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EXPLORING MONEY MULE RECRUITMENT: AN INITIATIVE IN COMBATING MONEY LAUNDERING

Mohd Irwan Abdul Rani[1], Salwa Zolkaflil[2*], Sharifah Nazatul Faiza Syed Mustapha Nazri[3], Farah Aida Ahmad Nadzri[4] and Azwanis Azemi[5]

[1 2 4] Accounting Research Institute (HICoE), Universiti Teknologi MARA, Shah Alam, MALAYSIA

[3] Faculty of Accountancy, Universiti Teknologi MARA, Kampus Puncak Alam, Puncak Alam, MALAYSIA

[5] Kolej Universiti Poly-Tech MARA, Kuala Lumpur, MALAYSIA

*Corresponding author: salwazolkaflil@uitm.edu.my

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Abstract: *The aim of this paper is to explore the evolution of money mule recruitment, as a means in combating money laundering. Money mules are used by organized criminal groups or fraudster to launder illicit funds from outrageous criminal activities. The money mules are individuals who allow their accounts to be used for money laundering by OCG. The attacker, OCG or fraudsters would layer the stolen funds using money mule accounts. These money mules are recruited using various approaches, such as direct approach, fake job advertisement and scams. The money mule recruitment method has now evolved due to technological advancement in the digital era. Cybercrime is seen to have a connection with money mule recruitment, such as money mule recruitment through advertising on Instagram. The recruiters demonstrate allure and opulent lifestyles to captivate the interest of potential money mules. Furthermore, the recruiters often use a fake account when recruiting to avoid being caught by the authorities. Hence, future research may investigate the money mule recruitment in their countries so that it will be an insight to the police agency in dealing with money mule cases. This article will be beneficial for future money mule researchers, enforcement agencies and practitioners in preventing and confronting money mule activities. Money mule is one of the layering channels for money laundering activities, this study will also assist the researchers and regulators in combating money laundering activities, as an initiative to attract foreign direct investment in their countries.*

Keywords: Fraud, Money Mule, Recruitment, Scams, Cybercrime.

1. Introduction

Money mule is a global threat that impair the security of the financial system and the society wellbeing. This is attributed to the high demand of money mule services following rampant growth of criminal activities, such as scams, fraud, cybercrime attacks and deception. The trend of money mule activities picks up a growing trend which is aggravated by the vulnerability of middle age group. Credit Industry Fraud Avoidance System (CIFAS), a UK-based fraud prevention group reported an increase of money mule activities by 34% from the group age of 40-60 years old since 2017 (Credit Industry Fraud Avoidance System, 2021). The scenario has also seen a greater shift toward business account involvement wherein 26% increase is seen in 2020. It is likely the elderly mules are aggressively recruited to open business accounts since it is more convincing for the banks to process the applications under their names, which may not be the case for younger money mules.

European Money Mule Action 7 (EMMA 7) program initiated between 15 September 2021 to 30 November 2021 to crack money mule offenders saw 18,351 money mule accounts identification and 1,803 individuals arrested (Europol, 2021). This is about 4.5 times higher than 2020 which EMMA 6 was able to detect 4,031 money mule account holders and detained 422 individuals (Europol, 2020). However, Singapore observed the opposite trend of money mule which recruiters preyed on youngsters, offering fast income (Lau, 2022). The advertisements were posted on gambling websites which is a clear indicator that the recruitment syndicate sets its foot on the doorstep of forlorn and desperate young gamblers. Almost 7,000 money mule accounts were identified in 2021, and 1,239 individuals below 30 years old were arrested (Lau, 2022). The rancor of money mule threat is seen to have tentacular effects on several jurisdictions and will continue to jeopardize financial system.

The aim of this paper is to explore the evolution of money mule recruitment based on prior literature over ten years, from 2012 until 2022. Although there are many literatures discussed on financial crime and money mule activities, yet very few published articles have looked into the evolution of money mule recruitment especially after the covid-19 pandemic when the whole nation is facing financial difficulties and technology is advancing rapidly. The technological advancement and high financial pressure may influence money mules to willingly be involved in the illegal activities since it provides fast financial gain. The paper will analyse the critical discussions on money mule recruitment which is still at an infant phase as opposed to other financial crime issues such as fraud, scams and corruption. The paper will provide a useful insight to researchers and policy makers who are keen to understand the magnitude of money mule threat to financial system and society.

Money Mule

Money mule is defined as an individual who permits the use of own banking account as intermediary to launder ill-gotten funds at behest of someone else (Federal Bureau Investigation, 2018). The illegal proceeds are acquired from illegal activities, are then layered through few channels including money mule to conceal its money trail. Therefore, money mule service is crucial to obfuscate the money trail and potentially stymie the investigation by law enforcement agencies.

Money muling is a form of illegal money laundering, and a money mule is a person who receives money from a third party in their bank account and then transfers it to another person in exchange for a commission (Raza, Zhan, & Rubab, 2020). A money mule is not directly involved in criminal activity by profiting from cybercrimes such as online fraud, drug distribution, and human trafficking, among others. However, they are complicit because they are involved in laundering the criminal proceeds. In other words, by moving funds around the world, money mules have helped criminal syndicates maintain their anonymity (EUROPOL-Public Awareness and Prevention Guide, 2019). In Malaysia between January and November 2019, there were 21,862 commercial crimes recorded, resulting in an RM5.8 billion damage overall. The number of instances reported in 2019 was 4.7 percent more than the number of cases reported for a comparable period in 2018, and over half of the incidents included loan scams, African scams, Macau scams, and e-purchases via the online transactions (Vedamanikam et al., 2022).

There are three types of money mules who offer their services to the fraudsters, namely unwitting, witting and complicit money mules (Federal Bureau Investigation, 2020). The unwitting money mules are individuals who are completely unaware that their accounts are being compromised by fraudsters to legalise the illicit funds. They are often the addlepated individuals such as elderly, housewives and dropouts who have lack of knowledge on money mule yet desperate to have the money for their own consumption. On the contrary, witting money mules are individuals who permit their accounts to be used by the fraudsters and do not care of what is being undertaken as long as the income of account rental will continue uninterrupted. Lastly, the complicit money mules are individuals who use their accounts, open multiple accounts under their own name and take part in money mule activities willingly. They are fully aware of the crimes and are actively participating for financial gain or out of duty to a criminal organization. They are willing to set up accounts in various places and recruit more money mules to expand the money mule network.

The earliest articles on money mules provide cogent insight on phishing and the need to create a dedicated service that would distance the fraudulent funds from the origin of attack (Florêncio & Herley, 2010; Florêncio & Herley, 2012). This was the onset of realization that money mule had a significant role to launder stolen money. Phishing was used to steal victim's online banking credentials and subsequently would be used for unauthorized access. The victims who received the phishing email would click the given link and is automatically connected to the bogus internet banking website, which captures the entered username/password (Custers, Pool & Cornelisse, 2018). Once the fraudster had logged on to victim’s internet banking, the funds sitting in the victim’s account would be transferred to the money mule account, without the victim’s knowledge. Money mule will then transfer the money to the fraudster’s account, minus the commission agreed upon. This is one of the methods of money mule through phishing.

Besides phishing, money mules are found assisting fraudster in committing telecommunication fraud operated from scam call centres that harangue and threaten the victims under various intimidations (Chang, Lai, Chou & Chen, 2017). One perfect example of telecommunication fraud is The Macau Scam syndicates, frightening victims to send money to money mules and these activities which originated from China have unfortunately found its foot in Malaysia. The modus operandi has been so complex that makes it difficult for the law enforcement agencies to detect and catch the culprit involved in the syndicate.

There are also few cases in the United Kingdom, which money mules were described to perform mule jobs for the criminal organisation. According to Raza et al., (2020), 29 money mules arrested in Scotland were given tasks to run a shopping spree on luxury goods using illicit funds. A recruited money mule in Tonga switched to purchasing laptop and expensive gadget when her attempt to wire funds from phishing activities was refused by the bank. The items would be shipped out to the criminal and resold. A bevy of cases found to have money mules carrying hard cash across borders on behalf of drug pushers, such as in Croatia and France (Raza et al., 2020). In France, mules were hired to collect cash from street drug dealers and transported the gains to Belgium for gold purchases. Similarly, in Croatia, truck drivers were hired as money mules to smuggle cash from Netherlands and United Kingdom. In Russia, money mules were sought to open e-wallets and receive proceeds from illegal drug sale. The predicate offences of money mule are not only teeming with fraud, phishing and scam attacks but drug pushing is also noted to contribute toward the demand for money mule services.

Role differences are also observed among money mules recruited to work for low-tech and high-tech Dutch OCG (Leukfeldt & Jansen, 2015; Leukfeldt, Kleemans & Stol, 2017a). High-tech OCG used malware to infect the victim's computer and capture the credentials, therefore the network of money mules is dispersed across the globe. The mules in this category were making international transfers across borders, layering the illicit funds through multiple jurisdictions before ended up in the criminal's account. Meanwhile, low-tech OCG resorted to antediluvian phishing email/SMS and victims would be directed to criminals who pretended to be bank employee. Low-tech OCG tended to have local money mules who received fraudulent funds into their accounts and withdrawn at local ATMs. The frugality of low-tech OCG is reflected in neck-breaking jobs of making multiple small ATM withdrawals by their money mules to circumvent cash reporting threshold.

E-wallets, also known as electronic wallets, do not require cash or cards for purchasing and selling activities. E-wallets that only require an internet connection and confirmation from a smart phone for security make it easier and safer to attract users' attention (Nizam, Hwang, & Valaei, 2019). Custers et al. (2020) described regarding e-wallet payments. Payments can be made at linked online stores using an e-wallet service to or from e-wallet users by service provider. These services do not necessarily to have a credit card or bank account. If there is transaction of e-wallet to linked such transferring money to or from bank account, connecting an e-wallet to a bank account may create money laundering or money mules even though there is extra verification method for the service provider (Custers et al., 2020). The evolution and transition from cash to e-wallets makes the buying and selling process simpler, saves time and money, and makes transactions safer by reducing grazing and pickpocketing. Despite the fact that e-wallets provide users with flexibility, there are challenges and problems associated with using an e-wallet where cyber security cannot be guaranteed. Identity theft, credit card fraud, financial transaction fraud, and online reward fraud are all things that can happen with e-wallets (Kumari and Khanna, 2017). Supported by Karim et al., (2020) and Raza, Zhan, & Rubab,

(2020), when e-wallet are safer, easier to use, frequently utilised and well-known hence financial crimes are increasing including using money mules.

3.2 Money Mule Recruitment

The money mules provide their services by laundering the illegal funds. Vedamanikam, Chetiyar and Mohd Nasir (2020) found that dubious recruitment techniques and lack of on money mule awareness greatly contribute to rampant money mule recruitment. The extraordinarily easy job criteria with no trace of hidden criminal element attracts potential money mules into the syndicate. Many recruited money mules come from financially difficult background, such as fresh graduates, jobless, part-time workers, students, school dropouts and debt-laden individuals (Leukfeldt & Kleemans, 2019). This may happen due to their embattled economic hardship and desperation to earn money. Most of the money mules are recruited via close contacts, along several psychological naturalization of fabricated excuses to become money mule including easy money, contemporary lavish lifestyles, legitimate transactions and effortless work scope. The manipulation persuasive linguistic that is good to be true has expand the money mule recruitment (Leukfeldt & Roks, 2021). The money mule recruiters know how to play with the sentiments and they managed to attract many victims to be part of the money mule syndicate. Meanwhile high cost of living and burdensome university cost has become the factors for money mule job acceptance among the students (Pickles, 2021; Vedamanikam, Chethiyar & Awan, 2022). Money is clearly the main factor that encourages the unstoppable mule recruitment.

Besides close contact approach such as face-to-face recruitment at entertainment venues, music festivals or pubs, the recruitment process also takes place in the form of deceitful job advertisement, romance scams, social media and easy survey (Pickles, 2021; Raza et al., 2020). As shown in figure 3, random money mule recruitment message is blasted with harbored chance that some recipients may be piqued with the offer. To compensate the hidden criminality, the job advertisements would show immediate hiring of legitimate positions such as “finance manager, account manager, country representative, money transfer agent, client manager or sales representative” of some forex trading company (Dunham, 2006). Some job websites advertise job openings as payment agent for shell companies that bear names almost similar to well-incorporated firms (Raza et al., 2020). The fastest and easiest way to spread the money mule job advertisements is to use social media which nowadays penetrates every mobile phone user. In romance scams, the victims of “fake paramour profile” will succumb to any request made by the scammer such as joining the money mule syndicate. According to Dunham (2006), the accepted money mules were paid based on the type of account they held; personal account would earn USD 4,000 whereas commercial account holder would bring back USD 8,000. This is a red flag as commercial account stands a higher chance of circumventing money mule detection by the bank.

The social opportunity structure introduced by recruiters to money mules bridge the link to cybercriminal world and other form of sinister predicate offences (Kleemans & de Poot, 2008). It is a social tie giving access to the inexhaustible and lucrative criminal opportunities that can be exploited by potential money mules. Therefore, the money mule recruiters are people who are already established in the OCG or fraudster’s group but also living nigh the society which members are intensely desperate for quick jobs (Arevalo, 2015). They should have perceptibility in identifying vulnerable individuals that could be hired as money mule. The recruiters must have stellar persuasive skills to encourage dithering candidates and expand the

network base. Some recruiters exhibit glamourous lifestyles such as driving big cars and wearing expensive clothes in their attempts to spark curiosity among potential money mule candidates.

E-wallets have developed in Malaysia in response to the COVID-19 pandemic to reduce the risk of viruses (Aryani, Nair, Hoo, Lim, Chew, & Desai, 2021). In Malaysia it was introduced to the public in 2017 (Kadir, Ismail, Wok, and Manan, 2022). According to Karim et al., (2020), six of the most popular e-wallet in Malaysia among 42 e-wallets licenced by Bank Negara Malaysia (BNM) are AEON Wallet, Boost, BigPay, GrabPay, WeChat pay, and Touch'n Go. Raza et al. (2020) conducted a study using a case analysis methodology and discovered in Russia that e-wallets were used as the modus operandi for money laundering. Due to the convenience of e-wallets and the illegal sale of drugs on the Dark Web, users prefer to make purchases by transferring funds to their e-wallets. This scheme has been orchestrated and managed by financiers and networks for money laundering. Electronic wallets and debit cards are registered under the name of a front name, which is a money mule, and then sold to money launderers by students who are unaware they are being used for criminal purposes. Several e-wallets are used for money laundering, and IT experts will develop a transit panel that automatically switches between e-wallets used for drug payments to facilitate the money laundering process. A cash coordinator carrying multiple debit cards will then transfer the funds from the e-wallet to the debit card and withdraw them from an ATM.

While Custers et al., (2020) described the fraudster of money mule using vouchers. The vouchers can be purchased via different physical stores. As the fraudster received the payment through a voucher, the organization behind the ransomware can choose from a variety of next steps such as putting the value of the voucher into an e-wallet account. After that, putting the voucher credits via online into several digital payment account service provider. Then, they will transfer the voucher credits from an account with a connected e-wallet to prepaid credit cards. Many online payment service providers offer prepaid credit cards to easily spend money. There are also service providers that issue completely anonymous prepaid credit cards, sometimes with very high credit limits or no credit limits at all. Besides that, there is also a method of money laudering that is quite rampant and includes transferring the voucher credits to an online account with a connected e-wallet. After that, the e-wallet is then will be used to purchase products or services at online stores. By this way, they can easily spend with the value of a voucher. Additionally, the credits in the e-wallet can also be converted into other currencies such as into dollars or euros and it would then use a cash-out. Voucher credits can also be loaded from one e-wallet to another (Custers, 2020).

4. Discussion and Conclusion

The aim of this paper is to explore the evolution of money mule recruitment based on prior literature over ten years, from 2012 until 2022. This paper found that there is changes on the money mule recruitment trend due to technological advancement and financial difficulties faced during the Covid-19 pandemic. Therefore, the money mule recruitment approach has now becoming more complex yet it manages to attract more mules accounts to be part of the money mule syndicate.

These money mules are recruited using various approaches, such as direct approach, fake job advertisement and scams. The money mule recruitment method has now evolved due to technological advancement in the digital era. Cybercrime is seen to have a connection with money mule recruitment, such as money mule recruitment through advertising on the social media. The recruiters demonstrate allure and opulent lifestyles to captivate the interest of potential money mules. Furthermore, the recruiters often use a fake account when recruiting to avoid being caught by the authorities. Hence, this paper is an eye opener to the law enforcement agencies to be aware of the latest money mule recruitment approach in order to create awareness and educate the public about money mule activities.

This crime will continue to increase, as will the number of cybercrimes involving money laundering. Criminals are able to use students and young teenagers as money mules due to the high unemployment rate and the significant amount of time spent by teenagers on the internet. These individuals are easily exploited and, without their knowledge, have become complicit in illegal activity.

However, this paper is limited to information discussed in the previous literatures. Therefore, future research may extend this study by conducting interviews with the money mule victims or offenders and law enforcement agencies to understand their current recruitment method. This will help in identifying the knowledge gap and at the same time enhance the competency of the law enforcement agencies in dealing with money mule investigation.

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