Ah Nam: The Downfall of Vietnam's Wolf of Wall Street

September 2022
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19. **AUG-SEP 2017**
   - Record quantity of rhino horns available.

20. **DEC 2017**
   - Case File provided to the Vietnam Environmental Crime Police.

21. **JAN 2018**
   - Ah Nam allegedly arrested.

22. **FEB 2018**
   - Ivory sighting, seizure and arrest in Khanh Ha village.

23. **AUG-SEP 2017**
   - Record quantity of rhino horns available.

24. **JAN 2018**
   - Ah Nam allegedly arrested.

25. **FEB 2018**
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Executive Summary

From humble beginnings as a low-level wildlife trader in 2016, Nguyen Van Nam rose to prominence rapidly. By 2019 he had asserted his position as one of Vietnam's top wildlife criminals, the lead broker for a sophisticated criminal network responsible for trafficking vast quantities of elephant ivory and rhino horn from Africa to China via Vietnam. However, he is now languishing in prison, having fallen prey to his own arrogance, poor criminal tradecraft, and effective police work.

Nguyen Van Nam was arrested in Hanoi on 30 September 2019 in connection with the illegal trade of 204 kg of ivory; and on 16 July 2020 was convicted and sentenced to 11 years in prison.\(^1\) The deceptively small quantity of ivory he was in possession of belies the volume of wildlife products he is known to have trafficked during the three years he was under investigation by the Wildlife Justice Commission. In that time, the Wildlife Justice Commission documented his access to a minimum of 17.6 tonnes of raw ivory valued at more than USD 9 million, and 477 kg of rhino horn valued at more than USD 8 million, based only on what operatives directly observed and verified during that period.\(^2\) This quantity of product is estimated to equate to the killing of approximately 1,760 elephants and more than 100 rhinos, and represents only a fraction of what he is likely to have trafficked. To illustrate the level Nguyen Van Nam operated at, in August 2017 he provided an undercover operative with an image of 76 rhino horns. This was the largest number of raw rhino horns the Wildlife Justice Commission has ever been offered in one single transaction.

The trial received limited media coverage both within and outside of Vietnam, the significance of the event going largely unnoticed. However, the arrest and imprisonment of Nguyen Van Nam represents a meaningful and encouraging step forward for Vietnam's law enforcement authorities in combating organised wildlife crime. The removal of one of the most prolific wildlife traffickers has not only severely disrupted his criminal network, but due to the major role Vietnam plays in the international illegal wildlife trade, the impact has extended across the region and globally.

The Wildlife Justice Commission initiated Operation Medusa in 2016 to delve into the illegal ivory and rhino horn trade in Vietnam and gain a deeper insight into the Africa-Asia supply chain. Nguyen Van Nam (hereafter referred to by his criminal alias Ah Nam) was first introduced to Wildlife Justice Commission operatives in June 2016, and by January 2017 he had become the key subject focus of Operation Medusa and related investigations due to his growing criminal role.

The Wildlife Justice Commission’s investigations into Ah Nam and his network were intensive, resulting in the collection of a wealth of intelligence and evidence. Intelligence on Ah Nam and his key associate Duong Van Phong (hereafter referred to by his criminal alias Ah Phong) was compiled in a detailed
Case File and provided to the Vietnam Environmental Crime Police and the Anti-Smuggling Bureau of China Customs in December 2017. The two men were partners in crime for the entire period of the investigation and were eventually arrested and convicted together. During the course of operations to infiltrate and dismantle the network, at least 15 individuals were arrested in Vietnam – 13 of whom have been imprisoned (including Ah Nam and Ah Phong), and two were released without charges – and at least 1,632 kg of ivory and 18 rhino horns were seized. Further arrests and wildlife seizures relating to Ah Nam’s network were also made in China and Malaysia, showing the international reach and consequences of his operations.

Although valuable opportunities were missed to investigate the illicit financial flows associated with Ah Nam’s criminal activities, his conviction and the heavy penalty nevertheless sends an important message: the risk-reward ratio for wildlife crime is beginning to change in Vietnam. This has also carried positive implications more broadly in the region and globally, due to the key role of Vietnam in the illegal wildlife trade. Analysis of published court judgements in China shows that additional cases linked to Ah Nam have continued to be prosecuted and convicted, while the Wildlife Justice Commission’s investigations have found many Vietnamese traders are no longer operating due to the increased fear of arrest and difficulties in smuggling products across the border into China.

Now that the case against Ah Nam is closed and other related investigations and court matters are finalised, this report aims to bring some of that intelligence to light. Examination of Ah Nam’s profile is useful to expose key aspects of the criminal dynamics of ivory and rhino horn trafficking in Vietnam and to recognise the efforts of Vietnamese law enforcement authorities in bringing Ah Nam to justice.

<table>
<thead>
<tr>
<th>Ah Nam investigation outcomes</th>
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<tbody>
<tr>
<td>3-year investigation</td>
</tr>
<tr>
<td>Documented Ah Nam’s access to over USD 17 million worth of wildlife products</td>
</tr>
<tr>
<td>Estimated USD 5.57 million worth of wildlife products seized, including:</td>
</tr>
<tr>
<td>→ 3,892 kg of ivory</td>
</tr>
<tr>
<td>→ 192.9 kg of rhino horns</td>
</tr>
<tr>
<td>→ 28.5 kg of pangolin scales</td>
</tr>
<tr>
<td>Law enforcement agencies in three countries made 15 wildlife seizures connected to Ah Nam’s network</td>
</tr>
<tr>
<td>47 individuals imprisoned, sentences ranging from 9 months to 15 years</td>
</tr>
<tr>
<td>49 individuals arrested</td>
</tr>
</tbody>
</table>
The following timeline illustrates the key product sightings, seizures, and arrests related to Ah Nam’s network that occurred in Vietnam during the Wildlife Justice Commission’s investigation.

- **Jun 2016**: WJC sighting of 440 kg of ivory in Bai Uyen village.
  - The WJC’s first encounter with Ah Nam and Ah Phong.

- **Nov 2016**:
  - WJC sighting of 440 kg of ivory in Nhi Khe village.
  - The WJC’s first encounter with Ah Nam and Ah Phong.

- **Apr 2017**: Police seize 250 kg of ivory in Nhi Khe village; four suspects arrested.
  - WJC sighting of 20.9 kg of rhino horn in Hanoi.
  - Record quantity of rhino horns available (76 horns).

- **Aug 2017**: WJC sighting of 600 kg of ivory in Khang Ha village.
  - Police seize 971 kg of ivory; four suspects arrested.

- **Feb 2018**: Police seize 204 kg of ivory in Hanoi.

- **Sep 2019**: Ah Nam, Ah Phong, and Nguyen Van Hung (Ah Nam’s cousin) are arrested.

- **Dec 2017**: BAI UYEN
  - LANG SON
  - NHI KHE

- **Jun 2019**: Ah Nam, Ah Phong, and Nguyen Van Hung convicted; sentenced to prison.
Ah Nam and Ah Phong: Partners in crime

Ah Nam and his key associate Ah Phong were wholesale wildlife brokers, operating directly on behalf of product owners by playing an important role in selecting potential buyers and arranging sightings of the products. Ah Nam was identified as having seniority over Ah Phong in the network hierarchy, with Ah Phong usually deferring to him in decision making. Buyers typically met with Ah Phong first before being referred to Ah Nam, who did not communicate directly with new customers. Both men could converse freely in Chinese, which was an asset for their business as it meant they could engage directly with their predominantly Chinese clientele without the need for interpreters. This also gave them an advantage over other Vietnamese wildlife brokers.

Early into Operation Medusa it became apparent that Ah Nam was fulfilling a prominent role in the criminal network. The Wildlife Justice Commission had initially assessed both men to be Level 3 subjects, but based on the volume of ivory and rhino horn trade that they were known to be involved in, Ah Phong was later upgraded to a Level 4 subject and Ah Nam to a Level 5 subject. The Wildlife Justice Commission uses an internal rating system to classify subjects of interest according to factors such as their role in the network, modus operandi, geographical range across which they operate, estimated conservation impact, among others; with Level 1 being the lowest, for example, a poacher, and Level 5 being the highest, or a “kingpin”. A Level 3 subject is defined as a mid-level trafficker who is likely operating at the international level and involved in some decision making; while a Level 4 subject is a mid to high level trafficker who may have access to corrupt contacts and legitimate businesses to facilitate their crimes; and a Level 5 subject is a significant threat who orchestrates and finances the movement of wildlife trade at a commercial level.

Initially, neither Ah Nam nor Ah Phong were deemed to be the product owners. However, over time, the Wildlife Justice Commission observed Ah Nam expanding his position and standing as a wildlife trafficker, and he is known to have been involved in financing some shipments including a large consignment of rhino horns that was seized in Malaysia. As a major Malaysian transporter described in 2018 of Ah Nam’s increasing dominance, “There is only him in Hanoi now, no number two now.”

Ah Nam and Ah Phong: Partners in crime

<table>
<thead>
<tr>
<th>Name</th>
<th>NGUYEN Van Nam</th>
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<tbody>
<tr>
<td>Alias</td>
<td>Ah Nam, Ah Nan</td>
</tr>
<tr>
<td>Gender</td>
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</tr>
<tr>
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<tr>
<td>Criminal role</td>
<td>Broker</td>
</tr>
<tr>
<td>Threat level</td>
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</table>

<table>
<thead>
<tr>
<th>Name</th>
<th>DUONG Van Phong</th>
</tr>
</thead>
<tbody>
<tr>
<td>Alias</td>
<td>Ah Phong, Ah Feng</td>
</tr>
<tr>
<td>Gender</td>
<td>Male</td>
</tr>
<tr>
<td>Age</td>
<td>42</td>
</tr>
<tr>
<td>Nationality</td>
<td>Vietnamese</td>
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<tr>
<td>Location/base</td>
<td>Hanoi</td>
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<tr>
<td>Languages spoken</td>
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<tr>
<td>Criminal role</td>
<td>Broker</td>
</tr>
<tr>
<td>Threat level</td>
<td>4</td>
</tr>
</tbody>
</table>

1 Ah Nam and Ah Phong are fluent Chinese speakers, but cannot read or write in Chinese language.
2 The Wildlife Justice Commission Trader Rating is out of a maximum score of 5 and is based on an internal comparative analysis of the person of interest’s criminal antecedents and the impact on wildlife caused by their trader activity.
3 Full details of this seizure are withheld due to related ongoing investigations.
The first encounter

The Wildlife Justice Commission first met Ah Nam and Ah Phong in June 2016, while sighting a batch of 440 kg of ivory in Bai Uyen village, northeast from Hanoi. The two men were briefly introduced during the meeting but were not the main subjects of interest at that time.

Six months later in December 2016, Wildlife Justice Commission operatives engaged with a previous subject of interest, who referred them to two of his associates who were offering over one tonne of ivory in Hanoi at that time – Ah Nam and Ah Phong.

Around the same time, the Wildlife Justice Commission received intelligence that Ah Nam belonged to one of three families in Nhi Khe that is involved in the supply of rhino horn products. In a separate investigation, Ah Phong was introduced to another operative as the person to contact for buying large quantities of wildlife products.

Following these investigative leads, the Wildlife Justice Commission engaged directly with Ah Nam and Ah Phong and conducted further field missions to assess their levels of criminal involvement.

Ah Nam quickly became the main subject of interest of the Wildlife Justice Commission’s Operation Medusa, and a vast amount of time and resources were dedicated to infiltrating his network and building his Case File to support law enforcement action. For three years between 2016 and 2019, operatives monitored Ah Nam and Ah Phong’s WeChat and Facebook accounts and approached them in an undercover capacity. A total of 35 field missions to Vietnam were also conducted to collect intelligence and evidence on Ah Nam and Ah Phong’s criminal activities. Other engagements were made to cross-reference and test the intelligence collected, including interventions designed to collect further information on how Ah Nam connected with the African side of the supply chain. These revealed valuable intelligence about how his operations were structured, including how he organised logistics and his preferred shipping routes, pricing, and payment methods.

The Wildlife Justice Commission diligently documented the quantity of illegal wildlife products directly observed for sale by Ah Nam and Ah Phong and the quantity offered during covert engagements. The rates they offered for ivory and rhino horn were also tracked over time to understand the network and the market, and to calculate the value of their criminal activities.

Ah Nam was also known to have lost a significant quantity of rhino horn in a major seizure in Malaysia.

The information presented in this report is based on the culmination of three years of focus on Ah Nam during Operation Medusa and related investigations using a variety of strategic approaches, and collaboration with the Vietnam Environmental Crime Police and other partners including Education for Nature-Vietnam (ENV).

Infiltrating the network

Ah Nam quickly became the main subject of interest of the Wildlife Justice Commission’s Operation Medusa, and a vast amount of time and resources were dedicated to infiltrating his network and building his Case File to support law enforcement action. For three years between 2016 and 2019, operatives monitored Ah Nam and Ah Phong’s WeChat and Facebook accounts and approached them in an undercover capacity. A total of 35 field missions to Vietnam were also conducted to collect intelligence and evidence on Ah Nam and Ah Phong’s criminal activities. Other engagements were made to cross-reference and test the intelligence collected, including interventions designed to collect further information on how Ah Nam connected with the African side of the supply chain. These revealed valuable intelligence about how his operations were structured, including how he organised logistics and his preferred shipping routes, pricing, and payment methods.

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*Due to sensitivities relating to ongoing investigations, full details of the China and Malaysia incidents are withheld from this report.*
Who is Ah Nam?

Ah Nam used several different storage facilities around Hanoi, Nhi Khe village, Bac Ninh, Hai Duong, Vinh Phuc and other locations, which were typically backrooms of residences, shops, or factory-like premises. The main reasons for Ah Nam’s success as a wildlife trafficker were his ability to speak Chinese and his extensive network of Chinese and Vietnamese contacts, which meant he knew all the major buyers and sellers in the wildlife business.

Ah Nam was known to have owned at least two residences in Hanoi, both fully refurbished with top quality rosewood furniture, and appeared to live a lavish lifestyle with his wife and children, and multiple girlfriends. His wife is known to be a real estate trader, but Wildlife Justice Commission’s investigation failed to identify any form of legitimate employment for Ah Nam. Throughout the investigation he was seen driving various vehicles, typically expensive SUVs, and his wife often posted images on Facebook of her luxury fashion purchases, holidays, and on one occasion a large pile of bank notes that was estimated to equate to USD 10,000.

Ah Nam was not known to travel much outside of Vietnam, which was understood to be due to his fear of being arrested. The Wildlife Justice Commission received intelligence that Ah Nam was arrested in January 2018 after 20 kg of rhino horn products were seized in China and traced back to him. However, this was never confirmed or verified by other sources.
Personality and criminal characteristics

“Throughout the investigation, Ah Nam did not present as being particularly intelligent or criminally savvy, yet through his arrogance, Chinese language skills and extensive connections, he was able to elevate himself to a high-level position in the criminal network. His criminal tradecraft was very poor, using the same phone number and bank accounts for the entire three years that the Wildlife Justice Commission engaged with him, and he consistently met with customers and criminal associates at the same cafés, even the same reserved tables and seats to discuss business. This is not typical of comparable level serious criminals operating in other types of organised crime and shows his confidence that he could act with impunity. In April 2019, Ah Nam told Wildlife Justice Commission operatives, “I’m not scared of anyone in Vietnam.” Although Ah Nam and Ah Phong did increase their level of caution and security measures as the investigation progressed, such as conducting anti-surveillance and changing product sighting procedures, this was deemed to have been more in response to product owner demands rather than their own foresight.

The illegal wildlife trade is largely driven by the demand for rare and expensive products as a display of wealth and status, and this characteristic flows through to the traffickers themselves. Ah Nam’s habit of boasting about his money, success, and status permeated all his business dealings, and foreshadowed his eventual collapse and that of his criminal network. He also carelessly bragged about his criminal activities in a manner that divulged valuable operational intelligence and details about his associates that a more cautious criminal would have kept at much closer quarters. In one interaction in June 2018, while mentioning that he had “just taken a batch of products from Malaysia,” he sent operatives a photo of a baggage handler walking through a security door past Malaysian customs officers, as well as his Malaysian contact’s boarding pass from Africa to Kuala Lumpur with the booking code that revealed the entire detailed itinerary of the trip. These types of disclosures enabled operatives to gain greater insight into many aspects of Ah Nam’s operations and supply chain.

“My reputation in Vietnam, you must know. Many people deal with me, they all can tell you how I am like, you know.” – Ah Nam, June 2019.

“I have so much stuff, I’m just afraid you don’t have enough money.” – Ah Nam, January 2017.

“My reputation in Vietnam, you must know. Many people deal with me, they all can tell you how I am like, you know.” – Ah Nam, June 2019.

“That little bit of money is nothing... We do this business, 5,000 [USD] is too little you know, 5,000 [USD] we don’t care. At least we do a few millions [RMB], you just a few tens of thousands [RMB], is it big? Not big.” – Ah Nam, June 2019.

“Image 8: Ah Nam, Ah Phong, and a third suspect meeting at one of their regular café haunts.”

“Image 9: Ah Nam’s arrogant personality was well-known in the wildlife business.”
Ah Phong: Work and life

Ah Phong is originally from Lang Son province on the border with China, and is known to have previously lived in Pingxiang, China. Ah Phong was responsible for the day-to-day operations of the criminal network and the transport route from Hanoi to Lang Son, over the border to Pingxiang, and onwards in China. He claimed to be involved in the trade of timber and had links to factories in Lang Son. Legitimate local businesses transporting goods from Vietnam to China were suspected to be used as the means to smuggle wildlife products over the border into China.

In addition, Ah Phong was connected to a small traditional medicine shop in Hanoi, which was used as a meeting point on several occasions with Wildlife Justice Commission operatives. It is not known whether there were further links between the shop and Ah Phong’s wildlife business.

Throughout the investigation, while Ah Nam and Ah Phong traded primarily in raw and unprocessed ivory and rhino horns at the wholesale level, on several occasions they also offered processed ivory products such as bracelets and bangles (including at the meeting shown in Image 11). Although Wildlife Justice Commission operatives did not engage with Ah Nam and Ah Phong on pangolin scales, with their connections and role in the network they were likely able to source them if customers requested. 7

Given the volume of product observed during the investigation and what was learned about Ah Nam’s supply chain, the vast majority originated from African animals.

From June 2016 to June 2019, the Wildlife Justice Commission documented Ah Nam’s access to at least 17.6 tonnes of raw ivory valued at USD 9,131,713, and 477 kg of rhino horn valued at USD 8,098,075. This represents the minimum amount of product that Ah Nam traded, based on the product that was directly observed during field missions and the quantity offered during covert social media engagements that was able to be verified by image analysis to determine the uniqueness of products. The total value of these products is calculated based on the prices Ah Nam offered for ivory and rhino horn during these engagements (see Figures 1–4 below).

Prices for both ivory and rhino horn steadily declined over the three years of investigation. From the Wildlife Justice Commission’s first encounter with Ah Nam in June 2016 to the last offer received in June 2019, the price for ivory dropped by more than 50% from USD 820 to USD 405/kg, while the quantity of ivory available increased. This reflects the broader trends observed over the same period in the global ivory supply chain, of larger ivory shipments moving from Africa to Asia and decreasing ivory prices. 8

Ah Nam was believed to have been facing increasing difficulties in selling ivory after the introduction of the domestic ivory trade ban in China, 9 resulting in the development of several ivory stockpiles within Vietnam. “Should still have 10 tonnes, 10 tonnes material… white material, white material, white material,” he told operatives in early June 2019. Two weeks later he offered, “I take your brothers to view products in Cambodia, ok? Another batch is in Cambodia.” Similarly, the price of rhino horn dropped by approximately 37% from a high of USD 20,200/kg in 2017 to its lowest price of USD 12,704/kg in 2019. Ah Nam consistently had access to significant quantities of rhino horn throughout the investigation, regularly remarking that the market for rhino horn was strong and his main limitation was transportation of the product from Africa to Vietnam.

In early August 2017, Ah Nam offered 76 rhino horns (comprising both front and back horns) in one single transaction, highlighting the organised nature of the trade and the great volume of product he was able to move. This was the largest number of raw

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7 Two seizure incidents in China that were connected to Ah Nam involved a small quantity of pangolin scales (28.5 kg).
9 China banned all domestic ivory trade and processing from 31 December 2017.
The Wildlife Justice Commission has ever been offered in one deal, which implies that Ah Nam had access to a specific supplier with the capability to collect vast numbers of rhino horn in Africa. Investigators also suspect that although Ah Nam had access to large batches of products, he released them into the market in stages as a tactic to maintain control over product pricing. The distribution of too many products at once carried the risk of flooding the market and reducing the value of the commodities.

<table>
<thead>
<tr>
<th>Date</th>
<th>Quantity (kg)</th>
<th>Price/kg in Vietnam (USD)</th>
<th>Total value of products (USD)</th>
</tr>
</thead>
<tbody>
<tr>
<td>June 2019</td>
<td>10,000</td>
<td>405</td>
<td>4,050,000</td>
</tr>
<tr>
<td>October 2018</td>
<td>6,000*</td>
<td>437</td>
<td>2,622,000*</td>
</tr>
<tr>
<td>October 2018</td>
<td>1,000*</td>
<td>582</td>
<td>582,000*</td>
</tr>
<tr>
<td>June 2018</td>
<td>2,200</td>
<td>608</td>
<td>1,337,600</td>
</tr>
<tr>
<td>February 2018</td>
<td>971</td>
<td>603</td>
<td>585,513</td>
</tr>
<tr>
<td>January 2018</td>
<td>1,000</td>
<td>608</td>
<td>608,000</td>
</tr>
<tr>
<td>August 2017</td>
<td>2,000</td>
<td>762</td>
<td>1,524,000</td>
</tr>
<tr>
<td>January 2017</td>
<td>1,000</td>
<td>633</td>
<td>633,000</td>
</tr>
<tr>
<td>June 2016</td>
<td>480</td>
<td>820</td>
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<tr>
<td>Minimum total</td>
<td>17,651</td>
<td></td>
<td>9,131,713</td>
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<tr>
<td>Maximum total</td>
<td>24,651</td>
<td></td>
<td>12,335,713</td>
</tr>
</tbody>
</table>

* To avoid over-estimating the amount of product Ah Nam had access to, it is assumed the stock he had available in October 2018 is part of the same 10 tonnes of stock he claimed access to in June 2019.

Date | Quantity (kg) | Price/kg in Vietnam (USD) | Total value of products (USD) |
June 2019 | 60 | 12,704 | 762,240 |
April 2019 | 140 | 16,324 | 2,285,360 |
August 2018 | 116 | 17,757 | 2,059,812 |
January 2018 | 33 | 17,757 | 585,981 |
August 2017 | 100 | 18,436 | 1,843,600 |
May 2017 | 28,5 | 18,436 | 525,426 |
April 2017 | Unknown* | 20,200 | 20,200* |
January 2017 | Unknown* | 15,456 | 15,456* |
Total | 477,5 | | 8,098,075 |

* As the quantity of rhino horn Ah Nam had access to in January 2017 and April 2017 is unknown, the value was calculated based on the assumption that he had at least 1 kg of rhino horn available.
Ah Nam’s network was very close-knit. Familial relationships were alluded to across many network members, and family could be the uniting factor that it was centred on. However, none of the familial relationships are confirmed and calling each other “brother” or “cousin” may have only been a sign of endearment. Trust was at the core not only within, but also outside the network, and transactions beyond already known and trusted clientele were kept to a minimum.

During its investigations, the Wildlife Justice Commission identified more than 30 network members who played several distinct roles to facilitate operations in the ivory and rhino horn supply chain.

**Network composition**

1. **Sellers** are the true product owners who hold an influential position at the top of the supply chain but are deliberately removed from the day-to-day operations and remain anonymous.

2. **Brokers** play a key facilitating role as the intermediary between the sellers and the buyers, responsible for product pricing, quantity, quality, security, storage, price negotiations, and payment.

3. **Storage owners** provide a safe physical space to store the products.

4. **Caretaker/packers** clean, prepare and briefly process products prior to them being shown and sold to buyers.

5. **Transporters/couriers** deliver the wildlife products to the location specified by the buyer and bear responsibility if the products are seized.

6. **Currency converters** hold Chinese bank accounts and receive payments in RMB directly from the buyers. The payment is then exchanged to Vietnam Dong in cash and smuggled overland to Vietnam.

7. **Buyers** were identified as predominantly Chinese customers.
How the network operated

Sourcing and trafficking routes

Ah Nam claimed that he had never travelled to Africa himself, but said he had connections in many countries, including South Africa, Malawi, Mozambique, Nigeria, and Zambia.

At a meeting in Hanoi in April 2019, Ah Nam said he had multiple partners in South Africa and was imminently expecting the arrival of a shipment of 140 kg of rhino horn arranged by a Chinese partner. He stated he was willing to pay up to USD 6,000/kg for rhino horn sourced from South Africa, approximately USD 10,000 less than the price he was selling rhino horn for in Vietnam at that time.

At another meeting, he showed Wildlife Justice Commission operatives a video of unknown African men chopping ivory into small pieces and processing it into beads, which Ah Nam claimed was filmed in Africa. He further stated that it was difficult for Vietnamese nationals to smuggle carry-on products on flights out of Malawi, Nigeria, and Zambia – the common method used to smuggle rhino horn – but it did not pose a problem for Chinese nationals. He claimed that Mozambique was easier for Vietnamese, as they could carry wildlife products on board flights there.

Ah Nam also told Wildlife Justice Commission operatives that he cooperated with Chinese suppliers and transport organisers to move shipments of wildlife products. His preferred method to receive products was either via air cargo shipped to Malaysia and then on to Vietnam, which he said was the safest way, or via couriers hand-carrying products in their luggage, whom he would meet at Noi Bai International Airport in Hanoi. On several occasions he stated that he didn’t travel outside of Vietnam because he is a well-known figure in the wildlife trade and did not want to get arrested. “That man he looked for me many times, I am afraid, now I don’t dare to meet him in South Africa, I don’t dare to meet him,” Ah Nam said to operatives during an interaction in June 2019.

From discussions with Ah Phong, the Wildlife Justice Commission is aware that at least one ivory shipment they were selling had originated from Angola – a 1.2 tonne consignment that had been smuggled into Vietnam via air cargo in two separate batches of 600 kg each, transiting in Malaysia. Ah Phong had explained that the ivory was usually transferred to Vietnam either via Lao PDR, Thailand, or Malaysia, and it was “impossible” to deliver the ivory directly by air from Africa to Vietnam.

Ah Phong’s sister was said to be a fluent Portuguese speaker who has been based in Angola for more than ten years, and the owner of a company that imported timber from Angola to Hanoi via Ho Chi Minh City. Although he claimed that she was not involved in transporting ivory or rhino horn from Africa to Vietnam, it is possible that her company could have been used as a cover to facilitate the movement of ivory into Vietnam.

Ah Nam and Ah Phong both told operatives that larger shipments of wildlife products mostly entered Vietnam via one of the big seaports such as Ho Chi Minh City and Hai Phong, before being brought to Hanoi overland by truck.

Image 11: Ah Nam showing ivory being processed in Africa on his mobile phone, with Ah Phong.
Ah Nam and Ah Phong shared several images with Wildlife Justice Commission operatives that indicated the various types of smuggling techniques their network used to conceal wildlife products during shipment. In one image, ivory was painted black so that it appeared as charcoal or dark wood. In another image, ivory was concealed in wax. Staining the ivory brown using potassium permanganate was also sometimes used to make it appear antique. These types of concealment methods are based on the false belief that they will reduce the chance of products being detected during x-ray screening and other inspections and have also appeared in several seizures of ivory shipments originating from Africa.

Rhino horn was usually smuggled in smaller quantities and hand-carried by couriers in their personal luggage. The large front horns were often cut into several pieces so they could be packed more easily into luggage. Some larger rhino horn shipments were also known to have been smuggled by air cargo and sea cargo.

During meetings with Ah Nam, he was constantly receiving and sending voice messages in Chinese and discussing the availability and prices of wildlife products with potential buyers. “All Chinese, so many,” Ah Nam said, referring to his customers. All interactions with Ah Nam and Ah Phong demonstrated their continual access to a high volume of products and customers willing to buy them. On multiple occasions Ah Phong said that if buyers don’t pay the deposit in a timely manner, “I will have other Chinese buyers talking to me immediately.”
Delivery

The quoted prices for ivory and rhino horn sometimes included delivery fees to China, and products were delivered overland by truck. Legitimate local businesses such as agricultural products, vegetable and fruit traders transporting goods from Vietnam to China were likely used as a cover for the deliveries, with the main transport route suspected to run from Hanoi to Lang Son, then over the border to Pingxiang and onwards to other locations. Information obtained by the Wildlife Justice Commission indicated that Ah Nam was sending products to Coc Nam, a village close to the border between Lang Son and Pingxiang, corroborating the use of this transport route. Another route used by this network involved crossing into China via the Mong Cai/Dongxing border gate.

Delivery to places such as Guangxi autonomous region (Nanning or Kunming), Fujian province, Guangdong province and even Beijing city could be arranged. For anywhere further afield, such as Hong Kong SAR, delivery was possible but full payment was required beforehand. This was suspected to be due to the limited locations where money could be “collected” by trusted contacts. Depending on the exact location, delivery could be as fast as two or three days, or up to one week.

Early in the investigation, Ah Phong assured operatives that the couriers would take full responsibility if products were seized during transportation. However, by May 2017, the 100% courier liability model had changed. He stated that “when they deliver products, they need half of the money, and if anything happens, we share the loss equally.” This change in the delivery model was corroborated by other Vietnamese traders in separate investigations.

Pricing and payments

Ah Nam was understood to buy products via deposits made by investors, mostly from China. At the same time, he was suspected to buy and sell products either opportunistically or to return debts accrued when a shipment was seized.

When selling products, depending on the commodity and price, Ah Nam required 20-30% of the total value of the purchase to be paid as a deposit prior to delivery. The deposit was to be transferred in RMB to one of five Chinese bank accounts belonging to “currency converters” that were used by Ah Nam and Ah Phong to receive payments. The remainder of the payment was to be made upon receiving the products, either in cash to the transporter, or by direct transfer to one of the nominated bank accounts. In May 2017, Ah Phong explained that the currency converters would receive the RMB and exchange it to Vietnamese currency on his behalf. He said, “the small roads near the border crossing area” were used to physically smuggle millions of RMB or Vietnam Dong across the border, and “everyday there are many people who ship stuff, so no problem.”

The prices offered by Ah Nam and Ah Phong for raw ivory and rhino horn were drastically lower than the prices recorded during similar investigations in Vietnam in 2015-2016, and in Lao PDR in 2017. Such low prices compared to others in the region suggests that Ah Nam’s network was close to the source of the supply chain in Africa, and could afford to sell larger quantities of products at relatively lower prices, thereby controlling the wholesale market in the region.
Despite demonstrating a lack of criminal nous in many aspects of their operations, Ah Nam and Ah Phong exercised extreme caution in their interactions with new and untested buyers. They were reluctant to use WeChat for anything other than communicating, and very rarely used it to advertise their products. When asked for images of a newly arrived batch of raw ivory in Hanoi in April 2017, Ah Phong refused, saying: "If you want to buy, come to see... I don’t want to send pictures." Both men also used Facebook almost exclusively for social purposes rather than business, although this enabled the Wildlife Justice Commission to monitor their movements and lifestyle for anti-money laundering purposes. Their reluctance to trade on social media set them apart from most other traders.

This low uptake of social media may have been the result of Ah Nam and Ah Phong having a closed circle of Chinese buyers generating enough demand and turnover that it was not necessary to seek new customers, thereby reducing unnecessary attention and the risk of detection. On multiple occasions in 2017, Ah Nam and Ah Phong had boasted to Wildlife Justice Commission operatives how fast and easily they could sell products to China, with business doing so well that buyers were requested to place their orders before the products had even arrived in Vietnam.

Ah Nam was known to have crucial criminal connections in Malaysia that organised the transportation of shipments from Africa to Asia. He told Wildlife Justice Commission operatives that his preferred method to receive products was via air cargo shipped to Malaysia and then on to Vietnam, which he said was the safest way. In June 2018, Ah Nam told Wildlife Justice Commission operatives, "I just took a batch of products from Malaysia, all brought over by them... tusks, horns, scales, we take all." He was also seen on multiple occasions meeting in Hanoi with a key Malaysian person of interest.

On 13 August 2018, Malaysian authorities at Kuala Lumpur International Airport seized a shipment of 50 rhino horns weighing 116 kg, together with a stash of bones and carcasses of tigers or lions, leopards, and other carnivores, which was destined for Vietnam. At that time, it was the largest rhino horn seizure ever made in Malaysia. The incident was not made public until one week later. However, two days after the seizure was made, the Malaysian suspect and four other persons of interest were seen meeting with Ah Nam in Hanoi. This was a rare and enormously significant face-to-face meeting among kingpins, which corroborated many key pieces of intelligence that the Wildlife Justice Commission had collected up to that point. During the meeting, Ah Nam and the Malaysian suspect discussed options to try to "buy back" the seized rhino horn and referred to an unidentified associate ‘Ah Chen’ in China with a position of authority. Based on intelligence, it is inferred that the Malaysian suspect had direct involvement in facilitating the transportation of the rhino horn consignment, while Ah Nam was the intended recipient and one of the financiers of the shipment.

“I have done more than 10 years, never had anything, this is first, not even my fault. … This is not my transportation problem, only because they stink, then it happened,” the Malaysian suspect said during the meeting. Separate Wildlife Justice Commission investigations in South Africa confirmed that the shipment was detected and seized due to the strong odour and fluid leaking out of the package, as the owners wanted the products to be shipped out to Vietnam as soon as possible, before the bones were properly treated with chemicals.

This meeting was a crucial incident that underlined Ah Nam’s role and how his criminal ‘career’ had progressed during the investigation.

The Malaysia connection

Ah Nam (far left) was seen in Hanoi on 15 August 2018 meeting with the Malaysian suspect and four other persons of interest, to discuss their next steps immediately following a major rhino horn seizure in Malaysia.


Image 15: Ah Nam (far left) was seen in Hanoi on 15 August 2018 meeting with the Malaysian suspect and four other persons of interest, to discuss their next steps immediately following a major rhino horn seizure in Malaysia.
Key investigation events

In October 2016, the Wildlife Justice Commission arranged a meeting with a key subject in Nhi Khe village to sight 480 kg of ivory. One operative was required to stay at the house with the main subject, while a second subject named Pham Thi Thanh took the other operative to the safehouse for the product viewing, which was located at the rear of a mobile phone shop. The ivory was said to come from Angola. Upon their return to the house, a group of men including Ah Nam had arrived, and they had a short discussion about “business.” Later during the investigation, Ah Nam was observed several more times visiting this subject’s house. Intelligence on the location of the ivory was provided to Vietnam Environmental Crime Police and a few weeks later in November, police raided the property seizing 250 kg ivory and arresting four suspects, including Pham Thi Thanh. The case was prosecuted and in June 2017 all four suspects were sentenced to prison: Thanh received a 15-month sentence, another suspect was sentenced to 12 months prison, and two others received nine months imprisonment.11

The Wildlife Justice Commission approached a previous subject of interest to discuss ivory and rhino horn products, who referred the operatives to Ah Phong instead. Ah Phong offered to sell rhino horn and said he had over one tonne of ivory available in Hanoi. They arranged to meet at Ah Phong’s traditional medicine shop in Hanoi, then went by taxi to the safehouse where Ah Nam was waiting. Ah Nam quickly recognised the operatives from the October meeting in Nhi Khe village and greeted them as old customers. Even though they had previously interacted, Ah Nam was still reluctant to allow the operatives to view the ivory for security reasons and tried to convince them to buy the product without sightseeing. After a heated discussion with Ah Phong, Ah Nam relented and showed a small sample of four pairs of tusks. The sample contained two fake tusks, intended to test the operatives’ product knowledge and ensure they were genuine buyers. An appointment was made that evening to view 800 kg of ivory that had just arrived in Hanoi, but Ah Phong called at the last minute to say it was cancelled due to security concerns.

Three days later, Ah Phong offered operatives seven rhino horns weighing 28.8 kg via WeChat, and another appointment was made to view the horns. Operatives arrived at the residential address provided by Ah Phong to find he wasn’t there. After 40 minutes waiting, Ah Phong sent a message to say he was running late. After another 20 minutes he sent another message saying that Ah Nam had “just come back” and they were “too busy” to meet now. The appointment was cancelled.


Note: The Wildlife Justice Commission’s sources indicate that the initial seizure involved 50 kg of ivory, but an additional 200 kg of carved ivory products were seized at one of the subject’s homes which may not have been taken into account during the trial.
The Wildlife Justice Commission engaged with Ah Phong on WeChat and was offered two tonnes of raw ivory and 30 kg of rhino horns for sale, so a meeting was arranged at a café in Hanoi with both Ah Phong and Ah Nam to discuss purchasing these products. At the meeting, Ah Nam informed the operatives that the ivory had already sold, but another 800 kg was expected to arrive within five days. The rhino horn was available for viewing, although only “one or two pieces” remained unsold. They left the café in Ah Nam’s car to sight the rhino horns. He parked at a school playground and was met by an associate, who escorted them the rest of the way to the house, walking in single file. Two other associates joined the group and were observed to be conducting surveillance for Ah Nam. At the house, six rhino horns weighing a total of 20.9 kg were presented, each marked in white with a simple number and the weight of the horn. Only three small pieces were still available to purchase, with a combined weight of 3.94 kg. The operatives met with Ah Nam and Ah Phong again the next day to further discuss pricing, payment, and delivery details.

One month later, a Wildlife Justice Commission operative engaged with Ah Phong on WeChat and was offered 1.4 tonnes of raw ivory and 21 kg of rhino horns for sale. They met at a café in Hanoi and Ah Phong told the operative that Ah Nam was currently in Ho Chi Minh City inspecting 1.2 tonnes of ivory that had just arrived via air cargo from Angola. Ah Phong showed a photo of the ivory tusks painted in a black or dark brown colour and explained that the shipment had been delivered in two batches of 600 kg each, transiting in Malaysia. He said it would be arriving in Hanoi in a few days. They negotiated prices, payment method and delivery, and made an appointment for the next morning to sight the rhino horn.

Ah Nam and Ah Phong were both present at the next meeting, but Ah Nam left early to inspect a new shipment of 28 rhino horns that had just arrived in Hanoi and to prepare the 21 kg of rhino horns for sighting. However, Ah Phong received a phone call a few hours later and informed the operative that the 21 kg of rhino horns could no longer be viewed, as the product owner was now reluctant to show products to someone they haven’t dealt with before.

Instead, Ah Phong promised to arrange a sighting of the newly arrived batch of 28 kg of rhino horn. He drove the operative to another café and met with another associate. Ah Phong remained at the

Image 18: Ah Nam checking raw rhino horn products.

Image 19: The associate using a hair dryer to dry the rhino horns and reduce mould, May 2017.
café while the associate and the operative travelled by taxi to a nail salon. The operative was taken to a small house at the back of the nail salon, where the house owner and his wife began unpacking the plastic-wrapped horns. There were 28 back rhino horns in total, numbered from B1 to B28 and weighing a total of 28.5kg. Some of the horns still had dried flesh at the base, blood stains, and emitted a strong odour, indicating they had not long been cut from the rhinos. The associate weighed and arranged the horns, took some photos, then used a hairdryer to dry them and reduce moulding. During this process, Ah Phong called the operative several times, concerned that the visit was taking too long. The horns were packed away, and the associate and the operative returned by taxi to the café where Ah Phong was waiting. He said he was in a hurry to get back to his medicine shop where there was an issue he had to deal with.

The Wildlife Justice Commission passed information on the location of the rhino horns to the Hanoi-based NGO Education for Nature-Vietnam (ENV), which alerted the Vietnam Environmental Crime Police. The following day, police arrested the house owner Nguyen Anh Son while he was attempting to flee with a box containing 14 rhino horns. During questioning, Son surrendered a further four horns, bringing the total to 18 rhino horns. At the time, this was Vietnam’s largest seizure of rhino horn that was made outside of a transportation hub. Nguyen Anh Son was prosecuted and convicted in January 2018 and sentenced to 18 months in prison.\(^{12}\) This case demonstrates the vulnerable position of storage owners in the wildlife supply chain, with Son taking the fall for Ah Nam for illegal possession of the rhino horns despite only being the storage provider.

In August 2017, Ah Nam shared an image on WeChat of 76 rhino horns, which at that time was evidence of an unprecedented quantity of rhino horns being stored in one location. All horns were still whole and wrapped in plastic, and clearly arranged according to size and type. Ah Nam also later shared a series of images of the horns unwrapped, sequentially numbered, on scales. Around the same time, a previous person of interest from Operation Phoenix also posted photos on WeChat advertising the sale of 27 rhino horns. The handwritten numbering of the horns, as well as the scales, floor and background wall in those pictures appeared the same as Ah Nam’s photos, indicating they could be part of the same batch. Wildlife Justice Commission operatives re-engaged with this subject and made an appointment to meet at a café in Hanoi to discuss the purchase of five horns weighing 27 kg. During the discussion, the subject revealed that the horns had arrived by sea cargo from Africa as part of one very large consignment of 300 kg of rhino horns and 10 tonnes of ivory. He also referred to the “big ones” above him, and his “big brother” who controlled the products but was not available to meet the operative. The subject showed more images of rhino horn products on his phone that were part of a conversation with a WeChat account recognised as belonging to Ah Nam.

Based on all the information and evidence collected on Ah Nam and Ah Phong, and the workings of their criminal network since June 2016, the Wildlife Justice Commission prepared a detailed Case File and submitted it to the Vietnam Environmental Crime Police for action.

In February 2018, Wildlife Justice Commission operatives engaged with Ah Nam to ascertain if he had ivory available, and a sighting of approximately 600 kg of ivory was arranged at a gated house in Khanh Ha, a neighbouring village to Nhi Khe. For the first time in the investigation, Ah Nam said he had “ready-made” ivory products available as well, such as chopsticks, bangles, and pendants. Around this time Ah Nam had begun to mention that raw ivory sales were slowing down, and Wildlife Justice Commission suspects that he may have been branching out into processed ivory products to counter the reducing interest in raw ivory. This intelligence was disseminated to the Vietnam Environmental Crime Police, which raided the property and seized a total of 971 kg of raw ivory and ivory products and arrested four suspects.

Two of the suspects were released without charges, while two others were prosecuted and convicted in March 2019 and sentenced to five years prison each. Information received from a source in Nhi Khe village around five months after the raid indicated that Ah Nam was the owner of around 70% of the seized ivory. To date, this is the largest seizure of ivory made in Vietnam outside of a port.

The Wildlife Justice Commission received intelligence that Ah Nam experienced troubles in January 2018 after 20 kg of rhino horn was seized in Xianyou, China, and the investigation traced the products back to Ah Nam. It was alleged that he was arrested over this incident, but Wildlife Justice Commission was not able to find any other source to confirm or verify this intelligence.

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The police acted promptly and raided the café premises the next day, seizing 207 kg of ivory and arresting one suspect in relation to illegal possession of the ivory.\(^{14}\) They also conducted further investigation, identifying an additional two suspects related to the case who were later arrested as well. All three suspects were prosecuted and convicted, with one suspect sentenced to 12 years prison and two others sentenced to 10 years prison.

A video of how this case unravelled is available for viewing at the following link.\(^{15}\)

The Wildlife Justice Commission continued to have some engagement with Ah Nam in the subsequent months after this incident but received no further offers of ivory or rhino horn.

In June 2019, Wildlife Justice Commission operatives contacted Ah Nam, who offered 10 tonnes of raw ivory tusks priced at USD 405/kg, including transportation to Dongxing, China, which was the cheapest ivory price he had offered up to that point. He indicated that at least five tonnes were currently stored at a location near the border with Cambodia. He was extremely cautious during the interactions, even more so than previous engagements, and adamant that no ivory sighting in Hanoi would be permitted due to the security risks. However, after an initial meeting, the operatives persuaded him to take their mobile phone to video the ivory at its storage location to demonstrate possession and the quality of the stock.

Ah Nam met the operatives again the following day and collected the mobile phone. He was observed exchanging the phone with an unknown person of interest, who was then observed working at a café premises in Hanoi. Ah Nam later returned the phone to the operatives with a video of over 200 kg of raw ivory tusks. An intelligence report indicating the café as one of Ah Nam’s suspected ivory storage locations was disseminated to Vietnam Environmental Crime Police.

Images 23 & 24: Photos from Ah Nam of part of his 10-tonne ivory stockpile, received in June 2019.

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15 Video password: AHardDaysN1ght_64
Increasing caution and frustration

Between 2016-2018, Wildlife Justice Commission operatives were commonly able to sight large quantities of ivory (more than 500 kg) without needing to pay a deposit. However, after several arrests this became much more difficult to do in Vietnam. “Now the problem is that I’m a big risk in Vietnam… I’m afraid of being caught,” Ah Nam told operatives in June 2019.

Throughout the investigation, Ah Nam regularly tried to persuade operatives to purchase products without sighting them. Several sightings were cancelled, or times or locations would change at the last minute. During meetings, operatives’ knowledge of the trade would be tested, such as by showing small samples of lower quality products but claiming them to be high quality. The Wildlife Justice Commission understood these measures were intended to minimise the risk of detection, and only those who passed such tests were considered legitimate and taken to sight product.

At the end of May 2017, Ah Phong expressed his frustration in the illegal wildlife business, possibly in relation to law enforcement disruption in the extended network. Around this time, Wildlife Justice Commission operatives observed Ah Nam and Ah Phong’s growing use of anti-surveillance measures during meetings to sight products. For example, parking the vehicle in a public location and walking to the safehouse while other network members maintained surveillance; making random detours and pulling over unexpectedly while driving to test if being followed; or driving and changing cars multiple times en route to a safehouse. This level of nervousness could be attributed to the increase in reported wildlife seizures in Vietnam, but such deliberate anti-surveillance measures have not been encountered in any of the previous Wildlife Justice Commission investigations.

Ah Nam’s ivory storage practices also changed. Larger quantities of ivory were stored in locations outside of Hanoi, such as Hai Duong, Bac Ninh, and Vinh Phuc, with only smaller, moveable quantities kept in Hanoi. He also increasingly kept his business operations away from Nhi Khe, due to greater police attention in the village after the Wildlife Justice Commission Public Hearing exposed the rampant wildlife trade in the village in 2016.16 During 2018, it became apparent that ivory trade in Vietnam was slowing down to the extent that ivory stockpiles were starting to build up.

In October 2018 and again in April 2019, Ah Nam stated that his wildlife business was merely “ok”, due to the low price and slow sales of ivory. He said delivery to China had become more problematic due to increased check points along the transport route – likely caused by China’s ivory trade ban – and he was struggling to move ivory that he had already stored for five or six months.

By June 2019, Ah Nam was offering 10 tonnes of ivory for sale at USD 405/kg, which was the lowest price and highest quantity he had offered up to that point, suggesting his desperation to offload the ivory. He indicated he had stockpiles of ivory in various locations, including five tonnes stored near the Cambodian border. “Another batch is in Cambodia… I bring you to Cambodia… it’s at somewhere between Cambodia and Vietnam,” he told operatives in June 2019. However, Ah Nam also exhibited the highest level of wariness regarding security that operatives had observed up to that point, and it was the only time during the investigation that operatives were unable to convince him to allow a direct sighting of the product.

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Checkmate: Game over

19 October 2019

Just as a tall tree catches more wind and rain; a boastful person attracts more attention and suspicion. Ah Nam and Ah Phong were finally arrested on 30 September 2019. According to media reports, Ah Phong admitted being contacted by a Chinese buyer and a Vietnamese interpreter who were looking to buy a large amount of ivory. They allegedly settled on a price of USD 541/kg. Ah Nam engaged his cousin to drive the vehicle to the agreed location and deliver 204 kg of ivory to the buyer, and Ah Nam and Ah Phong accompanied him. The three men were reportedly arrested at the scene during the transaction.

The Wildlife Justice Commission had some audio message interaction with Ah Nam in October 2019 where he indicated he was in trouble. It is unclear whether he was out on bail during this time, or whether he was messaging from police custody, but he was evidently unable to “fix” his problem.

On 16 July 2020, the Hanoi People’s Court found the trio guilty of the illegal trade of 204 kg of African elephant tusks. Ah Nam and Ah Phong were sentenced to 11 years prison each, and Ah Nam’s cousin was sentenced to 10 years prison for his role in the crime.

Many of the reported details of this final incident appear uncharacteristic of Ah Nam and the way he was known to operate up to this point, and rumours circulated among some traders claiming that Ah Nam was arrested because he owed a large sum of money to others in the “black circle” for land or real estate development. Some others think it was Ah Nam’s high-profile personality that resulted in more attention from the police and his subsequent arrest. Regardless of the circumstances, it is a significant achievement for Vietnam’s law enforcement that is to be commended. Bringing high-level international traffickers of the likes of Ah Nam to justice is crucial to disrupt criminal networks and achieve the greatest impact, but it is no easy task: it took many attempts and the arrest of at least 12 other network members before they could finally reach him.

*Ah Nam was arrested because he owed a large sum of money to others in the “black circle” for land or real estate development, or his high-profile personality resulted in more attention from the police.*

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Known seizures and arrests related to Ah Nam’s network

From June 2016 until Ah Nam’s arrest in September 2019, law enforcement authorities in Vietnam, China, and Malaysia played important roles in disrupting his network. In total, at least 15 individuals associated with his extended network were arrested in Vietnam, including Ah Nam himself, 13 of whom were imprisoned with sentences as high as 12 years (Figure 5). Analysis of convicted rhino horn and ivory cases was conducted on China Judgements Online, a database of published Chinese court judgements, accessed at: https://wenshu.court.gov.cn/

Figure 5: Known seizures and arrests related to Ah Nam’s network in Vietnam and Malaysia

* Values are calculated based on the price per kilogram Ah Nam offered for the products at that time. Refer to Figures 1 and 3 in this report for full details.

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Figure 6: Convicted ivory and rhino horn cases in China where the products were purchased from Ah Nam

* Values in these cases are calculated based on the price per kilogram Ah Nam offered for the products at that time. Refer to Figures 1 and 3 in this report for full details.

** Values in these cases are based on the actual trading prices in the court records in China.

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**Rhino horn weight in these cases was not specified. An average of 2.78 kg per horn was assumed to calculate the total rhino horn weight, based on Milliken (2014).**

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Given that the mean weight of horn from white rhinos is 2.94 kg per horn and from black rhinos is 1.33 kg per horn, and based on the assumption that 90% of rhino horns in illegal trade are from white rhinos, an average of 2.78 kg was used to represent the weight of one unspecified rhino horn.
2,260 kg ivory
63 kg rhino horns
28.5 kg pangolin scales

2,260,603 USD

1 country

Convicted and imprisoned 34 individuals
Following the money

Following the money by conducting financial investigation is important to identify the proceeds of crime, where and how they are moving within the criminal network, and any associated money laundering activity that may be occurring. Tracing the financial flows can also help to identify other higher-level members of the criminal network who may be removed from the day-to-day criminal operations.

During its investigation, the Wildlife Justice Commission collected valuable intelligence on Ah Nam’s payment methods that was shared with authorities in Vietnam and China. However, financial investigation was not conducted in Vietnam, which was a significant missed opportunity for the authorities to identify the illicit proceeds and allow for the seizure and confiscation of related assets.

This illustrates that the seizures alone had only a minor financial impact on Ah Nam’s business, and that identifying and tracing the proceeds of crime to enable asset recovery is essential to take away the expected rewards of crime and send a message to other criminals that this is not a high-profit activity.

Downstream seizures in China where investigations identified Ah Nam as the trader of the ivory and rhino horn products were estimated to be worth an additional USD 2.26 million, further indicating the sheer volume of the illegal trade he was engaged in.

Ah Nam’s access to millions of dollars’ worth of wildlife products, and particularly the speed at which he was known to be trading rhino horn, indicates the presence of significant illicit financial flows. There were multiple potential entry points in Ah Nam’s operations that could have been probed with financial investigation, including specific bank accounts that were known to be used consistently for at least three years, the use of cash couriers to transport cash between parties across the border with Vietnam and China, and potential wiring of payments to the bank accounts of legitimate timber businesses in China and Vietnam. However, these leads were not followed.

It was apparent throughout the investigation that Ah Nam and his wife lived an affluent lifestyle, owning multiple houses, driving expensive cars, using multiple iPhones X, and various other public displays of wealth. Such luxury items all require means and methods of purchase, and while his wife works as a real estate trader, Ah Nam appeared to have no legitimate form of employment. It seems highly plausible that illicit proceeds from Ah Nam’s criminal activities could have been used to purchase such high-value assets and goods. Financial investigation could have established if indeed this was the case or not.

Furthermore, it is not known whether Ah Phong’s traditional medicine shop in Hanoi could have been used to launder criminal proceeds, or whether Ah Nam could have been laundering proceeds of crime via his wife’s real estate business. These questions should have been examined by following financial leads during the wildlife crime investigation, but instead now remain as gaps in the case.
Vietnam is consistently at the forefront of wildlife trafficking in Asia and globally, and it remains a crucial gateway to China. It is a conduit for huge quantities of wildlife products moving between Africa and China and contains many high value targets who are driving the trafficking of ivory, rhino horn, and pangolin scales.

Ah Nam flourished in this environment as a high-level trafficker specialising in large quantities of product, and over a three-year period was identified as having access to a minimum of 17.6 tonnes of raw ivory and 477 kg of rhino horn valued at more than USD 17 million. The arrest, conviction, and imprisonment of Ah Nam is the result that all who worked on this case had been aiming for, and Vietnam achieved this on 16 July 2020. Vietnam’s law enforcement authorities are to be applauded for their efforts and commitment to bringing Ah Nam to justice, with cooperation and intelligence sharing between the Wildlife Justice Commission, Vietnam Environmental Crime Police, and the Anti-Smuggling Bureau of China Customs undoubtedly playing an important role in contributing to this result.

It is a significant achievement not only because Ah Nam was such a high-level figure in the criminal network, but because he was dealt a heavy penalty that has sent an important deterrent message to other wildlife criminals operating in Vietnam. The Wildlife Justice Commission’s investigations in Vietnam since Ah Nam’s conviction reveal that this message has been heard by other trafficking networks, with subjects expressing deep concern that the “wildlife business is now very dangerous”. Many traders say they are no longer operating due to increased fear of arrest and the challenges in smuggling products across the border into China.
As one subject who was closely linked to Ah Nam stated: “Who dares to go whole pieces [of black materials] now?”

**Ah Nam’s position** in the network made this an ideal case to justify conducting a parallel financial investigation to identify, freeze and seize his proceeds of crime, and to investigate any potential money laundering activities associated with his operations. Following the money is a powerful investigation technique that is rarely used for wildlife crime offences, but considering the scale and threat of Ah Nam’s crimes, and the many sources of financial information and intelligence that presented during the investigation, the fact that it did not occur is a substantial missed opportunity. An analysis of Ah Nam’s bank accounts would have had the potential to yield a veritable “who’s who” of wildlife crime in Vietnam and China over the three-year period that he used the same bank accounts.

**As Vietnam’s law** enforcement authorities continue to make encouraging progress with their investigations to combat organised wildlife crime, the Wildlife Justice Commission strongly recommends that resources are dedicated to “following the money” in future cases involving high-level wildlife criminals so the full extent of their criminality can be uncovered and penalised accordingly.

**Ah Nam’s case** has left an enormous amount of valuable intelligence in terms of additional subjects of interest and their modus operandi, demonstrating how important it is for law enforcement authorities to use intelligence to identify new investigative leads. The Wildlife Justice Commission will continue to work with countries impacted by organised wildlife crime to assist with developing and analysing intelligence and conducting intelligence-led investigations to help disrupt and dismantle transnational wildlife crime.
Law enforcement and legal experts fighting transnational organised wildlife crime.