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## The Trends and Challenges of Money Mule Investigation by Malaysian Enforcement Agency

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### ABSTRACT

*This article discusses the roles played by the enforcement agency, the current money mule situation, and the challenges faced by enforcement agency investigation officers in money mule investigations. An interview with informant from one of the Malaysian Enforcement Department, was conducted to gather his insights. An enforcement officer launches a money mule investigation based on the victim's police report or Suspicious Transaction Report (STR). Investigation into money mule cases received by law enforcement agency is guided by Penal Code 424 and AMLATFPUAA 2001, which clearly expound the offence implicated in the money mule syndicate. The output from the interview is analysed under content analysis, whereupon the large amount of extracted information is summarised and arranged into important themes that address the research objective. The major challenges faced in criminal investigation include lack of cooperation from telco, delayed response from banks when requested to provide crucial information, wrong public perceptions on enforcement agency's aggressiveness to fight money mule, lengthy investigation procedure, limited resources and lackadaisical attitude towards money mule threat. The challenges undermine the fight to eradicate the money mule phenomenon, one of the most critical financial crime threats in Malaysia. A slew of changes that enforcement agency is keen to see are proposed, including a more proactive telco regulator, a shorter processing period by banks in responding to production orders from enforcement agencies, and a steeper involvement by the media to build public awareness.*

**Keywords:** Challenges, Malaysian Enforcement Agency, Money Mule, Trends

### 1. INTRODUCTION

The threat of money mule has become a global concern to the financial system. In 2021, Europol through European Money Mule Action 7 (EMMA 7) has revealed 1,903 arrests and identification of more than 18,000 money mules (Europol, 2021). The EMMA 7 program saw a horrific number of 7000 reported fraudulent transactions, and has successfully plugged €67.5 million loss. Meanwhile UK's Credit Industry Fraud Avoidance System (CIFAS) which tracks the money mule development in UK reported a huge jump of 78% in new money mules below 21 years old for the year of 2021 (CIFAS, 2021). This is attributed to the COVID-19 pandemic which draws youths to the heinous syndicate. The 2021 statistics presented from Europol and CIFAS show the seriousness of money mule syndicate in respective jurisdictions. Meanwhile in Malaysia, 29,769 bank accounts were identified as money mule in 2021 (Yong, 2022). The alarming number of accounts reported as money mule are expected to rise further in the coming years if scam and fraud are not assiduously fought by the authority. This clearly put the burden on Royal Malaysia Police as the main enforcement agency to work harder in combatting the crimes, especially the money mule syndicate.

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Money mules are facilitators of financial crime and money laundering. They are often at the bottom of organised crime and help in the rudimentary execution of layering dirty funds, such as multiple fund transfers, wire remittance and ATM cash withdrawals (Leukfeldt et al., 2020). The money mule syndicate is truly a problem to the society, whereupon the recruited mules hold significant role in laundering the stolen funds and obscure the money trail. The criminal strategy that involves the money mules often chafed the investigation process, primarily caused by layering of funds in a complex entanglement of mule accounts. The act of distancing in money laundering between victim and criminal wedged by multiple layers of money mule becomes the hardest challenge to forensic accounting investigation (Flores et al., 2012; Schneider, 2006). This is the commonly faced by financial crime investigators and enforcement agency officer assigned to investigate money mule cases. As such, it is crucial to understand the difficulties faced by law enforcement agency in money mule investigation, the current money mule situation in Malaysia and what are the new improvement actions very much sought by them to ease their job. Therefore, the primary goal of this article is to elucidate the roles played by the enforcement agency, current money mule situation in Malaysia and challenges faced by them in working on money mule cases.

## **2. LITERATURE REVIEW**

Money mule is defined as an individual who allows personal account to be abused by criminals for laundering of ill-gotten proceeds (Esoimeme, 2021; Federal Bureau Investigation, 2021; Pickles, 2021; Raza et al., 2020). The mules absorb a tiny percentage or small cut from the stolen funds they advocate to launder which is understood to be service fee for lending their account while the criminals enjoy the largest portion of illicit profit (Hülse, 2017; Leukfeldt et al., 2020; Sisák, 2013). Some of the mules are aware of the interest paid by criminal to recruit them and completely disregard the crime that drives their recruitment. They are coined as a participant of Crime as a Service (CaaS) in a hierarchy of cybercrime actors, which their recruitment helps in keeping the flow of illicit funds undetected (Manky, 2013). But there are money mules who have no conscience of the underlying criminal activity (Hülse, 2017). They are often the downtrodden and elderly who are genuinely looking for job opportunity. A combination of bogus recruitment website/advertisement, unclear job description, lucrative income and minimal work requirement are the driving huge number of new money mule hiring (Bekkers et al., 2022; Vedamanikam et al., 2022). Despite the controversial issue surrounding money mule's awareness, money mule is still held accountable for illicit activities in their account.

The complexities of mule syndicate consist of the money mule recruitment, criminal network, operation and investigation (Abd Rahman, 2020; Hülse, 2017). Money mule has gained traction for its impudent role in laundering illegal funds from various criminal activities executed across jurisdictions, such as fraud, scams and cybercrime. The value chains of these criminal activities are not vertically supported by legitimate market, and therefore the task of keeping the exposure at the lowest risk is outsourced to others, including money mule (Van Wegberg et al., 2017). The problem caused by money mule has eroded the trust financial system owes to the public, and also places a heavy burden to enforcement agency especially police department in asserting its authority to curb digital crime (Abdul Rani et al., 2022a; Nish & Naumann, 2019). The burden of money mule phenomenon has strained the already limited resources enforcement agency is facing, on top of other financial crimes associated with the mule syndicate (Rozlin, 2022). If left undeterred, money mule will become a major threat to the well-being of society and stability of financial system's money laundering control.

The unscrupulous money mule accounts are identified through STR raised by the banks (Chaikin, 2009). The STR accomplishes list the red flags indicating money mule activities and the potential predicate offence that leads to the money mule reporting (Abdul Rani et al., 2022b). The bank or financial institution is chiefly responsible in monitoring its account holders and report any

suspicious activity including suspected money mule, as clearly stated in Section 14 Anti-Money Laundering Act, Terrorism Financing and Proceeds of Unlawful Activity Act (AMLATFPUAA) 2001. The STR that goes to Financial Intelligence and Enforcement Department (FIED) under Bank Negara Malaysia will be reanalysed and routed to Royal Malaysia Police for necessary criminal investigation. This is the beginning of a more complicated work in money mule investigation involving the analysis by enforcement agency.

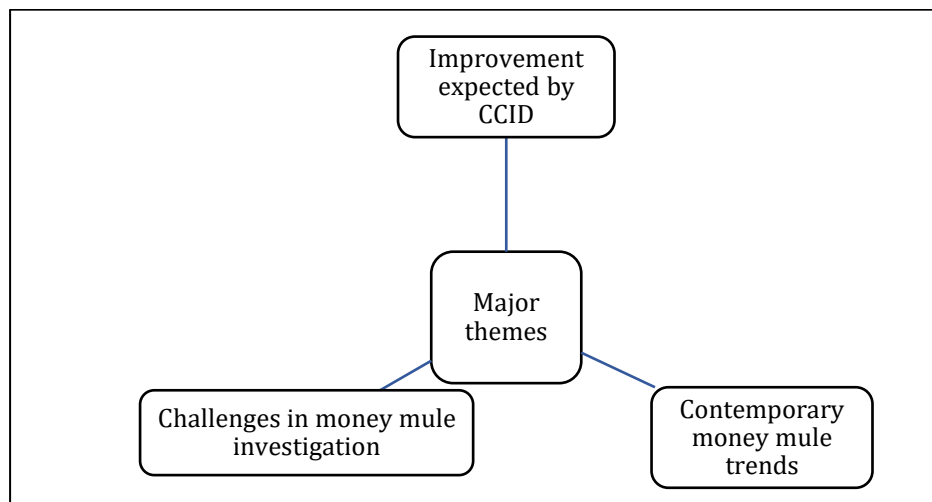
The nature of law enforcement agency's investigation is beleaguered by challenges from variety kind of circumstances and perspectives. Several previous studies have profoundly highlighted the challenges that beset investigation in their respective law enforcement field, such as bad record-keeping in hawala networks due to strong trust held by the operators (Passas, 2004), finite access to the source of child pornography and search for the offenders (Wells et al., 2007), getting the latest technology to outsmart the stealth tactics by crypto launderer (Tziakouris, 2018), poor manpower allocation, skills and latest technology in wildlife conservation law enforcement (Ariffin, 2015), low rate of reporting and poor investigative strategy hampering the human trafficking investigation process (Farrell et al., 2014; Farrell & Reichert, 2017). There were also several studies that have unveiled challenges faced by enforcement agency's money laundering investigation in different settings such as restricted access to central bank registries (Pavlidis, 2020), stolen/illicit asset recovery (Pavlidis, 2022; Zemskov & Prasolov, 2021), evidence gathering (Meiryani & Warganegara, 2022; Zolkafilil et al., 2019) and dark web analysis (Dalins et al., 2018). In the case of money mule, the investigation requires extensive research on the underlying predicate offence which first lead to the layering of the illicit funds, followed by the long trail of the money flow. These tasks are often hamstrung by limited information on the money mule from key stakeholders, stiff bureaucracy imposed on the procedure to get the necessary information and little awareness on money mule threat. It is essentially vital to explore the apprehensiveness and difficult situations faced by Malaysian enforcement agency in managing their money mule investigation. Therefore, this issue is identified as a gap that needs to be explored and addressed.

The responsibility of law enforcement on money mule cases is not only limited to money trail investigation. The authority given to police department covers an array of interventions such as arrest, raid, intelligence, obtaining order to freeze suspected mule account and prosecute the money mule offenders. Under Penal code 424 and AMLATFPUAA 2001, enforcement officer from police department is allowed to partake exercises or actions perceived to be helpful in the money mule investigation (Abd Rahman, 2020). The investigation of money mule cases in police department is centralised under Commercial Crime Investigation Department (CCID). Apart from rigorous nation-wide operations such as investigations, arrests and prosecution to fight money mule, CCID has developed an application "SemakMule" which public is encouraged to use and check if the recipient of fund transfer is listed as possible money mule account (Oon, 2017). This effort launched by police department is intended to control the worsening financial loss from money mule scams and fraud. The police department has adopted a serious stance against any person or party under suspicion of money mule and perpetrators will be dealt with in accordance with the law.

### **3. METHODOLOGY**

The research methodology consisted of semi-structured interview with informant from the Malaysian Enforcement Department. This study adopts phenomenological approach, a method useful to understand the personal knowledge, interpretation and shift of expectations in the development of money mule problem. The face-to-face interview was conducted and lasted for 2 hours. The study engaged semi-structured interview in gathering responses from the informant on issues brought up to address the themes of the study. The core framework of the interview connects a few themes of informant's view on contemporary money mule trends, challenges that

curtail law enforcement money mule investigation and expected propositions which would help to unburden the challenges. The informant's wide knowledge on money mule issues is credited on his long involvement in the investigation process.



**Figure 1.** The Main Themes of the Interview

The general inductive approach is used in the content analysis of results for this study. General inductive analysis offers advantages in compacting large chunk of information into a brief summary and establishes comprehensible links between the research objectives and findings (Thomas, 2006). The data analysis is performed using approach proposed by Braun and Clarke (2006) which follows the steps of data familiarisation, initial codes generation, search and creation of themes, reviewing themes and finally naming the themes. These are the steps in transcribing the interview into results in order to understand the phenomenon of CCID money mule investigation challenges. Then inductive content analysis is also practical in model and theory development based on underlying structure of experience taken from the data. Another researcher is engaged to review the transcripts to ensure the interpretation of results is coherent and aligned.

#### 4. RESULTS

The interview has provided thoughtful insights of the current money mule problem in the society and approaches adopted by authority to combat the associated criminal activities. The police department relies on no specific or gazetted definition of money mule; however, money mule is generally understood by CCID and its team members as account holder who is not aware that the account is being used for online scam. The primary characteristic of money mule account is inexplicable rapid fund disposal right immediately after the fund appears in the account.

*'When you asked me, gazette definition (money mule) is not available. However, the definition that we use is any account found abused by scammers and the actual account holder is not aware (of the said activities). They do a lot of transfers between themselves (the mule syndicate) to deceive the enforcement authority' (Informant).*

The definition understood by CCID is very similar given by the sources from literature (Esoimeme, 2021; Federal Bureau Investigation, 2021). The objective of money muling is to interrupt the money trail which considerably important in identifying the source of criminal activity. It applies to all clusters of money mules, irrespective of their consciousness of the criminal activity behind the appearance of stolen funds in their account. Enforcement agencies

around the world have been tracing the money trail as a strategy to get to the organised crime (Levi, 1997). The identification of money trail also helps in the recovery, confiscation and seizure of the stolen or dirty funds which is critical in pursuing effort to stop the organised crime.

The investigation also helps to profiling suspicious money mules and proceed with legal actions on them. Under Penal Code Act 420 and 424, CCID has the power to arrest identified money mules for interrogation or prosecution. The arrest also serves as a lesson to the public that money mule syndicate is a criminal offence, and hope it will stop the syndicate from growing further. The influence policing approach is a strategy used to suppress potential criminal growth especially in cybercrime, targeting the vulnerable groups (Collier et al., 2022). The authority is utilising the law vested on them control and prevent the money mule phenomenon. Moreover, the insane number of money mule, scam and fraud cases have forced the police department to take firmer actions.

*'People often asked me, why do we arrest money mules? I said if we don't arrest them, more people will be deceived' (Informant).*

The approach by CCID to supposedly take stern actions on money mule is hardly a surprising decision. Bank Negara Malaysia has categorised money mule, fraud and scam as high net risk emerging financial crimes in Malaysia for year 2020 (Bank Negara Malaysia, 2021). The severity of these fraud-related financial crimes including money mule has led to the establishment of National Scam Response Centre which was tabled in 2023 national budget (Bernama, 2022). The center which comprises Royal Malaysia Police, Bank Negara Malaysia, Malaysia Communication Multimedia Commission (MCMC), National Anti-Financial Crime Centre (NFCC) and financial institutions will act as the key player in the enhancement of nation's cybersecurity.

#### **4.1 Current Trend of Money Mule Phenomenon**

Money mules themselves are sometimes not aware of the illegal activities taking place in their account. The impression these money mules have is the account being managed by a third for normal businesses, and hence paying non-committal responses to the inexplicable transactions showing in the monthly account statement (Leukfeldt & Kleemans, 2019). It has yielded a huge share of investigation failure by enforcement agency especially the apprehended money mules are unable to provide information related to the account activities. In some cases, the money mule recruitment is targeted on groups that are not interested with potential law repercussions, such as the case of drug addicts who lent their account in return for a regular stream of payments to satisfy their addiction. The scammers know for the fact that the drug addicts are not living at the address stated on their NRIC and may have fled their family, which makes investigation by law enforcement agency harder. The enforcement agency investigation officer could not locate the homeless money mules with drug addiction for arrest or interrogation. Eventually, the investigation stalls and scammers would not stop from recruiting more drug addicts as money mules.

*'It's like this..drug addicts don't care what is happening in their account. Only money that matters to them. So, they give away their account (to money mule syndicate). They (money mules) deliberately let their account (to criminals)..when they are unemployed, desperate, such as drug addicts who are not living at address stated on NRIC, they don't care (on the account conduct). It has become a business.'* (Informant).

Besides approaching drug addicts with promise of steady payment to satiate their cravings, increasing number of money mules are recruited by scammers through SMS blast machine and leaked/sold data obtained from dark web. The SMS blast machine is capable of sending SMSes to mass recipients within a certain radius of distance. The SMS blast has possibility of capturing a small percentage of interested individuals with economic depravity to join the money mule

network. The historic impact of COVID-19 pandemic on economic disruption derived from prolonged movement restriction has surrendered the poor to no other option, except becoming mule. It is also a preferred mode of social engineering due to the blaster's small size, low cost, portability and high penetration (Njuguna et al., 2021). Meanwhile, the leaked data containing name and phone number is sold by unethical individuals such as insurance agents, stolen from company's database. The leaked data is sold to the highest bidder in dark web and most of the buyers are scammers desperate to build a network of money mules.

*'A lot of information (individual data) being sold in dark web, for example insurance agents..I don't understand how could they do this thing (unethical work). So, these money mule recruiters buy (individual data) for their dirty work (money mule recruitment).'* (Informant).

The main objective of money mule case investigation is to curb the rise of online scam which continue to attract victims, as highlighted by the informant. Several factors have been identified by police department as contributors toward money mule problems. Lack of public awareness on money mule and scam threat to the society is the biggest concern for enforcement agency. Most of the victims turn overwhelmed and thrilled at bogus investment offerings. The investment scams offer huge return within a short period, leading to victim's unthinkable transfer of their hard-earned savings to the scammers. The awareness drought is partially attributed to police department's anachronistic stance to engage only local TV station for its money mule awareness campaign. The complacency on orthodox approach does not help in curtailing the money mule problem and effort to educate the public becomes exasperatedly fruitless. The informant also believes that public is not taking the pleas made by enforcement agency on money mule threat seriously, which has caused the money mule cases continue to rise. This is also partially supported by Dowland et al. (1999) which express the idea that public is aware of the seriousness of computer crime, but less not having too much knowledge on the associated legislation or legal consequences.

*'If you ask me, (the main factor of growing money mule phenomenon) is lack of awareness. That is the most important (factor). We have tried to campaign on money mule awareness, but they (public) don't care' (Informant).*

Scammers and fraudsters from all over the world eye Malaysia as a likely place to base their criminal activity due to strong growth in digitalisation and borderless communication. It is evident from Malaysia's strong effort to enhance its internet technology and connectivity across the country (Badarudin et al., 2018). The informant agreed that renewed online technology and globalisation are driving the emergence of sophisticated online scams. Besides scams, the widespread use of e-payment and cashless banking facilitate the money mule activity whereby ill-gotten funds could be transferred a lot easier. The notoriety of digital technology breakthrough has unfortunately left its footprint on the rise of scams and money mule typology.

*'Globalisation (factor), online technology (factor), COVID-19 which limits to online business (factor), cashless payment... they are all factors that influence (worsening money mule problems) ...economic and environment factors too. They (criminals) are happy because there is a silver lining to it (the COVID-19 pandemic)' (Informant).*

E-wallet and cashless economy are not immune to potential abuse by fraudsters and cybercriminals. The danger lies in minimal regulatory control and technology loopholes that can be exploited by prodigious cyber attacker (Aji et al., 2020; Octora et al., 2021). In the absence of regulations dictating the use of e-wallet and other forms of cashless payment, money launderers are able to remit illicit funds by smurfing. The situation resembles the money laundering risk carried by prepaid cards, attributed to its transportability and cross-border features that are not well-regulated (Sienkiewicz, 2007). The minimal Know-Your-Customer (KYC) and Client Due

Diligence (CDD) requirements with no rigorous monitoring are hailed as the major risks posed by prepaid cards for money laundering abuse. Therefore, e-wallet and cashless payments are some of the evidences that can be presented to demonstrate the potential money mule risks by online banking technology.

**Table 1** Some Important Illustrative Responses from Respondents

Current money mule trends	Illustrative responses
Definition of money mule	<i>When you asked me, gazette definition (money mule) is not available. However, the definition that we use is any account found abused by scammers and the actual account holder is not aware (of the said activities)</i>
The objective of money mule investigation	<i>People often asked me, why do we arrest money mules? I said if we don't arrest them, more people will be deceived.</i>
Recruitment of drug addicts as mules	<i>They (money mules) deliberately let their account (to criminals)..when they are unemployed, desperate, such as drug addicts who are not living at address stated on NRIC, they don't care (on the account conduct). It has become a business.</i>
Money mule awareness	<i>If you ask me, (the main factor of growing money mule phenomenon) is lack of awareness. That is the most important (factor).</i>
Other money mule factors	<i>Globalisation (factor), online technology (factor), COVID-19 which limits to online business (factor), cashless payment... they are all factors that influence (worsening money mule problems) ...economic and environment factors too.</i>
Lack of money mule awareness	<i>But, don't blame them (banks and enforcement agency) for not disseminating (scams prevention campaign). Actually, they have done (the campaign), it is just the public never think of taking it seriously.</i>

#### 4.2 Challenges in Money Mule Investigation

The flow of enforcement agency's investigation on money mule case was explained by the informant in the interview. An investigation is launched upon receiving victim's complaint, police report or STR from FIED. The chief target by enforcement agency in money mule investigation is to follow the trail of the fraudulent fund. The money trail analysis involves statement request from the affected money mule bank and secure freezing order under AMLATFPUAA 2001 if law enforcement agency feels the need to stop the fund. The exhibits requested from the bank such as bank statement, account opening form and ATM card application would provide crucial information on account holder, fund beneficiary details and mode of transfer. If it is decided that thorough interrogation would help the investigation, the law enforcement agency will exercise its power to arrest the suspect especially in cases of recalcitrant money mule who refuses to cooperate.

Production order is a powerful tool used to collect evidence from third-party which holds important information in helping legal enforcement investigation. Banks, tax office and money changer are some of the entities that can be compelled by legal enforcement agency for evidence



of financial crimes. It is a legitimate badge that allows police department's application to access physical documents related to the accused such as account statement, cash deposit slip and CCTV record. In Malaysia, production order by CCID is created under Section 48 AMLATFPUAA 2001 or Section 134 Financial Service Act 2013 (permitted disclosure). The bank is required to disclose the necessary document whereby such disclosure is approved in writing and issued by authorised legal enforcement officer. Besides local production order, the scale of investigation may involve international counterparts, given that the threat of cybercrime can reach beyond Malaysian border. In this kind of situation, mutual legal assistance (MLA) is necessary to facilitate criminal investigation and money mule prosecution. As such, web of enforcement should be institutionalised to combat the international network of cybercriminals (Broadhurst, 2006).

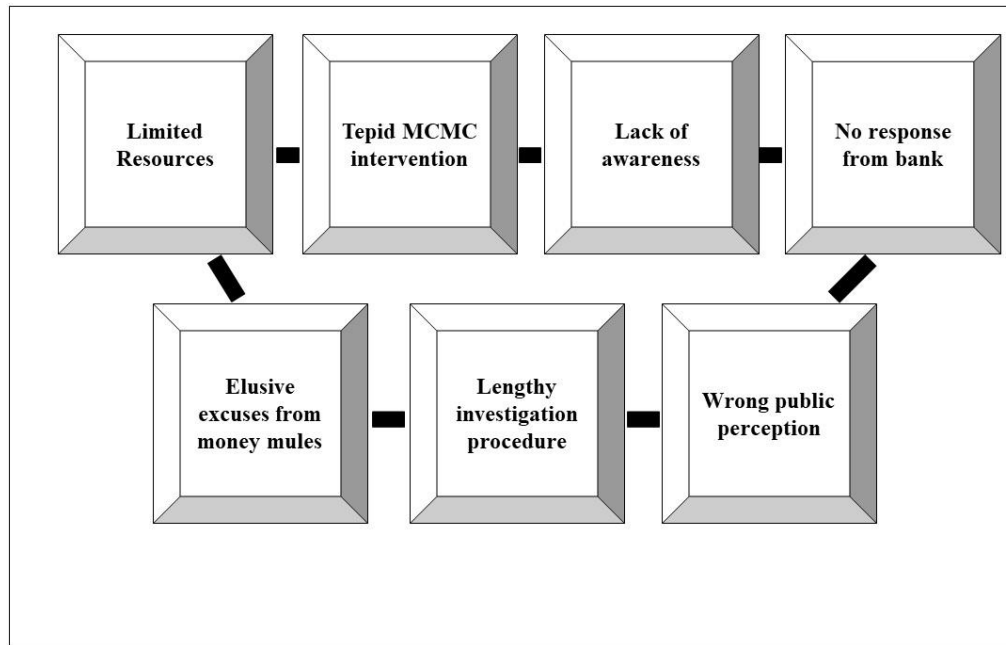
Based on the interview, the informant has outlined 7 major challenges faced by law enforcement agency in money mule investigation. Malaysian Communications and Multimedia Commission (MCMC) as the telecommunication regulator in Malaysia does not exercise full control on telco which has resulted into scammers compromising mobile phone network for fraudulent activities. Ubiquitous disposable prepaid phone card which can be easily obtained from convenient store is being used to make scam calls or bogus threat to vulnerable victims. The enforcement agency is also beleaguered with emaciated resources such as limited fund allocation, technology and expertise. Such as the case of United States, Federal Bureau Investigation hires computer hackers to assist in cybercrime investigation and intercept potential cyberattacks which may result in massive loss. Computer scientists, IT specialists and engineers form the FBI technical talent to become cyber special agents (Federal Bureau Investigation, 2014). The hiring of IT prodigy is something that Malaysia has no wherewithal and very much regretted by the law enforcement agency.

Several countries have begun to notice the urgency of ramping up regulatory enhancement to fight cybercrime. UAE has decided to amend the laws pertaining to cybercrime and increase the power of telecommunication regulator in prosecuting the criminals (Rajan et al., 2017). The newly enacted cyberlaw extends tougher penalty on cases dealing with e-financial crimes such as money mule, hacking, forgery and fraud. This is a significantly positive development since the telecommunication regulator has vast access of multimedia, digital and telco evidence at their disposal. The process of investigation, arrest and prosecution in collaboration with other legal enforcement agency would be tremendously easier and less time consuming. The resources limitation is the most frequently quoted challenge of cybercrime prosecution which could be overcome by centralisation of the investigation process (Grabosky, 2007).

The money mule investigation could be a long process, especially in situation when money mule suspect refuses to co-operate. The law enforcement officer has to find alternative in acquiring the required information and additional process can be woefully bureaucratic. This occurs when bank fails to respond to the law enforcement officer's request for additional document or information. In some extreme scenario, the suspected money mule has the gall to disdainfully condescends the investigation as wasteful, proclaiming to have powerful link to VIPs. The made-up excuse is one of many strategies to seed fear and halt investigation performed on the suspected money mule (Dripps, 2009). Notwithstanding the elusive reasons given by suspected money mule, the law enforcement officer would not dismiss the investigation until affirmative closure is met.

The informant implored lack of public awareness on current money mule threat among society members as another challenge faced by law enforcement agency. Public seems unintrigued to the growing trend of money mule, scam and fraud reported in the media. The upset demonstrated by the informant and his team is seen in the unabated rise of reported money mules. According to the latest research by Lancaster University, nearly half of the money mule respondents reckon it is not unusual to allow others use their account (Stocks, 2022). The ignorance especially among susceptible victims continues to indirectly encourage the rise of money mule cases which

eventually inundate the law enforcement workload. The deterioration of public perceptions of law enforcement agency's function and effectiveness are pushing down the agency's self-confidence, and eventually erodes the determination to combat money mule phenomenon. The bad impression given by public decreases the investigation officer's motivation to control the money mule problem. The challenges highlighted in this study are displayed in Figure 2.



**Figure 2.** Major Challenges Faced by Law Enforcement Agency

### 4.3 Changes and Improvements

The interview has elicited a few changes and improvement areas the law enforcement agency would like to see constituted in the future. These improvement areas and changes are proposed with harbored expectations that they may help in making law enforcement money mule investigation easier with minimal impediment.

Banks and financial institutions are expected to shorten their legal order processing Turnaround Time (TAT). The enforcement agency expects the bank to expedite legal orders especially that the request comes with strict instruction that carries information critical to the investigation. The investigation officers are often abandoned in the penumbra of uncertainty when some banks disregard the urgency. They also would like to see a wider and direct communication access to the bank granted to the enforcement agency, without having to go through the Bank Negara Malaysia. The labyrinthine procedure to send production order disrupts the investigation timeframe. In some remote cases, the response expected from the legal order is delayed by technical snafu surrounding missing beneficiary/originator information from the account statement. This information is crucial in law enforcement agency's money mule investigation to trace the origin of fraudulent fund and subsequent money trail.

The law enforcement agency believes that the bank is not wrestling its fullest action to explain the ethics of personal account conduct and consequences from account abuse. Every account holder ought to be informed, educated and reminded that neither account nor ATM card should be surrendered to a third party. The modus of money mule operation is largely reliant on account infringement by criminals. If the account conduct is clearly explained during account opening and continuously disseminated to bank's clients, money mule phenomenon could be prevented.

Nothing greater than better awareness campaigns to curb, combat and conquer the money mule phenomenon. The relevant stakeholders including financial institutions, Central Bank, enforcement agency, telco and regulators should be actively contributing to money mule awareness campaign. EMMA and CIFAS are two excellent examples of money mule collaboration across all stakeholders in fighting money mule problem in their respective jurisdictions. The campaign should be placed in both printed media and electronic advertisement. Local advertisement spaces found in public transports, malls, highways, parks and other venues should be used to broadcast money mule awareness campaigns. Vigorous campaign across the country will eventually eradicate the money mule population and directly contain scams, fraud or money mule-related criminal activities. Celebrities, social media influencers, prominent public figures should use their influential avenues such as social media to promote money mule awareness campaign. The collective effort to campaign the danger and threat of money mule phenomenon will somehow help to keep a tight rein on this issue.

## **5. CONCLUSIONS**

The bellicose threat of money mule is very imminent and shows no indication of slowing down in Malaysia. The arrests made on money mule in Malaysia have continued to show an increasing trend, although the suspects fully understand that they should not reveal their account information to anyone (Veno, 2022). Potential money mule recruitment has seeped into every fabric of society that is vulnerable to economic torpidity, turning this disadvantage into an ominous opportunity to expand the money mule syndicate. The information provided by the enforcement agency highlights a range of targets for money mule recruitment and factors that lead to money mule problem. Technology, poverty and paucity of awareness campaigns have crudely dismembered the stability of society, driving the rise of money mule phenomenon.

The challenges faced by enforcement agency especially police department are becoming more difficult after the emergence of COVID-19 pandemic. The global economic meltdown from the pandemic has contributed to the rise of different sorts of financial crimes and regulatory challenges (Jamil et al., 2021; Ma & McKinnon, 2022; Wronka, 2022). As such, response towards money mule phenomenon must be based on scientific and organised method in attempting to eliminate the crime (Laycock, 2004). Awareness on the magnitude of money mule threat and newest scam strategy should be constantly highlighted by using all streams of social media, news outlet and campaign. The negative perception given by public does not help to boost the morale of enforcement agency especially in resolving money mule investigation. The disappointment is exacerbated by lack of serious understanding among public in the menace of deception (scam, fraud, unverified get rich investment scheme) and responsibility of keeping their account from money mule syndicate.

This article brings a new discovery of challenges faced by enforcement agency particularly CCID and past entreaties they have made to address the money mule problem. The essence of the money mule quagmire stems from absence of collaboration from other stakeholders such as banks, MCMC and financial regulators. In order to keep the money mule problem at bay, all parties must ensure their roles are fulfilled and offer to work together in fighting the threat. Without synchronised understanding of respective function and acknowledgement of the money mule threat, money mule problem will continue to draw very little attention. Therefore, this article is set to become a reference in overcoming the challenges face by enforcement agencies such as Commercial Crime Investigation Department of Royal Malaysia Police in performing money mule investigation.

The study is limited to the interview with only one lead of the Commercial Crime Investigation Department (CCID). Future research should include a larger sample of CCID officers from other districts and regions to gather a more holistic view on money mule investigation challenges. Similar study should be expanded to banking first line of defence members, such as contact centre

staffs and branch customer service officers. Insights from different sectors would contribute to the improvement of money mule risk mitigation and action plan.

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