February 2020





# 1 INTRODUCTION

**The illegal wildlife trade (IWT) is all about money.** Organised crime groups get involved in IWT for one reason – to make a profit. The trade is seen by these groups as highly lucrative, with a low chance of disruption or arrest.

Today, there is wide recognition that we need to use financial investigations against IWT. These techniques are widely and successfully used against other forms of global organised crime, such as drugs, arms and human trafficking.

**Illegal Wildlife Trade (IWT) refers to the taking, trading (supplying, selling or trafficking), importing, exporting, processing, obtaining and consumption of wild animals or plants in contravention of national or international law.**

## The Three Pillars of “Following the Money”

There are three main reasons for using financial investigations and intelligence in IWT cases:

### 1: Using financial techniques to produce evidence of the IWT crime

“Following the money” can prove the involvement of an individual in a criminal network. Finding out who paid for transport, shipping or storage of illegal wildlife products can help identify previously unknown suspects involved in the same criminal network.

### 2: Using anti-money laundering legislation to charge suspects with additional offences

Money laundering involves taking the profit from a crime, ‘cleaning’ it to disguise its origin, and then using it. Criminals involved in IWT use laundered money to fund their often-lavish lifestyles. If they are using the proceeds of crime to purchase property or cars, or to fund their everyday living, they are very probably guilty of money laundering.

### 3: Identifying criminal assets that may be forfeited or confiscated

Seizing or confiscating the proceeds of crime is a powerful weapon against criminals involved in IWT. ‘Assets’ are not just money – they are also vehicles, houses or personal effects, such as jewellery or expensive watches, that have been bought with the criminal proceeds.



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# 1 INTRODUCTION (2/2)

**This Handbook** is a practical resource for those engaged on the ground in the fight against IWT. It does not seek to turn IWT first responders and investigators into financial investigators. There are already specialists in law enforcement agencies who carry out this role.

Non-specialists and first responders can help their colleagues by gathering as much financial information as possible at an early stage, handling it correctly, asking the right questions and knowing where to seek help with the financial aspects of a case.

It provides:

1. An awareness of financial investigation techniques;

2. Possible sources of financial intelligence;

3. What information to gather.

**Always think about “following the money”!**

## How to Use this Handbook

This Handbook is a practical resource. It does not set out in detail the legislation applicable in Malawi.

These details, and ‘points to prove’ for to potential offences, including money laundering, can be found in the guide [Putting the Tools to Good Use](#) (2019) and [Rapid Reference Guide for Law Enforcement Agencies on Model Charges for Wildlife Crime Prosecutions](#). This latter was developed by the Malawi Law Commission, having been commissioned by the Department of National Parks and Wildlife (DNPW), the Royal Society for the Prevention of Cruelty to Animals (RSPCA) and Stop Ivory. You should ensure that you and your agency have access to it.

More resources can be found via the Lilongwe Wildlife Trust: <https://www.lilongwewildlife.org/research-reports/>

There is a multi-agency taskforce in Malawi, the **Inter-Agency Committee on Combating Wildlife Crime** (IACCWC).

Participating agencies include the Department of National Parks and Wildlife (DNPW), Judiciary, Police, Revenue Authority, Financial Intelligence Agency, Anti-Corruption Bureau, other national agencies and NGOs.

**Nothing in this Handbook should be taken to suggest actions other than in accordance with any guidelines or agreements produced by the IACCWC.**

▶ Establish contacts and arrangements with other national agencies to enable the use of financial intelligence sharing to combat IWT.

▶ Record the details of individual contacts in relevant agencies and make this available for investigators.

▶ Sign Memorandums of Understanding (MOUs) to ensure that inter-agency coordination is possible, including how information will be safeguarded and the role of each agency in developing financial intelligence.

▶ All activity should be coordinated in accordance with the [Rapid Reference Guide for Law Enforcement Agencies on Model Charges for Wildlife Crime Prosecutions](#).

**This Handbook and printable check lists can be downloaded at**  
<https://shoc.rusi.org/IWT>





## 2

ACTIONS AT SCENE OF  
SEIZURE OR ARREST

## Identifying Potential Financial Intelligence Leads at a Scene

As first responders at the scene of an IWT-related seizure or arrest your focus will be on the main offences and the persons arrested and/or illegal wildlife products that have been seized. You should be aware of the possibility of finding financial information or leads.

## Everything present at the scene must have been paid for somehow:

poachers have been paid

vehicles have been bought or hired

shipping containers have been leased

storage has been paid for

If any items present at the scene have been purchased using a bank account or credit card, examination of those accounts may create further leads. It may also lead to the identification of those who have been funding the operation.



## KEY POINT

Any item at a crime scene may provide financial intelligence leads. **Think about the money at all times and ask yourself:**

**HOW** was this paid for?

**WHO** paid for it?

## Powers to seize

Generally, anything that may have been used in the commission of an offence or may provide evidence can be seized. The powers to seize items must be well understood by first responders and be used appropriately.

Chapter 2 of the [Rapid Reference Guide for Law Enforcement Agencies on Model Charges for Wildlife Crime Prosecutions](#) provides guidance on how to collect evidence during IWT cases and should be consulted when planning searches or interviews.

The Investigating Officer should ensure the exhibit's chain of custody is maintained in accordance with local instructions. Items that may provide financial leads may be seized using these powers, as they provide evidential leads.

**Exhibits should be copied and stored in accordance with these instructions.**

## Handling

Any items seized must be handled in the correct manner. At a minimum, the time and date of seizure must be recorded, as well as the exact location.

## Example:

**In driver's door: Blue notebook found in pocket of Ford Explorer, registration number KCC 358Y**

There may be forensic evidence on any documents collected, so they must be handled carefully.

You should consider sending suitable documents for forensic examination but working copies should be taken so that financial enquiries can be carried out without relying on access to the original exhibits.



## 2

ACTIONS AT SCENE OF  
SEIZURE OR ARREST (2/3)

## Key Items to Look for on Persons or in Vehicles

There are some obvious categories of items that should be looked out for and recorded or seized:

## ► Direct evidence of financial accounts/activity:

- Cash in the possession of suspects
- Bank or credit cards
- Financial records such as bank or credit card statements, cheques or deposit slips
- Money transfer documentation
- Receipts from ATMs



## ► Electronic devices:

- Mobile phones, which may be used for mobile money services, as well as SMS and other messaging services
- Laptops, tablets or other devices such as hard drives and USB sticks that may contain details of financial transactions or shipping documentation, as well as email evidence



## ► Indirect evidence of financial accounts via transactions:

- Receipts of any kind – e.g. for petrol or meals
- Airtime vouchers
- Hotel or other accommodation invoices
- Aircraft boarding passes
- Vehicle hire documentation



## ► Information about shipping and transportation:

- Any documentation relating to shipping methods, including bills of lading or waybills, customs declarations or invoices
- Details of containers, vehicles or vessels



## ► Examine any documentation in the possession of suspects or at the scene for notes that may relate to financial activity, such as:

- Lists of numbers, or names and numbers, that may relate to accounts or transactions
- Names or other details of companies
- Details of financial institutions such as banks or money transfer companies



## ► High value items:

Look for expensive items or those that appear to be out of the ordinary, or out of the apparent income range of your suspects.:

- Personal items such as watches, jewellery or clothing
- Vehicles
- Weapons







## 2

ACTIONS AT SCENE OF  
SEIZURE OR ARREST (3/3)

**Financial Investigation  
IN ACTION:**

In one case, fingerprints found on a money transfer form recovered during an investigation were used as evidence to prove that an individual was guilty of sending the money and therefore of being involved in funding illegal activity, even though the money had been sent using false names on the form.



**KEY POINT**

At the scene, ask yourself:

Have we seized all relevant items or recorded enough details to accurately describe and identify them?

**This may include:**

Photos or copies made at the time

Notes on all relevant details, such as serial numbers or other identifying characteristics

CHECK LIST FOR USE AT A  
SCENE OF SEIZURE OR ARREST**SEARCH for evidence of financial activity, such as:**

- Cash in the possession of suspects
- Bank or credit cards
- Financial records such as bank or credit card statements, cheques or deposit slips
- Money transfer documentation
- Receipts from ATMs
- Receipts of any kind – e.g. for petrol or meals
- Airtime vouchers
- Hotel or other accommodation invoices
- Aircraft boarding passes
- Hire car or van documentation
- Any other documentation, such as notebooks or diaries

**SECURE devices that may contain financial information:**

- Mobile phones
- Tablets, laptops or other devices such as hard drives or USB sticks

**IDENTIFY how shipping, other transportation, or storage has been paid for:**

- Any documentation relating to shipping methods, including bills of lading or waybills, customs declarations or invoices
- Details of containers, vehicles or vessels

**RECORD any high-value items owned, in the possession of, or under the control of suspects:**

- Personal items such as watches, jewellery or clothing
- Vehicles
- Weapons

## SEARCHES OF PROPERTIES



During your investigation, you may have enough grounds to search properties, such as homes, hotel rooms or commercial premises. Your focus will be on securing evidence for the IWT crime you are investigating. But, as always, you should also be thinking about the money trail. Ensure everyone involved in the search has been briefed on what to look for.

Your focus will be on securing evidence for the IWT crime you are investigating. But, as always, you should also be thinking about following the money trail when you conduct any searches.

Searches must be carried out in accordance with relevant legislation, such as the Corrupt Practices Act, National Parks and Wildlife Act 2017 and the Financial Crimes Act 2017. Conservation and Management Act 2013 or the Prevention of Organised Crime Act 2010. See here for [guidance on legislation](#).

Financial Investigation  
IN ACTION

When searching a suspect's hotel room, investigators found a briefcase containing a diary and other documents. Close examination of the diary identified a list of numbers, written to look like telephone numbers. By thinking about the 'follow the money' principles, the investigator recognised them as Money Transfer Numbers.

Enquiries with the relevant companies revealed that they had been used to transfer funds to other members of a criminal organisation.

## Searching for Financial Information and Evidence

- ▶ **The most obvious thing to search for is cash:** all cash should be considered for seizure and detention, in accordance with the relevant legislation mentioned above.
- ▶ **The second most obvious thing to look for is any relevant financial records.** As well as searching for any documents relating to financial activity, carefully examine any records kept by the suspect or occupiers of the property, such as address books or diaries.

- ▶ **Make sure any items such as mobile phones, tablets or computers** that may have been used for financial activity are appropriately seized.

- ▶ **Property** has to be paid for, either by renting, buying it outright or using a loan/ mortgage. Identifying how the property you are searching is paid for can provide valuable financial information to follow up later. Enquiries should be made with the owners of commercial rented property, or with the hotel if you are searching hotel rooms, to establish **who pays and how**.

- ▶ **Utilities like gas, water and electricity, as well as other services** at a property also have to be paid for. Whilst searching any location, take note of what is connected – including water, subscription television or internet access and try to establish **who pays for these services and how**.

**It is important to take accurate notes of any high-value assets present**, even if they cannot be immediately seized as evidence. Try to establish how they were paid for, or where the suspect got them from. Common examples can include:

Vehicles

High end electronic items such as cameras, sound systems or laptops

Personal items, such as jewellery, watches or clothes

Furniture

Art and other collectibles





# 3

## SEARCHES OF PROPERTIES (2/2)



### KEY POINT

At any property search, take the time make sure that you know all about the property and its contents:

**HOW** was this paid for?

**WHO** paid for it?

**WHAT** financial activity is recorded here?

#### Example:

Identifying how utilities (such as electricity and water) are paid at an address does not provide direct evidence or intelligence linked to an IWT offence. However, it will help build a fuller picture.

Is a previously unknown account being used, or are there further leads to be followed?

#### Example:

Make accurate records of any such items, including photographs, as they will form part of the analysis of your suspect's finances.



In living room: Panasonic 60-inch Plasma TV, model number TX-P60X60B, xserial number 9834982384982.

## CHECK LIST FOR USE AT A SEARCH



### SEARCH for evidence of financial or commercial activity, such as:

- Cash
- Bank or credit cards
- Company records - invoices, shipping documents
- Financial records such as bank or credit card statements, cheques or deposit slips
- Money transfer documentation
- Receipts of any kind
- Airtime vouchers
- Hotel or other accommodation invoices
- Aircraft boarding passes
- Hire car or van documentation
- Any other documentation, such as notebooks or diaries



### SECURE devices that may contain financial information:

- Mobile phones
- Tablets, laptops or other devices such as hard drives or USB sticks



### IDENTIFY how the property and any utilities or services are paid for:

- Water or electricity services
- Subscription television
- Internet access



### RECORD any high-value items:

- High-end electronics, such as cameras, televisions or sound systems
- Vehicles
- Weapons





## 4

## INITIAL FINANCIAL ANALYSIS

**Most full financial investigation and analysis is conducted by specialist officers, but initial financial analysis can often be carried out by the first responder agency responsible for the case.**

If a trained criminal analyst is available, they will have some familiarity with the techniques used and access to special software that can be used for this purpose. These analysts currently sit within the FIA, ACB and Central Intelligence Unit of the Police.

**Purpose of Initial Analysis**

An initial financial analysis can be used to:

- Prepare for interviews with suspects
- Identify investigative leads
- Create a basic financial snapshot of the case to help Senior Management to develop an in-depth investigation strategy
- Brief partner agencies, who may be able to provide specialist financial investigation support in appropriate cases.

**KEY POINT**

**Financial analysis is like other forms of criminal analysis. It uses the available financial information to learn about suspects and criminal networks and their activities.**

**The UN Office on Drugs and crime has produced a useful Criminal Intelligence Manual for Analysts, which can be found online at:**  
[https://www.unodc.org/documents/organized-crime/Law-Enforcement/Criminal Intelligence for Analysts.pdf](https://www.unodc.org/documents/organized-crime/Law-Enforcement/Criminal%20Intelligence%20for%20Analysts.pdf)

**Financial Profiles**

A good place to start is to create a basic financial profile of relevant suspects.

At this stage, analysis will mainly depend on the information that has been obtained during any arrests, seizures and searches, and any other further information that may be readily available in the public domain.

All investigations should include initial enquiries with law enforcement and other partner agencies. These agencies may be able to provide financial information, alongside other types of information and intelligence they hold.

**There are a few specific financial enquiries that should be carried out:****The Financial Intelligence Authority (FIA - Malawi's FIU):**

A Financial Intelligence Unit's (FIU) core function is to receive, analyse and disseminate suspicious transaction/activity reports from private institutions such as banks, mobile money operators or money remittance bureaus.

FIUs may also hold a variety of other financial information or be able to request it. At this initial stage, a check should be carried out to find out if the FIA holds any relevant data. By law, the FIA will only be able to disseminate intelligence to certain agencies. You should check with them to see if you are authorised to receive intelligence. If not, it may be possible to work in partnership with another law enforcement agency who does have access to FIA intelligence.

**Malawi Revenue Authority:**

Customs/Revenue agencies may be able to provide details of tax and other matters relating to your suspects, including their declared income and any border crossings or declarations. Again, this information is confidential and there may be restrictions on sharing it.

**Other Government Departments:**

Agencies such as the road traffic agency and land registry should be checked (where appropriate) for details of your suspects and associated properties, such as title and ownership, mortgages on property, and company accounts.



Other sources of financial information

Public Domain:

Internet (including social media) and local media sources can be searched to identify companies, properties and associates. Legitimate companies tend to have a presence on the internet, and websites may contain useful ownership, location and activity information.

Financial Institutions, including banks, money transfer networks and mobile money providers:

In addition to the suspicions they must report to the Financial Intelligence Authority, it is possible to access information from financial institutions using specific powers. This usually involves a court order.

Immigration Authorities:

Immigration authorities hold records of movements and identity documents. If a foreign suspect, it may be possible to identify how they paid for their visas – especially if travelling by air.

Anti-Corruption Agencies:

Anti-corruption agencies may have access to asset declarations and earnings for public servants, which can be compared to actual findings, leading to other possible charges for corruption.

Courts:

Courts may hold records of previous court cases involving the subject, for example bankruptcy hearings, which can help to build a picture of their financial history.

Utilities:

Utility companies can identify how and by whom payments are made at an address and may be able to identify further addresses linked to the same person. Remember to check with mobile phone providers.

You should draw up a list of contacts in these other national agencies that are able to carry out checks at the initial stage of financial analysis. A basic institutional list is included at the end of this Handbook.

Once all possible immediate checks have been carried out, a financial profile of the suspect(s) can be drawn up. Using the checklist below, it will then be possible to identify gaps in knowledge that can be filled by interviews or further financial investigation.

Using Charts to Understand Information

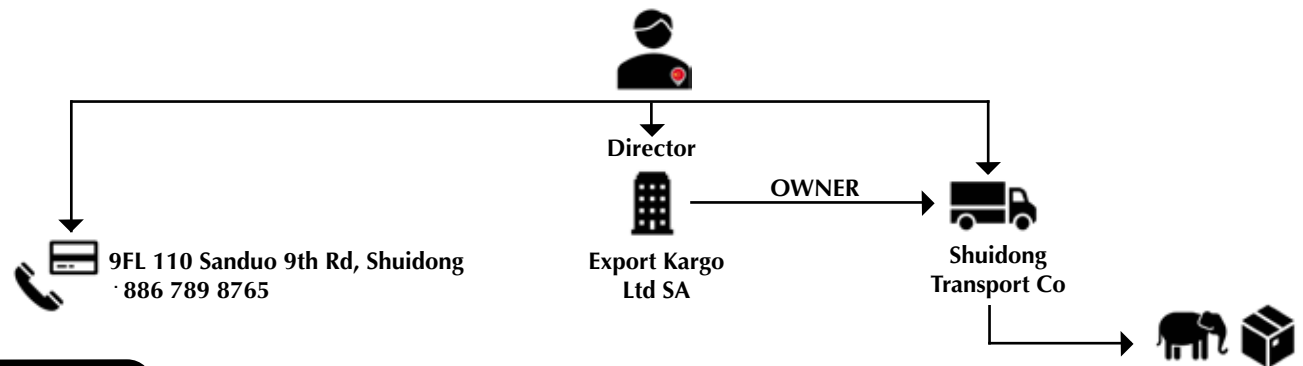
In cases involving several suspects or a series of events that have occurred over a period of time, charts are a useful way to see connections and activity across a network.

If the case progresses to a full financial investigation, specialist financial software might be used to analyse large quantities of transactions, such as several years of bank records from multiple accounts.

There are two types of charts that can be **produced without software** and can be useful to help understand and create basic financial profiles:

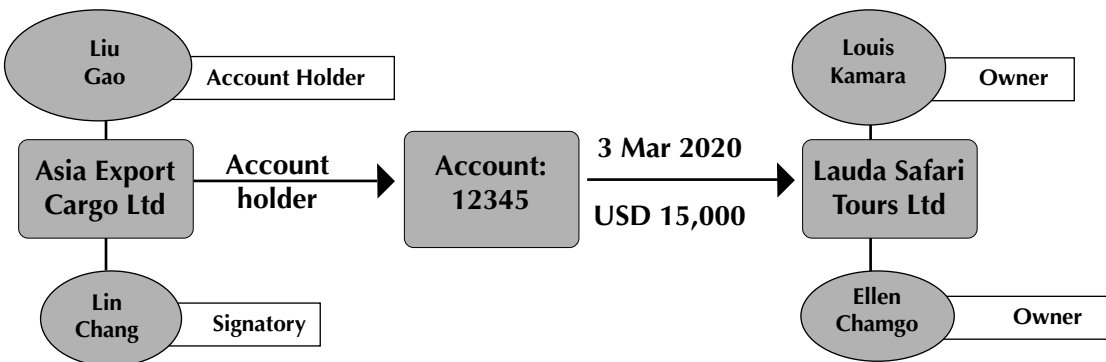
Link analysis:

This type of chart plots connections or links based on financial or other data. For example, companies are linked through their shareholders and directors; individuals may be linked by financial transfers or communications between them.



Timelines:

This type of chart, also known as ‘event charting’, is useful for tracking activity between accounts or individuals over time. This helps to “follow the money” through several accounts to its final destination. Other events can be added to the chart, such as the movement of illegal products or suspects’ travel, which can help to identify payments linked to those activities.





# INITIAL FINANCIAL ANALYSIS

(3/3)



## Writing Up a Basic Financial Profile

Although charts are useful, they are not the final product of analysis. Based on all the information available and the connections and patterns revealed by analysis and charts, a short report should be written with the conclusions that can be made. These can be based on the following questions:

**WHAT** is the criminal activity taking place and how does the financial intelligence support this?

**WHO** are the key individuals involved in the case?

**HOW** is the activity financed?

**WHERE** are the key locations?

**WHEN** is the timeframe for the criminal activity?

Analysis will help identify the activities of the criminal network. It will also highlight possible money laundering offences and assets representing the proceeds of crime available for seizure.

## Example of a conclusion from initial analysis:

**'Subject A'** is a low-level poacher who was paid a small amount in cash immediately prior to a kill in a national park where an elephant's tusks were removed. He has no known bank accounts or assets.

**'Subject B'** is a fixer or middleperson, who was responsible for paying 'Subject A' and other as yet unidentified suspects.

Subject B's expenses are funded by wire transfer from unknown subjects in South East Asia. He has no known legitimate income, yet he rents a luxury flat in the capital and drives expensive rented SUVs.

## FINANCIAL PROFILE CHECK LIST

The following points should be included where possible in a financial profile:



### INDIVIDUALS:

- Full name
- Date of birth
- Passport or other identify card numbers
- Address
  - Owned/rented? Payment details?
  - Utilities and other services
- Vehicles owned/used
  - Estimated value
  - Outstanding loans or purchase agreements
- Bank accounts (own or joint), credit cards
  - Balance and turnover information
- E-money accounts and wallets
- Use of money remittance services or networks
- High value assets owned
  - Purchase details (outright or loan?)
- Salary payments and tax delcarations?



### BUSINESSES:

- Name and registration
- Registered offices and places of business
- Type of business activities carried out
- Business licenses held
- Owners, shareholders, directors and others in control of the business
- Business bank accounts and credit cards
- Property, land and other assets owned by the business e.g. vehicles
- Tax delcaration and other business accounts





# FINANCIAL INTERVIEW STRATEGIES

A valuable source of financial information is what a suspect or witness can tell you during a financial interview. You should ask the FIA to be present and assist in leading a full financial interview.

It may not be possible to conduct a specific interview about financial matters, but financial questions should always be asked during any questioning or interviews. The investigators who will conduct the interview should be briefed on the sorts of financial information they should try to uncover.

## Financial Interview Questions

Any questions about travel, transport or storage should always be accompanied by questions about **how it was paid** for and **who paid for it**. Follow-up questions should be used to obtain precise information, such as details of particular banks or money remitters.

Some suspects may not have extensive financial history of their own, but should be questioned about the financial activity of the rest of the network. For example, who paid for meals if they had them and how? Who appeared to control the cash? What types of transport do they use? Where do they meet?

## Using financial documents during an interview

Suspects should be questioned in detail about any commercial, shipping or financial transactions and records. Copies of documents may be shown to the suspect. You must keep records of any documents that are used or mentioned during the interview.

## Interviews about lifestyle, assets or money laundering

Interviews help create a better financial profile of a suspect. Suspects should be asked about their sources of income (such as salary), and expenditure (such as living expenses, accommodation, communications or vehicles).

Suspects should be asked about how they acquired any high-value goods found during searches. This type of question establishes if they have a possible income from criminal activity. This information could ultimately be used as evidence to forfeit assets.

If the suspect is known to have travelled, they should be questioned about how their travel and accommodation was paid for and who paid for it.

If a suspect is believed to be involved in money laundering, for example by using front companies to place criminal money into the banking system, it is advisable for interviews to be carried out by specialist financial investigators. These investigators will want to carry out a comprehensive financial intelligence gathering exercise before these interviews.

# FINANCIAL INTERVIEWING CHECK LIST



## PREPARATION:

- **Prepare** initial financial profile of the person to be interviewed
- **Identify** any specific questions to be asked and prepare supporting exhibits:
  - Specific financial transactions
  - Financing of specific activity connected to the IWT offence, such as storage or shipping
  - Purchase of high-value assets



## LINES OF QUESTIONING:

1. **In connection with the IWT activity** – how were items paid for and who paid them?
2. **Associates and contacts** – what does the suspect know about their finances?
3. **Lifestyle** – what income does the suspect have? What are their major expenditures? Who pays for their accommodation, vehicles and communications?
4. **Identified high-value assets** – when and how were they bought, and who paid for them?

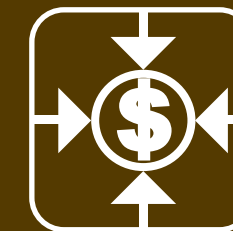


## FOLLOW UP:

**If answers are given, follow up to ensure that as much specific information is obtained as possible, such as:**

- Names and branches of banks used
- Location of money transfer agents used
- Currency of banknotes used – what size notes (e.g. US\$100)
- Where records are kept





## 6

FINANCIAL INVESTIGATION  
STRATEGIES AND PRACTICE

This chapter helps non-specialists understand why initial financial information gathering at the start of a case is so important, and to encourage trained financial investigators to apply their resources to IWT cases.

**When to perform a full financial investigation**

Financial investigations can require a lot of time and effort from specialist officers. Before creating a financial investigation strategy, it is important to consider the expected outcome.

A financial investigation will not be possible in every case.

Will the financial intelligence:

- lead to a significantly greater understanding of the criminal network, through identifying activity (e.g. travel or money transfers) or additional associates both in Malawi and abroad?
- provide evidence to support IWT charges, for example by showing how criminal activity was funded?
- lead to potential money laundering charges, by identifying where and how the proceeds of IWT offences have been transferred or hidden?
- identify high-value assets or large sums for potential post-conviction forfeiture?

**The officer in charge of the case, in conjunction with the DPP if necessary, should decide if a parallel financial investigation is to be carried out or if the case requires involvement from the FIA, Anti-Corruption Bureau or Central Intelligence Unit in the Police.**

**KEY POINT**

**Allocate resources to the cases most likely to benefit from a full financial investigation.**

Did your initial enquiries suggest that there are enough financial leads to follow and will they create useful information to assist the case?

**Conducting a Financial Investigation**

Once the officer in charge of the case has decided on the investigative strategy, a full financial investigation can be launched. The decisions and the strategy should be recorded in a case file.

It is good practice for a financial investigator to be allocated to carry out the investigation. These specialist officers who have the powers to access financial information collected by financial institutions and other bodies.

They also have the skills and experience to follow leads and to produce the financial intelligence required by the strategy. In IWT cases where different agencies may be involved, it is recommended that one financial investigator is given lead responsibility.

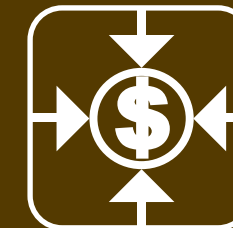
**Intelligence and Evidence**

A financial investigation can collect lots of data from different sources in a short space of time.

Wherever possible, “soft” or electronic copies of data are useful for storage and analysis. Ask for transaction records to be supplied in a spreadsheet format, as this can immediately be used for analysis. If these records are supplied on paper, they will need to be manually inputted, which can lead to errors and delays.

However, these records may be needed as evidence in subsequent court proceedings. For this reason, it may also be necessary to receive “hard” copies or PDFs, suitably certified and exhibited. The originals should be stored safely and working copies used for analysis.





# FINANCIAL INVESTIGATION STRATEGIES AND PRACTICE (2/3)

## Access to Financial Information in Malawi and Abroad

A financial investigator has access to many sources of financial information in Malawi. **By working with other agencies**, they will be able to access the information they need through MOUs or other agreements. In some cases, they may also use court orders, like production orders or search warrants.

Obtaining full records from a financial institution for evidential purposes requires a court order, for example under Financial Crimes Act 2017. These powers are beyond the scope of this Handbook – assistance should be sought from specialist financial investigators at the FIA.

IWT cases almost always have foreign elements. For example, if foreign bank accounts are identified sending funds to facilitate IWT activity in Malawi, enquiries will need to be made in the country where those bank accounts are held.

### There are a variety of ways to carry out international enquiries:

- Contacting counterpart agencies in the foreign jurisdiction, who may initiate a parallel financial investigation of their own.
- Contacting the FIU in the foreign jurisdiction, who can respond to requests from the FIA. Any response will be sent back to the FIA and dealt with through their normal dissemination channels.
- Sending a request through INTERPOL channels.
- Sending a formal 'letter of request' for assistance to the foreign jurisdiction.
- Requesting Mutual Legal Assistance (MLA) - [guidelines available here](#)

Advice on which methods is best for any particular enquiry should be sought from the DPP, FIA or Central Intelligence Unit in the Police.

## Financial Intelligence Support to Investigations

Financial investigations generate large amounts of data, so it can be difficult to keep them on track and focused on the original objectives.

It is important for the officer in charge of the case overall to be regularly briefed on progress. To assist with this, interim financial analysis products and charts can be produced at regular intervals.

The officer in charge should then review the objectives. Decisions about enquiries into new subjects should be made and recorded in the case file.

Although this Handbook has focused on investigations arising from the seizure of illegal wildlife products or arrests, financial investigations are equally valuable during a proactive, intelligence-led case.

They can be used to support intelligence operations in near-real time. Good practice is to appoint a financial investigator and to brief them on all intelligence aspects of the case, including surveillance, communications intercept and informant information, so that they can identify opportunities for financial intelligence development.

**Informants or undercover operatives should be tasked to collect any financial data they can. They should be briefed and asked questions about any financial activity they have observed.**

**Surveillance teams should also be tasked to record all possible details about financial activity.** This can include exactly who the subject spoke to and what they did in a bank or other financial institution.

If a subject uses an ATM, the exact time and date of the transaction should be recorded by a surveillance officer.



## KEY POINT

**To stay on track with a financial investigation, ask yourself if this line of enquiry helping:**

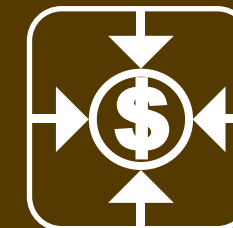
to build a case or understand the criminal network?

to identify possible money laundering?

to identify assets held by suspects?

**Do not carry out financial enquiries for their own sake – they should be leading somewhere.**





# 6

## FINANCIAL INVESTIGATION STRATEGIES AND PRACTICE (3/3)

### Example:

In our financial analysis example in Chapter 4, we had two suspects:

**‘Subject A’** – a low-level poacher, paid a small amount of money in cash

**‘Subject B’** – a fixer, who had apparent access to significant sums and travelled internationally

In this case, a financial investigation of **‘Subject B’** is likely to lead to identification of further activity and associates through his financial transactions. Further financial profiling will help to establish whether the funds he has access to have a legitimate origin or can be considered the proceeds of crime. Money laundering charges and asset forfeiture may follow in due course.

In contrast, there would appear to be little value in pursuing further financial enquiries about **‘Subject A’**.

### Financial Investigation IN ACTION

A subject was observed by a surveillance team entering a bank. He was followed by an officer who saw him pay money over a counter.

The officer noted which counter the subject had used and a description of the bank employee he spoke to.

These details enabled the financial investigator to establish which account the money had been paid into and the details of a false identity used by the subject.

### Financial Investigation IN ACTION

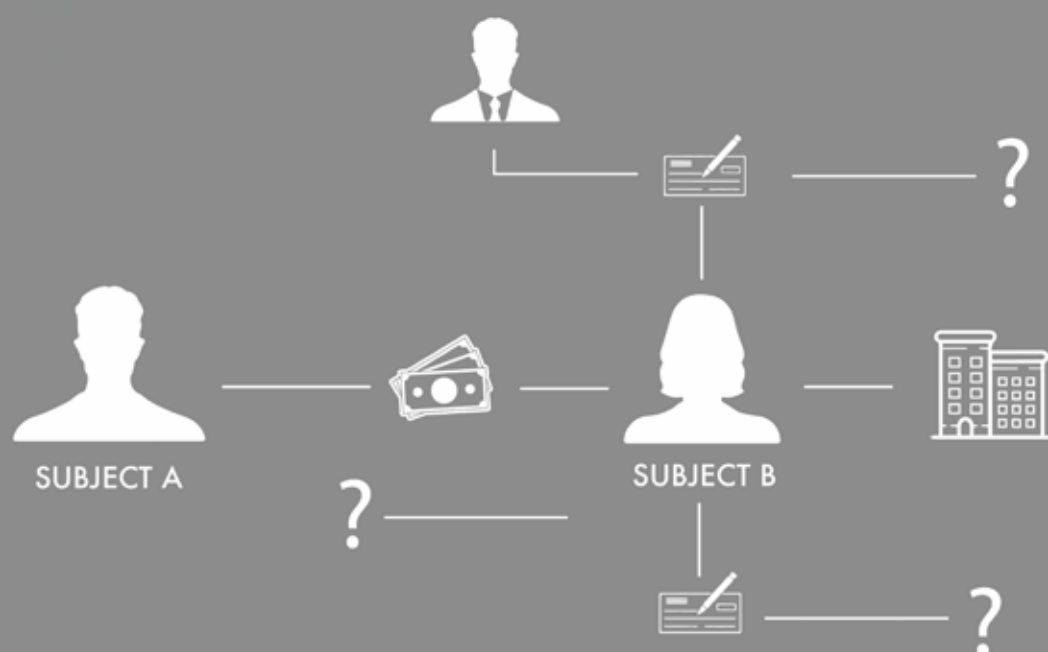
An informant described how he had been present at a meeting of wildlife traffickers in a restaurant.

When asked who had paid for the meal and how, he remembered that one of the group had used a credit card. Enquiries with the restaurant were able to identify a previously unknown account linked to the traffickers.

### Financial Investigation IN ACTION

In one case, a surveillance team lost their subject, who was believed to be going to a meet another member of the organised crime group.

An urgent financial enquiry revealed use of a bank card associated with the suspect in an ATM, allowing the surveillance team to deploy to the area, where they re-acquired the subject.







# CONCLUSION

## Conclusion

This Handbook has shown how all first responders and IWT investigators can play a role in identifying financial leads and gathering financial intelligence, particularly in the early stages of an investigation.

The “golden hour” immediately after an arrest or seizure is an important time to gather financial information and lay the groundwork for the first stages of a financial investigation.

The priority for IWT investigators will be the primary offence, arresting suspects and recovering illegal wildlife products. But they should also be thinking about the financial details of the crime at all times.

If the case warrants a full financial investigation, these early actions can generate evidence relating to the IWT offence itself, identify possible additional money laundering charges and lead to the forfeiture of criminal assets.

In this Handbook, we have examined the basic techniques of financial analysis and profiling. Some examples of where and how an investigator can access financial information in Malawi and abroad have also been identified.

To successfully complete a full financial investigation, a specialist financial investigator should be appointed, and an investigation strategy created to guide the case.

**Close cooperation between the investigating officer, the DNPW, DPP, FIA and other agencies is vital. Collaboration should be carried out through the IACCWC where appropriate.**

# Remember, always follow the money!



Establishing contacts and arrangements with these agencies should form part of a national strategy to use financial intelligence to combat IWT. Details of individual contacts and how to access their information should be kept on record in your agency. Memorandums of Understanding (MOUs) are useful to ensure that the arrangements are understood, including how information will be safeguarded and the role of each agency in developing financial intelligence. **All activity should be coordinated in accordance with the IACCWC.**

**The various agencies to consider, and to ensure that you have contacts with, are:**

**Wildlife Crime Investigation Unit (WCIU) in the Department of National Parks and Wildlife (DNPW):** <https://wildlife.gov.mw>

The Department of National Parks and Wildlife (DNPW) are the key agency responsible for anti-wildlife trafficking in Malawi. They have a specialised anti-IWT unit with experience investigating wildlife crime. They should be notified of all significant investigations.

**Financial Intelligence Authority (FIA):** <https://www.fia.gov.mw/index.php>

Every country has a specialist Financial Intelligence Unit (FIU) that sits at the heart of the national financial intelligence and anti-money laundering system. The FIU has connections with the financial sector and receives confidential reports of any suspicious activity from financial institutions. In Malawi, the Financial Intelligence Unit, created by Section 4 of the Financial Crimes Act 2017, is the FIA.

**Malawi Revenue Authority (MRA):** <https://www.mra.mw/>

The MRA is responsible for collecting revenue and taxes for the government. They have a great deal of financial information about individuals available to them and Customs will have information on shipping and goods. This information is usually confidential and must be accessed under appropriate powers and arrangements.

**Anti-Corruption Bureau (ACB):** <http://www.acbmw.org>

IWT cases often involve corruption and bribery at various levels. If there is suspected involvement of corrupt officials, the specialist agencies responsible for such matters should be consulted. In Malawi, the relevant agency is the ACB.

**Directorate of Public Prosecutions (DPP):**

Prosecutors play a vital role in building cases and taking them to court. Close cooperation with prosecutors is required during the detection, investigation and prosecution of wildlife crimes and any associated financial offences. In Malawi, the **Directorate of Public Prosecutions (DPP)** plays this role and should be consulted in appropriate cases, particularly those where there may also be money laundering aspects.

**Central Intelligence Unit (CIU), Malawi Police Service**

The Central Intelligence Unit in the Malawi Police Service has advanced analytical capabilities that can be applied to IWT investigations.