

THE XAYSAVANG NETWORK



Pseudo-Hunts and the Illegal Trade in Wildlife

The details contained in this document are provided as an example to highlight successful **legal charges pursued** and **money flows identified** to combat environmental crime cases globally. This case shows how pseudo-hunts are turned seemingly into legitimate trophy hunts, a practice that is illegal in South Africa. This case study is not intended to provide a full account of case events.

Illegal Commodity



Rhinoceros



Lion Bones



Rhinoceros Horn

Linked Jurisdictions

1



PRIMARY
JURISDICTION



South Africa

2

SECONDARY
JURISDICTION



Laos



Thailand



Legal Charges

Failure to comply with permitting requirements under the National Environmental Management: **Biodiversity Act 10 of 2004.**

Improper use of licenses, permits and documents under **Customs and Excise Act 91 of 1964.**

A **money laundering charge** was originally considered but subsequently dropped

Legislation

- **Biodiversity Act 10 of 2004.**
- **Customs and Excise Act 91 of 1964.**

Summary

Thai national, Chumlong Lemtongthai was arrested in 2011 in South Africa for illegally obtaining wildlife products via pseudo-hunting practices. Chumlong would hire sex workers to pose as hunters, a scheme that exploited existing trophy hunting laws in South Africa. The wildlife products obtained would be sent to Asia to be sold on the black market. Chumlong travelled periodically to South Africa to undertake the hunts and was allegedly working on behalf of Vixay Keosavang, a Laotian national that had become notorious for his involvement in wildlife trafficking, so much so that the US Authorities offered \$1m in 2013 for assistance relating to his role and involvement in the illegal wildlife trade. Chumlong was eventually charged, convicted and sentenced carrying out about 6 years of his jail time.



ARRESTED IN
2011

\$1million
FOR ASSISTANCE
2013



6 YEARS
OF JAIL TIME

Legal Outcome

Chumlong pleaded guilty in 2012 to the charges. He was originally sentenced to 40 years on 9 November 2012 however he was released from jail in South Africa after serving six years of his 40-year sentence and immediately repatriated back to Thailand.

SENTENCED 40 YEARS
IN 2012
SERVED ONLY 6



The Financial Investigation

Payment Methods

There were predominantly two main methods of payment. Bank transfers via the international banking system and cash payments.

1



The International Banking System

International bank transfers were used to pay for the “hunted trophies” from the Laos import-export company (“Xaysavang”) or from Chumlong's personal account in Thailand after approvals were given from individuals based in Thailand. The funds were sent to the bank accounts of South African game farms and safari companies.

- Payments were made via U.S. Correspondent banks;
- Payments were made in US dollars (USD) or South African Rand (ZAR);
- Some invoices were paid partially in cash and partially with bank transfers.

2



Cash Payments

- Cash payments were often made for the purchase of rhino, rhino horn and lion bones.
- Thai women would pose as hunters and get paid ZAR 5,000 each (USD 329) in cash for their services.
- ATM withdrawals (between ZAR 2,000 and 1 million ZAR) were made at a casino in Johannesburg with a Thai bankcard.
- Cash payments were made to locals that played a role in obtaining the wildlife products (i.e.: transport, export etc)



Asset Recovery

Assets were recovered in both South Africa and Thailand.



Corruption

Bribe payments were allegedly occasionally paid amounting to ZAR 400–500 to local authorities to ensure that each trophy received the required microchip which is required to verify it as a trophy for legal trade. In addition, there were alleged bribe payments made to airline officials to transport the trophies from South Africa to Thailand.



For more information and/or detailed case studies, please contact:
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