

March 26, 2025

The Honorable Marco Rubio
Secretary
U.S. Department of State
2201 C St., NW
Washington, D.C. 20451

Dear Secretary Rubio:

We, representatives of the undersigned organizations, would like to draw your attention to one of the most significant barriers to making America great again: the extraction of more than \$80 billion from our nation's middle class by Chinese organized crime groups through the use of cryptocurrency investment fraud.¹ This fraud, know more popularly as “pig butchering,” is conducted from scam compounds based in southeast Asian countries hostile to the United States' interests. Crime groups staff these compounds with slave labor obtained through human trafficking. An estimated 300,000 people are believed to be held against their will in these compounds.²

Instances of sexual abuse, torture, and murder as instruments of control used at these scam compounds have been documented by your Department.³ Of particular concern is the Government of Cambodia. The State Department has acknowledged that Cambodia is an epicenter of this organized crime, with an estimated 10,000 cybercrime slaves held in that country. The U.N. Office of the High Commissioner for Human Rights estimate is 10 times higher; with as many as 100,000 people believed to be held against their will in scam call centers in Cambodia.⁴

While this exploitation, violence, and suffering overseas is tragic, it is vital to understand that the goal of these crime groups is to steal billions of dollars per year from hard working American citizens. The FBI's 2023 annual Internet Crime Report documented 43,653 complaints about cryptocurrency fraud.⁵ These crimes—especially those targeting elderly Americans—are devastating for their victims, in many cases draining families' entire net worth.

Organized crime on this scale is not possible without the aid and protection of corrupt government and political elites. Indeed, such collaboration has been documented by independent observers.

¹ FBI, “Internet Crime Report, 2023” Page 23—\$7.5 billion reported lost 2021-2023 (not counting 2024), with only an estimated one-in-ten frauds actually reported (https://www.ic3.gov/Media/PDF/AnnualReport/2023_IC3Report.pdf).

² U.S. Institute of Peace, “Transnational Crime in Southeast Asia, A Growing Threat to Global Peace and Security” (May 2023); Page 18 (https://www.usip.org/sites/default/files/2024-05/ssg_transnational-crime-southeast-asia.pdf).

³ U.S. State Department, “2023 Trafficking in Persons Report” Pages 65-66 (https://www.state.gov/wp-content/uploads/2023/05/Trafficking-in-Persons-Report-2023_Introduction-Additional-Pagesv4_FINAL.pdf).

⁴ U.N. OHCHR, “Online Scam Operations and Trafficking into Forced Criminality in Southeast Asia: Recommendations for a Human Rights Response” (2023) Page 7 (<https://bangkok.ohchr.org/wp-content/uploads/2023/08/ONLINE-SCAM-OPERATIONS-2582023.pdf>).

⁵ FBI, “Internet Crime Report, 2023” Page 20 (https://www.ic3.gov/Media/PDF/AnnualReport/2023_IC3Report.pdf).

- Radio Free Asia documented eyewitness accounts of human rights abuses at cybercrime call centers with alleged links to a business owned by a Cambodian government advisor.⁶
- Al Jazeera documented scams conducted from a remote compound with alleged links to a relative of Cambodian Prime Minister Hun Manet.⁷
- Huione Guarantee, a sprawling online criminal marketplace that caters to Cambodian scam compounds, is also allegedly connected to the same relative of the Cambodian Prime Minister.⁸ Other reporting indicates Huione Guarantee's apparent parent company handled cryptocurrency payments for a North Korean hacker group.⁹
- The Associated Press documented scam call center operations run out of a casino allegedly owned by a Cambodian Senator.¹⁰

Your Department designed Cambodia as a “Tier 3” country, non-compliant with the requirements of the Trafficking Victims Protection Act (TVPA) due to credible, documented, and widespread complicity in allowing cyber scam operations to defraud Americans of billions of dollars per year.

The Government of Cambodia does not fully meet the minimum standards for the elimination of trafficking and is not making significant efforts to do so...corruption and official complicity in trafficking crimes, including by high-level senior officials, remained widespread and endemic...Authorities did not investigate or hold criminally accountable any officials involved in widespread, credible reports of complicity, in particular with unscrupulous business owners who subjected thousands of men, women, and children throughout the country to human trafficking in cyber scam operations...¹¹

Despite these unambiguous findings, the previous Administration pursued a policy of appeasement with the Cambodian Government in hopes of isolating it from Chinese influence. Specifically, President Biden issued waivers for Cambodia in each year sanctions were mandated under TVPA.¹²

⁶ Radio Free Asia, “Cambodia's Prince Group: A business empire built on crime?” (February 16, 2024) (<https://www.rfa.org/english/news/special/prince-group/index.html>).

⁷ Al Jazeera, “Meet Cambodia's Cyber-Slaves” (July 15, 2022) (<https://www.aljazeera.com/features/longform/2022/8/11/meet-cambodia-cyber-slaves>).

⁸ Elliptic, “Huione Guarantee: The Multi-Billion Dollar Marketplace Used by Online Scammers” (July 9, 2024) (<https://www.elliptic.co/blog/cyber-scam-marketplace>).

New York Times, “How Scammers Launder Money and Get Away With It” (March 23, 2025) (<https://www.nytimes.com/2025/03/23/world/asia/cambodia-money-laundering-huione.html>).

⁹ Elliptic, “Huione: the company behind the largest ever illicit online marketplace has launched a stablecoin” (January 14, 2025) (<https://www.elliptic.co/blog/huione-largest-ever-illicit-online-marketplace-stablecoin>)

¹⁰ Associated Press, “EU, UN Reschedule Launch of Anti-Human Trafficking Project in Cambodia After Questions About Venue” (May 1, 2024) (<https://apnews.com/article/cambodia-eu-united-nations-human-trafficking-f3bc1437047530cfadbed770d35ed553>).

¹¹ U.S. State Department, “2023 Trafficking in Persons Report: Cambodia” (<https://www.state.gov/reports/2023-trafficking-in-persons-report/cambodia/>).

¹² Executive Office of the President, “Memorandum on Presidential Determination with Respect to the Efforts of Foreign Governments Regarding Trafficking in Persons” (<https://www.whitehouse.gov/briefing-room/presidential-actions/2023/09/29/memorandum-on-presidential-determination-with-respect-to-the-efforts-of-foreign-governments-regarding-trafficking-in-persons-2/>).

In 2024, our and other organizations conducted a public awareness campaign aimed at driving letters and phone calls to key Members of Congress about this flaccid appeasement policy. Under pressure, the Biden administration relented and issued financial sanctions against a key Cambodian political figure with alleged ties to scam compounds.¹³ The White House later allowed limited TVPA sanctions.

It has since become clear that the Cambodian Government has not taken the threat of additional escalating sanctions seriously. There have only been a few, obviously performative, raids by Cambodian police.

We understand that the United States has many complex strategic interests in southeast Asia. However, protecting Americans comes first.

If the Government of Cambodia is not willing to cease support for, and protection of, transnational criminal groups that defraud our citizens, this Administration must exact a disproportionate cost, including:

- Revoking Cambodia’s TVPA sanctions waiver and applying the full range of mandatory TVPA sanctions;
- Instituting additional financial, travel, and other sanctions against individuals and businesses linked to scam compounds; and
- Application of crippling trade sanctions.

Once these sanctions—or threats of these sanctions—are applied, they will need to be backed up with real, vigorous verification. Given the extent to which revenue from scam operations has permeated the Cambodian political and business elite, it is certain that Cambodian police will, at first, stage minimal performative raids against smaller, less connected scam compounds. State, Justice, FBI, and Homeland Security will need to collaborate in making sure hard evidence about scam groups is provided to Cambodian authorities and subsequently acted on.

The plague of transnational fraud has negatively impacted every single American and has caused life altering consequences for hundreds of thousands. Our members look forward to your diligent efforts to effectively combat this problem.

Best regards,

s/ Troy Gochenour
Investigator
GA-SO (The Global Anti-Scam Organization)



s/ Tom Walker
Executive Director
FVRO (The Fraud Victim Rights Organization)



¹³ U.S. Treasury Department, “Treasury Sanctions Cambodian Tycoon and Businesses Linked to Human Trafficking and Forced Labor in Furtherance of Cyber and Virtual Currency Scams” (September 12, 2024) (<https://home.treasury.gov/news/press-releases/jy2576>).

s/ Michael Roberts
Founder
PICDO (The Public International Cybercrime Disruption Organization)



s/ Lindsey Kennedy, CEO
Nathan Paul Southern, Director of Operations
The Eyewitness Project



s/ Kathy Waters
Co-Founder, Executive Director
AARS (Advocating Against Romance Scammers)



c/o: Michael Needham, Chief of Staff to Secretary Rubio (delivered electronically)

cc: Rachel Poynter, Acting Director, State Department Office to Monitor & Combat Trafficking in Persons
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