

# A RESEARCH INFORMED, EVIDENCE BASED, & LIVED EXPERIENCE DRIVEN APROACH

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## Foreword by Andy McDonald, WFF Senior Advisor

This whitepaper highlights several key issues, together with some explanations as to causes for the phenomenon that has been known for many years as 'money muling'. It caused me to consider how things have, or perhaps haven't changed over the almost 40 years that I've been involved in the fight against serious and organised crime, terrorism and the illicit finance that facilitates such nefarious activities.

One of my presentations from 2006 raised discussions around how drug dealers (OCG's in today's parlance) were seemingly buying high-value goods; but not using cash. It was, of course, the use of mules to open several accounts and then the use of 'Smurfs' to feed cash from the drug deals into the various accounts, which were then, post some 'mixing' (layering) used to 'legitimately purchase' quality goods. We saw this process at both street level with gangs through to some of the most sophisticated OCG's. No change here, then!

From a law enforcement perspective, we weren't really following the money too much and we certainly didn't have public-private sector partnerships trying to understand the problem of money muling... and work together to do something about it.

I also found minutes from a meeting in 2012, which contained the following comment:

# "Money mules are hired to launder proceeds of an online banking attack. They are usually recruited as a work from home-type scheme. Often these recruited individuals do not know that they are working as a money mule"

Sound familiar? It's perhaps fair to say, as this whitepaper highlights, that many of our current 'mules' are more aware of their criminal involvement; but just consider it to be fairly 'low level'. We should remember that there is nothing 'low-level' about money mules. They facilitate serious crime and terrorism in many ways, such as:

- Mules are integral to money laundering schemes, where illegal money is processed through a series of transactions to appear legitimate.
- Money mules often transfer funds obtained through various forms of fraud, such as phishing schemes, business email compromise, and online scams. This helps criminals quickly move stolen money and complicate recovery efforts.
- Terrorist groups rely on money mules to transfer funds across borders and finance their activities. These transfers are often structured to avoid triggering regulatory scrutiny, using methods like small, frequent transactions.
- The use of money mules is closely linked to cybercrime, as they often facilitate the transfer of funds obtained through online fraud, phishing scams, and ransomware attacks. This perpetuates the cycle of cybercrime, making it more difficult to combat.



## Foreword

- Money mules facilitate the international movement of funds, which is essential for both organised crime groups and terrorist organisations that operate globally. This cross-border transfer of money supports logistics, recruitment, and other operational needs. By leveraging money mules, criminal and terrorist organisations can develop their finances, sustain their activities, and evade law enforcement efforts.
- Criminals often target vulnerable people, such as students, the elderly, or those in financial distress, to become money mules. Such individuals may be unaware of the illegal nature of their actions and can suffer severe legal and financial consequences.

This whitepaper serves as a reminder that money muling methodology has evolved, but as with most financial crime the basics really haven't changed too much. From a personal perspective, cross-sector collaborative work over the last five years or so has really developed from discussions and qualitative discussions; to an arena where many organisations can now better identify, understand and mitigate the ongoing threat from money mules. This work shows quantifiable, disruption, enforcement and crucially prevention outcomes.



Andy was formerly Head of Special Investigations at SO15 Counter Terrorism Command and UK National Terrorist Financial Investigation Unit (NTFIU) previously Head of Metropolitan Police Fraud Squad at New Scotland Yard. With over 30 years in detective roles, Andy is a leading financial crime and risk management expert, advising a wide array of global organisations. Andy is now a subject matter expert in Fraud and other illicit finance; using his law enforcement experience as a platform to help both public and private sectors to identify, understand and then manage and mitigate risk. Andy ensures that all WFF clients have a clear understanding of the threat landscape facing their organisations. He oversees all aspects of the agreed tactical options to mitigate the various identified risks.



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## **Executive Summary**

1.Fraud now accounts for over 40% of all crime recorded in England and Wales. Money mules play an important part in the monetisation of fraud by organised crime groups.

2. "A small reduction in the rate of account compromise will not reduce fraud at all, at least until account compromise is at a level small enough that it becomes the bottleneck. The only effective way to reduce online fraud is by making mule recruitment even harder" (Florêncio and Herley, 2010).

3. This study combines qualitative research conducted by We Fight Fraud and a quantitative analysis of known money mule data by Experian.

The study found:

4. More than half of mules (69.6%) are under the age of 40, with 37.5% of all known money mules under 29 years, and a further 32.1% fall into the 30-39 year old age category.

5. Almost 2/3 of money mules identified are in the 3 lowest income deciles of the UK population, meaning that they earn an income that is below £22,000 per annum.

6. Credit profiles of money mules were predominantly (over 50%) poor or very poor, limiting their access to legitimate credit.

7. 45% of money mules don't have a telco account, so they can't pay monthly for their mobile phone and may be digitally excluded after becoming a mule.

8. 15% of all identified mules become de-banked and financially excluded by not having an active current account after identification as a money mule. This affects around 11,000 people.

9. Money mule 'hotspots' track almost identically to the most deprived areas shown in The English Indices of Deprivation (2019), with concentrations in poorer London boroughs along with the cities of Manchester and Birmingham.

10. A key feature of recruitment was the importance of relationships. Often, money mules were recruited through their friendship networks, people whom they knew well and trusted.

11. Some organised crime gangs employed and potentially groomed girls to persuade other young people into money muling.

12. Others utilised social media advertising that looked like legitimate jobs or refunds, targeting specific groups such as those on Universal Credit.

13. Once recruited, money mules were taken through a step-by-step process that was explained to them by the money launderer, or their contact. They were told what they needed to do, when and where, and followed the instructions given to them. Social engineering is used throughout all interactions to minimise the risk of the money mule not doing as the criminal wishes.



14. The study discusses the experience of three separate money mule vectors:

- Opening a company on Companies House and a related bank account
- The use of the mule's personal account
- Recruitment for a job

15. Money mules received between £25 - £250 per transaction if they got paid at all.

16. The study details how the money mules were socially engineered into their roles and the outcomes that they experienced because of their actions.

17. Trying to prevent mule recruitment largely relies upon increased awareness and education to reduce the criminal's ability to socially engineer non-criminals into laundering criminal funds.

18. The case study evaluation of the 'Crooks on Campus' intervention for university students showed that:

- 57.5% of students had been approached to become money mules, with 17.5% approached in person and online, and 40% online only.
- After watching the film, 100% of students felt confident in spotting scam approaches.
- 80% of students said they would report scam approaches to Crimestoppers after watching the film.
- Students are more susceptible to recruitment by criminals than they perceive themselves to be.
- 95.2% of students claimed they would not accept an approach from a social media contact.
- Initially, 20 out of 30 students submitted information in a mock recruitment exercise, suggesting openness to becoming money mules.
- After watching the film, only 2 out of 30 students submitted data, indicating a 90% reduction in risk-taking behaviour.

19. Money mules are often coerced, socially engineered, and groomed into cleaning large sums of money for criminal groups. This is financial exploitation.

20. Even those who seem to have some grasp of the act that what they are doing may be wrong, they do not have a full comprehension of what money muling is or the seriousness of what they have engaged in.

21. More needs to be done to educate about money muling and its consequences in layerd, creative and impactful ways.

22. Education and awareness alone is not enough, interventions need to be evaluated and assessed for positive behavioural change.

23. Partnership working is key to tackling money mule activity.





## Understanding the money mule problem

Fraud is now the most common crime type recorded in England and Wales, with over 40% of all recorded crime categorised as financial crime (NCA, 2024). Far from being a "blip" due to the pandemic, or a moral panic, the growth has been described as an epidemic - one which is still in significant need of practitioner resourcing, and cultural change in attitude towards its threat level (Button et al., 2023). Whilst this is a shocking figure, it is not unexpected for those on the front line working within financial crime prevention, detection, and investigation, who have experienced mounting workloads and increased sophistication in fraudulent activity in recent years.

However, this has not always been the case. In 2010, fraud as a crime category was not growing at the expected rate, despite the expansion of digital attacks such as phishing. Florêncio and Herley (2010) identified that it was the ability to get access to the funds derived from fraudulent activity in a difficult to trace manner that was acting as a bottleneck to the expansion of fraud. They predicted at the time that "..a small reduction in the rate of account compromise will not reduce fraud at all, at least until account compromise is at a level small enough that it becomes the bottleneck. The only effective way to reduce online fraud is by making mule recruitment even harder" (Florêncio and Herley, 2010). In this statement, they were some of the first to formally acknowledge the importance of money mules to financially focused criminal activity.

This paper combines new research conducted by Experian into the demographics of money mule account holders, with qualitative in-depth interviews with former money mules conducted by We Fight Fraud. Offering a previously unexplored understanding of who money mules are, how they are recruited, their experience as money mules, the outcome of their involvement and how that has impacted their lives moving forward. Here, Experian examines trends in money mule characteristics, such as age, geographical placement, use of financial services, and overall credit rating. The research team at We Fight Fraud conducted in-depth interviews with six people who have previously been recruited as money mules and spent three months monitoring social media recruitment adverts. The authors of this paper have analysed and synthesised the two data sources to offer a greater understanding of who criminals are targeting to become mules, how they are approached, why they get involved in money mule activity, their understanding of what it is they have become involved with and the outcome and effect of being a money mule on their lives.

Money mules have become a key role within the eco-system of serious organised crime and are essential to those who conduct fraudulent activity. By gaining a deeper understanding of who money mules are, how they are recruited, their experience and the impact of the consequences of becoming a money mule, we can begin to consider how we can work together to prevent money mule activity and disrupt the flow of illegal money amongst criminal groups.



## 'A money mule is defined as a person who, whilst not part of a core criminal group, allows illegal funds to be moved through their bank account' (Bekkers et al, 2024).

The purpose of the money mule is to act as an intermediary for criminals, whereby illicit monies are moved to the money mule account and then sent on to another money mule or into the criminal's account (Rani et al, 2024). The aim is to disguise the illegal funds to make the money appear lawful before it is transferred to criminals (Raza et al 2020). This process enables criminals to move illegal monies through accounts that are less likely to attract investigation because they are not currently being monitored as 'known' criminal or 'at-risk' accounts. Money mules are therefore an important link to organized crime groups as they facilitate low-risk (to the criminal) money laundering.

Money mules are recruited, often unwittingly, by organized crime groups or criminals to transfer and hide illegally obtained money between different accounts or locations (Bekkers et al, 2024). Given the increasing digitisation of the world, and to some extent greater ability to track the activities of individuals online, recruiting either willing or unwilling 'naive' co-offenders to move or hide money is an important tool for fraudsters (Levi, 2023).

These individuals are typically used as an intermediaries to facilitate various types of financial crimes, such as fraud, money laundering, or cybercrime. They are recruited using various approaches such as the offer of a lucrative and easy-to-apply job opportunity (Bekkers et al, 2022; The Federal Bureau of Investigations, 2021; Vedamanikam et al, 2020; Vedamanikam & Chethiyar, 2020), as well as online social networks and communication platforms, face to face in schools, parks, sports centres, online gaming platforms, and through lottery or romance scams (Bekkers et al, 2023; The Federal Bureau of Investigations, 2023; Roks et al, 2020; US Office of Public Affairs, 2024).

Research has shown that many money mules have either previously only committed minor offences or have no previous convictions (Hong & Lee, 2024), and too often they are unaware they are participating in money laundering (Hong & Kim, 2020; Hong et al, 2024; Roks et al, 2020). Criminals coerce and mislead money mules into allowing their accounts to be used to launder the proceeds of crime. Money mules are often promised payment or other incentives for their cooperation, but they may not fully understand the criminal nature of the transactions they are involved in. Money mules are often the victims of criminal exploitation, are vulnerable, at risk or naive; traits that crime gangs exploit (Pickles, 2021). Regardless of how they are recruited, and despite their willingness or ignorance, money mule activity is illegal and can have serious legal consequences for the individuals involved, including prosecution and imprisonment.

Once money mules are recruited, criminals seek to gain access to the mule's bank account and their details. Some money mules provide criminals with full access to their bank accounts and forgo their ATM card and PIN number (Vedamanikam et al, 2020), enabling the Organised Crime Group (OCG) to have full control of their accounts. In some cases, money is moved through the account, to other bank accounts. In others, criminals withdraw cash from the mule's account (Home Office, 2024a). Once the illegal funds have been moved or withdrawn, criminals disappear and leave mules with no compensation or remuneration, but instead liable for criminal charges of money laundering.



Money muling is a global problem. There are estimates that, in the UK, £10million of illegal money is laundered in the UK each year (The Home Office, 2024b). In the US, it is estimated that 0.3% of accounts at U.S. financial institutions are held by money mules, and an estimated \$3 billion in fraudulent transfers (BioCatch, 2022). Evidence also suggests that money mule activities have increased in recent years. For example, increases in money mule activity have been identified by operation EMMA (European Money Mule Action - see fig. 1), which is a worldwide operation against money mule schemes, funded by EMPACT (Europol, 2020: 2022; 2023).

| Year | Number of mules | Number detained | Number of recruiters |
|------|-----------------|-----------------|----------------------|
| 2020 | 4031            | 422             | -                    |
| 2022 | 8755            | 2469            | 22                   |
| 2023 | 10759           | 1013            | 474                  |

#### Fig 1 - Money mule activity identified by Europol 2020-2023

Research which seeks to understand the demographics of money mules is conflicting. For example, whilst an increase of 34% in money mule activities since 2017 has been identified by a UK-based fraud prevention group, Credit Industry Fraud Avoidance System (Cifas), this increase is specifically the 40-60 years old age group (Cifas, 2021). According to Rani et al (2024), arguably it is more beneficial to recruit older people to launder money because it is more likely that they already hold bank accounts and can process applications under their name.

In contrast, however, the UK National Crime Agency (2023) claims that 6 in 10 money mules are under the age of 30, with most being recruited between 17-24 years of age while attending sixth form, college or university. This is further supported by more recent data from the Cifas National Fraud Database (UK), which shows that of the 64% of cases that indicate money mule activity, the account holder is under 30 years of age - and one in five is 21 years of age or under. Likewise, in countries such as Singapore, half of all money mules were under 30 years of age (Lau, 2022). In the Netherlands, research found that 10% of young people have been approached by money mule recruiters (Bekkers et al, 2023).

At this age, young people may be struggling financially, seeking to be financially independent or lack financial experience which is then exploited by criminals. Whilst those most likely to be money mules are young people according to Lloyds Banking Group (2022), a sharp increase (29%) in those over 40 years of age acting as money mules were identified in 2022, suggesting that people of all ages are increasingly susceptible to money muling.



To prevent young people from becoming embroiled in money mule activities, education programmes aimed at school children aged from 10 – 14 years old have been piloted by Cifas in schools across the UK. The scheme seeks to encourage safety online and protect friends and family from money muling. Following this approach, the UK government is funding a new Financial Exploitation Lead at The Children's Society whose role will be to lead in educating front-line workers such as banks, teachers and the police in financial exploitation (The Home Office, 2024b).

The UK National Crime Agency (2023) is asking parents to look out for the signs of money muling and have regular conversations with young people about staying safe online. We Fight Fraud have worked with the City of London Police and Lloyds Bank, under Project OLAF, to educate university students in UK universities about the dangers of money muling. Other interventions include sending warning letters to advise those who have been unknowingly recruited by money launderers that they were facilitating crime and educating the public through awareness campaigns (US Office of Public Affairs, 2024).



## The Study

This study brings together empirical research conducted by the research team at We Fight Fraud, consisting of six in-depth interviews with people who report that they have engaged in money mule activity with data analysed by data scientists at Experian. The interviews were conducted either face to face and audio recorded, or over Microsoft Teams video call, and also audio recorded. These interviews were then transcribed and analysed by the authors.

The interviews were conducted in compliance with internal ethical procedures and oversight from We Fight Fraud's Senior Advisor. The research team at We Fight Fraud also conducted a visual ethnography completed during Feb - May 2024 that examined social media posts from accounts that appeared to be money mule recruiters.

Experian's team of data scientists analysed 94,000 records held in the National Hunter database. These are identified mules from during the past 6 years. Experian's team managed to cleanse the data of synthetic and duplicate accounts to pin 72,000 accounts with their current credit data profile and available demographic data.

By analysing these separate data sets together, this paper aims to offer a mixed-methods understanding of money mule activity. Including targeting, recruitment, engagement and outcomes.



## Who are targets for money mule recruitment?

The data from Cifas, the NCA and new data from Experian found the average age of a money mule to be 35 years old, with the majority (70%) of money mules under the age of 40. All of the participants who spoke to us in-depth about their experiences as a money mule are under the age of 40, with over half being aged between 17-19 at the time of the offence, meaning that some money mules were recruited as children. The money mules we spoke to were inexperienced bank account holders, who demonstrated naivety and vulnerability that was exploited by organised criminal gangs for money laundering purposes. They often were unaware of the consequences of their actions, and had not given considerable thought to the requests made of them, or whether they were being asked to take part in illegal activities:

"18 or younger, 17 I think .... I didn't really know, like, the repercussions of it." (Rich)

> "I thought I should have cottoned on to this being a red flag [they wanted to] make sure I was over 18." (Adam)

## "You're 17 years old ... slightly more carefree then and didn't really even consider repercussions". (Simon)

For all participants, their vulnerability, in various ways, such as financial instability, enabled criminals to exploit them by manipulating, misleading and coercing them into providing access to their personal information and bank accounts. This vulnerability can be heightened, especially for young people, due to the lack of understanding of banking and finance because of their relative inexperience of being bank account holders:

"I was 15 when I first got into it ... the people that get introduced to it as people at the top of the chain are obviously targets and people like me because they know that I'm, you know, naive ... it doesn't even take anything special to convince them ... to give you the bank...give you the pin number. Give you everything you want". (Jamie)



It is not simply that these participants were young and naïve, in fact only half of the participants interviewed were under the age of 20 years old. However, data from Experian's analysis of money mule accounts shows that those under the age of 40 are disproportionately targeted in comparison to the age profiles of UK adults.

37.5% of all known money mules were under 29 years, and a further 32.1% fall into the 30-39 year old age category. The data shows that less than 13% of detected money mules during the last 6 years are aged 50 years or older, as such, there is not an even spread of money mule activity across the life course, it is an activity that is more targeted to younger adults.

Age is a significant aggravating factor in the recruitment of money mules, with criminal targeting younger and younger potential mules. Partly, this is due to the vulnerability of younger generations to find themselves in financial difficulty. During recruitment, we found that money mules were motivated by financial difficulties and a desire to make money quickly. For some, a critical financial challenge occurred, and they were unable to finance the issue. One money mule participant, Adam, resided in harsh living conditions in a caravan and used his car to keep warm. For Adam, his precarious financial position led him to look for other forms of income, in addition to his paid employment, to repair his much-needed car:

#### "Struggling for money as you do. Like in desperate times and desperate need ... I didn't have enough cash flow in order to pay for my car ... I live in a caravan. It's not great, its damp, it's cold. And a vehicle to me .. is pretty comfortable. I do enjoy sitting in the car". (Adam)

This is reflected in Experian's data analysis, showing that the credit profiles of money mules were predominantly (over 50%) poor or very poor. This will affect the money mules access to affordable credit and may push them towards alternative suppliers of credit, such as illegal money lenders, and is a significant factor in motivation to become a money mule – particularly when the unexpected happens.

In We Fight Fraud's previous research with Fair4all Finance, out of just under 300 people interviewed, around 85% of those who borrowed from illegal lenders also described taking part in money mule activity. As such, poor access to legitimate credit is also a key marker for vulnerability to money mule recruitment.

Other participants became money mules because **"it sounded like an easy way to make some money"** (Rich), and after watching other people and friends make money quickly:

#### "You're 17 years old, you see other people like raking it in, and like you want a bit of that, and it's like, it's very enticing". (Simon)



#### Income and opportunity

The income profiles of identified money mules give an insight into the relationship between poverty and money mule activity, and can help make sense of the poor credit scores, leading the credit exclusion.

Almost two thirds of money mules identified are in the 3 lowest income deciles of the UK population, meaning that they earn an income that is below £22,000 per annum.

45% of money mules don't have a telco account, so can't pay monthly for their mobile phone, with only 85% having a current account now (after their identification as a money mule. meaning 15% of all identified mules become de-banked and financially excluded). In correlation with the majority of money mules identified, they have less credit products than the UK population as a whole. Possibly due to their credit rating, or because of previous defaults on their credit report. 21% of accounts held (open or defaulted) are currently reported as being in default with an outstanding balance due compared with 3% of the UK

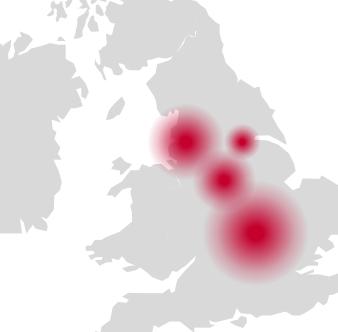
Regionally there is an over-indexation compared to the UK in London, North West and West Midlands with concentrations in poorer London boroughs along with the cities of Manchester and Birmingham.

These money mule 'hotspots' track almost identically to the most deprived areas shown in The English Indices of Deprivation (2019).

There are 7 domains of deprivation, which combine to create the Index of Multiple Deprivation.

- Housing (barriers)
- Income
- Employment
- Education
- Health
- Living environment
- Crime

Whilst the money mule demographics point to links between low income, poor credit, and poor money management or credit defaults. It is important to understand the social issues that are interlinked to living in some of the most deprived areas in the UK and how that experience may link to money mule activity.



#### Fig 2 - UK Money mule hotspots



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#### Witting or unwitting?

Money mules in our study were, in the main, not calculated criminals seeking to exploit the banking system and launder illegal money. Instead, they were young people lesson-learning from their peers about how they, too, could earn money.

One participant (Jamie) did however identify his **"greed of money and the greed of wealth"** as his motivation for his various fraudulent activities, which enabled him to **"buy clothes or whatever, Rolexes, you know, going out in town and spending two grand and, you know, strip clubs, whatever, VIP."** His actions were planned and sophisticated. Yet, as with others, he was a child when he first engaged in criminal activities, stating how he was just **"15 when I first got into it"**.

There is a question often posed as to whether the mule is a witting or unwitting money mule. Essentially, the question is whether the money mule knew what they were doing was illegal activity or not. Statements such as Jamie's above would give the impression that he was a witting mule and that he understood the implications of the activities he undertook on behalf of criminal gangs.

However, it is often difficult to be certain how much money mules understand what it is that they are getting involved in. Often money mule schemes are promoted as methods to earn money quickly, not overt criminal activity, on mainstream platforms which gives the impression of legitimacy. There is also little education about money mule activity or money laundering in the school curriculum or popular discourse, allowing the criminals themselves to set the narrative about what it is that they are asking the money mule to do. This offers room for the mule recruiter to socially engineer the potential mule to think that it is either a legitimate opportunity or that it is not 'that bad'.

For Jamie, he is engaged in a world of conspicuous consumption, with brand-name luxury goods and activities that he is financially, and due to his young age, excluded from. He was not old enough to obtain credit when he first engaged in money mule activity, but he was able to go and buy goods that he saw others consuming. Even though it is likely that those he saw with such goods on social media or around him at the time would have been using credit to obtain them, he could not, and as such found money mule activity as a form of illegitimate means to obtain the goals he saw others achieving. When he was initially recruited he was under the age of 18, and criminals used this desire as a way of recruiting him, without him fully understanding the implications for himself or others.





#### How are money mules are recruited?

It is not simply enough to be experiencing financial hardship, or to desire expensive items to 'fit in'. To become a money mule, there needs to be some contact with the criminal world. A key feature of recruitment was the importance of relationships. Often, money mules were recruited through their friendship networks, people whom they knew well and trusted. OCGs used friendship networks to gain access to large groups of young people to exploit and launder money through their bank accounts. These young people were recruited through their friends, who then contacted the money launderers and were told what they needed to do.

"We were friends and I think I must have seen Rich do it.... the same friend that kind of put us in contact ... it just like looked like it went very smooth and being quite young and not giving it any thought and just being very stupid ... it went smoothly for [him] and yeah I guess I thought it sounded like an easy way to make some money so yeah, I said I'd do it". (Simon)

> "We were friends ... it was kind of just this other friend that was like been the middleman, I suppose. .... it sounds crazy ... but I suppose it was like the thing of it being my friend ... I suppose I didn't give it that much thought". (Rich)



"It was just like everyone was doing it like left, right and centre and even, even if it wasn't like people that I knew directly, I knew it was going on in like colleges and stuff because I went to three different colleges ... But my friend who I was good friends with at the time, we had a mutual friend from secondary school, and he apparently had been sorting out cards for this bigger guy, didn't really know much about him, but they said that they could sort me" (Rich)

The recruitment of money mules through friendship groups meant that young people assumed there would be little to no consequences and that they could trust their friends. Believing in their pre-existing friendships, and the trust forged over many years, young people were groomed into illegal activities:

"The fact that it's happening through one of my good friends at the time, I just thought that I'm gonna be looked after, like this isn't gonna bite me in the ass" (Simon)

#### "Because this was my friend and because I knew this guy from secondary school, I knew it should be fine. I probably wouldn't get like messed around" (Rich).

It was also claimed that some organised crime gangs employed and potentially groomed girls to persuade other young people into money muling. Girls, it was claimed, were able to more effectively persuade others into providing personal information and access to the mules' bank account:



#### "They use girls apparently, because they have more luck persuading people to persuade the boys to hand over their cards". (Finn)

The process of recruitment is thus varied and involves many people, some of whom may also have been groomed and exploited themselves. The mules and their friends were groomed over a period of weeks and months, enticing them into activities which, unbeknown to them, were illegal. Their exploiters were persistent, in some instances calling them daily to coerce them into handing over their personal information and bank details. Over time, the young people began to trust their exploiter, believing their falsities and establishing a more intimate connection with them:

"There was this big bloke had phoned me consistently every day at the same time which built up a lot of trust ... answered all my questions that I needed tidied up, all the loose ends" (Adam)

> "Eventually after maybe like, I don't know, maybe a few weeks, like a month, my friend that introduced me to the other guy from my old school, he just turned up with a load of cash for me". (Simon)

The criminal gangs also used the vulnerability and financial hardship of victims as a tool to extract information and lure young people into money laundering. As one mule explained, the criminal gangs drew him in by promising to help him pay off his outstanding loan debts, which to anyone in financial hardship is a luring proposal:



"When I initially signed up they asked for what accounts I had the login details to, [they said] 'I've been going through your accounts. I can see you've got like previous loans'. And I was like, 'Yeah, I do'. And he's like, 'You got a fair few of them. Like we know someone who can do this for you'. And I was like, 'Fantastic'. And that was, like, an an overwhelming sense of relief ... And I thought, fantastic, because if I can get rid of my loans, like, then I can start saving up some money to, like, realise my potentials, my dreams ... He's like, 'I'll put you in touch with someone who'll be on there. Yeah, go from there, Yeah'. So I was introduced to a bloke called Liam\*" (Adam).

Young people who were financially vulnerable and inexperienced in banking and finance were being targeted by organised crime gangs. They were recruited through friends, and other young people to launder money through accounts held in their name, but controlled by criminal groups. But that is not to say that these young people were already embedded within criminal gangs. The first contact would often be through social media, and look like adverts for legitimate job opportunities, or 'get rich' schemes, designed to be too tempting to miss.

As these images of active accounts trying to recruit money mules on popular social media sites, adverts are often framed to look like compensation schemes (see fig. 3). Within the adverts they will put desirable features such as 'white name' meaning English or European sounding name, in an attempt to obtain accounts that are less likely to flag or experience increased scrutiny (see fig, 4). Rightly or wrongly, criminals will learn key characteristics of account holders that are more likely to be unsuccessful or blocked quickly and try to filter riskier accounts out during the recruitment process.

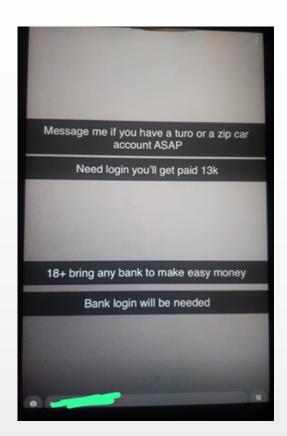
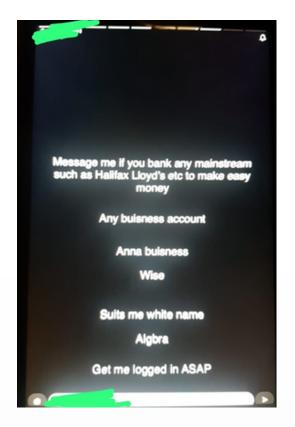


Fig 3- Money mule advert







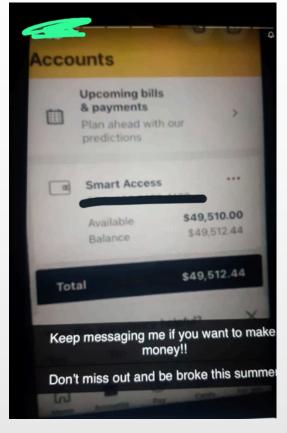


Fig 6 - Money mule advert

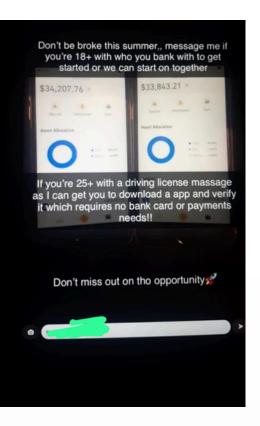


Fig 5 - Money mule advert

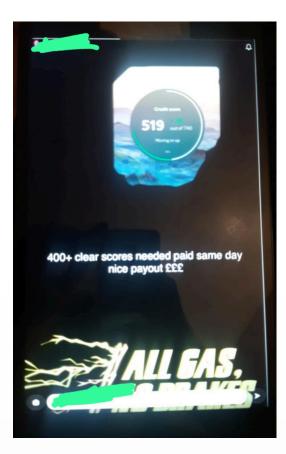
Criminals will offer evidence of how much money has been 'earned' before to look legitimate, or at least that there is proof that money is being earned. Often the posts will also contain feedback from others in the form of text messages from satisfied mules or comments underneath posts.

Criminals will state their requirements but also offer to 'start together' if they don't have specific accounts. The criminal is offering to onboard with them.

The same account will offer multiple posts in different currencies, often USD, Euros or GBP. Indicating that these accounts are recruiting money mules globally.



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Criminals also specifically target demographics with a higher credit score. As fig. 7 shows, if you can show you have a credit score of higher than 400, then the criminal is offering same-day payout.

This is targeted recruitment for the criminal, and, likely, the individual will then also find that credit accounts are taken out in their name or that other financial accounts are opened. The credit rating of a money mule bears no weight to the chance of detection but means that the criminal can get added value by defrauding the money mule or fully taking over their identity.

#### Fig 7 - Money mule advert

By asking for the credit rating, the criminal also gives an impression that they may also be offering a loan rather than engaging in money mule activity. Most people are unaware of money muling. As such, a loan may be a more understandable prospect to a money mule recruit. This was something observed in We Fight Fraud's previous research into illegal lending. We saw people who believed they were taking a payday or high-interest, short-term loan, but were opening accounts with online neo-banks.

Fig. 8 shows how criminals are targeting the more vulnerable and financially excluded, by specifically stating universal credit claimants wanted. Particularly after 'top ups' and 'refunds'. This appears to the user that the criminal may be helping them to claim a legitimate refund or compensation.



Fig 8 - Money mule advert



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|         | THE PERIOD 03/19/05 TO  | 04/18/05  |
|---------|---|---|
| SUMMARY | OF ACTIVITY FOR THE PERIOD <b>03/19/05</b> TO<br>YOUR BALANCE ON 03/18/05 WAS<br>THERE WERE WITHDRAWLS AND SUBRACT<br>THERE WERE DEPOSITS AND OTHER ADD<br>INTEREST POSTED THIS PERIOD<br>YOUR BALANCE ON <b>04/18/05</b> | 2,514.18<br>-200.00<br>172.63<br>1.01<br>2,487.82 |
|         |   |   |

0/05

## How do criminals engage with money mules?

Once recruited, money mules were taken through a step-by-step process that was explained to them by the money launderer, or their contact. They were told what they needed to do, when and where, and followed the instructions given to them:

#### "Well, basically they just gave me - like it was pretty much just like 'Do this. Okay, cool. Once you've done that, now do this, cool, once you do this, now on to the next step'. It is like a breadcrumb trail of progressing through this thing" (Simon)

Many of the accounts given by money mules illustrated their naivety, lack of knowledge about banking and finance, and the manipulation, coercion, and grooming of vulnerable young people who do not fully understand the illegality of the actions they were being told to engage in. For some, the grooming process involved the deception of people in friendship groups to legitimise illegal activities, whereas for others deception involved an elaborate job opportunity. In all cases, young people were told what to do and how to do it – acting as puppets for illegal crime gangs who were profiteering from their vulnerability. The amount laundered through money mules accounts ranged from between a few hundred pounds to tens of thousands. The recruitment and engagement process occurred over several weeks or months, depending on if the mules' account is suspended and when it appears criminal gangs decide to move on to their next victim.

#### Company set up and opening an account

At least two of the money mules interviewed reported that they were asked to open a business account and register a fake business through Companies House. Once the account was established, money mules sold the account to the money launderer who then took control of the bank account. Money was then moved through the account, without the involvement of the money mule, who in Simon's case knew little about setting up and registering a legitimate business - a knowledge deficit criminal gangs can exploit:



"I had to set up a bank account with Lloyds I think, and then once I set up a bank account, I had to set up a company, so I registered a company with it, I can't remember what, it's like something houses or, it's like a register for companies ... I think I said it was like some graphic design or like some website building company ... then I linked that company to this business account that I created with Lloyds. And then once that was all set up and it was all legit, then I just sold all the details to this guy ... they had full control of the account, they were putting money in it. (Simon)

Taking control of the young person's account was a key feature of money laundering through young people. Whilst the young person could see the transactions, and that tens of thousands were moved through the account, they were unaware of the legal consequences their actions could lead to.

#### Personal account

Gaining access to and controlling a money mule's account was another way that money was laundered by criminal gangs. Once recruited, money mules were persuaded to share their bank details and provide access to their online account for the criminal gangs to control. In some instances, crime gangs used remote access software to gain access to mules' computers to open personal accounts, secure loans, and move money between accounts:

#### "I opened another account within my account ... and money came into there and I think I was meant to send that to someone else with a bit taken out for me". (Rich)

"He sent me a link already installed. I did send him a six-digit number ... Which allowed us to screen share ... He helped me apply for loan, took it out, and then once we taken out, transferred it into a crypto wallet and crypto.com and transferred it to another wallet address, which then went into my trading account. ... I felt foolish because I'd fallen for it .... Because the red flags were there. It just sort of wandered in sort of blind, regardless ... I was filling in over the phone while I was on the money desk, so he saw me fill out all my details. So my information. ... he'd done it before he knew exactly what he's doing [where to go on the loan website]" (Adam)



Ashley had been paying off the loan taken out by his exploiter for two years, with no benefit or capital gain for himself. Instead, the loan amount was transferred to other accounts without Ashley's awareness, and he was left with nothing but loan debts to repay for money taken from him.

"He also transferred I think it was like without looking 500 to a woman called Linda\* and £100 to a girl called Claire\* . And I still had a PayPal balance of like £200.... But then I found out that he transferred that as well.... And with the same I'm like 1100 quid now and I haven't heard from him and he said he'd been in touch shortly". (Adam)

In response, Adam decided to dispute the transactions made from his account to reclaim the loan money. It was at this point that the criminal gang member contacted him, but only to claim that Adam, despite being deceived and extorted of money, had betrayed and double crossed the OCG member.

"So I set up a dispute on PayPal and before it's the £800 that went into the account and the then that transaction and the closing of all transaction... Even then I get a call saying, 'What do you think you're doing? You, you're trying to play me....?' And he said, 'You're trying to put a farce on me. Like you're a bit of a cheeky [redacted] for doing this'. I'm like, 'Right, okay'. And he's like, 'You need to sort this out. Like, I trusted you. Like, you've done me over'''. (Adam)

Non-conforming money mules received aggressive threats from the OCG member who made it clear they "know where you live", and his family lived, leading him to be fearful for his safety.

"I know where you live. I know what a caravan is.... it was getting quite aggressive ... it was really intimidating in the way the way he posed himself is really sort of dominating sort of attitude and tone and the fact he's like, well, it's nothing to me, you're nothing to me sort of thing. And this is where it felt like it's getting out of hand, ... it was frightening. ... this feels like I'm in a bit too deep now. And if I cross him, he knows where I live.... I've got your details, mate. And homes of family... I was shaking, was really shaken" (Adam)



Because of this loan and other outgoings, Adam needed to take out a further loan so that he could pay the loan and other expenses.

#### "I had my caravan fees to pay and I didn't have enough to fund that so I took out another loan to pay that off". (Adam)

Adam became financially worse off than before he was scammed by the organized crime gang, leaving him in greater hardship and as a more vulnerable young person. Money mules are rarely benefiting financially from money laundering and are instead the victims of organised crime groups. They too often face the consequences of being coerced, misled, groomed and manipulated by having their bank accounts frozen and markers placed on their credit scores, meaning that some are unable to open another bank account.

#### Recruited for a job

Online job advertisements were used to entrap unsuspecting money mules into illegal activities. Social media platforms were used by organised crime groups to generate interest in opportunities to make money quickly and reach large populations of young people online. Given the advertisements were on a trusted social media platform, for many unsuspecting young people this gave a veil of legitimacy that was unwarranted. The frequency of posts about such opportunities, that were not removed from the social media sites due to their bogus nature, led some money mules to seek out such options.

"I'd noticed every now and then on [an insurance broker's] stories they would advertise like a way to make money quickly .... I was trying to ignore it... but it came to a point where...I didn't have enough cash flow in order to pay for my car....it was 500 quid odd. So I sort of reached out to him in the hopes of doing that. I did, and it sort of spiralled from there". (Adam)

After contacting the post advertiser, Adam was called by phone and told "**We've got a job waiting ... you don't need to worry about a thing, it's proper**". He was then introduced to a middleman whose role was to extort personal information from him. This person diffuses any concerns the potential victim may have by explaining that he too had been involved successfully and that the role involved helping to distribute money from offshore accounts:



"I'm introduced to a bloke called Adrain\* [who] seems very forward with getting information off me, getting my card details, getting my license and all bits and pieces like that ... the phone call pretty much went along the lines of Adrian\* explaining what jobs he's done successfully and ..he went through the motions of going through this job ...I was asking him like questions of like where the money was coming from? How it sort of worked. He said that you couldn't use his because he's used them too often and needed other people's accounts and I didn't believe it was laundering as such ... he said there are offshore accounts that money comes in and he said it's for people to distribute like, distribute" (Adam).

Adam revealed the hierarchy existing within the organised criminal gang that had recruited him, with Adrian\* reporting to **"the brains behind it"**, a person named Abdul\*. Adrian, he claimed, was the person who established contact and arranged meetings to talk through the job opportunity and arranged group chat meetings on WhatsApp with Abdul\*. Abdul\* said very little during these meetings, apart from explaining the process of him moving money. He also seemed **"quite shy"** (Adam), but he was the person who moved money from a fraudulent insurance company account into Adam's account and then onto another.

Criminals engaged money mules in different ways, with each approach and explanation being tailored to the individual and the place or relationship involved in recruiting them in the first place. This demonstrates the relational nature of engaging money mules and the level of social engineering expertise needed to ensure that the money mules perform the tasks required, and often hand over their data, without much questioning or resistance. Mules are targeted for specific financial vulnerabilities, such as claiming universal credit, and desirable features, such as a higher credit score.





#### How money mules are paid

Whilst payment to money mules for their involvement in money laundering was not always made, for those involving friendship groups, payment is likely a useful way to entice other young people to take part. Payment to money mules was made either through leaving money in the mule's account or through payment in cash.

#### "Eventually after maybe like, I don't know, maybe a few weeks, like a month, my friend that introduced me to the other guy from my old school, he just turned up with a load of cash for me ." (Simon)

The amount of money being moved through money mules' accounts was in the tens of thousands when accounts were not frozen by banks following the first transaction. For some "10 grand" was being moved at a time, whilst in others "20-25k" and as much as "40k" moved in total over several months. Payments were made from their accounts to account names unknown to them.

For these types of payments, the mules obtained between £25 - £250 per transaction. One mule told the team how he made four transactions of £5,000 each, with the money leaving the country, to be paid approximately £25-30 each time. Meaning he successfully laundered £20,000 before his account was closed by the bank. He is a universal credit claimant and vulnerable person with impaired cognitive skills. He received around £100-120 but lost his bank account and ability to receive welfare benefits as a result.

Not all money mules obtained payment, as cash was only received when the transactions were successful. One of the money mules did not manage any successful transactions, but has his account taken over by criminals before eventually becoming un-banked.





## **Detection of money mule accounts**

Many money mules became fully aware of the illegal activities that they had been implicated in when their accounts were frozen, and they were contacted by bank representatives who explained that activities on their accounts were being scrutinized. Some were unaware that illegal money laundering had taken place and were unfamiliar with the offences they had committed:

"[Money] came in [to] my account [and was] instantly flagged and I didn't have control of it anymore. Maybe I couldn't even log in ... I think maybe I called my bank or I left my bank and they said, you just got to come in and talk to us.... I went into the bank. And I think they said I can't remember the phrase you used earlier, but it was it reminded me of something they said, I think illegal money or illegal funds or maybe like an illegal transfer of money into my account" ... (Rich)

#### "I think I did get a lot of letters and I've got letters from company house I didn't look at them ever". (Simon)

In Simon's case, £2,000 had been moved into his account and instantly detected. His account was automatically closed. Money mules therefore become unable to access funds in their accounts and the realisation of what they had become embroiled in occurred, leading them to regret their decisions and suffer with anxiety:

"So I was quite stressed out by that. I was already regretting my decision a lot. And yeah, I think I didn't have my card at this point as well because I'd given it to this friend" (Simon).



## Money mule outcomes

The outcome for many money mules was the closure of their bank accounts and markers attached to their credit files, making it difficult to open further bank accounts.

# "They said yeah we've closed your account and don't look to have an account with us in the future". (Simon)

Some mules buried their heads in the sand, ignoring letters from the bank and Companies House, hoping that the problem would disappear. The discovery of their actions by family members was also a concern, as well as the potential outcome - something that the young people feared:

#### "It was just like bank statements and stuff and also I lived with my dad at the time and he's like pretty like alert and I think I feel like he was starting to clock it was some fishy going on. So I kind of just as soon as I got those letters. I think I just stuff them on in my bed Don't look at them again". (Rich)

Unable to open a subsequent account, Simon sought support from an ombudsman to remove the marker left on his credit files. Luckily, his marker was removed and, since the incident, he has been able to continue being a bank account holder. Yet, the impact on his credit rating is something he continues to be concerned about, but feels unable to clarify:

"I couldn't open another account for the next time I tried, basically party ombudsman, I think they're called, who successfully kind of, I don't know, did something, got the mark, whatever mark that was on my name, got that removed and I was able to open another account. And since then, no, it hasn't affected me, but similar to Rich, I haven't actually checked my credit rating yet I'm quite nervous to". (Simon)

Ultimately, for the mules in the study, the main consequences have been felt by the process of de-banking and reduced access to financial services, particularly at a young age. A money laundering conviction can see a money mule prosecuted and facing up to 14 years in prison. However, the more likely outcome is becoming de-banked and losing their bank account, as has happened with the majority of mules in this study, and a cease and desist letter from the police in co-operation with their bank.





## **Case Study: Money mule prevention**

The UK Higher Education sector educates over 2.3 million students, employs over 400,000 staff and contributes more than 95 Billion to the UK economy each year. This makes universities and their students a very attractive prospect for criminals.

Criminals seek to extort money through crimes such as ransomware and cyber attacks. However, once they manage to obtain money through criminal actions, they need ways of unlocking it. The answer to this is a money mule - someone who allows their bank account to be used by a third party.

In 2021, we found that **3 in 5 students** had been approached to become a money mule prior to starting university. The consequences for your students if they do get involved can be 1) losing their bank account, 2) losing the ability to get another account or credit, 3) becoming a victim of fraud themselves, 4) up to **14 years in prison**.

We Fight Fraud has worked with the National Crime Agency, WPM Education, the City of London Police and Lloyds Bank to reduce the number of students engaging in money mule activity. As Experian's data has shown, the largest risk group for money mule activity is under 40 years old. Within this age category, money muling is a significant issue among students. In 2020, the 21-30 age group accounted for 42% of money mule activity, with nearly 6,000 student accounts involved in 2018. Money mule transactions average between £3-7k per account, meaning student accounts could have transferred between £18-72 million in 2018.

Despite some universities providing targeted guidance, there is no coordinated approach across UK higher education institutions. The National Union of Students has not delivered a nationwide campaign on financial fraud, missing an opportunity to engage students on this critical issue. Therefore, We Fight Fraud developed, wrote, and produced 'Crooks on Campus', a crime drama designed as an intervention to engage, explain and educate university students about money mules, to disrupt mule recruitment across university campuses in the UK.



Whilst there are multiple awareness campaigns about money mule activity, some through financial institutions themselves or campaigns such as 'Don't be fooled' backed by the UK Government and UK Finance. Such campaigns are not evaluated to assess if they provoked demonstratable behavioural change.

To ensure Crooks on Campus prompted positive behavioural change, Dr Nicola Harding and Tony Sales, alongside two peer researchers, Ronni and Joel, conducted an evaluation to assess for behavioural change and to understand more about how criminals can socially engineer young people to become money mules in a mock mule recruitment exercise.

## **Key Findings**

**Awareness:** Before watching "Crooks on Campus," 57.9% of students were unaware of what a money mule is.

**Approaches:** 57.5% of students had been approached to become money mules, with 17.5% approached in person and online, and 40% online only.

**Confidence Post-Intervention:** After watching the film, 100% of students felt confident in spotting scam approaches.

**Reporting:** 80% of students said they would report scam approaches to Crimestoppers after watching the film.

**Perception vs. Reality:** Students are more susceptible to recruitment by criminals than they perceive themselves to be.

**Social Media Approaches**: 95.2% of students claimed they would not accept an approach from a social media contact.

**Mock Recruitment Exercise**: Initially, 20 out of 30 students submitted information in a mock recruitment exercise, suggesting openness to becoming money mules. After watching the film, only 2 out of 30 students submitted data, indicating a 90% reduction in risk-taking behavior.



## **Project Aim**

The project aims to prevent university students from becoming money mules and falling victim to financial fraud.

The evaluation of this intervention involved two stages:

1. Immediate Feedback: Pre-screening questionnaire and post-screening exit survey to assess immediate attitudinal changes.

2. Mock Recruitment Exercise: Conducted before and after watching the film to measure behavioral changes.

The first screening at Lancaster University involved 90 first-year students, with 50% participating in the surveys. The majority (86.1%) were aged 18-19, and 13.9% were mature students (20-40 years old). Most had no significant direct experience with fraud.

## **Survey Questions and Results**

Before watching the film, 9.5% would let a friend use their account for money, with 4.8% having already done so. After the film, 97.4% said they would not let a friend use their account, showing a 26% change in attitude. For social media contacts, 95.2% initially said no, which increased to 100% after the film.

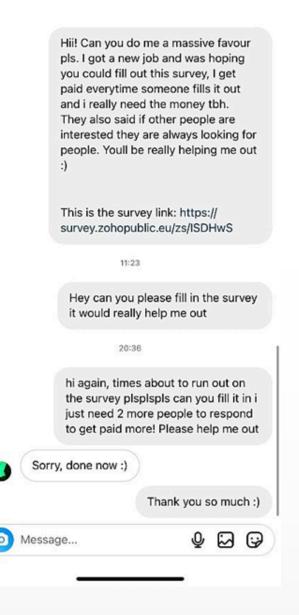
Initially, 71% said they would not buy foreign exchange, concert tickets, or pay bills through an online contact, with 29% being open to it. After watching the film, 87.2% said no, showing increased wariness.

After watching the film, 80% of students said they would report criminal approaches to Crimestoppers if they felt they had been approached.

## **Mock Recruitment Exercise**

A mock recruitment exercise was conducted with 30 students. We worked with peerresearchers to send controlled money mule recruitment messages to the student in the study.





#### Fig. 10 - 1st mock recruitment message example

After the first attempt, 20 students submitted information. After watching "Crooks on Campus," only 2 students submitted information in a follow-up exercise, indicating a significant reduction in risk-taking behaviour.

We also observed the students trying to intervene with peer researcher 1 after watching Crooks on Campus, showing that the film creates the desired 'peer challenge' effect.

The two students that did submit their data again were debriefed and interviewed about their experiences. One spoke English as a second language and described how she struggled with critical thinking and feelings of safety, making her unsuspicious of her friends, and the second had already been a victim of a similar type of account take over.

This demonstrated that Crooks on Campus was the ideal tool to use with a broad spectrum of young people, but more specialist messages are needed for those who have already been a victim of fraud.

The evaluation shows that "Crooks on Campus" effectively creates awareness and changes attitudes and behaviours toward financial fraud among students. Despite initial resistance, the film significantly reduces students' susceptibility to money mule recruitment. This highlights the importance of engaging and educating students through impactful media to prevent financial crime.

WE FIGHT FRAUD FINANCIAL CRIME PREVENTION This whitepaper has brought together three data sets that are seldom considered together. Firstly the authors worked with data scientists at Experian to understand their analysis of the data linked to known UK money mules that have been identified in the last six years. They then synthesised this with qualitative data found by the We Fight Fraud research team. This consisted of in-depth qualitative interviews and a visual ethnography of social media accounts advertising to recruit money mules.

By bringing together these datasets we can get an in-depth understanding of who money mules are, how they are recruited and engaged with and an understanding of the implications of how we decide to deal with money mule activity. As such the authors recommend:

- Money mules should be viewed and responded to as vulnerable victims of criminal exploitation.
- Greater support, advice and assurance should be provided to money mule victims.
- Money mules should not be prosecuted for being exploited by criminals, but that more should be done to deal with money mules without de-banking them wherever possible.
- By understanding the demographics of those who may be vulnerable to money mule activity, financial institutions should proactively look for vulnerable customers. This should include credit departments communicating with fraud departments.
- Greater education is needed for young people and children, to educate them about banking, and the dangers of criminal exploitation, with tailored advice for different demographics.
- Awareness is not enough, education should be engaging and evaluated to see if it is preventing the behaviors it seeks to address, e.g. money mule activity.
- Greater responsibility for digital platforms in awareness raising of money mule activity and removing accounts that advertise such illegal activity.

## REMEMBER

We all have our role to play in stopping financial child exploitation. Money muling has significant consequences for the people who get involved. It is necessary for the facilitation of organised crime, county lines, and terrorist financing. The consequences are increasing as money mules are viewed less as victims and more as enablers. There has never been a more urgent need for a proactive and partnership approach in the fight against financial crime. By identifying, understanding, and managing money mule activity quickly and effectively we can all fight fraud together.



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