

FALLING THROUGH THE CRACKS

CAMBODIA'S "CRACKDOWN"
ON SCAMMING COMPOUNDS
AND THE VICTIMS IT HAS FAILED

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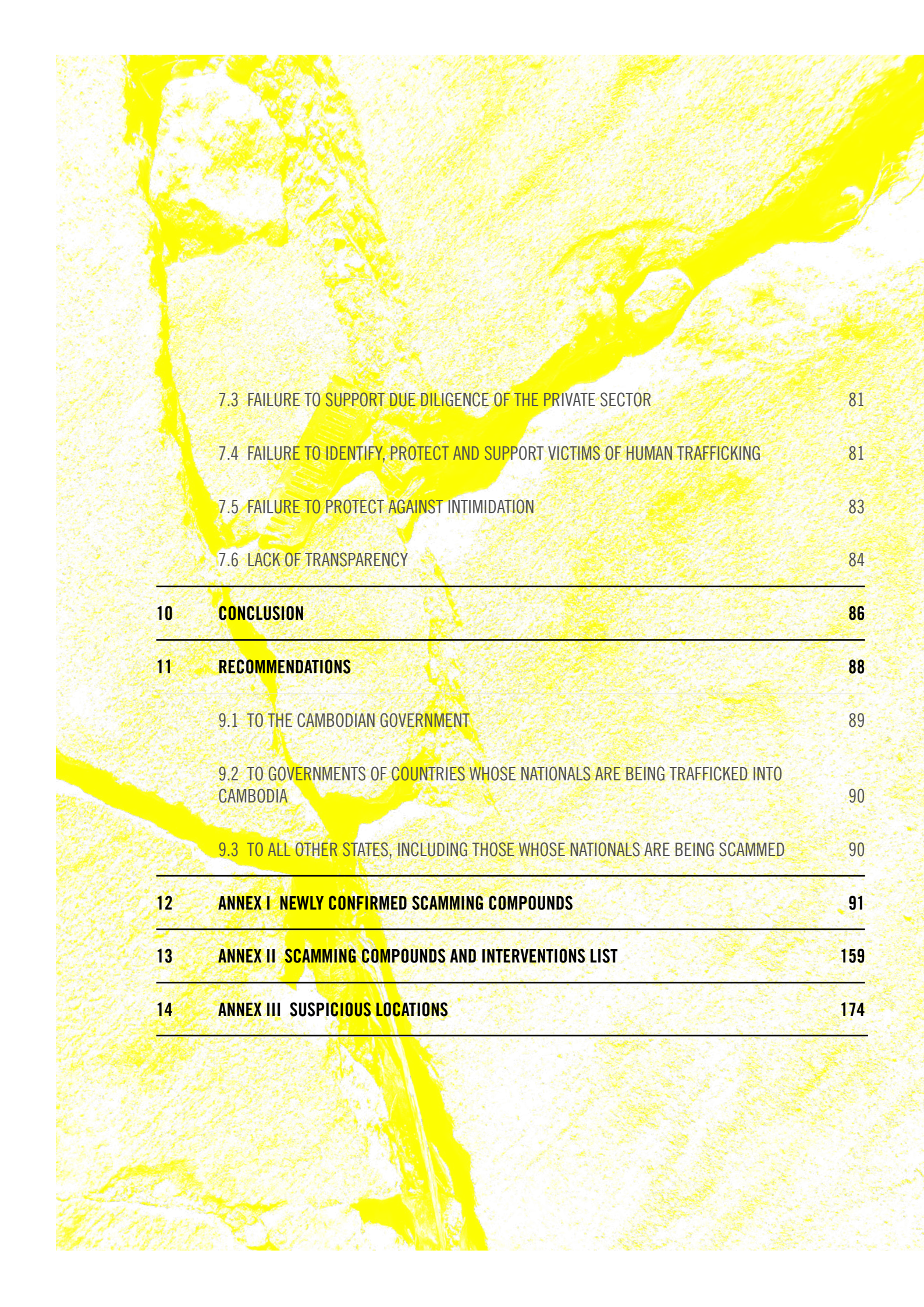


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GLOSSARY

WORD	DESCRIPTION
organizations	<p>This term refers to groups in Cambodia, Viet Nam, Thailand, Malaysia or other locations in the region, that advocate for assistance and rescue of victims/survivors from the scam industry. While these organizations are not affiliated to any government, they may include member(s) of a state agency acting in their personal capacity. The term is purposefully vague to protect the identities of such groups.</p>
scam	<p>An online scam is a deceptive or fraudulent scheme conducted over the internet, aiming to trick individuals into revealing personal or financial information and/or to steal money or property.</p>
scamming compounds	<p>Scamming compounds are locations where Amnesty International has determined that online scamming or online gambling operations are likely being run, and where trafficked persons or migrant workers involved directly or indirectly in such operations are subjected to deprivation of liberty and/or other human rights abuses carried out primarily by organized criminal actors.</p> <p>Scamming compounds can range from a small building to a set of buildings in a clearly delineated compound. These locations may also house other businesses such as casinos, hotels or restaurants.</p>

WORD	DESCRIPTION
state intervention	<p>Amnesty International defines a state intervention as occurring when there is credible evidence that police or other state authorities enter a scamming compound to make a “rescue”, to arrest someone or to officially investigate the location. A determination that an intervention occurred at a site does not necessarily mean that any victim was rescued, or that anyone was arrested, or that investigations were properly conducted. In contrast, a determination that there is no credible evidence of an intervention does not mean the state did not intervene, only that Amnesty International was not able to find evidence of the intervention.</p>
suspicious locations	<p>Locations in which Amnesty International identified a range of security features similar to those observed at the scamming compounds.</p>
victims and survivors	<p>The words “victim” and “survivor” refer to any individual who suffered any of the human rights abuses identified in this report. The terms are used interchangeably.</p>



01

EXECUTIVE

SUMMARY

“

**THEY HANDCUFFED ME TO
A CHAIR AND MADE ME STAND
FOR TWO DAYS. THEN THEY BEAT
US AND PUT US IN THE CAR.**

Winta, a young woman, was trafficked into a Cambodian scamming compound.¹

In 2018, *Winta* (not her real name), a 16-year-old child from East-Africa, was searching for a job after her mother died. A man offered her and her sister jobs on a cruise ship. They were taken by boat to Sri Lanka, where they were told they would be sold. They were then trafficked to Myanmar and Laos, where “Chinese gangsters” forced them to scam inside compounds. After seven years, she ended up in Cambodia, at a scamming compound previously identified by Amnesty International as CT01.²

The CT01 scamming compound where *Winta* was held had previously been investigated by the Cambodian government in August 2022, following a mass escape in which a young man died.

In early 2026, managers of the CT01 compound told *Winta* and other victims they had to get in a car and go because “police were on their way”. By then, the Cambodian government was six months into a nationwide crackdown on the scamming industry. It had known about CT01 for at least four years and had failed to shut it down.

Winta described being driven all day, finally arriving at a location she said looked like a “military base”. Amnesty International geolocated photographs sent by another survivor, *Gabe* (not his real name), which *Winta* identified as the site described in this report as BM02. *Gabe* said a car with military license plates had led them from CT01 in Chrey Thum to BM02 near Poipet – across the entire country – and *Winta* said that military-plated vehicles came and went from BM02.

In early 2026, *Gabe* contacted Amnesty International while both he and *Winta* were inside BM02. “She has disappeared” he said. Then he sent photographs of her handcuffed to a chair: “She is being tortured now.”³

After ten days in a dark room, where she was beaten and handcuffed, *Winta* was released, along with other victims. They were driven in a car late at night to the outskirts of Poipet and abandoned; managers told them “the police will come and get you soon”. The police arrived soon after, but they were not there to help. “They had an electric shock

1 Amnesty International interview with *Winta* (not her real name), 2026.

2 Amnesty International, “*I was someone else’s property*”: Slavery, human trafficking and torture in Cambodia’s scamming compounds, (Index: ASA 23/9447/2025), 26 June 2025, <https://www.amnesty.org/en/documents/asa23/7364/2024/en/> (hereafter “*Someone else’s property*”).

3 Amnesty International interview with *Gabe* (not his real name), 2026.

baton ... they took photographs of each of us, and they told us to leave the area or they would take us back to the compound.”⁴ *Winta* shared her location in real time with Amnesty International researchers during the ordeal.

Left with nothing, *Winta* relied on local Cambodians who lent her a phone and called her a tuk-tuk so she could leave the area. *Winta*, who had no passport, tried calling consular services in several countries. No one answered. Without money, documents or any support from Cambodian authorities, *Winta* had nowhere to go.

Around 12 March 2026, Cambodian authorities investigated the BM02 area. Yet *Winta* has still not been recognized by authorities as a victim of trafficking, and has not been able to access any state support, leaving her vulnerable to further exploitation.

Winta is one of the many survivors of Cambodia’s scamming compounds to have fallen through the cracks.

1.1 THE GOVERNMENT’S 2025-2026 “CRACKDOWN” AND THE PEOPLE IT FAILED

In July 2025, the Cambodian government launched the largest nationwide crackdown on scamming operations to date. It issued a 9-point order “for the campaign to crackdown on online scams”, with Prime Minister Hun Manet acknowledging the growing threat posed by the industry and instructing provincial officials, law enforcement agencies, the courts, and the national gambling commission, to take action. Since then, the government has claimed to have shuttered more than 250 “scam centres”, opened criminal cases against 1,089 suspects and deported 13,039 foreign nationals involved in online scams.

Despite these claims, **Amnesty International’s latest research casts serious doubt on the effectiveness of the latest crackdown and raises concerns about the harm it may have caused to survivors.** This report covers the time period from the beginning of the crackdown in July 2025 up until the end of April 2026. The government has extended the crackdown beyond this time period, and continues to take action, but actions beyond April 2026 were not part of this research.

This report builds on the findings and analysis of Amnesty International’s June 2025 report, **“I was someone else’s property”: Slavery, Human Trafficking and Torture in Cambodia’s Scamming Compounds.**⁵ It:

1. Updates the evidence, identifying details of additional scamming compounds and suspicious locations;
2. Further documents continuing human rights abuses and violations that have come to light since the June 2025 report; and
3. Provides an assessment of the first 10 months of the Cambodian government’s latest crackdown on scamming compounds, from its start date in July 2025 through to April 2026.

4 Amnesty International interview with *Winta*, 2026.

5 Amnesty International, “*Someone else’s property*” (previously cited).

KEY FINDINGS:

- Since its June 2025 report which identified 53 scamming compounds, **Amnesty International has identified 33 additional scamming compounds. The total number of confirmed scamming compounds was 86, as at the end of April 2026.**
- Interviews with 73 people who were **deprived of their liberty** and held across 20 scamming compounds documented **a consistent pattern of human trafficking, forced labour, torture or other ill-treatment and deprivation of liberty amounting in many cases to enslavement.** This latest report also documents sexual violence, with six women describing **rape by or at the direction of compound managers and team leaders.**
- Despite government claims of over 250 interventions, Amnesty International found **evidence of state interventions at only 24 of 86 identified compounds,** and many of those were **often reactive, ineffective or undermined by apparent collusion between compound managers and police,** with survivors reporting being moved across the country mid-crackdown to evade authorities. Amnesty International also documented mass escapes or releases at a further seven of 86 compounds, with no police presence reported at the time.
- Rather than identifying and supporting trafficking victims, **Cambodian authorities have consistently treated people fleeing or being released from scamming compounds as irregular migrants** – detaining them in substandard immigration detention facilities without access to lawyers or embassies, charging visa overstay fees that some victims had to borrow money to pay – in direct violation of both international obligations and the government's own 2015 victim identification guidelines. In at least six cases, **police threatened victims with arrest or arrested them and did not provide them with access to legal counsel.**
- **Cambodia's crackdown has failed in key areas,** both in investigating and shuttering some of the most well-known compounds across the country and in protecting and assisting the victims who escaped or were removed from compounds. **Not one of the 73 survivors interviewed by Amnesty International was recognized by the government as victims of human trafficking, despite them all meeting the internationally agreed legal definition of the term.**

1.2 UPDATING THE EVIDENCE

1.2.1 IDENTIFYING ADDITIONAL SCAMMING COMPOUNDS

In preparing this latest report, between June and December 2025, Amnesty International researchers visited 75 of the now 86 confirmed scamming compounds.

A full profile for each of the 33 newly confirmed scamming compounds has been compiled and included in Annex I of this report, providing a location and approximate boundary, a timeline of events, a list of security features, an assessment of the human rights abuses that occurred at the compound, and an assessment of the state's obligations and its fulfilment of these obligations.

1.2.2 DOCUMENTING CONTINUING HUMAN RIGHTS ABUSES

Between July 2025 and April 2026, Amnesty International interviewed **73 survivors, who all met the legal threshold required to be classified as victims of human trafficking for forced labour** or other exploitation: recruited through fraudulent job offers only to be forced into compounds and threatened with violence if they refused to scam. Yet **none of them have been recognized by authorities as victims of human trafficking.**

The survivors were **nationals of Bangladesh, Brazil, China, Colombia, Ecuador, Eritrea, Ethiopia, Ghana, Indonesia, Kenya, Liberia, Madagascar, Morocco, Niger, Uganda and Venezuela.**

All described being subjected to human rights abuses by compound managers or bosses, security guards and others involved in human trafficking. **Every person interviewed reported witnessing or being subjected to torture or other ill-treatment,** typically inflicted by compound bosses or security guards when victims tried to escape. Several showed

Amnesty International researchers scars they attributed to beatings or electric shocks. One woman showed bruises on her legs that she said were caused by a baseball bat wielded by her manager. Armed guards, frequently carrying shock batons or guns, prevented victims from leaving the compounds and used violence to maintain control. The level of coercion amounted, in many cases, to enslavement, consistent with Amnesty International's June 2025 findings that the **scam industry remains driven by slavery and violence.**

Six women described being **subjected to rape** and other ill-treatment by or at the direction of managers and team leaders who were armed or controlled security guards. Amnesty International considers the circumstances so coercive that all such acts constitute rape. Five of the women interviewed by Amnesty International said they were raped by managers or team leaders. A sixth woman said she was raped by other people within the industry at the direction of a manager. This woman, *Cecilia* (not her real name), a survivor from Brazil, said the compound manager invited a group of "successful" scammers to rape her.

“

IT WAS LIKE A PRIZE

FOR DOING GOOD

WORK. HE SAID I WAS

LIKE 'A PRESENT' [...]

THEY RAPED ME.

Cecilia explained how a compound manager invited scammers to rape her.⁶

⁶ Amnesty International interview with *Cecilia*, 2026.

1.3 ASSESSING GOVERNMENT EFFORTS

1.3.1 THE FAILURES AND LIMITATIONS OF STATE INTERVENTIONS IN SCAMMING COMPOUNDS

Despite public claims of sweeping enforcement, **Amnesty International found evidence of state interventions at only 24 of the 86 identified scamming compounds – only 25% – during the crackdown period.** Amnesty International documented mass releases or escapes at a further seven compounds, with no police presence reported at the time.

This stands in stark contrast to the government's claims that they have intervened at more than 250 scam centres. While it is likely that authorities have acted at more compounds than Amnesty International was able to verify, the government's persistent lack of transparency, combined with documented failures during publicized interventions, significantly undermines its own claims of success.

Where state interventions did occur, Amnesty International identified **three recurring patterns of failures:**

1. **Cambodian authorities largely responded to abuses at scam compounds when compelled by international pressure, viral incidents or public crises**, rather than through proactive monitoring. This is illustrated by the Bokor mountain case in Kampot province, where police were long aware of scamming operations occurring in the area but only acted after a South Korean man's highly publicized death, even then failing to fully shut the sites down. This reactive approach allowed some compounds to persist or simply relocate after interventions, consistently favouring perpetrators over victims.
2. Even where authorities did intervene, Amnesty International obtained evidence to show

that **in at least three of the 24 compounds, continuing human rights abuses were reported even after the interventions.** During the crackdown, authorities investigated the compounds identified in this report as SIO1, KAO3 and MD02, but failed to fully end the abuses taking place there. Amnesty International obtained testimony and rescue records showing these sites were still in operation and depriving people of their liberty after these publicized state interventions. This continued the trend documented in Amnesty International's June 2025 report, which showed that **state authorities were aware of human rights abuses occurring at more than a third of all scamming compounds across the country, but failed to shutter those locations.**

3. Third, probable **collusion between compound managers and local authorities appeared to have significantly undermined the effectiveness of police interventions.** Survivors described how managers coordinated moves to evade crackdowns, such as by transferring victims at night to other compounds, likely with prewarning from police. This occurred in at least four separate instances.



THEY TOLD US TO NOT HANG OUR CLOTHES OUTSIDE WHEN POLICE WOULD BE COMING.

A Kenyan survivor, *Wambui*, describing how managers acted at BA087

7 Amnesty International interview with *Wambui* (not her real name), 2026.

“

**THEY SAID THE POLICE
ARE COMING AND
PUT US ON A BUS
AND DROVE US INTO
THE MOUNTAINS.**

Two survivors who were forcibly moved to avoid police during the 2025 crackdown.⁸

8 Amnesty International interview with *Andres* and *Valentina* (not their real names), 2025.

1.3.2 FAILURE TO IDENTIFY, PROTECT AND SUPPORT VICTIMS OF HUMAN TRAFFICKING

The crackdown coincided with mass exoduses from casino and compound areas. Amnesty International's research suggests thousands, and possibly many more, were released or fled scamming compounds between December 2025 and April 2026, with mass releases or escapes documented at 16 compounds. While the extent to which these were a direct result of enforcement actions remains unclear, the crackdown probably played a role.

Under its international obligations, Cambodia must identify victims of human trafficking, protect and assist them and ensure that anti-trafficking measures do not adversely affect human rights.⁹ Yet evidence gathered by Amnesty International – including victim interviews, testimony from organizations and social media footage – indicates that many human trafficking victims fleeing scamming compounds were neither properly identified (if at all), nor provided protection or assistance by the state.

None of the 73 survivors interviewed by Amnesty International were identified as victims of human trafficking by police or anyone who they believed was a government representative.

The Cambodian **government's failure to identify victims of human trafficking left them without support and vulnerable to further exploitation**, including trafficking by organized criminal groups. This is counter to Cambodia's own National Committee for Countering Trafficking in Persons guidelines issued in 2015,¹⁰ requiring authorities to presume victim status for potential trafficking victims and provide timely, humane and non-discriminatory protection pending further investigation. Rather than applying this presumption,

authorities appear to have prioritized visa-overstay fees over victim identification, with some forced to take loans to pay their way out of Cambodia.

Further, none of the 75 survivors interviewed were provided direct support from the state, instead having to rely on local Cambodians or non-governmental organizations (NGOs), who provided food, money and in some instances, shelter, until the victims were able to leave Cambodia. **In five cases, the police threatened survivors with arrest or with being returned to a scamming compound.**

Public reporting indicates that, as of April 2026, there was only one shelter in Cambodia which accepted victims of scamming compounds, with capacity for just 100 individuals.¹¹ The state had not established additional shelters for victims of scamming compounds, despite the obvious and urgent need.

Ultimately, **the Cambodian government has failed victims who escaped or were removed from scamming compounds**, subjecting them to immigration detention rather than treating them as victims, despite five years of public reporting strongly indicating that **individuals in the scamming industry are highly likely to have been trafficked or otherwise exploited**. Of the 133 people interviewed by Amnesty International over the last three years in the course of investigating Cambodian scamming compounds, all but two of them met the threshold to be considered victims of human trafficking.

Further, the state is required to protect victims from punishment for criminal activities they were compelled to commit, and requires protections for individuals who allege to be victims of torture, especially against "intimidation as a consequence" of the giving of evidence on torture. But, as of April

9 UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children, Supplementing the United Nations Convention against Transnational Organized Crime (UN Do. A/55/383), 15 November 2000, <https://www.ohchr.org/en/instruments-mechanisms/instruments/protocol-prevent-suppress-and-punish-trafficking-persons> (the Palermo Protocol), Article 9(4),(5); UN Office of the High Commissioner for Human Rights (OHCHR), Recommended Principles and Guidelines on Human Rights and Human Trafficking (UN Doc. E/2002/68/Add. 1), 2010, <https://www.ohchr.org/Documents/Publications/Traffickingeng.pdf>

10 The National Committee for Counter Trafficking in Persons (NCCT), Guidelines on Forms and Procedures for Identification of Victims NCCT of Human Trafficking for Appropriate Service Provision, 2015, https://wiki.ncct.gov.kh/media/document:victim_id:d1_identification_guideline_eng.pdf (NCCT Guidelines).

11 The Asahi Shimbun, "In Cambodia, thousands flood out of 'scam compounds' and find increasingly little help", 12 February 2026, <https://www.asahi.com/ajw/articles/16347993>

2026, **survivors of trafficking and torture are being subjected to punishment for overstaying their visas or for their illegal entry into Cambodia**, through their detention in immigration centres, and the authorities' apparent refusal to acknowledge their status as victims.

1.3.3 DEFICIENCIES IN THE STATE RESPONSE TO THE SCAMMING INDUSTRY

The scamming industry is run by a network of transnational, criminal groups. However, without the consent or acquiescence of the Cambodian state, these non-state actors would be unable to perpetuate the abuses that this report documents. Cambodia has a responsibility to investigate scamming compounds to prevent slavery, forced labour, human trafficking and other abuses that occur inside scamming compounds, and to prevent further abuses happening in the future.

This report shows the Cambodian government is failing to fulfil these obligations. It is also **failing to ensure human trafficking does not continue to flourish in new establishments**, even as the existing compounds are shut down. Amnesty International's research from April 2026 found that Cambodia's Commercial Gambling Management Commission (CGMC) had approved plans for at least 16 new casinos directly linked to known scamming compounds. These approvals were granted in December 2025 and January 2026, in the midst of the very crackdown meant to root out such operations.

The state should also be transparent about its interventions during the crackdown, with exceptions only for grounds of operational necessity that are narrowly construed and strictly necessary for the purposes of an effective investigation. The

government has provided insufficient detail to substantiate its claims of shuttering hundreds of scam centres, carrying out many arrests and deporting thousands of individuals, rendering these statements difficult to independently corroborate. In particular, very few locations or operational details of the alleged shuttered compounds have been disclosed.

Further, since the crackdown of 2022 and throughout the most recent efforts, **the government has actively suppressed transparency, arrested at least six journalists and rescue workers¹² and shut down the Voice of Democracy (VoD) media outlet,¹³ which reported regularly on the compounds. Four journalists were arrested or continued to face charges during the latest crackdown period.¹⁴**

1.4 CONCLUSIONS

Cambodia's crackdown on scamming compounds has delivered isolated gains, but they are overshadowed by **systemic failures: compounds were left operating; victims were detained, ignored or threatened rather than protected; and police at times actively undermined interventions**. While it is likely thousands of people have been freed from slavery and other human rights abuses inside of scamming compounds, many **survivors were left without support after suffering rape, torture and enslavement**.

These shortcomings reflect a fundamental failure to abide by Cambodia's international legal obligations.

To meaningfully address slavery and torture in the scam industry, the government must now investigate all compounds, properly identify and support trafficking victims and hold accountable those officials whose conduct has undermined this crackdown.

- 12 Amnesty International, "Cambodia: Charges against journalist highlight clampdown on press freedom", 2 October 2024, <https://www.amnesty.org/en/latest/news/2024/10/cambodia-charges-against-journalist-highlight-clampdown-on-press-freedom/>; Cambodian League for the Promotion and Defense of Human Rights (LICADHO), "Journalists Detained Over Video of Alleged Cyberscam Torture", 28 January 2025, <https://www.licadho-cambodia.org/flashnews.php?perm=434>
- 13 Amnesty International, "Cambodia: Shuttering 'Voice of Democracy' outlet is attempt to slam door on independent media", 13 February 2023, <https://www.amnesty.org/en/latest/news/2023/02/cambodia-shuts-down-voice-democracy-media/>
- 14 KiriPost, "Detained Journalist Released After Deleting Photos of Suspected Scam Centre Raid in Dara Sakor", 12 February 2026, <https://kiripost.com/stories/detained-journalist-released-after-deleting-photos-of-suspected-scam-centre-raid-in-dara-sakor/>; LICADHO, "Immediately release and drop charges against journalist Hem Vanna", 10 February 2026, <https://www.licadho-cambodia.org/pressrelease.php?perm=555>; KiriPost, "Two Detained Journalists Released After Reporting on Scam Compound in Takeo | Kiripost", 13 February 2026, <https://kiripost.com/stories/two-detained-journalists-released-after-reporting-on-scam-compound-in-takeo>

1.5 KEY RECOMMENDATIONS

1.5.1 TO THE CAMBODIAN GOVERNMENT

- Prioritise the protection of victims of human trafficking by ensuring shelters can operate, providing funding to shelters and assisting victims to stay in hotels or other safe locations until immigration processes can occur. The state should also consider opening shelters, not immigration detention facilities, for this specific purpose.
- Uphold the non-punishment principle by refraining from arresting, detaining or prosecuting identified or presumed victims of human trafficking for immigration or alleged criminal offences that may have been carried out as a direct consequence of their human trafficking.
- Urgently conduct a thorough and effective investigation into each of the scamming compounds identified by Amnesty International.¹⁵
- Review the implementation of the crackdown against the documented failures identified in this report and implement the process to review officials outlined in the 9-Point Order.
- Immediately suspend the gambling licenses of the casinos identified in this report and conduct a full, independent and transparent investigation into the violations documented at these sites. Investigate all those suspected of individual responsibility for crimes under international law or other gross human rights violations, including the owners, financiers and operators of these casinos.

1.5.2 TO GOVERNMENTS OF COUNTRIES WHOSE NATIONALS ARE BEING TRAFFICKED INTO CAMBODIA

- Urge the United Nations to launch a crisis response, and provide resources that facilitate the identification of victims of trafficking, rescue operations and provision of shelter, physical and psychological support and legal assistance for victims of human trafficking.
- Screen repatriated persons to identify victims of human trafficking and provide assistance to returned victims of human trafficking. Do not prosecute victims of human trafficking for crimes alleged to have been committed as a result of them being trafficked.

1.5.3 TO ALL OTHER STATES, INCLUDING THOSE WHOSE NATIONALS ARE BEING SCAMMED

- Continue to use powers at their disposal, in line with international human rights law and standards, to compel the Cambodian government into further action.
- Prioritize funding rescue shelters and civil society organizations that are working on this issue and supporting the victims.

¹⁵ The details of each of the identified compounds are set out in Annex I of this report and Annex I of Amnesty International's July 2025 report, "*Someone else's property*".



02

INTRODUCTION

2.1 OVERVIEW

This report builds on the findings and analysis of Amnesty International's June 2025 report, *"I was someone else's property": Slavery, Human Trafficking and Torture in Cambodia's Scamming Compounds*.¹⁶ It:

- Updates the evidence, identifying additional scamming compounds and suspicious locations;
- Further documents human rights abuses and violations that have come to light since the original publication;
- Provides an assessment of the Cambodian government's crackdown on scamming compounds, launched in July 2025 and lasting until the end of April 2026.

This report presents the latest evidence on the state of the scamming industry in Cambodia from a human rights perspective and assess the effectiveness of state actions on both the industry and its victims. It explores transparency, accountability, due process, victim protection and state responsibility, assessing whether the measures taken by the Cambodian government constitute genuine attempts at countering the scamming industry or merely replicate past patterns of selective enforcement and human rights violations.

This report covers the time period from the beginning of the crackdown in July 2025 up until the end of April 2026. The government has extended the crackdown beyond this time period, and continues to take action, but actions beyond April 2026 were not part of this research.

2.2 METHODOLOGY

2.2.1 INTERVIEWS AND DATA COLLECTION

Between July 2025 and April 2026, Amnesty International interviewed 73 survivors from scamming compounds in Cambodia, who reported

being held in 20 different compounds during the crackdown period. The survivors interviewed by Amnesty International were nationals of Brazil, China, Colombia, Bangladesh, Ecuador, Eritrea, Ethiopia, Ghana, Indonesia, Kenya, Liberia, Madagascar, Morocco, Niger, Uganda and Venezuela. Of the 73 survivors interviewed, 31 were women and 42 were men.

Interviews focused on establishing what abuses survivors had endured and where the abuses had occurred. Amnesty International used photographs of compounds and asked victims to describe features of the compounds or the surrounding area to confirm where they had been. In addition, interviewers sought to understand how the crackdown had been affecting scamming compounds and survivors.

In this report, all survivors have been given pseudonyms to protect their identities.

Amnesty International also spoke with five organizations that advocate for assistance and rescue of victims/survivors from the scam industry, to understand what they knew about the crackdown and confirm the credibility of requests for help from potential victims of scamming compounds. Amnesty International reviewed records provided by organizations which included information about "rescues", requests for help and locations of scamming compounds where victims were deprived of their liberty. Due to the risk to the organizations, the groups are not identified in this report, but rather referred to collectively as "organizations" or separately as "organization [#]".

Finally, Amnesty International reviewed information from organizations who provided evidence, including photographs, details and phone numbers, showing that hundreds of people, many likely to be victims of human trafficking, were unable to access rescue shelters or obtain support from the Cambodian government and were homeless after escaping or being released from scamming compounds. In some cases, Amnesty International later interviewed these people and confirmed that they had been subjected to human trafficking and other serious human rights abuses.

¹⁶ Amnesty International, *"Someone else's property"* (previously cited).



A “No Human Trafficking” sign inside the BA05 scamming compound, photographed in November 2025. In August 2025, an organization reported a child had sought a rescue from this location.¹⁷ © Amnesty International, 2025

2.2.2 SITE VISITS

Between June and December 2025, Amnesty International researchers visited 46 of the 53 scamming compounds profiled in its June 2025 report, *“Someone else’s property”*. In addition, researchers visited 29 of the 33 newly identified scamming compounds featured in **Annex I** of this report. Researchers also visited 30 of the 36 identified suspicious locations featured in **Annex III** of this report.

Amnesty International used testimony from victims, witnesses and rescue groups to identify scamming compounds on a case-by-case basis. As of the date of publication, Amnesty International confirmed there were or had been at least 86 scamming compounds in Cambodia between 2022 and 2026. This count establishes the minimum number of identified scamming compounds.

During the site visits, researchers approached compounds from a variety of directions, attempting, where possible, to circle each compound and identify physical security features (such as walls and cameras) and organizational security features (such as security guards and their positioning throughout the compound). Researchers took photographs of the locations and spoke with people present near the sites, including, in a few instances, security personnel guarding the compounds.

In addition, Amnesty International used satellite imagery to confirm the locations, dates of construction, and general layout of compounds, along with any changes to the areas visible from above. Where possible, the security features of the scamming compounds and suspicious locations were observed and compared to other similar buildings.

¹⁷ On file with Amnesty International.

2.2.3 ASSESSING THE STATUS OF A COMPOUND

This report assesses the status of scamming compounds that were previously featured in Amnesty International's June 2025 report, *"Someone else's property"*, as well as newly identified compounds set out in **Annex I** to this report. These assessments sought to determine whether state interventions were carried out during the crackdown period from July 2025 to April 2026 and whether these interventions resulted in the shuttering of the compound in question.

To determine whether the state intervened at a scamming compound, Amnesty International reviewed official Cambodian government sources, primarily reported through mainstream news platforms, victim testimony, and information posted on social media platforms.

Amnesty International geolocated images and videos, where possible confirming the information and using it to inform its assessment of police interventions at sites. For example, some videos provided by victims, distributed via news reports or shared on social media platforms, showed police cars at scamming compounds or police walking through compound buildings – indicating the likelihood of an intervention at the site. Others showed people running away from the site – possibly indicating attempted escapes from the compound or that police had arrived on site and people were fleeing as a result. Some videos and photos contained information that allowed researchers to track movements of people between different scamming compounds. In most instances of intervention, videos were taken by local people or people within scamming compounds and typically showed dozens, and sometimes hundreds, of police or other authorities at a location.

It is likely that police visited some locations not included in this report and that these operations were not made public.

In addition, Amnesty International wrote to the Cambodian government on 30 April 2026 to

share the findings of this research, including the precise locations of the scamming compounds and suspicious locations. At the time of publication, the government had not responded.

Amnesty International also contacted all named companies and casinos in this report, none of which responded.

2.3 ACKNOWLEDGEMENTS

Amnesty International could not have undertaken this research without the support of partner organizations and individuals, especially Cyber Scam Monitor.¹⁸ Investigative journalists, groups assisting survivors, and others monitoring the industry face threats in carrying out this work. Without their efforts, this assessment would not have been possible, and many survivors would not have received any support after escaping or being released from scamming compounds.

18 <https://cyberscammonitor.net/>



03

BACKGROUND



A guard tower overlooks TD01C, a compound in a special economic zone (SEZ). The SEZ houses several compounds and has been the site of several high-profile rescues, yet remained operational afterwards. © Amnesty International, 2025

3.1 EXPOSING THE SCAMMING INDUSTRY IN CAMBODIA

Scamming compounds have flourished across Cambodia since the mid- to late-2010s. Cambodia has been identified by national and international media, civil society groups, UN agencies and regional organizations as a central node in a network of transnational scamming operations that extended into Myanmar, Laos and beyond.¹⁹ These operations are rife with serious human rights abuses, largely against foreign nationals, many of

whom were fraudulently recruited and then forced to carry out scams.²⁰

Prior to July 2025, the Cambodian authorities had responded to increasing international scrutiny with sporadic raids and arrests, often timed to coincide with media attention or diplomatic pressure. These actions rarely resulted in the systematic dismantling of scamming networks.²¹ Victims were frequently treated as irregular migrants or criminal suspects rather than trafficked persons, and many were detained or deported.²²

19 See for example: OHCHR Regional Office for South-East Asia, *Online Scam Operations and Human Trafficking in South-East Asia*, 25 August 2023, <https://bangkok.ohchr.org/sites/default/files/documents/2025-01/online-scam-operations-2582023.pdf> (accessed 27 April 2026); UN Office on Drugs and Crime (UNODC), *Inflection Point: Global Implications of Scam Centres, Underground Banking and Illicit Online Marketplaces in Southeast Asia*, Technical Policy Brief, April 2025, https://www.unodc.org/roseap/uploads/documents/Publications/2025/Inflection_Point_2025.pdf (accessed 27 April 2026); OHCHR, "A wicked problem": *Seeking human rights-based solutions to trafficking into cyber-scam operations in South-East Asia*, 20 February 2026, <https://www.ohchr.org/en/documents/thematic-reports/wicked-problem-seeking-human-rights-based-solutions-trafficking-cyber> (accessed 27 April 2026).

20 Amnesty International, "Someone else's property" (previously cited), Chapter 6: Human Rights Abuses at Scamming Compounds.

21 Amnesty International, "Someone else's property" (previously cited), see Annex I profiles for PPO9, TK01 and Chapter 3: Background.

22 Amnesty International, "Someone else's property" (previously cited), Chapter 7: State Responsibility.

In June 2025, Amnesty International published a comprehensive report, ***"I was someone else's property": Slavery, Human Trafficking and Torture in Cambodia's Scamming Compounds***, showing how abuses were not isolated but formed part of an organized transnational system of exploitation. The report documented the scale and human rights impact of scamming compounds, and established that, by mid-2025, Cambodia had become a hub for large-scale online fraud operations reliant on slavery, human trafficking, forced labour and torture.

The report relied on the testimony of over 50 survivors and referred to rescue records of 365 victims collected by organisations, showing the massive scale of operations and the significant failures of police to shut down the industry. The report identified and profiled 53 scamming compounds across the country – many housing thousands of people. It established that while the main perpetrators of the abuses were organized criminal groups, the Cambodian state grossly failed in its duty to take adequate steps to stop the widespread human rights abuses, despite being made aware of such abuses – in many cases, repeatedly. The state's failure demonstrated acquiescence and pointed to complicity in these human rights abuses.

3.2 THE 2025–2026 CRACKDOWN ON ONLINE SCAMMING COMPOUNDS

In July 2025, the Cambodian government launched the largest nationwide crackdown on scamming operations to date, with Prime Minister Hun Manet acknowledging the growing threat posed by the industry.²³ The government issued a 9-point

order "for the campaign to crackdown on online scams", which instructed provincial officials, law enforcement agencies, the courts and the national gambling commission to take action.²⁴

The order made only a single mention of human trafficking, despite ordering the Ministry of Interior and the police to "establish procedures for the legal expulsion of foreigners who have entered or resided in Cambodia illegally, or who are engaged in illegal activities".²⁵ Point 8 tasked the Commercial Gambling Management Commission of Cambodia (CGMC) with "enhance[ing] the management and supervision of all licensed casino or gaming centres, ensuring full protection from: (1) online scams; (2) kidnapping, torture and illegal detention; (3) human trafficking and all forms of sexual exploitation; (4) arms trafficking, illegal arms storage and use; (5) illegal force deployment through private security firms and armed police forces; and (6) illegal trafficking, handling and storage of drugs and narcotics."²⁶ However, there was no mention of how victims of human trafficking and other human rights abuses would be supported.

Throughout mid-2025 to early 2026, authorities claimed significant progress towards their stated goal to "end the last group of online scams" by April 2026.²⁷ The timeline for the crackdown was subsequently extended, with the government stating its intention to continue the operation beyond April 2026.²⁸

By the end of April 2026, the government claimed to have shuttered more than 200 scam centres, though it provided little evidence to support this. It had, nonetheless, taken demonstrable action: arresting high-profile individuals, conducting raids and creating conditions that appeared to push compounds to relocate and release victims. During

23 Khmer Times, "Royal Government Issues 9-point Order on Campaign to Crack Down on Online Scams", 16 July 2025, <https://www.khmertimeskh.com/501718152/royal-government-issues-9-point-order-on-campaign-to-crack-down-on-online-scams/> (accessed 27 April 2026).

24 Khmer Times, "Royal Government Issues 9-point Order" (previously cited).

25 Khmer Times, "Royal Government Issues 9-point Order" (previously cited), Point 2.

26 Khmer Times, "Royal Government Issues 9-point Order" (previously cited), Point 8.

27 Cambodianess, "Cambodia's 'XXL' Scam Crackdown Targets Thousands — But Will It Reach the Powerful?", 9 February 2026, <https://cambodianess.com/article/cambodias-xxl-scam-crackdown-targets-thousands-but-will-it-reach-the-powerful>

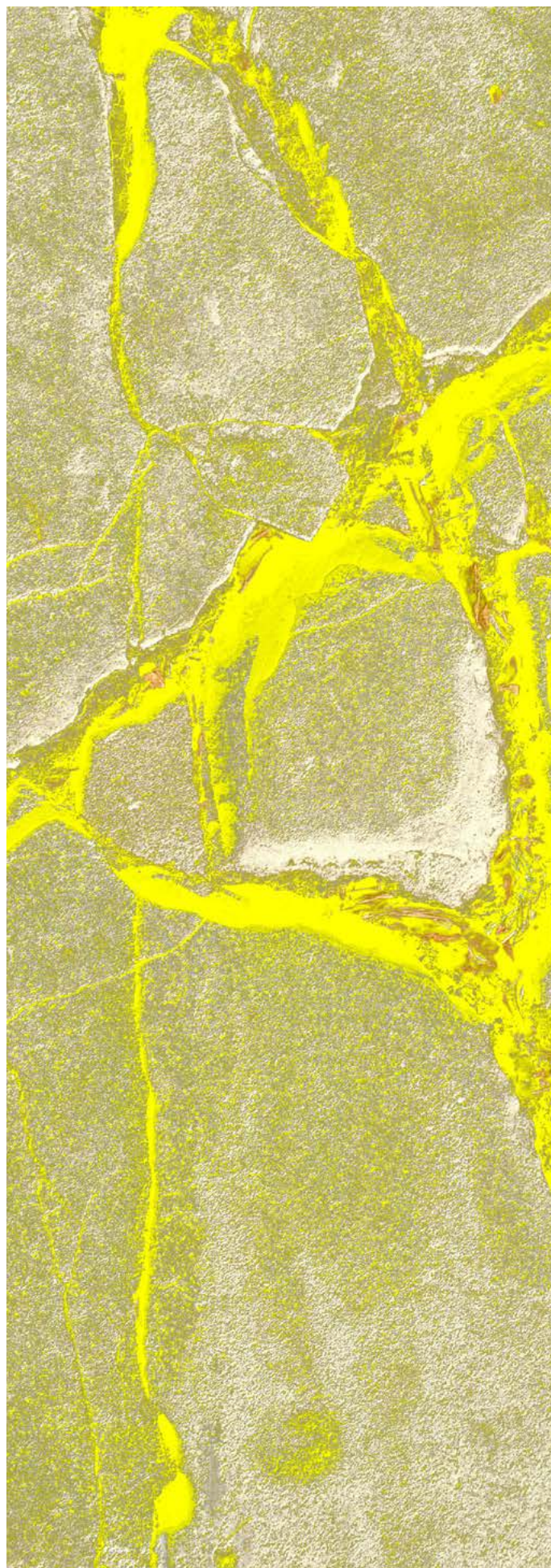
28 Khmer Times, "Banteay Meanchey launches online scam crackdown, arrests thousands in raids", 5 May 2026, <https://www.khmertimeskh.com/501891754/banteay-meachey-launches-online-scam-crackdown-arrests-thousands-in-raids/>

this crackdown period, thousands of individuals escaped or were freed from scamming operations, a trend that continued as of the date of publication. While Amnesty International could not attribute all such releases directly to state intervention, enforcement action likely shaped conditions across the industry more broadly. Selected releases are documented in **Annex II**.

However, between July 2025 and April 2026, Amnesty International could not identify any publicly available government-run source that compiled and published comprehensive information on the scam industry or the crackdown. Sometimes, the Cambodian Ministry of Information published official updates on raids, arrests and government operations, but these were not systematic updates. Neth Pheaktra, the Minister of Information, also periodically issued statements on arrests and enforcement actions, but not regularly. Similarly, the Commission for Combating Technology Crimes provided periodic statements on the crackdown, but these were not found in one unified location or site.

On 30 April 2026, Amnesty International wrote to the government of Cambodia and asked it to provide a list of all steps taken in relation to its crackdown and to provide details in relation to such information. At the time of publication, it had not responded.

Despite being unable to systematically identify, record and compile all government efforts related to the crackdown, Amnesty International has compiled below a timeline that shows the most prominent government efforts, most of them reported through media coverage.



TIMELINE OF THE CRACKDOWN EFFORTS

2025
July



4 July 2025: The Government of Cambodia issued the 9-point “Order for the campaign to crackdown on online scams”, allocating specific roles to Ministries and departments.²⁹ The order required coordinated action by provincial authorities, national police, border officials, the courts and the national gambling commission. Further, the directive included an indirect warning to law enforcement and military personnel that they risked losing their jobs if they failed to “prevent and crack down on online scams”.

[AUTHORITIES] NOT FOLLOWING THIS ORDER, OR NOT COOPERATING WITH THIS ORDER, IN ANY ACTION, THIS IS USED AS A FORM OF PERFORMANCE REVIEW TO EITHER CHANGE YOUR POSITION OR FIRE YOU FROM YOUR POSITION.

Order for the Campaign to Crack Down on Online Scams, Cambodian Government, signed by Cambodian Prime Minister, 4 July 2025.

July 2025: Authorities began raiding scam centres in July, including in Phnom Penh, where police “carried out two raids on the same day the directive was posted, detaining 234 foreign nationals at a suspected scam compound, along with three Chinese nationals from a smaller alleged scam ring.”³⁰ By late July, the government stated that “raids had been conducted at nearly 140 locations, leading to the arrests of more than 3,000 suspects from at least 19 countries, more than half of them from China and Vietnam.”³¹ The government said only a few of the suspects were deprived of their liberty.³²

29 Khmer Times, “Royal Government Issues 9-point Order” (previously cited).

30 Business and Human Rights Centre, “Cambodia: Govt. order crackdowns on scam compounds and human trafficking hubs while NGOs raise doubt over effectiveness”, 16 July 2025, <https://www.business-humanrights.org/en/latest-news/cambodia-govt-order-crackdowns-on-scam-compounds-and-human-trafficking-hubs-while-ngos-raise-doubt-over-effectiveness/>

31 Channel News Asia (CAN), “Commentary: Cambodia vows to get rid of scam compounds – but large operators are left untouched”, 10 August 2025 (updated 6 November 2025), <https://www.channelnewsasia.com/commentary/cambodia-scam-centre-thailand-border-crackdown-raids-5284741>

32 CAN, “Cambodia vows to get rid of scam compounds” (previously cited).

2025
OCTOBER

October 2025: Following fighting between Thai and Cambodian troops at various locations along the border, a ceasefire was brokered and both sides agreed to the removal of scam compounds as a step required before the joint management of the border could be resumed.³³

2025
DECEMBER

December 2025: A report was released by the Secretariat of the Commission for Combating Online Scams (CCOS) which noted that the scale of Cambodia's crackdown on online scams was significant: resources had been mobilized across 18 municipalities and provinces; raids had been conducted at 118 locations; arrests were made of 4,983 suspects from 23 different nationalities including 168 suspected ringleaders and accomplices – **“shifting the focus from low-level operators to the ‘kingpins’ behind the syndicates”** – and 4,039 foreign nationals were deported.³⁴ The United Nations Office on Drugs and Crime (UNODC) reportedly commended the government's “clear political will” to resolve the crisis.³⁵

December 2025: The border-conflict with Thailand resumed and again ended in a ceasefire with the removal of scam compounds listed once more as a step required before the joint management of the border could be resumed.³⁶

2026
JANUARY

January 2026: Chen Zhi, the chairman of Prince Group, who, according to media reports and state actors, was linked to the scam compound industry, was arrested by Cambodian authorities and deported to China.³⁷ Later, Okhna Ly Kuong was also arrested by Cambodian authorities for his role in crimes believed to be related to the scamming industry, such as money laundering and illegal recruitment for exploitation.³⁸

33 The Diplomat, “3rd Cambodia-Thailand Ceasefire Holds Amid Talks in China”, 29 December 2025, <https://thediplomat.com/2025/12/3rd-cambodia-thailand-ceasefire-holds-amid-talks-in-china/>

34 Orkun Santepheap, “Fighting Cyber-Fraud: Cambodia's Crackdown on Online Scams Nets Thousands”, 19 December 2025 (updated 29 April 2026), <https://orkunsantepheap.com/cambodias-crackdown-on-online-scams-2025-report/>

35 Orkun Santepheap, “Fighting Cyber-Fraud” (previously cited).

36 The Diplomat, “3rd Cambodia-Thailand Ceasefire Holds” (previously cited).

37 The Diplomat, “Cambodia's Prince Bank Founder Deported to China For Alleged Cyber Crimes”, 8 January 2026, <https://thediplomat.com/2026/01/cambodias-prince-bank-founder-deported-to-china-for-alleged-cyber-crimes/>

38 British Broadcasting Corporation (BBC), “Alleged scam mastermind arrested after being exposed by BBC”, 21 January 2026, <https://www.bbc.com/news/articles/cwy8v31kkv1o>



The British Broadcasting Corporation (BBC) had linked Ly Kuong to several scamming compounds and the Cambodian government confirmed he was the owner of one compound.³⁹

- **January 2026:** China's Ministry of Public Security issued a notice on 15 January urging fugitives suspected of involvement in the Chen Zhi cross-border gambling and fraud crime syndicate to turn themselves in. It stated those who voluntarily surrendered and truthfully confessed to their crimes before 15 February would receive lighter or mitigated punishment, in accordance with the law.

- **January – February 2026:** Amnesty International documented how thousands of people who had recently escaped or were released from scamming compounds in Cambodia, where they were subjected to grave abuses, including rape and torture, became stranded and in urgent need of humanitarian assistance. Amnesty International reported that these people received no or very limited state support. In response, Information Minister Neth Pheaktra stated: "The Royal Government of Cambodia rejects claims that it is failing trafficking victims or tolerating abuse linked to scam compounds", and insisted that all individuals were screened to separate victims from perpetrators, with victims receiving protection, shelter, medical care and assistance for safe return.⁴⁰

- **January 2026:** The government promulgated the Sub-Decree on Strengthening Security Management in Residential Areas, designed to prevent and suppress acts that threaten public safety by targeting heads of organizations, landlords and managers of collective living areas and special economic zones by providing penalties for those who "intentionally conceal and allow undocumented foreigners to reside in their properties".⁴¹

39 BBC, "Alleged scam mastermind arrested" (previously cited); see also US Department of Justice, "Chairman of Prince Group Indicted for Operating Cambodian Forced Labor Scam Compounds Engaged in Cryptocurrency Fraud Schemes", 14 October 2025, <https://www.justice.gov/opa/pr/chairman-prince-group-indicted-operating-cambodian-forced-labor-scam-compounds-engaged>

40 Associated Press, "In Cambodia, Thousands Flood Out of Scam Compounds and Find Increasingly Little Help", 12 February 2026, <https://www.khaosodenglish.com/news/international/2026/02/12/in-cambodia-thousands-flood-out-of-scam-compounds-and-find-increasingly-little-help/>

41 Royal Government of Cambodia, Sub-Decree No. 03 ANKR.BK on the Management of Safety and Security in Concentrated Residential Areas, 5 January 2026, Phnom Penh: Office of the Prime Minister, available at <https://hbslaw.com.kh> (accessed 27 April 2026).

2026 FEBRUARY

• **February 2026:** The government launched the intensive “XXL” campaign to eradicate scam compounds, an operation aimed at dismantling all such syndicates by the Khmer New Year in April.⁴² The Ministry of Interior spokesperson, Touch Sokhak, called it the “XXL elimination” of online scams, noting that the campaign involved both capital and provincial authorities and stressing that, with strong political will and following the Prime Minister’s orders, the country was determined to clean up by April 2026.⁴³ Senior Minister Chhay Sinarith stated: “The problem of online scams has fallen to just 50%”.⁴⁴ No evidence was made available to substantiate the claim.

• **February 2026:** Police interventions were reported at three major scamming compounds. At one site, KA03 (see Annex I for more details), provincial police admitted they were overwhelmed and may not have had enough police to deal with the crackdown.⁴⁵ At the same time, TK01, or “Mango 2”, initially abandoned during the crackdown, was turned into an immigration detention centre to be run by Takeo provincial authorities.⁴⁶

2026 MARCH

• **19 March 2026:** Cambodia Daily reported authorities claiming “more than 4,400 individuals from 19 nationalities have been referred to the immigration department, while 127 suspects from six nationalities have been sent to court. Another 342 people have been released, and 895 others remain under legal procedures at provincial police units.” Additionally, the Ministry of Interior said that between “March 1 and March 14, operations continued actively, with authorities not only carrying out new raids but also re-inspecting previously closed sites.” The Minister for the Interior warned that from early March, “authorities would tighten enforcement on foreign residents. Property owners, including those running housing developments, hotels, and

42 Cambodianess, “Cambodia’s ‘XXL’ Scam Crackdown Targets Thousands” (previously cited).

43 Khmer Post USA, “Cambodia Vows to Eliminate Online Scams by April 2026”, 5 February 2026, <https://khmerpostusa.com/cambodia-vows-to-eliminate-online-scams-by-april-2026/>

44 The Straits Times, “Cambodia Claims Its Crackdown Has Halved Online Scam Activity”, 26 February 2026, <https://www.straitstimes.com/asia/se-asia/cambodia-claims-its-crackdown-has-halved-online-scam-activity>

45 Business Today, “Cambodia seals 190 alleged scam centres in sweeping crackdown on fraud networks”, 12 February 2026, <https://www.businesstoday.in/world/story/cambodia-seals-190-alleged-scam-centres-in-sweeping-crackdown-on-fraud-networks-515844-2026-02-12>

46 CamboJA News, “Scam Hub ‘Mango Park 2’ Shut, Converted to Holding Center”, 13 February 2026, <https://cambojanews.com/scam-hub-mango-park-2-shut-converted-to-holding-center/>

2026
APRIL

apartment buildings, could face legal action if they fail to report foreign occupants to the authorities.”⁴⁷

- **22 March 2026:** 49 suspects were detained (43 Chinese, 3 Malaysians, 1 Vietnamese, 1 Myanmar, 1 Cambodian) and authorities seized 687 phones, 60 computers, and 46 SIM cards in a Phnom Penh raid, according to the Ministry of the Interior.⁴⁸
- **23 March:** 50 suspects were arrested across 26 locations. It was also reported that 236 scam sites had been shut down since 2025, including 91 casino-based operations.⁴⁹ No further information about which sites or which casinos was made available.
- **1 April 2026:** Cambodia announced it had arrested and extradited Li Xuiiong, a former chairman of Huione Pay, to China in a joint crackdown on online scams following a request from Beijing.⁵⁰ The same day, Senior Minister Chhay Sinarith reported 750 prosecutions and 11,000 deportations had taken place since July 2025.⁵¹ No specific compounds were provided.
- **2 April:** Amnesty International published an analysis of official licensing documents issued by Cambodia’s Commercial Gambling Management Commission in December 2025 and January 2026, showing that casino owners were in direct control of buildings and sites where human rights abuses had been documented in at least 12 separate locations.⁵² On 3 April 2026, the Head of the Secretariat of the Commission for Combating Online Scams said the Commission would “tak[e] the information provided [from

47 The Cambodia Daily, “Cambodia cracks down on online scams with nearly 6,000 arrests in two months”, 19 March 2026, <https://english.cambodiadaily.com/2026/03/19/cambodia-cracks-down-on-online-scams-with-nearly-6000-arrests-in-two-months/>

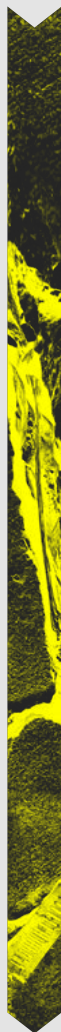
48 Ministry of Information, “Cambodia Detains 49 in Phnom Penh Raid on Online Scam Operation”, 23 March 2026, <https://www.information.gov.kh/articles/189210>

49 Agence Kampuchea Presse, “Cambodia Intensifies Crackdown on Online Scams, 50 Suspects Arrested in Sihanoukville”, 24 March 2026, <https://www.akp.gov.kh/post/detail/365736>

50 CamboJA News “Blacklisted Huione Pay Chairman Li Xiong Arrested, Extradited to China”, 1 April 2026, <https://cambojanews.com/blacklisted-huione-pay-chairman-li-xiong-arrested-extradited-to-china/>

51 Ministry of Information, “Cambodia Cracks Down on Cybercrime: 750 Suspected Scammers Prosecuted, 11,000 Foreigners Deported”, 1 April 2026, <https://www.information.gov.kh/articles/190010>

52 Amnesty International Australia, “Cambodia: Casinos get state approval despite links to human rights abuse at scamming compounds”, 2 April 2026, <https://www.amnesty.org.au/cambodia-casinos-get-state-approval-despite-links-to-human-rights-abuse-at-scaming-compounds/>



the Amnesty International investigation] to continue the investigation.”⁵³

3 April: The National Assembly formally approved the Law on Countering Technology-Based Scams to “enhance the effectiveness of combating online scams.”⁵⁴ Article 2, which establishes the scope of the law, defines the criminal offence of “fraud committed through technological system”.⁵⁵ Cambodia’s previous laws on combating human trafficking and the criminal offenses of “torture” and “fraud” had been in place for more than a decade.⁵⁶

5 April: 121 foreigners were reportedly detained in Sihanoukville (42 Chinese, 37 Sri Lankans, 22 Vietnamese, 12 Indians, plus nationals from Kenya, Philippines, Nepal, Bangladesh, Malaysia).⁵⁷ No specific locations were provided.

7 April: Further raids were reported across the country, with hundreds reportedly arrested in Phnom Penh, Banteay Meanchey, and Kep. An additional 139 suspects were detained at Poipet casino-hotel.⁵⁸ No specific locations were provided.

23 April: A statement released by the Royal Government Spokesperson Unit said that the crackdown would continue past April and that:

53 Kiripost, “Cambodia Accepts Amnesty Report Linking Licensed Casinos to Abuse”, 3 April 2026, <https://kiripost.com/stories/cambodia-accepts-amnesty-report-linking-licensed-casinos-to-abuse>

54 Article 1 of law unofficially translated in CamboJA News, “Life Sentences Loom Under New Online Scam Law”, 3 April 2026, <https://cambojanews.com/life-sentences-loom-under-new-online-scam-law/>

55 Article 2 of law unofficially translated in CamboJA News, “Life Sentences Loom Under New Online Scam Law” (previously cited).

56 For the crimes of “torture” (Articles 210–212) and “fraud” (Articles 377-382) see the Royal Government of Cambodia, Criminal Code of the Kingdom of Cambodia, promulgated by Royal Kram No. NS/RKM/1109/022, 30 November 2009, Phnom Penh: Office of the Prime Minister, available at <https://www.gposc.gov.kh> (accessed 27 April 2026); for other crimes such as human trafficking and confinement see Royal Government of Cambodia, Law on Suppression of Human Trafficking and Sexual Exploitation, Royal Kram No. NS/RKM/0208/005, 15 February 2008, Phnom Penh: Office of the Prime Minister, available at <https://www.unodc.org> (accessed 27 April 2026).

57 Ministry of Information, “Cambodia Busts Online Scam Ring, Detains 121 Foreigners in Coastal Hub”, 5 April 2026, <https://www.information.gov.kh/articles/190235>

58 Agence Kampuchea Presse, “Cambodia Leaves “No Safe Haven” for Cybercriminals as Authorities Bust Online Scam Sites”, 8 April 2026, <https://www.akp.gov.kh/post/detail/367162>

From July 2025 to mid-April 2026, authorities have taken action against more than 250 online scam cases nationwide, including the closure of 91 casino locations. A total of 112 cases have been brought before the courts, involving approximately 1,089 suspects of multiple nationalities.

Cambodia has also carried out large-scale deportation measures under the nationwide campaign. From January 2025 to April 19, 2026,

authorities deported 13,039 foreign nationals involved in online scams, including 1,509 women, representing 33 different nationalities.

In addition, from mid-January to April 19, 2026, a total of 241,888 individuals voluntarily departed Cambodia as part of the nationwide campaign, including Chinese, Vietnamese, Indonesian, Indian, Bangladeshi, and Pakistani nationals.⁵⁹

“

THE SCAM NETWORK, WHAT WE CALL THE BLACK ECONOMY, IS DESTROYING OUR HONEST ECONOMY... THIS IS THE REASON WHY WE NEED TO CLEAN THIS OUT.

Prime Minister Hun Manet, in an interview with Agence France-Presse (AFP), 25 February 2026.⁶⁰

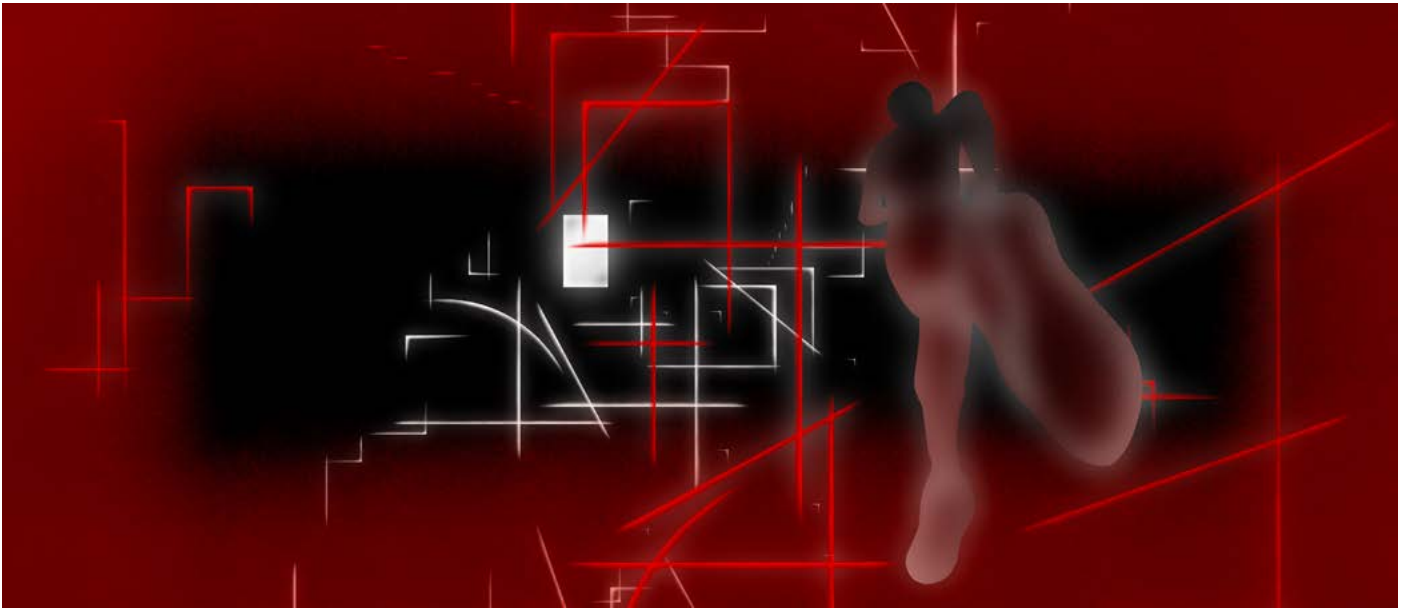
59 Khmer Times, “PM Orders Year Round Crackdown on Online Scams Amid Major Enforcement Results”, 23 April 2026, <https://www.khmertimeskh.com/501885362/pm-orders-year-round-crackdown-on-online-scams-amid-major-enforcement-results/>

60 Agence France-Presse (AFP), “Scam centres ‘destroying’ Cambodia’s economy, PM tells AFP”, 25 February 2026, <https://www.france24.com/en/live-news/20260225-scam-centres-destroying-cambodia-s-economy-pm-tells-afp>



04

**CURRENT STATUS
OF SCAMMING**



WE HEARD THERE WAS A CRACKDOWN. WE WAITED AND WE HOPED [...] WHEN NOTHING HAPPENED, WE DECIDED TO ESCAPE [...] THERE WAS BLOOD ON THE GUARD'S HEAD [...] HE WAS HIT WITH A BRICK AND A GLASS BOTTLE. WE RAN.

THERE WERE 17 OF US – BUT THREE WERE CAUGHT BY THE GUARDS. THREE GIRLS [...] WE DON'T KNOW WHAT HAPPENED TO THEM.

Two Thai nationals who escaped from the “Black Gate” compound (PO21) – a newly confirmed compound – during the crackdown.⁶¹

4.1 ADDITIONAL COMPOUNDS IDENTIFIED

In its June 2025 report, *“Someone else’s property”*, Amnesty International identified at least 53 scamming compounds in Cambodia.⁶² Between June 2025 and April 2026, Amnesty International continued to monitor the operations of these scamming compounds (see **Annex II** of this report for documented interventions at compounds). In addition, during this period, Amnesty International identified at least 33 additional scamming compounds in Cambodia. **The total number of confirmed scamming compounds in Cambodia was 86, as of the end of April 2026.**

A full profile for each newly confirmed scamming compound has been compiled and included in **Annex I** of this report, providing a location and approximate boundary, a timeline of events, a list of security features, an assessment of the human rights abuses that occurred at the compound, and an assessment of the state’s obligations and its fulfilment of these obligations.

The new locations share many of the same characteristics as the first 53 compounds identified by Amnesty International. For example, many new

61 Amnesty International interviews with *Poo* and *Nuu* (not their real names), 2025.

62 Amnesty International, *“Someone else’s property”* (previously cited).

locations cluster along the borders, notably Bavet (Svay Rieng), Poipet/Pailin–Banteay Meanchey, Tbong Khmum, Prey Veng and Mondulkiri. In multiple instances, Amnesty International documented cross-compound flows of people (for example, people moving between compound TBK02 to MD01, and BA08 victims “sold” to BA06), and mass releases or escapes, sometimes when managers fled, leaving gates open.

4.2 SECURITY FEATURES OF SCAMMING COMPOUNDS

Across most newly-identified sites, Amnesty International researchers observed perimeter fencing (often with razor wire), caged or barred windows, internal-facing CCTV, floodlights and multi-layered checkpoints. Entrances typically had more than four or five guards; and on the inside, guards were stationed on interior perimeter walls and at internal posts. In several compounds, security staff carried electric shock batons;⁶³ in others, guards or managers carried firearms.⁶⁴ Some locations also featured double-gate systems and license plate-reading cameras, signalling an intent to control incoming and outgoing traffic.

Amnesty International assessed many of these physical and organizational features as being consistent with prison design and the intention to keep people inside of a location. A further breakdown of these features, including maps and pictures demonstrating their practical use in securing compounds, is found in Chapter 5 of the “*Someone Else’s Property*” report.⁶⁵

Collectively, analysis of the 33 additional compounds reinforces Amnesty International’s previous human rights findings.⁶⁶ Compounds exhibit security features consistent with prison design that can deprive individuals of their liberty.

4.3 HUMAN RIGHTS ABUSES IN SCAMMING COMPOUNDS

4.3.1 HUMAN TRAFFICKING AND FORCED LABOUR

Between July and May 2026, Amnesty International spoke with 73 people who had been held inside scamming compounds during the crackdown period. All of them described being subjected to human rights abuses by compound managers or bosses, security guards and others involved in human trafficking. These survivors, often from newly identified compounds, gave accounts to Amnesty International which bore similarities and patterns to cases previously documented by the organizations tracking rescues and escapes.

According to their testimonies, the experiences of all of the survivors interviewed indicated that they were victims of human trafficking for the purpose of forced labour or other exploitation inside of scamming compounds. They were all recruited using fraud or deception, often believing they were coming to do legal and legitimate work, only to be forced into compounds where they were threatened with violence if they did not work in online scamming activities. In many cases, victims were taken across borders, unbeknownst to them, and into Cambodia during the government crackdown period. Many of them were then forcibly moved between compounds so that their captors could avoid police interventions.



63 Amnesty International interviews with *Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe, Rakib, Rezaul, Saiful, Arif, Tanmay, Aditya, Nasiche, Alpha, Brima, Prince, Winta* and *Gabe*, 2025, 2026.

64 Amnesty International interviews with *Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe* and *Nasiche* (not their real names), 2025, 2026.

65 Amnesty International, “*Someone else’s property*” (previously cited).

66 Amnesty International, “*Someone else’s property*” (previously cited).

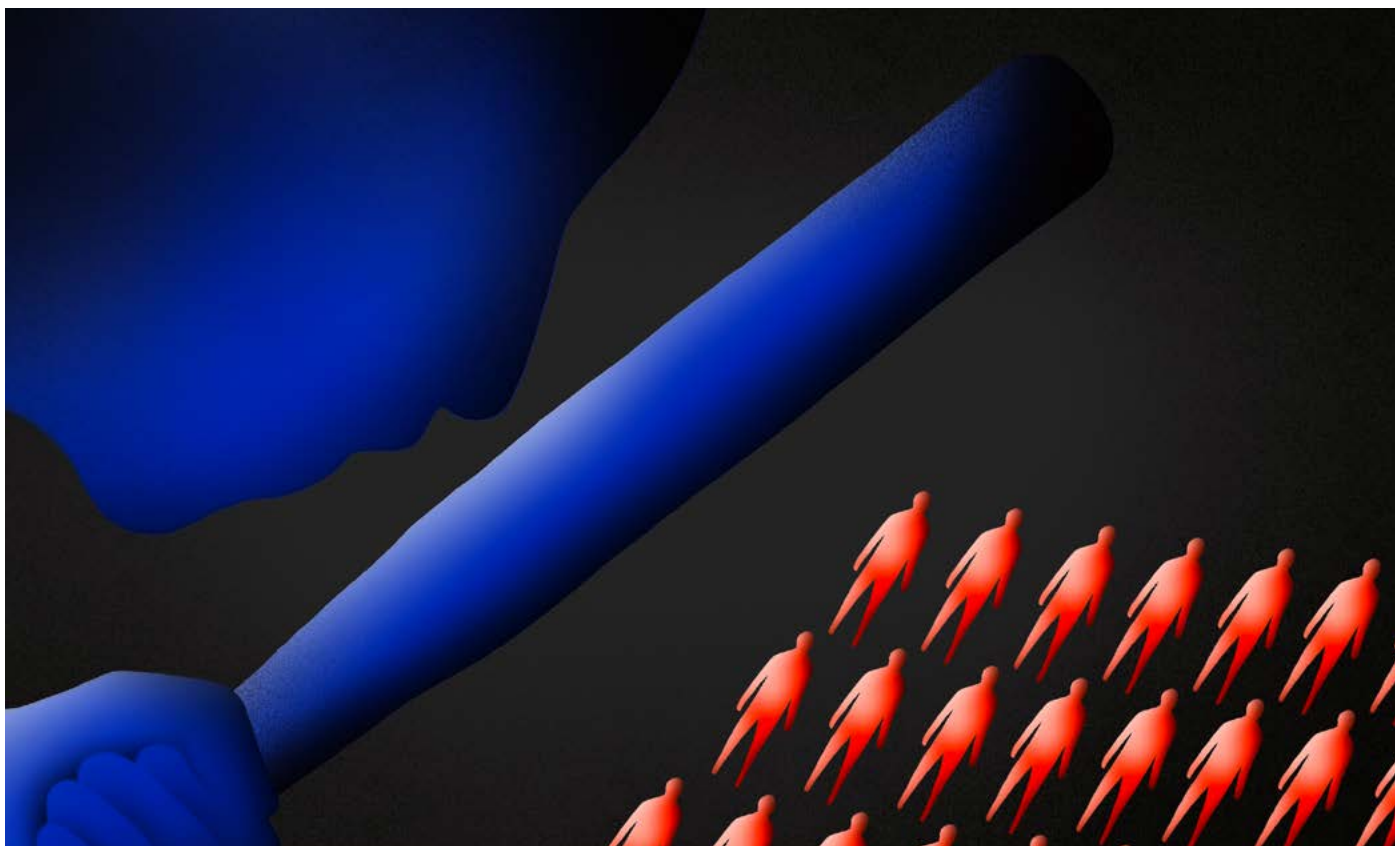
4.3.2 TORTURE AND OTHER ILL-TREATMENT

Every victim interviewed by Amnesty International reported seeing or being subjected to torture or other ill-treatment. Torture and other ill treatment were committed by compound bosses or security guards, often because victims tried to escape. Some victims showed Amnesty International researchers scars they said were from beatings or the administration of electric shocks. One survivor showed a scar that he said was from being beaten with a metal pole but later said "I would rather be beaten with the pole than given the electric shock".⁶⁷ He described being taken to a cell within the KA03 compound: the cell had metal bars and was guarded by two security guards. He recalled being periodically beaten and shocked. Once they managed to escape the compounds, some survivors sought medical treatment for mental anguish. Others suffered from severe trauma and did not want to talk about some aspects of what had happened to them. Many testimonies from "Park 8" (PV01) refer to deaths inside the compounds.

4.3.3 SLAVERY

Victims told Amnesty International they were deprived of their liberty after being trafficked into scamming compounds. Security guards, often armed with shock batons or guns, prevented victims from leaving. Many survivors reported that guards regularly used violence to intimidate trafficking victims, including using shock batons and guns in the administration of their duties.⁶⁸

As a result, these human rights abuses often amounted to the enslavement of people within scamming compounds due to the extreme amount of control that managers had over victims. This continued to mirror the findings of Amnesty International's June 2025 report, that the industry remains driven by slavery and violence.



67 Amnesty International interview with *Kane* (not his real name), 2025.

68 Amnesty International interviews with *Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe, Rakib, Rezaul, Saiful, Arif, Tanmay, Aditya, Nasiche, Alpha, Brima, Prince, Winta* and *Gabe*, 2025, 2026.

4.3.4 RAPE

During the research for this latest report, Amnesty International was able to interview more female victims who were willing to assist with documenting sexual abuses.⁶⁹

Amnesty International interviewed six women who described being subjected to rape and other ill-treatment. In each case, the managers and team leaders either had weapons or could direct the security guards who did. Amnesty International considers that the circumstances were so coercive that all such acts amount to rape. Rape is defined under international law as sexual penetration or "invasion," however slight, when committed by force, or by threat of force or coercion, by taking advantage of a coercive environment, or against a person incapable of giving genuine consent.⁷⁰

Human rights law and international criminal law recognize that the pain and suffering caused by an act of rape is of a severity reaching the threshold of constituting torture, both physically and psychologically,⁷¹ as is also evident from the testimonies of survivors documented in this report. The purpose includes punishment, as well as discrimination on the grounds of gender. The Cambodian government is obligated to investigate rape as a human rights abuse and a form of torture within scamming compounds.

Five of the women interviewed by Amnesty International said they were raped by managers or team leaders. The sixth woman said she was raped by other people within the industry at the direction of a manager. This woman, *Cecilia* (not her real name), a survivor from Brazil, said the compound manager invited a group of "successful" scammers to rape her.



IT WAS LIKE A PRIZE

FOR DOING GOOD

WORK. HE SAID I WAS

LIKE 'A PRESENT' [...]

THEY RAPED ME.

Cecilia explained how a compound manager invited scammers to rape her.⁷²

Cecilia was moved between several compounds against her will, at one point deprived of her liberty at PO16 compound in Poipet. She identified the buildings from pictures and described the nearby area accurately. She also showed Amnesty International researchers extensive bruising and other injuries on her legs, which she said were inflicted by a manager using a baseball bat. She said she was beaten after a manager found out that her father was making inquiries with police about her whereabouts and situation.⁷³

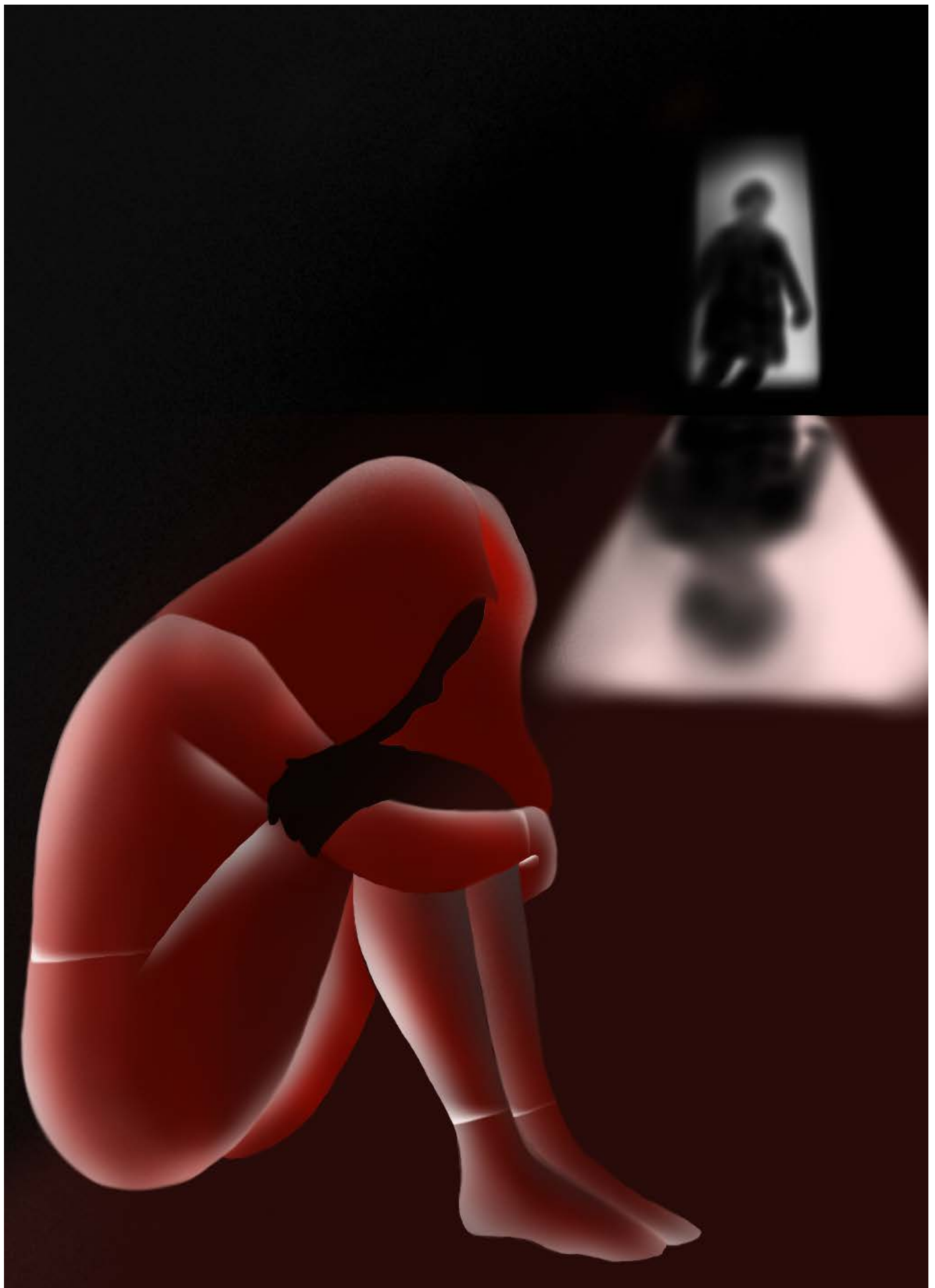
69 It is likely that some of the victims interviewed for Amnesty International's June 2025 report were also subjected to sexual abuses, but did not disclose that information at the time.

70 See International Criminal Court (ICC), Elements of Crimes, Element 1, Article 7 (1) (g)-1 and Article 8(2)(e)(vi)-1(2). Coercive circumstances that negate consent include circumstances created by the perpetrator, such as fear of violence, duress, detention contexts, and the abuse of power. Consent is also negated when the perpetrator takes advantage of coercive circumstances that already exist, even if they are not of their own making, such as those already inherent to an armed conflict. For more on this, see Amnesty International, *Rape and sexual violence: Human rights law and standards in the International Criminal Court* (Index: IOR 53/001/2011), 1 March 2011, <https://www.amnesty.org/en/documents/ior53/001/2011/en/>

71 For more on this, see Amnesty International, *Rape and sexual violence* (previously cited), p. 42.

72 Amnesty International interview with *Cecilia* (not her real name), 2026.

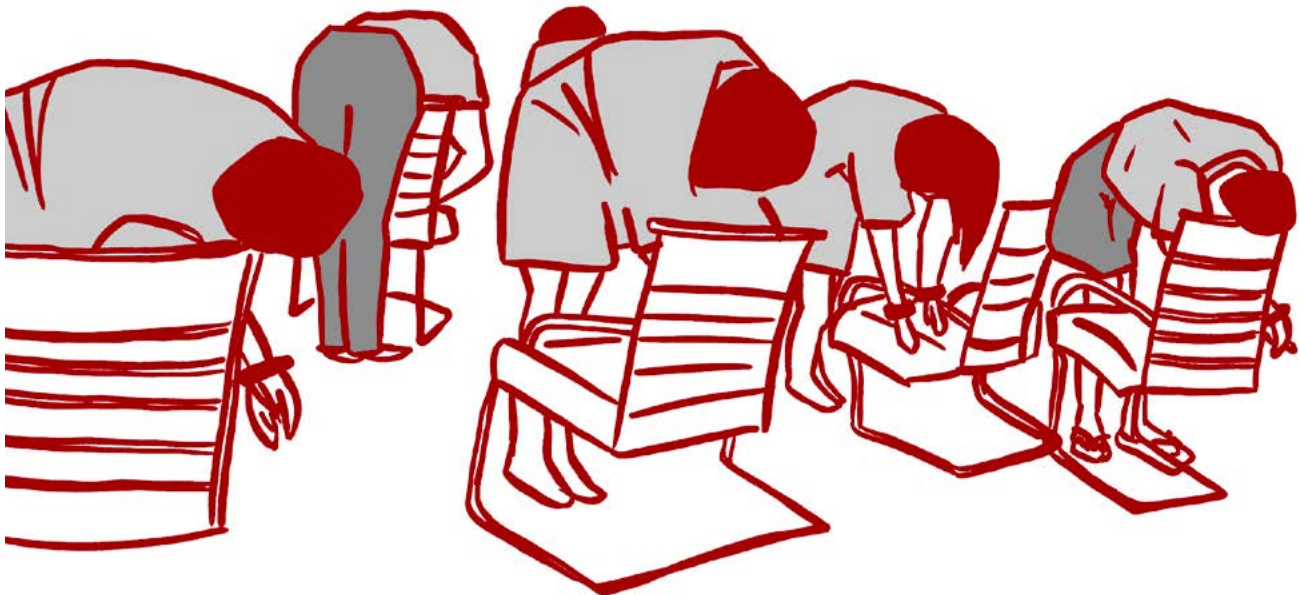
73 Amnesty International interview with *Cecilia*, 2026.



Indah (not her real name), another woman who was held at a scamming compound in Pailin, said she was raped by multiple people after managers prohibited her from locking her door. She said she was alone in the room, and men would come in late at night after drinking alcohol.⁷⁴

Two other women described being raped by their managers: They said they realized they had no other way to make it through their time inside the scamming compounds unless they complied with their managers' demands. They told Amnesty International they would receive "protection" in exchange for enduring sex with their managers. Both women said they had no meaningful way to reject the sexual advances in the coercive circumstances in which they were confined. The managers were aware of the coercive circumstances, rendering the act rape. Both women also became pregnant as a result.

Another woman said she was subjected to rape at the PV01 compound. *Kenyangi* (not her real name), a 20 year old woman from Uganda, was trafficked into the PV01 compound in 2025. *Kenyangi* was told she would be teaching English before she entered the compound. Once inside, she was told she would be a model to be used in romance scams, and said she was raped by her manager on multiple occasions. She said guards would stand at the door when her Chinese manager would enter the room to rape her. She also said she was not the only one, and that one other woman she knew – another model she described as her friend – was also raped. *Kenyangi* said she became pregnant as a result of the rapes and was taken to a Chinese doctor, with security guards accompanying her, and given pills to have an abortion. *Kenyangi* told Amnesty that both she and her friend bled after taking the abortion pills.⁷⁵



A recreation of a photograph shared to Amnesty International by a survivor showing victims handcuffed to chairs inside the BM02 compound. Amnesty International later interviewed one of the victims who appeared in the original photo. Photograph taken by an informant inside the compound and shared with Amnesty International, 2026.

74 Amnesty International interview with *Indah* (not her real name), 2026.

75 Amnesty International interview with *Kenyangi* (not her real name), 2026.

“

SHE LOOKED MAYBE**24 OR 25 [...]****SHE WAS FROM KENYA****[...] THE LAST THING****SHE SAID TO ME WAS****SHE WAS BLEEDING****AND FEELING PAIN.**

Kenyangi, describing her friend, another woman held in the PV01 compound, who had been raped.⁷⁶

One night, *Kenyangi* witnessed her friend's body – covered in blood – on a bed inside the compound. But the guards would not let her touch the body. The man who raped her told her “she's dead, mind your own business”, when *Kenyangi* asked about her friend. *Kenyangi* told Amnesty International she did not know what happened to the body, and that her friend had talked about having two children back in her home country.

Kenyangi had not been identified as a victim of human trafficking by the Cambodian authorities by the time she was interviewed by Amnesty International. As she hid in Cambodia awaiting repatriation, she said that the man who raped her, a manager in PV01 or “Park 8”, “is looking for me”.⁷⁷



⁷⁶ Amnesty International interview with *Kenyangi*, 2026.

⁷⁷ Amnesty International interview with *Kenyangi*, 2026.



05

STATE

INTERVENTIONS

AT SCAMMING

COMPOUNDS

5.1 LACK OF TRANSPARENCY AND PUBLIC INFORMATION

5.1.1 FAILURE TO PROVIDE INFORMATION ON ACTIONS AND OUTCOMES

Since the beginning of the scamming compound crisis in 2022, including during the crackdown period in 2025-2026, the Cambodian government has failed to provide transparent or detailed public reporting on many of its stated interventions, including a lack of information on which specific compounds were investigated, what evidence was gathered or whether prosecutions and convictions actually followed. This reflects a systemic opacity in the state's overall approach to documenting and communicating its interventions against scamming compounds and those who operate and facilitate them.

For instance, on 11 February 2026, the Khmer Times stated that "officials reported the deportation of more than 110,000 foreigners, with 37 major cases currently being prosecuted in Cambodian courts".⁷⁸ However, neither the media outlet nor the government published any further information about these cases, including whether any charges had been filed, the nature of those charges or disaggregated data on the individuals deported, detained or charged.

Given the seriousness of the human rights abuses, it is in the public interest to share information about the state interventions. However, during the crackdown period, Amnesty International was unable to identify any of the following information made public by the Cambodian government:⁷⁹

- Which agencies participated in investigations (police, military police, immigration, provincial authorities); whether independent observers were allowed access; the procedure for how the screening of potential victims of human trafficking was carried out and whether this screening was done in private or in
- the presence of compound management; whether any operations led to prosecutions of perpetrators of abuses; or if any potential victims of human trafficking were detained and/or deported;
- Disaggregated data on potential trafficking victims identified, assisted or deported, including exact numbers of potential victims screened and identified; details on screening procedures for trafficking indicators; details of assistance provided to presumed victims (shelter, medical assistance, interpreters, legal aid, access to remediation); clarification on how many people were deported without being properly assessed for trafficking indicators; referral pathways to NGOs or international organizations;
- Information on individuals charged or prosecuted, their roles (compound owners, managers, IT supervisors, recruiters, enforcers, and so on); evidence of high-level actors or state officials being investigated (police, military, powerful individuals); public reporting on convictions and court outcomes, including any sentences handed down;
- Investigations into companies and beneficiaries, including which companies were inspected or investigated; whether licenses were suspended or revoked; whether companies involved in land leasing, transport, or recruitment were also investigated due to their potential links with human rights abuses; whether special economic zones (SEZs) implicated in abuses were scrutinized; and
- Accountability mechanisms within law enforcement, including investigations into police or local officials accused of collusion or corruption; any disciplinary actions taken against officials facilitating trafficking or extorting victims or failing to take required action when being informed about ill-treatment

78 Khmer Times, "More than 300 Chinese suspects deported in scam crackdown", 11 February 2026, https://www.khmertimeskh.com/501843230/more-than-300-chinese-suspects-deported-in-scam-crackdown/#google_vignette

79 UN Human Rights Committee, General Comment 34: Freedom of opinion and expression (Article 19), 12 September 2011, UN Doc. CCPR/C/GC/34, paras 18-19.

or torture being committed in a given compound; whether complaints mechanisms exist for victims abused in custody or during raids; what, if any, independent bodies (anti-corruption unit, trafficking taskforces) have oversight of the crackdown period.

As the Cambodian government has systematically failed to provide the public with detailed (or at times, any) information on its efforts to dismantle the scam industry, Amnesty International has continued to rely on a range of sources for its findings, including survivors. Many survivors said they have been ignored by police after informing them they were victims of human trafficking,⁸⁰ told they had to sign documents they could not read or documents that gave differing accounts of their story,⁸¹ were extorted by police,⁸² intimidated by police,⁸³ and, according to interviews with local organizations and victims, were not recognized as victims of human trafficking by authorities.⁸⁴ Some of these cases are described further in **Chapter 6.3** below.

5.1.2 ARRESTS AND INTIMIDATION OF JOURNALISTS AND RESCUE WORKERS

The government has intentionally exacerbated the lack of transparency by taking steps to silence those who speak out about the scamming industry. The arrest and intimidation of journalists and rescue workers, the prosecution of rescuers and repeat detentions of reporters, suppressed independent scrutiny, further undermining public oversight and victim protection. Arrests of journalists and rescue workers and the shuttering of Voice of Democracy (VoD), a news outlet that was reporting weekly on the

scamming compounds, reflects a brazen attempt to eliminate all negative reporting on the topic.

The following examples show how the Cambodian government used its legal system to oppress journalists and those who help rescue people from compounds (rescue workers), rather than engage in meaningful actions to protect and support trafficking victims and shutter the scamming compounds:

- **August 2022:** Three rescue workers were arrested following public reporting on a “blood slave” – a man who claimed his blood was harvested inside a compound.⁸⁵ One of the rescue workers was sentenced to 2 years in prison for “incitement to discriminate, false declaration, unlawful interference in the discharge of public functions and unlawful use of a certificate of profession”.⁸⁶
- **February 2023:** Cambodian Prime Minister Hun Sen ordered the revocation of VoD’s media licenses. VoD’s investigation into the scamming compound crisis involved speaking to dozens of victims, documenting businesses at the site and speaking to police about why locations had not been further investigated.⁸⁷ VoD was the most prolific investigator of scamming compounds to that point, having produced more than 100 articles on the issue.
- **September 2024:** Cambodian journalist Mech Dara, who was considered a leading journalist on the scamming compound crisis and a former VoD reporter, was arrested. At the time of publishing this report, Dara was on bail, awaiting a trial without a set date, for charges of “incitement”.⁸⁸

80 Amnesty International interviews with *Benjamin, Elise, Winta* and *Mo* (not their real names), 2024, 2025 and 2026.

81 Amnesty International interview with *Benjamin* (not his real name), 2024.

82 Amnesty International interviews with *Hassan, Lek, Noi* and *Tam* (not their real names), 2025.

83 Amnesty International interviews with *Winta*, 2026.

84 Amnesty International interviews with Organizations 2 and 3, 2024, 2025, 2026.

85 VOD, “‘Blood Slave’ Gets Suspended Sentence While Rescuers Sent to Prison”, 31 August 2022, <https://vodenglish.news/blood-slave-gets-suspended-sentence-while-rescuers-sent-to-prison/>

86 VOD, “Wife Says Trafficking Rescuer Sentenced to Two Years in Prison”, 30 August 2022, <https://vodenglish.news/wife-says-trafficking-rescuer-sentenced-to-two-years-in-prison/>

87 See VoD, *Enslaved: An Investigation*, <https://vodenglish.news/enslaved/>

88 Amnesty International, “Cambodia: Charges against journalist highlight clampdown on press freedom”, 2 October 2024, <https://www.amnesty.org/en/latest/news/2024/10/cambodia-charges-against-journalist-highlight-clampdown-on-press-freedom/>

● **December 2024:** Two Cambodian journalists working for the government-friendly Khmer Times were arrested after they published videos they said showed violence from inside an alleged scamming compound in Phnom Penh. Both journalists were charged with “incitement”.⁸⁹

● **February 2026:** Mech Dara was again detained by military police who forced him to delete photographs he took while investigating the BS04 and BS02 compounds.⁹⁰ A journalist in Poipet was arrested after reporting on an alleged compound there.⁹¹ Two other reporters were arrested after alleging TK01 remained operational.⁹²

during the crackdown period – including from sixteen of the 86 sites beyond the 24 that Amnesty International identified as being subject to state interventions. Amnesty International was unable to attribute all such releases to direct state action, however is likely that enforcement activity shaped conditions across the industry more broadly in ways that were not always visible through public reporting or social media.

While it is likely the government has intervened at more compounds than Amnesty International was able to find evidence for, their unwillingness to be transparent and their failures during publicized interventions undermine their own claims of success. The evidence suggests it is entirely possible that many of the most abusive operations continue unhindered.

5.2 INADEQUATE INTERVENTIONS: LIMITED SCOPE

The Cambodian authorities’ interventions into scamming compounds during the July 2025 to April 2026 crackdown have been ineffective and inadequate. Despite public claims of sweeping enforcement, interventions appear to have been limited in scope.

Amnesty International’s research found **evidence of state interventions at only 24 of the 86 identified scamming compounds – indicating only 25% of compounds were investigated by authorities during the crackdown period.** This stands in stark contrast to the government’s claims that they have intervened at more than 250 scam centres.⁹³

It is acknowledged that thousands of individuals were released or escaped from scamming compounds

Amnesty International spoke with four organizations involved in monitoring the crisis who were exasperated with the crackdown, describing it as having little effect on the industry.⁹⁴ One group showed records of rescues that it had undertaken since the crackdown had begun: Some of them showed repeated rescues from compounds already known to Cambodian authorities, such as PO16. At PO16, Amnesty International interviewed 13 people who identified the compound and said they were abused there. Eight of those people were abused at or rescued from the site since the crackdown began.⁹⁵ Another organization sent Amnesty International more than 40 requests for rescue from various compounds from July 2025 to April 2026, and Amnesty International received several other direct requests for rescue from victims inside of scamming compounds.⁹⁶

89 LICADHO, “Journalists Detained Over Video of Alleged Cyberscam Torture” (previously cited).

90 KiriPost, “Detained journalist released after deleting photos of suspected scam centre raid in Dara Sakro”, 13 February 2026, <https://kiripost.com/stories/detained-journalist-released-after-deleting-photos-of-suspected-scam-centre-raid-in-dara-sakro>

91 LICADHO, “Immediately release and drop charges against journalist Hem Vanna”, 10 February 2026, <https://www.licadho-cambodia.org/pressrelease.php?perm=555>

92 KiriPost, “Two Detained Journalists Released After Reporting on Scam Compound in Takeo | KiriPost”, 13 February 2026, <https://kiripost.com/stories/two-detained-journalists-released-after-reporting-on-scam-compound-in-takeo>

93 AML Intelligence, “News: Cambodia shuts nearly 200 scam centers in fraud crackdown”, 12 February 2026, <https://www.amlintelligence.com/2026/02/news-cambodia-shuts-nearly-200-scam-centers-in-fraud-crackdown/>

94 Amnesty International interviews with Organizations 1, 2, 3 and 4, 2025, 2026.

95 Amnesty International interviews with *Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe* and *Nasiche* (not their real names), 2025, 2026.

96 On file with Amnesty International.

5.3 INEFFECTIVE INTERVENTIONS: RECURRING PATTERNS OF FAILURE

Where state interventions did occur, Amnesty International's analysis revealed three recurring patterns of failure:

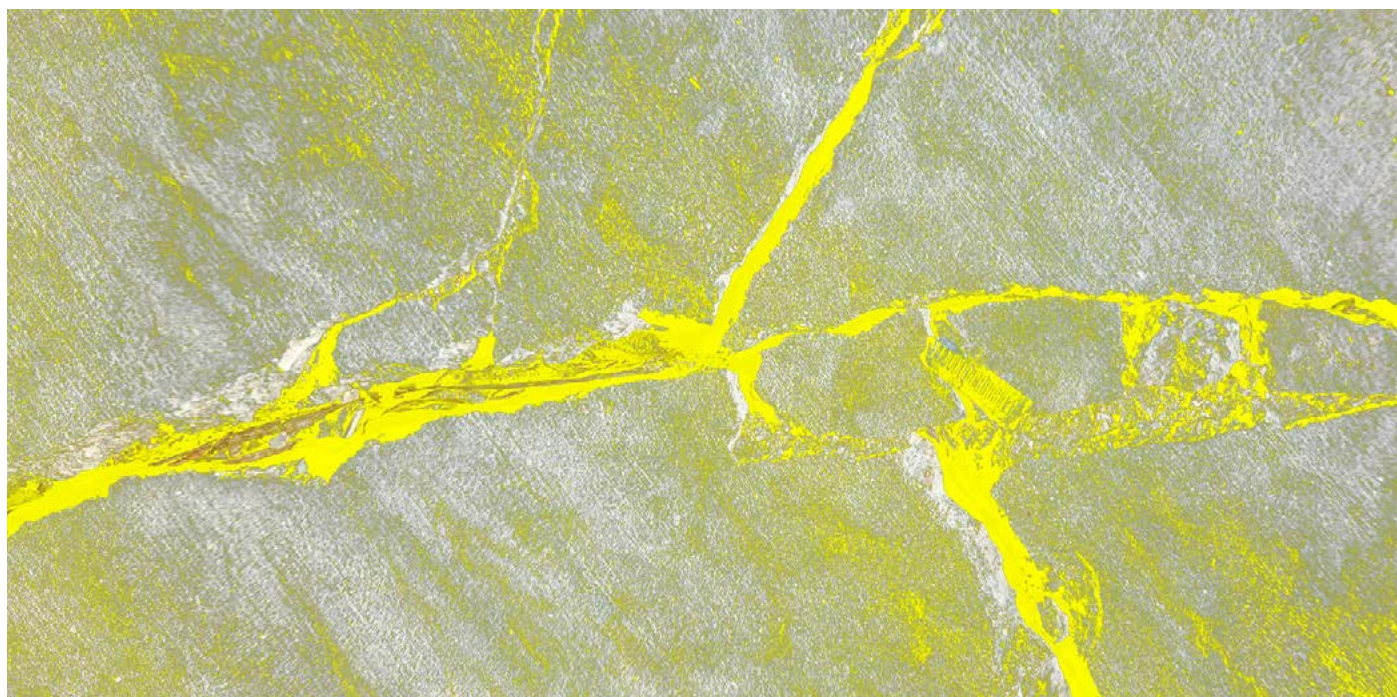
1. **Reactive interventions:** triggered by pressure rather than proactive systematic monitoring;
2. **Ineffective interventions:** including failed investigations and shutdowns, which failed to stop human rights abuses from continuing even after the intervention, and inadequate victim identification and protection; and
3. **Collusive interventions:** with indications of coordination between compound managers and police.

This continued the trend documented in Amnesty International's June 2025 report, which showed that state authorities were aware of human rights abuses occurring at more than a third of all scamming compounds across the country, but failed to shut down those locations. Amnesty International's research shows a response that is inadequate in both scope and substance, that leaves victims unprotected.

5.3.1 REACTIVE RATHER THAN PROACTIVE INVESTIGATIONS – AND THE IMPLICATIONS

The government's investigations often appeared to be reactive rather than proactive, driven largely by international pressure, public visibility or crisis moments rather than systematic investigation or monitoring. Instead of conducting sustained operations with follow-up inspections, the authorities appeared to intervene only after abuses had escalated, videos had circulated or victims had already escaped, conditions that inherently favour perpetrators rather than survivors.

As a result of Cambodian authorities failing to take meaningful, proactive actions against scamming compounds, many of them reappeared in other locations or sometimes continued to operate in the same locations even after police interventions. In the case of KA01, KA03 and KA04, for example, police had long been aware that the Bokor mountain area, a remote mountain top, was used for scamming operations and torture. As described in the case study below, police previously intervened and possibly shuttered KA01 in 2023 and also assisted in the removal of victims from the KA03 and KA04 sites in 2025. Despite this, it took a young South Korean man's widely publicized and horrific death to spur further police action, which still failed to result in a complete shuttering of the sites at Bokor mountain.



CASE STUDY

BOKOR MOUNTAIN – KA01, KA03 AND KA04



A perimeter wall being constructed around the KA01 compound in mid-2025. This compound was previously abandoned or shuttered in 2023 after police interventions but was confirmed to be active again as of early 2025. © Amnesty International, 2025

During the scamming compound crisis, Bokor mountain was home to multiple scamming operations involving police interventions – even during the crackdown – yet the main company in control of the land where the compounds are located has avoided any police investigation as of the time of publication.

KA01, KA03 and KA04 sit atop the old French colonial retreat of Bokor mountain in Kampot province. Draped by the clouds, the location is remote. A large parcel of previously public land was awarded to the privately-held Sokha Hotel Co., Ltd. (Sokha Hotel) by the Cambodian government in 2011, to “develop ecotourism” on the mountain.⁹⁷ The KA01, KA03 and KA04 scamming compounds appear to all be located on the same parcel of land awarded to Sokha Hotel in 2011.

97 Sub-decree on Designation of management areas in nature protection areas to become a sustainable use area, 30 March 2011, Royal Government of Cambodia, Article 1.

CORPORATE CONTROL OF THE MOUNTAIN

Sokha Hotel describes itself as a “Cambodian owned company ... under the Sokimex Investment Group”.⁹⁸ As of 28 April 2026, Sokha Hotel⁹⁹ was listed as a “brand” on the website of Sok Kong Import Export Co., Ltd. (Sokimex Co.)¹⁰⁰ and was described on its own website as “under the Sokimex Investment Group”.¹⁰¹ Sokha Hotel, Sokimex Co. and Sokimex Investment Group Co., Ltd. were registered with the Ministry of Commerce and had the same directors as of 28 April 2026.¹⁰² The Chairman, one of two directors, was listed as Sok Kong,¹⁰³ a man who was previously appointed as an advisor to the Royal Government of Cambodia with the rank of Senior Minister from 2006 to 2008.¹⁰⁴

In August 2022, Sokha Hotel was awarded a casino license for Thansur Bokor casino,¹⁰⁵ located on the same parcel of land Sokha Hotel had been awarded in 2011. As of 5 April 2026, the Thansur Bokor casino appears on a map from the CGMC website that indicates that the casino was still in operation.¹⁰⁶

During site visits to the KA01, KA03 and KA04 compounds across 2024 and 2025, Amnesty International researchers sighted employees who controlled the access gate at the main entrance to Bokor mountain.¹⁰⁷ These individuals wore hats clearly marked with a Sokimex group company logo.¹⁰⁸ As of 7 May 2026, Sokha Real Estate Co., a subsidiary of Sokha Hotel,¹⁰⁹ advertised property developments on the same land, including at a site which later became KA03.¹¹⁰ A flyer accessed from the Sokha Real Estate website in April 2026 provides an image which Amnesty International analysed using site visits and satellite imagery and found that it shows the locations of KA01, KA03 and KA04 compounds, describing KA03 as “Crown Estates” and describing KA04 as “Staff house” (see image below). Additionally, the same flyer notes the “project is managed by Sokha Hotel Group”, presumably referring to the real estate projects featured in the brochure, of which Crown Estates is one.¹¹¹

98 Sokha Hotels & Resorts, official website, <https://sokhahotels.com/kh/>

99 Sokha Hotel lists its main business objectives as hotels and accommodation. See Sokha Hotel Co. Ltd., Company Extract, Cambodia Business Registration, last accessed on 28 April 2026.

100 Sokimex Investment Group, “Timeline”, <https://skmig.com/about-us/timeline>

101 Sokha Hotels & Resorts, official website, <https://sokhahotels.com/kh/>

102 Sok Kong Import Export Co. Ltd. (Sokimex Co. Ltd.) and Sokha Hotel Co. Ltd., Company Extracts, Cambodia Business Registration, last accessed on 28 April 2026.

103 Sokimex Investment Group, The Secret Behind the Success of Neak Oknha Sok Kong, January 2023, <https://skmig.com/public/files/Sok-Kong-English.pdf>, p 141.

104 Sok Kong Import Export Co. Ltd. (Sokimex Co. Ltd.), Company Extract, Cambodia Business Registration, last accessed on 28 April 2026.

105 Commercial Gambling Management Commission of Cambodia (CGMC), Press Release, 19 August 2022.

106 CGMC, Casino Operators Map, see “Thansur Bokor” pin at <https://cgmc.gov.kh/operators> គណៈកម្មការគ្រប់គ្រងល្បែងប្រៃសណីយ៍កម្ពុជា (accessed 5 April 2026).

107 Amnesty International site visits 2024, 2025.

108 Amnesty International site visits 2024, 2025.

109 The Sokha Real Estate website states that it is a subsidiary of Sokha Hotel: <https://www.sokharealestate.com.kh/en/>

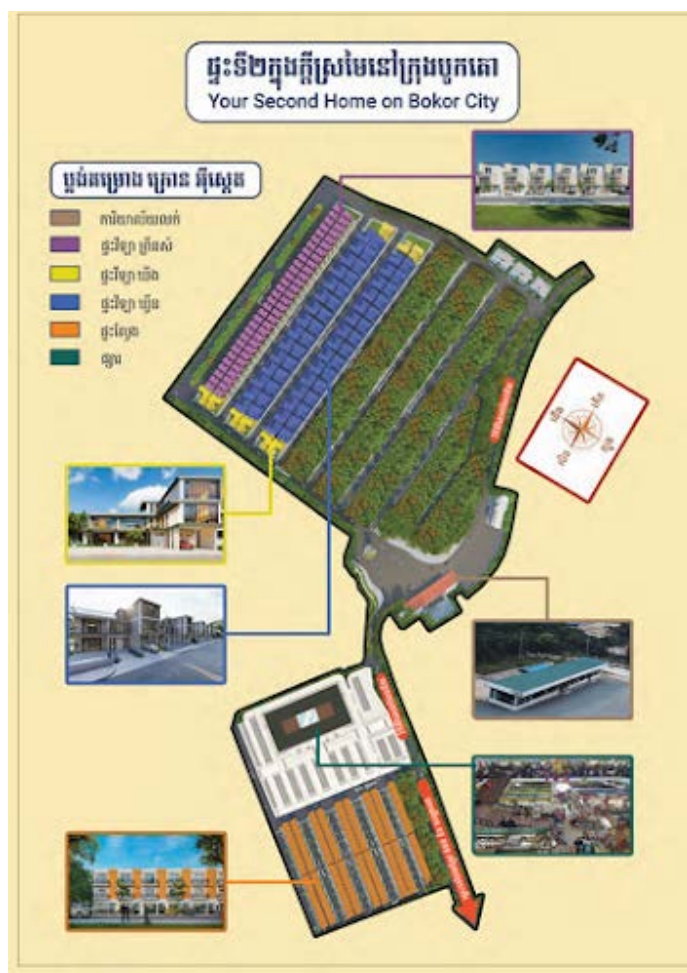
110 A brochure for Crown Estates by Sokha Real Estate (<https://www.sokharealestate.com.kh/crown-estates>) appears to match the location of KA02, http://sokharealestate.com.kh/files/digital_flyer_O9_2022.pdf

111 Sokha Real Estate brochure, http://sokharealestate.com.kh/files/Flyer_Sokha_Real_Estate.pdf

While it is not clear from the sub-decree issued in 2011 whether Sokha Hotel was granted title to or merely the right to use the land parcel to “develop ecotourism”, the totality of the evidence indicates that the company uses and exerts considerable – if not full – control over the land where the three scamming compounds are located. This is supported by four factors: the awarding of a casino licence at the site; the control of the main access road by employees wearing Sokimex group company logos (the group under which Sokha Hotel operates and with which it shares directors); the development of real estate on the land by Sokha Real Estate, a subsidiary of Sokha Hotel; and, most directly, a

Sokha Real Estate flyer that places KA01, KA03 and KA04 on a project map managed by Sokha Hotel Group, identifying the specific plots by name (see above).

KA03 also appears to correspond to the Crown Estates development site featured in a Sokha Real Estate brochure advertising property development on Bokor Mountain.¹¹² The following images taken from the same brochure show the Crown Estates project adjacent to the area victims identified as KA03.



Design for a Sokha Real Estate project (left) and the KA03 scamming compound (right).

112 Crown Estates by Sokha Real Estate brochure (previously cited).

RECURRING SCAMMING AND TRAFFICKING

Scamming compounds KA01, KA03 and KA04 all appear to have been investigated by Cambodian police at some point, but the evidence suggests that none of them were properly investigated. In at least two cases, the compounds did not close following police intervention; one remained operational for months after a raid conducted during the crackdown period.

KA01 was the first of the three compounds to come to police attention. It was operational as a scamming compound from at least 2022 to 2023,¹¹³

when Taiwanese and Cambodian police conducted interventions. It was later found abandoned in late 2024.¹¹⁴ This might appear to be a rare example of a compound successfully closed, but subsequent events suggest otherwise. In 2025, Amnesty International researchers documented increased security features at the site,¹¹⁵ and two requests for rescue confirm that KA01 had returned to operation and was once again involved in the deprivation of liberty between early and late 2025.¹¹⁶ When the site was originally investigated following Taiwanese police interest, CamboJA News visited and reported with photographs that guards at KA01 were wearing Sokha company logos.¹¹⁷ Sokha also operated a licensed casino approximately 120 metres from the compound.¹¹⁸ The company later told VOD that it had leased the portion of land suspected to be a scamming compound to another company, which had since departed.¹¹⁹

Despite the police having established in 2023 that a scamming compound was operating on Sokha Hotel's land, individuals held at KA03 (a second compound on the same property) were sending requests for rescue from as early as January 2025, according to records shared with Amnesty International by two organizations.¹²⁰ This means that authorities had been put on notice, or should have suspected, that trafficking was occurring at KA03 well before any action was taken. It was not until August 2025, when a young South Korean man was found dead, likely after being tortured or otherwise ill-treated, that Cambodian authorities moved.¹²¹ The death generated significant international media attention, particularly in South Korea, and appears to have prompted a swift response: authorities reportedly arrested individuals for torture and murder, and photographs included in subsequent news coverage suggest they investigated the KA03 site, though they never explicitly confirmed which compound the South Korean man had been trafficked to.¹²²

Yet even this intervention did not end operations at KA03. Three victims interviewed by Amnesty International identified pictures of the site and said they had been deprived of their liberty there from January 2025 until November 2025,¹²³ three months after the police raid.¹²⁴ All three were aware of the Korean man's death but could not confirm he had been held at their compound, though they believed he may have been.¹²⁵ One of them, *Alpha* (not his real name), from Sierra Leone, described how he and his friends eventually escaped:

113 Amnesty International, "Someone else's property" (previously cited), Annex I.

114 Camboja News, "Scams, Human Trafficking Thrived at Bokor Mountain Behind Tycoon's Luxury Hotel", 9 February 2023, <https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/>

115 Amnesty International site visits, 2025.

116 Rescue requests shown to Amnesty International by partner organizations, on file with Amnesty International.

117 Camboja News, "Scams, Human Trafficking Thrived at Bokor Mountain" (previously cited).

118 CGMC, <https://cgmc.gov.kh/operators>

119 Camboja News, "Scams, Human Trafficking Thrived at Bokor Mountain" (previously cited).

120 Records on file with Amnesty International, see Annex II, KA03 profile.

121 The Korea Times, "Gov't response team set to depart for Cambodia amid widening job scam crisis targeting Koreans", 15 October 2025, <https://www.koreatimes.co.kr/foreignaffairs/20251015/govt-response-team-set-to-depart-for-cambodia-amid-widening-job-scram-crisis-targeting-koreans>

122 Khmer Times, "In Pictures: Many arrested in raids in Kampot scam centres", 20 August 2025, <https://www.khmertimeskh.com/501741959/in-pictures-many-arrested-in-raids-in-kampot-scram-centres/>

123 Amnesty International interviews with *Alpha*, *Brima* and *Prince* (not their real names), 2026.

124 Khmer Times, "In Pictures: Many arrested in raids in Kampot scam centres" (previously cited).

125 Amnesty International interviews with *Alpha*, *Brima* and *Prince*, 2026.

**DURING THE COMMOTION, YOU
KNOW THEY [THE COMPOUND
MANAGERS AND SECURITY GUARDS]
HAD TO BURN EVERYTHING
AND RUN [FROM THE POLICE] ...
SO THERE WERE NO SECURITY
GUARDS SO WE JUST RAN OUT ...** ¹²⁶

Alpha, from Sierra Leone, describing how he and his friends escaped months after the police intervention.

A third compound, KA04, was active since at least mid-2025. Amnesty International was shown requests for rescue connected to the site.¹²⁷ By that point, all three confirmed scamming compounds – KA01, KA03 and KA04 – appeared to be operating on the same land the Cambodian state had awarded to Sokha Hotel for the development of ecotourism.

REACTIVE ENFORCEMENT

The pattern across these three compounds illustrates the limits of a reactive approach to enforcement. The August 2025 investigation into KA03, spurred by media pressure and the intervention of the South Korean government, demonstrates three things: that Cambodian authorities will act when external pressure is applied; that acting does not mean acting effectively, as KA03 continued operating for months after the raid; and that reactive investigations risk ignoring what should already have been under scrutiny. The police knew there was an operational scamming compound on Sokha Hotel's land in 2023. They received requests for rescue from KA03 and KA04 in 2025. Yet there is no evidence that at any point they investigated whether Sokha Hotel, as the company controlling the land, bore any responsibility for the abuses being committed on its property.

As of the date of publication, the authorities had not publicly indicated whether any investigation into Sokha Hotel's potential liability had been initiated, despite the company's land having hosted three confirmed scamming compounds, one of which was previously investigated and allowed to resume operations, and another of which continued functioning months into a government crackdown.

¹²⁶ Amnesty International interview with *Alpha*, 2026.

¹²⁷ See Annex I: KA04 profile.

INVESTIGATIONS INTO LANDLORDS MUST OCCUR IN PURSUIT OF JUSTICE

The UN Guiding Principles on Business and Human Rights state that all businesses, including landlords, bear a responsibility to respect human rights, which is independent of the state's duty to protect against human rights abuses by private actors.¹²⁸ Where privately controlled premises are used to facilitate the detention, coercion and exploitation of trafficked workers, property owners and landlords may face liability under Cambodian, transnational and international criminal law if there is evidence that they knowingly assisted in the trafficking, enslavement or torture of persons.

Sokha Hotel had previously stated, in response to reporting by CamboJA, that it had rented the land where KA01 operated to another company.¹²⁹ That does not, however, discharge its responsibility to conduct human rights due diligence to identify, prevent, mitigate and account for human rights harm arising from its own activities or those of third parties it is linked to, including tenants. Being made aware of KA01 in 2023 placed Sokha Hotel on notice that its property had been used to commit serious crimes, and it should have significantly heightened the scrutiny it applied to the use of that land thereafter.

Yet scamming operations continued on the same land (at KA03 and KA04) after Sokha Hotel had been put on notice, and KA01 itself resumed operations. Sokha Hotel therefore appears not to be in compliance with its responsibility to respect human rights, whether through a failure to conduct adequate due diligence or a failure to act on whatever findings such diligence may have produced. The persistence of three confirmed scamming compounds on its land, combined with the company's control over the roads in and out of the site (the same routes that would have been used

to bring trafficked persons onto the property) raises serious questions about the extent of the company's knowledge of, and potential involvement in, the abuses committed there. Amnesty International calls on the relevant authorities to immediately open a formal investigation into Sokha Hotel Co.'s operations at Bokor Mountain to determine whether the company and individuals affiliated with it bear any responsibility for those abuses.

Amnesty International wrote to Sokha Hotel and Sokimex on 15 May 2026 to give them an opportunity to respond to the allegations raised. At the time of publication, neither had responded.

5.3.2 HUMAN RIGHTS ABUSES CONTINUED AFTER INTERVENTIONS

Even in some locations where the state intervened, Amnesty International's evidence indicates these interventions were sometimes ineffective. As detailed in **Annex II**, Amnesty International found evidence showing **human rights abuses continued in at least three compounds, even after interventions by authorities during the crackdown period.**

The KA03,¹³⁰ MD02,¹³¹ and SI01¹³² compounds continued operating after police visits, with evidence suggesting guards, managers and infrastructure remained in place and survivors continued to be abused. In each of these cases, Amnesty International obtained evidence such as victim testimony and documented rescues of victims, which indicated the compounds were not shuttered despite police interventions.

At some sites, individuals deprived of their liberty were not identified or removed and taken to safety during police interventions; in others, scamming operations resumed once authorities had left. For example, authorities publicized their intervention

128 OHCHR, UN Guiding Principles on Business and Human Rights: Implementing the United Nations "Protect, Respect and Remedy" Framework, 2011, https://www.ohchr.org/sites/default/files/Documents/Publications/GuidingPrinciplesBusinessHR_EN.pdf, Principles 11 including Commentary.

129 Cambodia News, "Scams, Human Trafficking Thrived at Bokor Mountain" (previously cited).

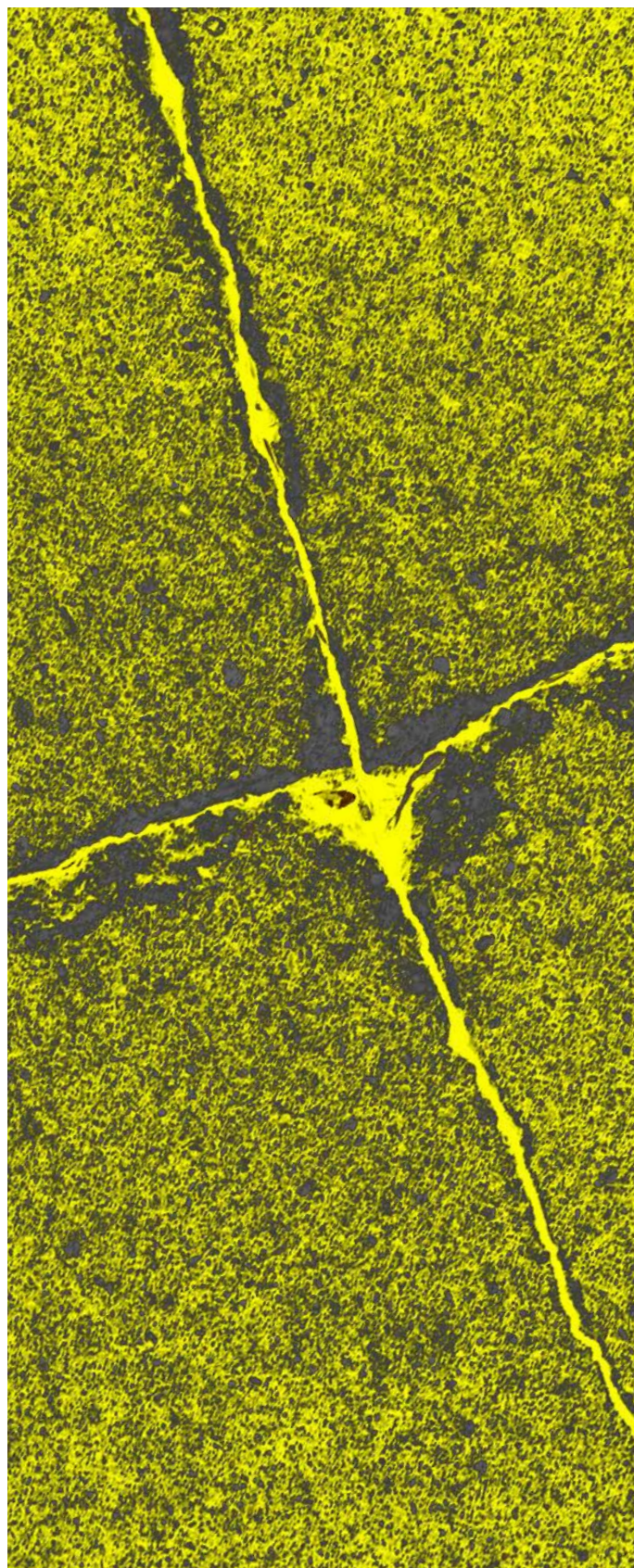
130 See Annex I: KA03.

131 See Case Study "Masquerade in Mondulkiri: MD02" and Annex I: MD02.

132 See Annex II: SI01.

at MD02 compound in July 2025 as part of the crackdown, however two trafficking victims who had been held there at the time revealed they were not rescued during that intervention, apparently because they were in an area of the same compound that the police never visited. The survivors knew it was the same compound because they recognized other people in the photographs from news stories about the raid. (See the case study below for more details.) As of publication, there is no further evidence to suggest the site has been shuttered or reinvestigated by authorities.

This demonstrates a continuation of the trend documented in Amnesty International's June 2025 report: State authorities were aware of human rights abuses occurring at more than a third of all scamming compounds across the country, but failed to shutter those locations.¹³³



¹³³ See Amnesty International, *“Someone else’s property”* (previously cited).

CASE STUDY

MASQUERADE IN MONDULKIRI – MD02



MD02: a scamming compound that was raided by police but continued to operate afterwards. © Amnesty International, 2025

On 22 July 2025, police, accompanied by a photographer, visited the MD02 site in the mountains of Mondulkiri province and arrested 149 foreign nationals, along with a number of Cambodian security guards.¹³⁴ Amnesty International's analysis of photographs from media coverage of the intervention found that the images appeared to show

only two sections of the compound were subjected to intervention.¹³⁵ A vehicle consistent with a police or state vehicle was later observed at one of these sections.¹³⁶ A third section of the compound appears to have gone untouched during the intervention: victims told Amnesty International they had been moved there and were not rescued by police, despite

134 Khmer Times, "In Pictures: 149 foreigners detained in Mondulkiri online scam raid", 22 July 2025, <https://www.khmertimeskh.com/501721847/in-pictures-149-foreigners-detained-in-mondulkiri-online-scam-raid/>

135 Geolocated by Amnesty International from images in Khmer Times, "In Pictures: 149 foreigners detained" (previously cited).

136 Amnesty International site visits, August 2025.

having been subjected to trafficking for the purpose of labour exploitation and subsequently deprived of their liberty within that part of the compound.¹³⁷

The intervention did not empty the site. Several people living nearby told Amnesty International that some individuals without passports were taken away by authorities at that time,¹³⁸ but guards remained stationed at entrance and exit points. Amnesty International's observation of the site over a two-day period in late 2025 revealed that many people were still inside the compound after the raid.¹³⁹



A guard opening the gate for a garbage truck at the MD02 compound © Amnesty International, 2025

Amnesty International interviewed four people who had been confined at the MD02 compound – three of whom arrived after the crackdown period had begun, and two of whom were present at the site during the July 2025 police intervention but were not rescued.¹⁴⁰ All four were able to identify the compound from photographs and descriptions of roads and gates. Two were able to identify security guards from photographs and recognised individuals pictured alongside police in news coverage of the raid.¹⁴¹

A young Thai man described being taken to the site in mid-2025 and moved between compounds against his will.¹⁴² When he arrived at MD02, he was instructed to work at a keyboard, a task that he was unable to perform, and was then forcibly transferred to another compound, where he was subsequently beaten so severely he could not sit down for a week.

Two people, from Venezuela and Colombia, reported being trafficked into the MD02 compound after the crackdown period began.¹⁴³ Their stories indicate they were initially trafficked into the TBK02 site and then were forcibly transferred, under threat of violence, to the MD02 site, after managers became worried about police action at TBK02. They identified the MD02 compound, its guards and the translator who was working there, from photographs. After the police intervened at the location in July 2025, the two survivors told Amnesty International that they heard about the police visit, but they did not see police at the site and were not rescued. Both victims were prevented from being able to leave the compound by managers and security guards.

In a site visit during the crackdown period, Amnesty International observed dozens of security guards at the site, as well as what appeared to be a police or state vehicle inside the compound and someone dressed in a military or police uniform at the site.¹⁴⁴ Further, Amnesty International researchers witnessed people and guards in the section of the compound where the victims said they had been held.¹⁴⁵

137 Amnesty International interview with *Andres* and *Valentina* (not their real names), 2025.

138 Amnesty International interviews with local people, August 2025.

139 Amnesty International site visits, August 2025.

140 Amnesty International interviews with *Nok*, *Andres* and *Valentina* (not their real names), 2025.

141 Amnesty International interview with *Andres* and *Valentina*, 2025, both of whom identified photographs from Khmer Times, "In Pictures: 149 foreigners detained" (previously cited). They provided photographs that matched those on file with Amnesty International.

142 Amnesty International interviews with *Nok*, 2025.

143 Amnesty International interview with *Andres* and *Valentina*, 2025.

144 Amnesty International site visits, 2025.

145 Amnesty International site visits, 2025.



A suspected police or state car inside the MD02 compound © Amnesty International, 2025



People, motorbikes and a car inside the MD02 compound. When this photograph was shown to victims, they positively identified this part of the compound as the location they'd been held inside of. © Amnesty International, 2025

5.3.3 COLLUSION BETWEEN COMPOUND MANAGERS AND POLICE



**THEY SAID THE POLICE
ARE COMING AND
PUT US ON A BUS
AND DROVE US INTO
THE MOUNTAINS.**

Two victims that were forcibly moved to avoid police during the 2025 crackdown.¹⁴⁶

Amnesty International's findings also suggest that collusion between compound managers and police further undermined the potential effectiveness of the interventions. Testimonies from several survivors,¹⁴⁷ as well as observations made by Amnesty International researchers during site visits, point to several cases where security personnel at compounds appeared to coordinate or communicate with local authorities.

The government's reactive posture likely contributed to the ongoing mobility of scamming operations, enabling networks to shift locations rapidly in response to any perceived government activity. Evidence obtained during the crackdown period indicates that compound managers repeatedly moved people to avoid police intervention. This is confirmed by testimony in some cases,¹⁴⁸ and witnesses in others.¹⁴⁹ This tactic was widely reported by media,¹⁵⁰ observers,¹⁵¹ and victims,¹⁵² during the first crackdown in September 2022. For example, in the days before the 2022 crackdown, multiple reports emerged of buses leaving compounds in Sihanoukville, where the crackdown was mostly focused, and of buses arriving at compound locations in Bavet.¹⁵³ In one instance, Amnesty International interviewed a survivor in 2022 who showed videos and photographs of people getting on buses at the SI42 compound in Sihanoukville.¹⁵⁴ The survivor said the bosses were moving people to Myanmar because of the crackdown, and took them to Phnom Penh during the night, where she escaped.

During the 2025-2026 crackdown, Amnesty International documented similar behaviour, with tip-offs regularly reported by victims who were forcibly moved between compounds. Eight victims said guards or managers told them the police were coming and they had to go.¹⁵⁵

146 Amnesty International interview with *Andres* and *Valentina*, 2025.

147 Amnesty International interviews with *Winta*, *Gabe*, *Andres* and *Valentina*, and *Mo*, 2025, 2026.

148 Amnesty International interview with *Winta*, *Gabe*, *Andres* and *Valentina*, 2025, 2026.

149 Amnesty International interviews with Organization 1 and local people, 2025.

150 See VoD, "Enslaved: An Investigation", <https://vodenglish.news/enslaved/>, especially VOD, "Echoes of Sihanoukville Troubles in Cambodian Border Town", 11 October 2022, <https://vodenglish.news/echoes-of-sihanoukville-troubles-in-cambodian-border-town/>; and VOD, "Scam Workers Relocated From Cambodia to Laos, Myanmar", 24 October 2022, <https://vodenglish.news/scam-workers-relocated-from-cambodia-to-laos-myanmar/>

151 Amnesty International interviews with Organizations 1 and 2, 2025.

152 Amnesty International interviews with *Gelila* (not their real name), 2023.

153 Amnesty International interviews with Organisation 1 and 2; VOD, "Echoes of Sihanoukville Troubles" (previously cited).

154 Amnesty International interview with *Gelila*, 2022. Amnesty International geolocated the pictures to confirm the buses were inside of the SI42 compound and showed the victim pictures of entrances and exits that she positively identified as the compound.

155 Amnesty International interviews with *Winta*, *Andres* and *Valentina*, *Indah*, *Mo*, *Luci*, *Don* and *Graham*, 2025 and 2026.

“

**[IN 2026] THEY PUT
EVERYONE IN A CAR
... A MILITARY CAR
ESCORTED US THE
WHOLE WAY TO POIPET.**

A victim who was moved between compounds to avoid police during the 2025 crackdown.¹⁵⁶

156 Amnesty International interview with *Andres and Valentina*, 2025.

TRAFFICKED PERSONS MOVED FROM CT01 TO BM02

In early 2026, during the crackdown, *Winta*, a survivor whose testimony indicates she was a child victim of trafficking for labour exploitation, was moved from the CT01 compound in Chrey Thum across the entire country to BM02, a compound in Banteay Meanchey. She said the managers at CT01 told everyone they had to leave urgently because police were coming. She was then put into a car and driven to BM02.¹⁵⁷ Another victim from the same compound confirmed her story and added that cars with military plates escorted the trafficking victims on their journey between compounds.¹⁵⁸ Cars with military plates were also seen in videos on an exit road when the BM02 compound and another location was investigated by police in early 2026. *Winta* identified both locations from photographs and described the journey and estimated time of travel accurately.

TRAFFICKED PERSONS MOVED FROM TBK02 TO MD02

In another case, two people from Venezuela and Colombia, who said they were trafficked into Cambodia, were deprived of their liberty at TBK02 in 2025. They described to Amnesty International how they were taken in the middle of the night to MD02 after being told by managers they were being moved to escape police interventions during the crackdown period.¹⁵⁹ The two victims identified both locations from photographs and described the journey and estimated time of travel accurately.

TRAFFICKED PERSONS MOVED FROM TK01 TO PV01

In another case, profiled below, Amnesty International believes the operations in the TK01 compound were likely relocated to PV01 to avoid police intervention. Evidence from the compound suggests security guards working at TK01 were later found working at PV01 in a time frame that matches when witnesses and videos suggest the TK01 compound was relocated.¹⁶⁰

TRAFFICKED PERSONS MOVED FROM PV01 TO TBK02

Another survivor told Amnesty International that he and others were forcibly relocated from PV01 to TBK02 during the crackdown. *Mo* (not his real name), a Ugandan man, was told he would be teaching English before arriving at the PV01 compound in June 2025.¹⁶¹ In January 2026, managers told him he was being sent to another compound to escape a police intervention. When he and others arrived at the TBK02 compound, the police arrived soon after. He told Amnesty International the police did not screen anyone, and simply told them to leave, or they would be arrested. *Mo* identified PV01 and TBK02 from pictures and described the travel time between the two locations accurately.

In another instance, *Luci* (not his real name), a Ugandan man, identified buildings at KA02 where he was confined and where he saw security guards beating people regularly. *Luci* said in January 2026 the managers told everyone to leave because police were coming to investigate the compound.¹⁶² Videos emerged on social media showing mass releases at the site around the same time.¹⁶³ On 10 February,

157 Amnesty International interview with *Winta*, 2026.

158 Amnesty International interview with *Gabe*, 2026.

159 Amnesty International interview with *Andres* and *Valentina*, 2025.

160 On file with Amnesty International.

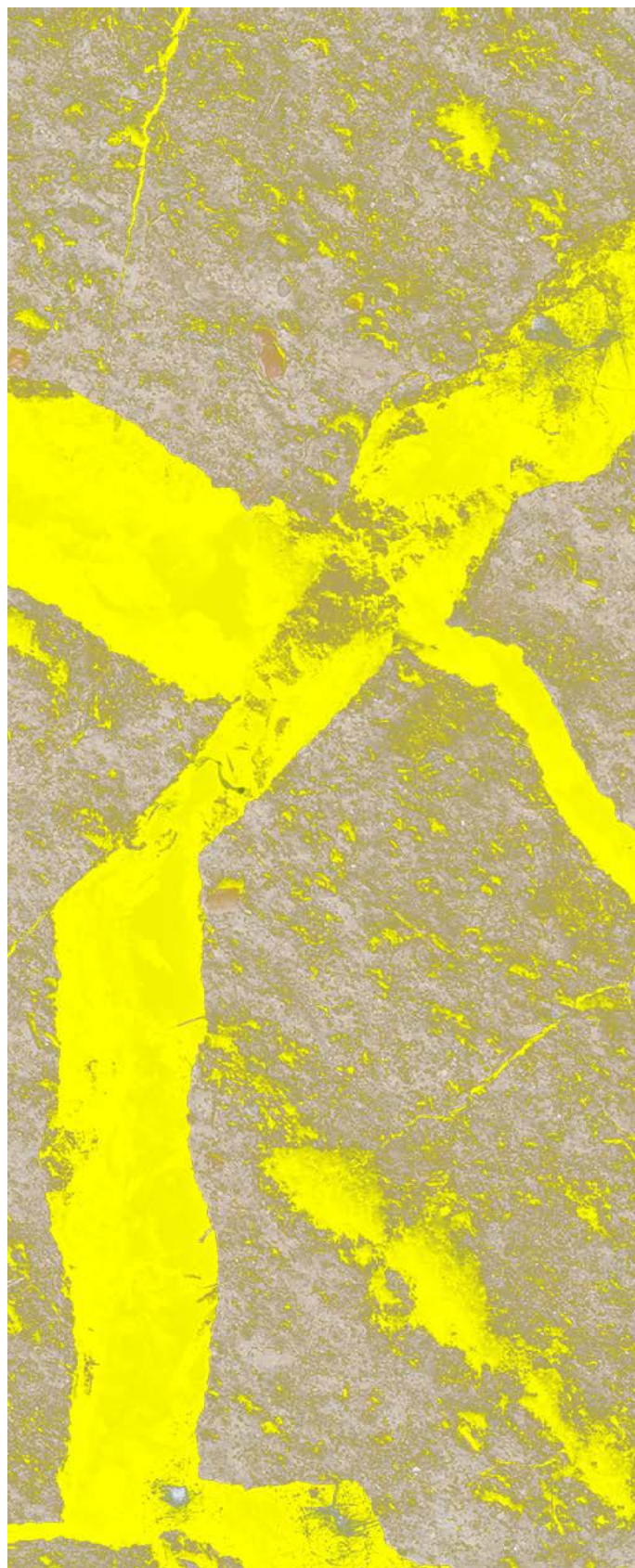
161 Amnesty International interview with *Mo*, 2026.

162 Amnesty International interview with *Luci*, 2026.

163 See *Cyber Scam Monitor*, <https://cyberscammonitor.net/>

after *Luci* had fled the site, police arrived and intervened at the compound.¹⁶⁴

These cases suggest a degree of collusion between police and managers within scamming compounds. Such collusive relationships erode any deterrent effect of state action, reinforce impunity and help explain why the Cambodian state's approach has failed to meaningfully disrupt scamming operations despite the scale of the crackdown.



164 See AML Intelligence, "News: Cambodia shuts nearly 200 scam centers in fraud crackdown" (previously cited).

CASE STUDY

"SAFEHAVEN" COMPOUNDS – PV01



PV01: a compound where multiple victims reported deaths inside © Amnesty International, 2025

“

**THE POLICE COME
TO GET THE BODIES.**

A victim inside “Park 8”, the PV01 compound.¹⁶⁵

165 Amnesty International interview with *Akella*, 2025.

PV01 is a compound which appears to have been untouched by police interventions, despite dozens of buses arriving to the compound in the early weeks of the crackdown, as well as reports of police having coffee inside and removing dead bodies from the site.¹⁶⁶

PV01 is a large-scale compound on the border of Viet Nam in Prey Veng province. It is a remote, very large compound that, at first glance, appears to be a housing development surrounded by rice fields. Despite its remoteness, the area is busy with cars, vans and buses. Dozens of security guards diligently patrol and stop cars at every gate, with more on the inside at second gates, and further security guards with guns inside offices.¹⁶⁷ Security guards wear black masks over their faces. Nearby, sitting next to rice fields and little else, is a helicopter pad.¹⁶⁸

PV01 was considered a “safehaven compound” – a location which has not been the subject of police intervention during the crackdown and where other compounds that fear police actions may have been relocating to. The compound is known to police: Eight victims, who identified the buildings and security guards, told Amnesty International that police regularly came to the location, including to remove dead bodies, drink coffee and visit.¹⁶⁹ *Elise* (not her real name), a Ghanian woman, told Amnesty International that after one person died, she approached a police officer inside the compound and asked, in English, for help, but was dismissed and ignored.¹⁷⁰

Social media evidence suggests that TK01 compound, also known as “Mango 2”, may have relocated to the PV01 compound. TK01 compound was a notorious scamming compound that was thrust into the spotlight after South Korean news reported on it and it was later raided by Cambodian police in 2024.¹⁷¹ Despite this, the compound appeared to still be operational at the time of the crackdown announcement.¹⁷²

Amnesty International spoke with three people who witnessed buses leaving the TK01 site in July, during the crackdown.¹⁷³ Amnesty International also geolocated a video posted in Telegram chats, showing a truck and other cars leaving the compound around the same time period.¹⁷⁴ Police later stated they could not catch the people who left the TK01 site in time.¹⁷⁵

Amnesty International researchers visited the PV01 site in July 2025 and spoke with local organizations who reported local people had seen buses “lined up and down the street” waiting to get into the PV01 site.¹⁷⁶ The number of buses was described as “unusual”, indicating greater activity than was normally observed. The time period in which these buses were seen at the PV01 site lines up with time period in which buses were seen leaving the TK01 site.

166 Amnesty International interviews with *Elise*, *Akella*, *Namazi*, *Nalini*, *Mutoni*, *Kenyangi*, *Dembe* and *Nasiche* (not their real names), 2025, 2026.

167 Amnesty International interviews with *Akella*, *Namazi*, *Nalini*, *Mutoni*, *Kenyangi*, *Dembe* and *Nasiche*, 2026; Amnesty International site visits, 2025.

168 Amnesty International site visits, 2025.

169 Amnesty International interviews with *Elise*, *Akella*, *Namazi*, *Nalini*, *Mutoni*, *Kenyangi*, *Dembe* and *Nasiche*, 2025, 2026.

170 Amnesty International interview with *Elise*, 2025.

171 KBS News, “직접 가본 캄보디아 ‘범죄도시’... 한국인 납치되는 이유는?” [“Cambodia’s ‘Crime City’ I Visited in person... Why are Koreans being kidnapped?”], 23 October 2024, https://www.youtube.com/watch?v=l_AzoduLZnc (in Korean); Camboja News, “1,000 foreign workers found in raid on suspected Kampong Speu scam compound”, 25 October 2024, <https://cambojanews.com/1000-foreign-workers-found-in-raid-on-suspected-kampong-speu-scam-compound/>

172 Amnesty International site visits, 2025.

173 Amnesty International interviews with witnesses, 2025.

174 Social media videos on file with Amnesty International.

175 The Nation, “Korean media expose abandoned scam compound in Cambodia — suspected flight to neighbouring countries with victims”, 17 October 2025, <https://www.nationthailand.com/news/asean/40056929>

176 Amnesty International site visits, 2025.

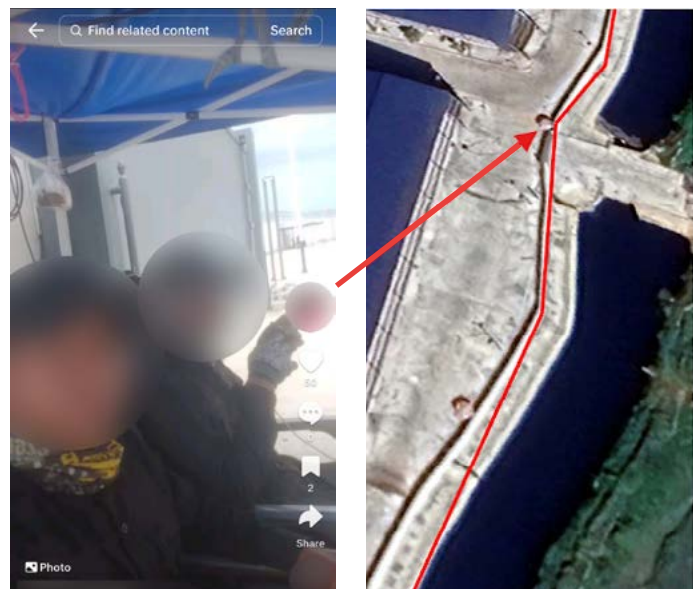
Further, Amnesty International recorded and geolocated public social media posts that show a guard from the TK01 site moving to work at the PV01 compound during the period in which the TK01 site was abandoned.¹⁷⁷ The user's uniform and positioning within the compound match suspected guard locations and the uniforms of some guards seen during site visits to the scamming compound.¹⁷⁸ The images below show the guard at PV01, on the inside of the northern most perimeter wall, as posted on 13 July 2025.

The same user then posted videos showing what could be him and other guards on a bus on 20 July 2025. These dates align with the period when buses are seen leaving the compound.¹⁷⁹

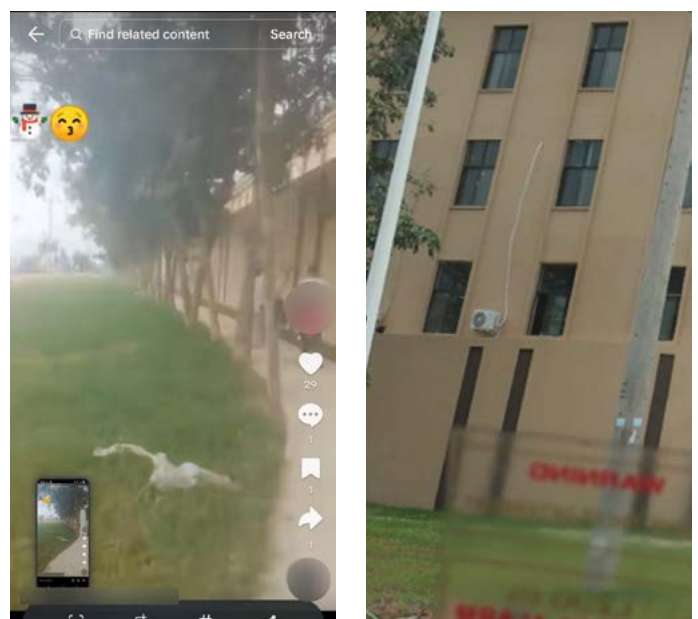
The next day, on 21 July 2025, the user posted images and videos of himself and other security guards, which Amnesty International geolocated to the PV01 site (see below).¹⁸⁰

This indicates that the security guard moved from the TK01 site to the PV01 site during the same period as witnesses saw buses leaving the TK01 site and arriving at the PV01 site.¹⁸¹

Despite being able to track movements of security guards, Amnesty International could not find evidence that Cambodian police investigated the PV01 compound until January 2026, when a survivor told Amnesty International he was moved to TBK02 because managers told him police were coming.¹⁸² However, it could not be confirmed that police intervened to shutter the location.¹⁸³ Amnesty International documented abuses or sighted rescue records that indicate the police were aware of the location and the deprivation of liberty of people inside the compound since 2024 and throughout 2025.¹⁸⁴ Yet Amnesty International



A security guard posted videos of himself and other guards (left) which Amnesty International geolocated to be at the TK01 scamming compound (right).



A security guard posted videos (left) that Amnesty International geolocated to the PV01 site (right).

177 On file with Amnesty International.
 178 Amnesty International site visits, 2025.
 179 On file with Amnesty International.
 180 On file with Amnesty International.
 181 On file with Amnesty International.
 182 Amnesty International interview with *Mo*, 2026.
 183 See Annex II: PV01, which notes an investigating judge visited the location in 2026.
 184 See Annex I, PV01 profile.

spoke with victims who had been inside PV01 until January 2026.

Elise (not her real name), a young woman from Kenya, broke down in tears as she recalled her experience inside of PV01. "They would beat you", she said. After asking to go home, she was taken to the bosses' office, where she was locked up, not allowed to bathe, given food and water only once a day, and threatened with violence.¹⁸⁵

But the police did not free the other people trapped inside.¹⁸⁶

In late 2024, an organization shared with Amnesty International that they had assisted in the rescue of two people from this site, which involved the assistance of Cambodian police.¹⁸⁷ Then later in mid-2025, another organization also reported rescues from the site that involved Cambodian authorities.¹⁸⁸ This further confirms not only that the Cambodian police were aware of the site, but that they had strong evidence about the abuses occurring at it because they had to make rescues from the site of people deprived of their liberty.

Amnesty International submitted this information to the Cambodian government on 30 April 2026. At the time of publication, they have not responded.

“

I SAW A WOMAN DIE INSIDE. WE TRIED

TO WAKE HER, BUT SHE WAS DEAD ALREADY ...

THE POLICE CAME TO GET THE BODY ...

THEY TOOK HER HUSBAND TOO.

189

185 Amnesty International interview with *Elise*, 2025.

186 Amnesty International interview with *Elise*, 2025.

187 Records on file with Amnesty International.

188 Records on file with Amnesty International.

189 Amnesty International interview with *Elise*, 2025.

5.4 STATE RECOGNITION OF CASINO PLANS AT KNOWN SCAMMING COMPOUNDS

The Cambodian government's intervention strategy has been inadequate not only in scope but also in substance. The lack of comprehensive action, the reactive nature of operations, the failure to shut down compounds even when present at the sites, and evidence of collusion, are further exacerbated by the state recognizing casino plans at known scamming compounds. These factors all point to a system in which abuse is allowed to persist.

The government's crackdown order tasked the Commercial Gambling Management Commission of Cambodia (CGMC) with "enhanc[ing] the management and supervision of all licensed casino or gaming centres, ensuring full protection from: (1) online scams; (2) kidnapping, torture and illegal detention; (3) human trafficking and all forms of sexual exploitation".¹⁹⁰ Despite this, the CGMC recognized plans from more than a dozen casinos which were linked to scamming compounds. In all cases, Amnesty International has evidence that the human rights abuses documented took place within the buildings marked as part of the casino complexes recognized by the CGMC. The recognition of the casinos by the CGMC demands accountability.

On 3 April 2026, the Head of the Secretariat of the Commission for Combating Online Scams said the Commission would "tak[e] the information provided [from the Amnesty International investigation] to continue the investigation".¹⁹¹ However, as of publication, no casino named in Amnesty International's investigation had their licenses revoked during 2026.

APPROVAL OF CASINO PLANS AT KNOWN SCAMMING COMPOUNDS DURING THE CRACKDOWN

In December 2025 and January 2026, the CGMC reviewed and recognized plans submitted by

companies operating casinos. These included Crown casinos in the cities of Poipet, Bavet and Chrey Thum, and the Majestic Two and Majestic Hotel & Casino in Sihanoukville, whose former chairman was charged in January 2026 with illegal recruitment for exploitation, aggravated fraud, organized crime and money laundering. The CGMC published detailed maps of the casino complexes, which show casino buildings, rental buildings, guest accommodation, hotels and general facilities.

By comparing the official CGMC maps with satellite imagery, analyzed alongside Amnesty International's own visits to compounds and testimony from survivors gathered for its June 2025 report, Amnesty identified 11 instances where the compounds profiled in the 2025 report were within the casino complexes recognized by the CGMC. An additional complex, the Crown Bavet Casino, was linked to very recent evidence of human rights abuses: In January 2026, Amnesty interviewed two individuals from Kenya who had been subject to forced labour and deprived of their liberty at the casino complex, in one case until December 2025.

Amnesty International has since identified five further CGMC-approved casino plans for scamming compounds, meaning a total of 16 casinos received CGMC recognition despite being directly linked to serious human rights abuses and scamming compounds.

The list below identifies the casinos that had their plans recognized by the CGMC during the crackdown period:

- **D.T.G Casino**, operated by D.T.G International Entertainment, is the same location Amnesty International identified as scamming compound BA01, a newly identified compound. Amnesty International interviewed victims from this location who said they were deprived of their liberty at the site and threatened with violence during the crackdown period.
- **Jin Dicheng**, operated by Jing Ta Ti Real Estate, is the same location Amnesty

190 Point 8.

191 Kiripost, "Cambodia Accepts Amnesty Report Linking Licensed Casinos to Abuse" (previously cited).

International identified as scamming compound BM03, a newly identified compound. Amnesty International reviewed records that indicated victims were removed from this location after being deprived of their liberty during the crackdown period.

- **Thaiyang Chhen E Loe**, operated by Thaiyang Chhen E Loe Co. Ltd., is the same location Amnesty International identified as scamming compound SI42 in its June 2025 report.
- **Gold Planet Casino & Resort**, operated by Amaze Trading Co., is the same location Amnesty International identified as scamming compound PO24, a newly identified compound. Amnesty International interviewed two victims who were forced to scam at this location during the crackdown period.
- **Crown Casino Bavet**, Crown Casino Chrey Thum and Crown Resorts, operated by Anco Brothers Co. Ltd., a Cambodian company, is the same locations as Amnesty International identified respectively as scamming compounds BA08, CT03 and PO18, where evidence of human trafficking and forced labour was documented.
- **The New Venetian**, operated by the New Venetian Resort Co. Ltd., is the same location Amnesty International identified as scamming compound BA03.
- **Casino Kyom (My casino)**, operated by Zhou Cheng K.P. Hotel Co. Ltd., is the same location Amnesty International identified as scamming compound KA02.
- **Marinan International**, operated by Marinan International Co. Ltd., is the same location Amnesty International identified as scamming compound PO07, where evidence of human trafficking and forced labour was documented.
- **Peak Casino**, operated by Conglomerate Development Group Co. Ltd., is the same location Amnesty International identified as scamming compound SI12.
- **Majestic Hotel & Casino and Majestic Two**, both operated by Big House Commercial Corporation, are the same locations Amnesty International identified as scamming compounds SI15 and SI16, respectively, where evidence of human trafficking, forced labour, child labour and enslavement were documented.
- **Long Feng Xuan Casino**, operated by Long Feng Xuan Co., Ltd., is the same location Amnesty International identified as scamming compound SI20.
- **Huang (or Wang) Chao International**, operated by Bao Shi International Entertainment Co. Ltd., is the same location Amnesty International identified as scamming compound SI32.
- **Golden Sea Casino**, operated by King Golden Sea Corp Ltd., is the same location Amnesty International identified as scamming compound SI50, where evidence of human trafficking, forced labour and torture and other ill-treatment was documented.

Between March and May 2026, Amnesty International wrote to all named casinos to give them an opportunity to respond to the allegations raised. At the time of publication, none had responded.



06

FAILURE TO

IDENTIFY, PROTECT

AND SUPPORT

VICTIMS OF HUMAN

TRAFFICKING

In the last year, thousands of people were released and escaped from slavery, or conditions akin to it.¹⁹² It is unclear to what extent these releases and escapes were a direct result of the Cambodian government's enforcement actions, though the crackdown probably played a role. However, victims of trafficking often found themselves going *from the frying pan into the fire*: stranded, without the support of Cambodian authorities, susceptible to being arrested for lacking legal residency status and at risk of being forcibly sent back to their home countries, where they risked being prosecuted or persecuted. Instead of being identified as victims of human trafficking, they were either sent to immigration detention centres or ignored.

Amnesty International's research and other reports suggest thousands of people, possibly many more, were released or escaped or were moved from 16 compounds. Amnesty International found evidence of mass releases, evacuations or mass escapes - incidents in which many people appear to have left a compound. Half of these incidents occurred at compounds that were later intervened at by authorities, reinforcing the possibly collusion alluded to above. Annex II provides further evidence on a compound by compound basis.

It is not clear why some people were released, though organizations suggest compound managers may have been trying to appease authorities or were scared and were fleeing police themselves.¹⁹³ In two cases, Amnesty International spoke with several victims who left compounds after they found fleeing security guards and were told by them that the

security guards and managers were leaving to avoid police interventions.¹⁹⁴

The mass exodus of workers from compounds represented a new phase of the scamming crisis, in which thousands of people, possibly tens or hundreds of thousands, including many who are very likely to be victims of human trafficking, forced labour and other serious human rights abuses, were left by the state without any support or shelter.

The USAID cuts that hit the world in 2025 devastated the anti-human trafficking sector, leaving the NGOs in Cambodia in a severely weakened state, with only a few known shelters, mostly underfunded, to help trafficking victims. Public reporting indicates that as of April 2026, there was only one shelter for victims of scam compounds in Cambodia, with capacity for just 100 individuals. The state had not established or allowed the operation of additional shelters for victims of scamming compounds, despite the obvious and urgent need.¹⁹⁵

Combined with the Cambodian government's policy of monitoring and harassing organizations,¹⁹⁶ this has led to a crisis where victims lack both support from the Cambodian government and from NGOs. Victims reported that the police did not help and foreign embassies remained one of the few lifelines for most victims. But for those whose embassies are not in Cambodia, or whose embassies are not able or willing to help them, they were left to fend for themselves.

192 Amnesty International Australia, "Cambodia: Victims must be protected as thousands 'leave scamming compounds'", 19 January 2026, <https://www.amnesty.org.au/cambodia-victims-must-be-protected-as-thousands-leave-scamming-compounds/> and Amnesty International Australia, "Cambodia: Growing humanitarian crisis as escaped scamming compound survivors tell of murder, rape and torture", 28 January 2026, <https://www.amnesty.org.au/cambodia-growing-humanitarian-crisis-as-escaped-scamming-compound-survivors-tell-of-murder-rape-and-torture/>

193 Amnesty International interviews with experts 1 and 2, 2026.

194 Amnesty International interviews with *Rakib, Rezaul, Saiful, Arif, Tanmay, Alpha, Brima* and *Prince* (not their real names), 2026. These victims escaped from the S103 and KA03 compounds.

195 The Asahi Shimbun, "In Cambodia, thousands flood out of 'scam compounds' and find increasingly little help", 12 February 2026, <https://www.asahi.com/ajw/articles/16347993>

196 Between August 2022 and February 2026, three rescue workers and three journalists were arrested for investigating the scamming compound industry and providing support to victims of human trafficking. Additionally, VOD was shut down by the Cambodian government likely because of its extensive reporting on the issue. See VOD, "'Blood Slave' Gets Suspended Sentence" (previously cited); VOD, "Wife Says Trafficking Rescuer Sentenced to Two Years in Prison" (previously cited); Amnesty International, "Cambodia: Shuttering 'Voice of Democracy' outlet is attempt to slam door on independent media" (previously cited); Amnesty International, "Cambodia: Charges against journalist highlight clampdown on press freedom" (previously cited); LICADHO, "Journalists Detained Over Video of Alleged Cyberscam Torture" (previously cited); KiriPost, "Detained Journalist Released After Deleting Photos of Suspected Scam Centre Raid in Dara Sakor" (previously cited).

6.1 DURING STATE INTERVENTIONS

Interviews with victims, organizations and videos from social media indicate that many people previously held in scamming compounds have ended up in state-run detention centres during the crackdown.¹⁹⁷ It is likely that the people removed from compounds during the 200 supposed state interventions were also sent to state-run detention centres,¹⁹⁸ or were ignored and told to leave the area.¹⁹⁹

Amnesty International interviewed two victims from inside a detention centre who shared images and said that the detention centre they were held in lacked bedding, that police did not inform them how long they would be detained for and did not provide them access to their embassies or lawyers.²⁰⁰ They also described potentially unsafe conditions in the detention centre. In one case, a Bangladeshi man reported being attacked by other inmates.²⁰¹ And in the other, a Ugandan man provided information about a woman passing out inside a detention cell.²⁰² An organization reiterated to Amnesty International that it tries to help victims avoid going through immigration detention, especially women, because of the hardships, including lack of bedding and food and risk of violence, that people face inside.²⁰³

The Cambodian government routinely failed to identify victims of human trafficking during the crackdown period,²⁰⁴ leaving them without support and vulnerable to further exploitation, including trafficking by organized criminal groups operating

in the area. Amnesty International spoke primarily to survivors who had not been rescued by police, instead escaping or being released. None of the victims Amnesty International spoke with were told they were identified by police as a victim of human trafficking, although the majority had yet to be interviewed by any state authorities. Interviews with organizations confirmed that the state had not been conducting victim identification,²⁰⁵ and follow-up communication with several survivors confirmed that they had not been given any victim status. Organizations and victims suggest that victims are rarely given victim status, and are instead subjected to three months in detention centres.²⁰⁶ This is contrary to the National Committee for Countering Trafficking in Persons' (NCCT) Guidelines, released in 2015, which established its purpose is:

“to facilitate victim identification through observation, asking questions, gathering information and searching for elements of victimization in potential victims of human trafficking in order to temporarily presume that s/he is a “victim” status so that protection, support and appropriate services can be provided in a timely and humane manner, and without discrimination, while awaiting further investigation in accordance with judicial procedures.”²⁰⁷

According to organizations, testimony from victims and social media videos, people were rounded up and taken to immigration centres or temporary holding points, where they were held without access to legal counsel, with inadequate bedding, and not informed of how long they would be held there.

197 Amnesty International interviews with *Simba* and *Aditya* (not their real names), 2026; Amnesty International interviews with Organization 1, 2, 3, 2025, 2026.

198 Amnesty International viewed social media videos indicating temporary detention centres had been set up and the government had also repurposed the TK01 scamming compound into a detention centre: *CamboJA News*, “Scam Hub ‘Mango Park 2’ Shut” (previously cited).

199 Amnesty International interviews with *Winta* and *Mo* (not his/her/their real name/s), 2026.

200 Amnesty International interviews with *Simba* and *Aditya*, 2026.

201 Amnesty International interview with *Aditya*, 2026.

202 Amnesty International interview with *Simba*, 2026.

203 Amnesty International interview with Organization 2, 2026.

204 Amnesty International interview with Organization 2, 2025.

205 Amnesty International interview with Organization 1, 2, and 3, 2026.

206 Amnesty International interview with Organization 1, 2, and 3, 2026.

207 NCCT Guidelines (previously cited), p. 7.

Cambodia recently repurposed TK01,²⁰⁸ a scamming compound with significant security features, into a detention centre, which is a sign of how many people authorities anticipate having to detain as a result of the crackdown, escapes or releases. However, a detention centre is very different from a rescue shelter, which would be specifically equipped to deal with victims of human trafficking, many of whom will have suffered torture and have been traumatised by their experiences. TK01, by its very design, may even retraumatise victims as they find themselves once more detained in a former scamming compound. The Cambodian government did not appear to have a single shelter capable of providing support to victims of human trafficking.

In other cases, the police did not actively help victims instead ignoring them. *Mo* described being told by police to leave the area when the TBK02 compound was subjected to intervention.²⁰⁹ Instead of being screened for being a victim of human trafficking, he was told to go somewhere else or risk being arrested. This is something other victims also described to Amnesty International (see the case study below).

This demonstrates a pattern of failure on the part of Cambodian authorities to identify, protect and support victims of human trafficking and torture – one of the state's core obligations under international law.

6.2 REPATRIATION

Many victims of human trafficking were not only held in detention centres, they were asked to pay

visa-overstay fees. Amnesty International spoke to victims and organizations who confirmed that the primary concern of police is not identifying who is a victim, but rather whether a person has a visa that has expired, and if so, how much that person must pay in order to leave the country.²¹⁰ Amnesty International identified several people who were very likely to be victims of human trafficking, due to the abuses they were subjected to during their recruitment to and time in scamming compounds, who were interviewed by police while they awaited repatriation. They were not formally identified as victims of human trafficking by the state.²¹¹ As a consequence, the Cambodian government did not waive visa overstay fees and potentially arrested or significantly delayed the repatriation process for victims who were desperate to return to their families and home country. In some cases, victims reported taking loans and borrowing money to pay fees to leave Cambodia.²¹²

In other cases, people were returned to countries in circumstances that may amount to a breach of the non-refoulement principle – an international legal norm which prohibits states from sending people to countries where they are at risk of human rights violations, including torture or the death penalty, among others.²¹³ Under the principle of non-refoulement, states are prohibited from transferring a person from one country to another where there are substantial grounds for believing that the individual would face a real risk of serious human rights violations, including torture or other ill-treatment.²¹⁴ This obligation arises under Article 3 of the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention against Torture) and the International Covenant on Civil and Political Rights (ICCPR) and

208 CamboJA News, "Scam Hub 'Mango Park 2' Shut" (previously cited).

209 Amnesty International interview with *Mo*, 2026.

210 Amnesty International interviews with Organization 2, 3, 2026.

211 Amnesty International interviews with *Aditya*, *Simba*, and *Cecilia*, 2026.

212 Amnesty International interviews with *Aditya*, 2026.

213 Convention relating to the Status of Refugees, 1951, Article 33. Non-refoulement is considered customary international law and is binding on all states. See also: UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention against Torture), Article 3; Committee Against Torture, General Comment 4: On the implementation of Article 3 of the Convention in the context of Article 22, 4 September 2018, UN Doc. CAT/C/GC/4, para. 10.

214 Convention Against Torture, Article 3; Committee Against Torture, General Comment 4 (previously cited), para. 10; Human Rights Committee, General Comment 20: Prohibition of torture and cruel treatment or punishment, 26 May 2004, UN Doc. CCPR/C/21/Rev.1/Add 13, para. 12; and Human Rights Committee, General Comment 31: Nature of the general legal obligation imposed on states parties to the Covenant, 28 July 1994, UN Doc. HRI/GEN/1/ Rev.1, p. 31, para. 1.

applies regardless of the individuals' nationality, immigration status or the circumstances of their presence in Cambodia.²¹⁵

Despite this, Cambodia has deported many people to China during its most recent crackdown, including people accused of scam-related crimes.²¹⁶ In January 2025, China executed 11 people for their role in scam-related crimes in Myanmar.²¹⁷ According to reporting in the Washington Post, and information obtained by Amnesty International, Cambodia has also previously returned a Uyghur person, whose ethnic and cultural group is persecuted in China, and who was a victim of human trafficking to China.²¹⁸

The lack of resources and options available to victims once they are freed from compounds often leaves many with little choice but to return to their country of origin – even if they do not want to or fear doing so. *Mo*, a survivor of PV01, said he feared being targeted by his traffickers upon return to his home country.²¹⁹

Even though five years of public reporting strongly indicates that individuals in the scamming industry are highly likely to have been trafficked or otherwise exploited, the Cambodian government is not doing enough to support people who escape or are removed from scamming compounds. It has put them at risk of further abuse by routinely treating survivors as irregular migrants rather than applying the presumption of victim status required by the government's own NCCT guidelines.



215 Convention Against Torture, Article 3; Committee Against Torture, General Comment 4 (previously cited), para. 10; Human Rights Committee, General Comment 20 (previously cited), para. 12; General Comment 31 (previously cited), p. 31, para. 1.

216 Cambodianess, "Over 3,300 Foreigners Deported as Cambodia Intensifies Online Scam Crackdown", 9 February 2006, <https://cambodianess.com/article/over-3300-foreigners-deported-as-cambodia-intensifies-online-scam-crackdown>

217 BBC, "China executes 11 members of Myanmar scam", 29 January 2026, <https://www.bbc.com/news/articles/cx2gdrvy9gjo>

218 The Washington Post, "A Uyghur man escaped China's Xinjiang. Cambodia deported him back", 12 December 2024, <https://www.washingtonpost.com/world/interactive/2024/china-uyghur-muslim-genocide-cambodia-deportation/>

219 Amnesty International interview with *Mo*, 2026.

CASE STUDY

POIPET POLICE AND CORRUPTION

AT THE LOCAL LEVEL

THE POLICE OFFICER WENT INTO THE COMPOUND AND GOT MY PASSPORT BACK. HE CAME OUT AND SAT IN THE CAR – IT WAS JUST ME AND HIM.

HE SAID POLICE OFFICERS DON'T GET PAID VERY MUCH AND THAT I OWED HIM. HE TOOK MY WATCH AND ALL THE MONEY I HAD. HE SAID HE COULDN'T HELP ME GET BACK TO MY HOME COUNTRY.

A Moroccan man describes how he was treated by police in Poipet after escaping a scamming compound.²²⁰

Poipet, a city in the north-west near the border with Thailand, continues to be a location where police are complicit in the torture and other ill-treatment occurring inside scamming compounds across the city. Amnesty International collected testimony and other evidence suggesting the police know the locations of scamming compounds and are failing to act to stop them, and ignoring or arresting and extorting victims of human trafficking.

In five cases, Amnesty International spoke with victims of scamming compounds who were either arrested by Poipet police or extorted by them for money and personal belongings.²²¹ In addition, even after victims described to police what had happened to them – principally that they were trafficked into scamming compounds and deprived of their liberty – the police did not shutter the scamming compounds or launch investigations, and in one case, the police appeared to be in contact with a compound.²²²

In mid-2025, a Moroccan man, *Hassan* (not his real name), told Amnesty International he was deceived into going to Cambodia for a job and then forcibly taken to a compound in Poipet. He was subjected to forced labour, other ill-treatment and deprivation of liberty in PO22 compound. *Hassan* told Amnesty International he managed to escape the compound during the crackdown period but had abandoned his passport and other belongings in his bid for freedom. He eventually found his way to a local police station, where he sought help from Cambodian police officers. One police officer took on his case and drove him back to the compound. The police officer told *Hassan* to stay in the car while he entered the compound. He came out a short time later and handed *Hassan* his belongings, including his passport, which had been held by the compound boss since *Hassan* arrived at the site. The officer then turned to *Hassan* and told him that police were

220 Amnesty International interview with *Hassan*, 2025.

221 Amnesty International interview with *Hassan, Lek, Noi, Dam, Em and Winta*, 2025.

222 Amnesty International interview with *Winta*, 2026.

not paid well and he needed to be paid. He took *Hassan's* remaining money and watch, leaving him with no funds. He then abandoned *Hassan* and told him he could "help" him no further.²²³

Hassan's case is not unique. In October 2025, four Thai victims of trafficking in persons were being forcibly moved between compounds after being held at the PO07 and PO16 compounds. They described how they were stopped by police and arrested. A tuk-tuk driver who was transporting them was handcuffed, and they were all taken to a police station in Poipet, where they were questioned and told they would either need to pay to be released or they would go to court and face charges for being "illegal aliens" in Cambodia. Despite protesting their innocence, the police held them overnight, locking the men in cells, and telling the women to sleep on the floor of the police office. The next day, the police reiterated that they must pay or face criminal charges. The police also added that, alternatively, they could call their "employer" from the scamming compounds to come and get them. At that point, two

of the women, *Nok* and *Lek* (not their real names), told the police they would rather face Cambodian jail than go back to the PO16 compound. *Nok* continued to tell the police she did not have the money to pay and asked the police to go to the PO16 compound to get the money from them. The police told her they were aware of the compound but that they would not go there. The next night, all four were released. The police told them to leave in batches, to talk to no one and offered no other help. The police turned off all the lights at the police station and released them back onto the streets of Poipet.²²⁴

In November 2025, authorities were reported to have investigated, made arrests and shut the PO07 compound,²²⁵ from which some of the Thai victims had been released months earlier. As of publication, Amnesty International could not find any evidence that PO16 or PO22 had also been targeted by raids.

223 Amnesty International interview with *Hassan*, 2025.

224 Amnesty International interview with *Hassan*, *Lek*, *Noi*, *Dam* and *Em*, 2025.

225 <https://www.akp.gov.kh/post/detail/352991>

6.3 THE ROLE OF THE INTERNATIONAL COMMUNITY

Just as the Cambodian government has neglected to fulfil many of its duties towards victims of human trafficking, so too have some members of the international community. While this report focuses mostly on the Cambodian government's efforts in its latest crackdown on scamming compounds, states other than Cambodia also have obligations to prevent trafficking in persons and protect victims. A human rights response to the scamming compound industry requires that states work together to facilitate protection for victims of human trafficking. Many embassies continue to do little to support their nationals stranded in Cambodia, while other states withdraw funding from anti-trafficking groups.

Article 9 of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (the Palermo Protocol) requires States Parties "to take and strengthen measures to alleviate the factors that make persons, especially women and children, vulnerable to trafficking and utilize other measures, both legislative and otherwise, to discourage the demand that fosters all forms of exploitation of persons, especially women and children, that leads to trafficking."²²⁶ This places prevention obligations on all States Parties, including those whose nationals are being trafficked to Cambodia. Despite this, most of the victims that Amnesty International spoke with were recruited into the scamming industry because they faced economic hardship in their home countries.

States also have an obligation to identify any of their nationals or permanent residents who are trafficking victims and, if they are identified, repatriate them if they wish to return.²²⁷ However, some of the victims that Amnesty International spoke to said their embassies did not help them enough or at all.²²⁸ For example, victims reported not receiving support from their embassies to purchase flights tickets back to their home countries.²²⁹ In two cases, victims said they or their families had to take on debt to purchase their tickets home.²³⁰ In other cases, victims said they did not receive enough support in advocating to the Cambodian government to let them leave without going through immigration detention.²³¹

Amnesty International found that victim and support organizations lacked sufficient resources to shelter and advocate on behalf of victims of human trafficking. In 2025, the gutting of USAID meant that organizations working in the anti-human trafficking sector were without funding or operating on significantly reduced budgets.²³² Additionally, organizations told Amnesty International that many foreign aid programs have not provided funding to shelters or other initiatives that would help to provide support for victims of human trafficking, including physical and psychological care, and legal assistance to pursue justice.

Some victims of abuses in the scamming compounds are repatriated only to face prosecutions by their own governments. Some states, like Thailand, frequently prosecute victims of human trafficking – arresting them shortly after they are repatriated.²³³

226 Palermo Protocol, Article 9(4),(5).

227 Article 8 of the Palermo Protocol, "Repatriation of victims of trafficking in persons", holds that "The State Party of which a victim of trafficking in persons is a national or in which the person had the right of permanent residence at the time of entry into the territory of the receiving State Party shall facilitate and accept, with due regard for the safety of that person, the return of that person without undue or unreasonable delay." As noted by OHCHR, "[a] failure to identify a trafficked person correctly is likely to result in a further denial of that person's rights. States are therefore under an obligation to ensure that such identification can and does take place." OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 2: Identification of Trafficked Persons and Traffickers.

228 Amnesty International interviews with *Winta, Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe, Rakib, Rezaul, Saiful, Arif, Tanmay, Aditya* and *Nasiche* (not his/her/their real name/s), 2025, 2026.

229 Amnesty International interviews with *Elise, Akella, Namazi, Nalini, Mutoni, Kenyangi, Dembe* and *Nasiche*, 2025, 2026.

230 Amnesty International interviews with *Simba* and *Aditya*, 2026.

231 Amnesty International interviews with *Simba, Aditya, Prince, Brima* and *Alpha*, 2026.

232 Amnesty International interviews with Organization 1, 2 and 3, 2025, 2026.

233 Amnesty International interview with Organization 1, 2025.

“

**THEY COME BACK AND
THEY ARE PROSECUTED
FOR SCAMMING.**

A rescue group discussing what happens to victims when they cross back into their home countries.²³⁴

234 Amnesty International interview with Organization 2, 2025.

One organization told Amnesty International that many victims from Thailand are prosecuted by Thai authorities for crimes they were forced to commit inside of scamming compounds.²³⁵ Amnesty International interviewed several victims who were being prosecuted in Thailand for illegally crossing an international border and other offences related to the scamming industry, despite the fact that Amnesty International and another organization considered them to be survivors of human trafficking. This is in breach of the principle of non-punishment, which means that trafficked persons should not be detained, charged or prosecuted for activities they were involved in “as a direct result” of being trafficked, including immigration offences.²³⁶

States must protect victims from punishment for criminal activities they were compelled to commit.²³⁷ According to the UN Special Rapporteur on Trafficking in Persons, this applies irrespective of the “gravity or seriousness of the offence committed”.²³⁸ The UN Office of the High Commissioner for Human Rights (OHCHR) Recommended Principles and Guidelines on Human Rights and Human Trafficking state that “[t]rafficked persons shall not be detained, charged or prosecuted for the illegality of their entry into or residence in countries of transit and destination, or for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as trafficked

persons”.²³⁹ The principle of non-punishment should be applied without discrimination, and should not depend on whether a presumed or identified trafficked person cooperates with law enforcement or in criminal proceedings.²⁴⁰

Revictimization can amount not only to a further violation of victims’ human rights, but also may deter them from wanting to cooperate with police. In some cases, victims may further endanger themselves by trying to avoid any government processes, including in Cambodia or their home countries – leading them to take unsafe, irregular routes to cross borders,²⁴¹ or even return to scamming compounds to try and find other ways to escape the industry.²⁴²

In order for justice initiatives to be launched, especially for legal proceedings in foreign countries that would help foreign governments fulfil their own obligations to counter human trafficking,²⁴³ the protection of victims is paramount, as victims provide significant evidence that can be used to investigate and prosecute individuals and companies responsible for crimes in the scamming industry. However, protection and care should never be contingent upon survivors giving evidence.

235 Amnesty International interview with Organization 2, 2025. See also Hard Stories, “Scammed, enslaved, arrested: The triple tragedy of Thailand’s cyber scam victims”, 3 September 2024, <https://hardstories.org/stories/rights-suppression/when-cybercrime-trafficking-victims-become-suspects>

236 See OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle on Protection and Assistance, which states: “Trafficked persons shall not be detained, charged or prosecuted for the illegality of their entry into or residence in countries of transit and destination, or for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as trafficked persons.” CEDAW Committee, General Recommendation 38, para. 98 requires that duty bearers ensure “all women and girls who are victims of trafficking, without exception, are not subject to arrest, charge, detention, prosecution or penalty or are otherwise punished for... their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as victims of trafficking”. See also Special Rapporteur on Trafficking in Persons, Especially Women and Children (Special Rapporteur on Trafficking in Persons), Report on the Implementation of the Non-Punishment Principle, 18 May 2021, UN Doc. A/HRC/47/34, para. 18.

237 Protocol of 2014 to International Labour Organisation (ILO) Forced Labour Convention 1930, 28 May 2014, Article 4(2). Note that states are also required to ensure access to effective remedies, irrespective of victims’ legal status in the country under Article 4(1).

238 Principle on Protection and Assistance; Special Rapporteur on Trafficking in Persons, Report on the Implementation of the Non-Punishment Principle (previously cited), para. 37.

239 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking, Principle 7. Guideline 5.5 provides that States should guarantee that traffickers are and will remain the focus of anti-trafficking strategies and that law enforcement efforts do not place trafficked persons at risk of being punished for offences committed as a consequence of their situation.

240 For further discussion on the principle of non-punishment, Special Rapporteur on Trafficking in Persons, Report on the Implementation of the Non-Punishment Principle (previously cited).

241 Amnesty International interview with Organization 5, 2024.

242 Amnesty International interview with *Winta*, 2026.

243 Palermo Protocol, Article 9(4),(5).



07

ASSESSING

THE CRACKDOWN

While Cambodia's crackdown has led to some successes, these gains are undermined by serious and persistent failures. Amnesty International acknowledges that during the crackdown period, thousands of individuals escaped or were released from scamming compounds – a trend that continued as of the date of publication. While Amnesty International was unable to identify evidence of direct state intervention as the cause of all such releases, enforcement action likely played a role in shaping conditions across the industry more broadly. Some of these releases are noted in **Annex II**.

Yet the government's approach exposed deep cracks in its commitment to meaningfully address the scamming industry and protect those harmed by it.

Under international law, the Cambodian state has a duty to ensure that no one is held in slavery or servitude,²⁴⁴ or required to perform forced labour;²⁴⁵ must prevent, prohibit, investigate and prosecute acts of torture or other ill-treatment;²⁴⁶ take action to prevent, suppress and punish trafficking in persons,²⁴⁷ identify, assist and protect victims of trafficking without discrimination,²⁴⁸ and provide remedy.²⁴⁹

As the findings in this report show, Cambodia has fallen short of its obligations to prevent trafficking, protect victims and uphold their human rights – even if it has done more during this crackdown than at any other time to combat the scamming industry.²⁵⁰

7.1 FAILURE TO PREVENT SLAVERY, HUMAN TRAFFICKING AND OTHER ABUSES

The International Covenant on Civil and Political Rights,²⁵¹ the Convention on the Elimination of all Forms of Discrimination against Women²⁵² and the Convention on the Rights of the Child²⁵³ require states to protect individuals from trafficking-related abuses. Additionally, Article 9 of the UN Protocol to Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children (Palermo Protocol), which was adopted in 2000 and to which Cambodia is a state party, defines human trafficking as constituting three elements:

1. An "action": that is, the recruitment, transportation, transfer, harbouring or receipt of persons;
2. A "means" by which that action is achieved (threat or use of force or other forms of coercion, abduction, fraud, deception, abuse of power or a position of vulnerability, and the giving or receiving of payments or benefits to achieve consent of a person having control over another person); and
3. A "purpose" (of the action/means): specifically, exploitation.²⁵⁴

244 The prohibition of slavery and the slave trade is a peremptory norm of international law. It has been universally accepted by the international community and cannot be derogated from under any circumstances. See United Nations, Report of the International Law Commission Seventy-third Session (18 April–3 June and 4 July–5 August 2022), https://legal.un.org/ilc/reports/2022/english/a_77_10_advance.pdf, Chapter IV, pp. 9-16.

245 International Covenant on Civil and Political Rights (ICCPR), Article 8; ILO Forced Labour Convention 1930, Article 1.

246 Convention Against Torture, Article 2 and 5 and 16.

247 Palermo Protocol, Article 2.

248 Palermo Protocol, Article 6. See also: OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking.

249 ICCPR, Article 2.

250 For a full breakdown of the obligations under international law see "*I was someone else's property*" Amnesty International, June 2025.

251 ICCPR, Article 8.

252 CEDAW, Article 6.

253 CRC, Article 35.

254 "Trafficking in persons" shall mean the recruitment, transportation, transfer, harbouring or receipt of persons, by means of the threat or use of force or other forms of coercion, of abduction, of fraud, of deception, of the abuse of power or of a position of vulnerability or of the giving or receiving of payments or benefits to achieve the consent of a person having control over another person, for the purpose of exploitation. Exploitation shall include, at a minimum, the exploitation of the prostitution of others or other

All three elements must be present to constitute “trafficking in persons”.²⁵⁵ The only exception is when the victim is a child, in which case the “means” requirement is no longer an element of the crime.²⁵⁶

The Cambodian state has a responsibility to investigate scamming compounds to prevent slavery, forced labour, human trafficking and other abuses that occur inside scamming compounds.²⁵⁷ Despite these obligations, Amnesty International could not obtain evidence, even after writing to the Cambodian government, that indicated authorities investigated more than a third of the scamming compounds featured in this and previous reports.

Even where the state did investigate compounds, several investigations appeared to miss trafficked victims, failing to locate them in the compounds and leaving them to continue to face serious human rights abuses. This casts doubt on the effectiveness of the investigations that did occur. Case studies for MD02 (see **Masquerade in Mondulkiri**) and KA01, KA03, and KA04 (see **Bokor Mountain**) show that **interventions did not fully end the human rights abuses** at those locations.

Finally, testimony from survivors indicates managers were sometimes aware of police interventions before they happened and were able to flee and move to another location. This could indicate collusion between police officers and compound managers. These case studies strongly suggest that **police are**

unwilling, rather than unable, to properly investigate scamming compounds.

7.2 FAILURE TO PREVENT TORTURE AND OTHER CRUEL, INHUMAN OR DEGRADING TREATMENT OR PUNISHMENT

Authorities can be legally responsible if they knew that torture or other ill-treatment was occurring at a location, or where accusations had been made that they failed to exercise due diligence to investigate, prosecute and bring to justice.²⁵⁸ Under the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention against Torture), the state is required to investigate scamming compounds because of reasonable and well-documented grounds to believe torture or other ill-treatment²⁵⁹ is occurring inside of them.

Cambodia is a state party to the Convention against Torture,²⁶⁰ which prohibits torture and other cruel, inhuman or degrading treatment or punishment (hereafter, “other ill-treatment”) absolutely, in all circumstances and without exception. The Convention against Torture obliges Cambodia to ensure “prompt and impartial investigation, wherever there is reasonable ground to believe that an act of torture has been committed in any territory under its jurisdiction”²⁶¹ and to take “effective legislative, administrative, judicial or other measures

255 See UNODC, “Issue paper: The concept of ‘exploitation’ in the Trafficking in Persons Protocol”, 31 December 2015, <https://migrationnetwork.un.org/resources/concept-exploitation-trafficking-persons-protocol>, p. 5.

256 Palermo Protocol, Article 3(c).

257 ICCPR, Article 8; CAT, Article 1; OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 13.

258 UN Committee against Torture, General Comment 2 (previously cited), para. 18.

259 CAT, Article 1, which defines torture as an act with four elements: (1) intention, (2) infliction of severe physical or mental pain or suffering, (3) a purpose such as coercion, intimidation, obtaining information or a confession, or discrimination and (4) a degree of official involvement. In contrast, cruel, inhuman or degrading treatment or punishment (“other ill-treatment”) is not defined under international law. In line with the position of many international and regional human rights monitoring bodies, Amnesty International considers that cruel, inhuman or degrading treatment or punishment may be defined negatively in relation to torture in that it lacks one or more of the above-mentioned elements of the torture definition. See: CAT, Article 16. See also: UN Committee against Torture, General Comment 2: Implementation of Article 2 by States Parties, 24 January 2008, UN Doc. CAT/C/GC/2, para. 10. For example, an act of ill-treatment would constitute cruel, inhuman or degrading treatment or punishment rather than torture if it lacks the required intention or the required purpose, or if the pain or suffering it causes is not “severe”.

260 UN Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (Convention against Torture), adopted by General Assembly resolution 39/46, 10 December 1984, entered into force 26 June 1987. Acceded to by Cambodia in 1992.

261 CAT, Article 12.

to prevent acts of torture in any territory under its jurisdiction".²⁶² Cambodia's obligations include the duty to criminalize torture, to investigate allegations of torture and other ill-treatment promptly and impartially, to bring suspected perpetrators to justice, to provide remedies to victims, to train all officials involved in the handling of detainees regarding the prohibition of torture and other ill-treatment, to implement safeguards to prevent torture and other ill-treatment, and to refrain from sending or returning (refouler) a person to a state where they risk being subjected to torture, ill-treatment or other prohibited treatment.²⁶³

The UN Committee against Torture has stated that where torture or other ill-treatment occurs but is not directly committed by state actors, the authorities can still be responsible if:

- The authorities knew that torture or other ill-treatment was occurring at a location; or
- The authorities did not know, but they should have known; or
- Accusations have been made of torture or other ill-treatment; and
- The authorities have failed to exercise due diligence to investigate, prosecute and punish the non-state actors.²⁶⁴

As a result, the Cambodian government is obligated to investigate scamming compounds and protect people from torture and other ill-treatment within its territory.

In some of the scamming compound cases documented by Amnesty International, police were aware of torture, or the possibility of it, and have been for years.²⁶⁵ In fact, the publicity around scamming compounds, and the fact that police would have interviewed victims who would have told them about torture means authorities did know that torture was likely occurring at many scamming compounds. Indeed, interventions were spurred at the Bokor mountain sites likely because of torture, yet abuses were still recorded after the intervention period (see **Case Study: Bokor Mountain**).

Only 24 of the 86 scamming compounds of the scamming compounds identified by Amnesty International were investigated, implicating authorities in the torture of people inside of known scamming compounds that were not investigated.

Cambodian authorities have been aware for years that torture and other ill-treatment are occurring at scamming compounds across the country. Cambodian authorities have also been involved in hundreds of "rescues", many of which involved survivors interviewed by Amnesty International who had suffered torture or other ill-treatment. Forty-five of the 58 survivors interviewed for Amnesty International's June 2025 report told Amnesty International they had witnessed and/or been subjected to torture or other ill-treatment. All 73 survivors interviewed during the research for this report told Amnesty International they had witnessed and/or been subjected to torture or other ill-treatment. Therefore, the failure to shutter these compounds must be read as complicity in the torture of victims from those sites.

262 Convention against Torture, Article 2(1).

263 Convention against Torture, Articles 3-16. See also Committee against Torture, General Comment 2, para. 25 ("Articles 3 to 15 of the Convention constitute specific preventive measures that the States parties deemed essential to prevent torture and ill-treatment, particularly in custody or detention.").

264 UN Committee against Torture, General Comment 2 (previously cited), para. 18.

265 Amnesty International, "*Someone else's property*" (previously cited), Section 7.1.3.

7.3 FAILURE TO SUPPORT DUE DILIGENCE OF THE PRIVATE SECTOR

Under Protocol of 2014 to the International Labour Organisation (ILO) Forced Labour Convention, states are required to begin making progress towards eradicating forced labour by, amongst other things, strengthening labour inspection regimes and supporting due diligence in the public and private sector to address and respond to risks of forced labour.²⁶⁶ This includes the proactive monitoring of workplaces, an obligation that extends to scamming compounds where forced labour is known or suspected to occur. The ILO Forced Labour Convention, ratified by Cambodia, defines forced labour as “any work or service which is exacted from any person under the menace of any penalty and for which the said person has not offered himself voluntarily”.²⁶⁷

The government appears to be failing to support due diligence in the private sector, as the **Bokor mountain** cases show. In the case of KA01, KA03 and KA04, the Sokha company has at least twice rented land and buildings to companies operating scamming compounds.²⁶⁸ Despite this, there is no evidence of investigations into the company and possible complicity from authorities.

New regulations put in place during the crackdown may support due diligence in an inadvertent, possibly problematic way. The promulgation in January 2025 of the Sub-decree on Strengthening Security Management in Residential Areas may help to increase the due diligence required of property

managers. It is designed to prevent and suppress acts that threaten public safety by targeting heads of organizations, landlords and managers of collective living areas and special economic zones. It provides penalties for those who “intentionally conceal and allow undocumented foreigners to reside in their properties”.²⁶⁹ However, the sub-decree does not address that undocumented foreigners may be victims of human trafficking. Amnesty International spoke with informants who suggested that an unintended consequence of the sub-decree has been that trafficking victims have been unable to find adequate housing after escaping scamming compounds because guesthouses are scared of being fined.²⁷⁰ And there is no evidence so far that landlords are being penalised for concealing undocumented foreigners on their property, as the Sokha company case study above exemplifies.

7.4 FAILURE TO IDENTIFY, PROTECT AND SUPPORT VICTIMS OF HUMAN TRAFFICKING

Cambodia is obligated to identify victims of human trafficking,²⁷¹ and provide measures to ensure that “rescue” operations of trafficked persons do not further harm their rights and dignity.²⁷² The state is obliged not only to intervene at scamming compounds, but also to assist and protect victims of human trafficking.

Under the Palermo Protocol, Cambodia must provide for the “physical safety of victims of trafficking in persons while they are within its territory”,²⁷³ including by providing victims of trafficking with:

266 Protocol of 2014 to ILO Forced Labour Convention, Article 2.

267 ILO Forced Labour Convention, Article 2.

268 See “Case Study: KA01 and KA03”.

269 Royal Government of Cambodia, Sub-Decree No. 03 ANKR.BK on the Management of Safety and Security in Concentrated Residential Areas, 5 January 2026, Phnom Penh: Office of the Prime Minister, available at <https://hbslaw.com.kh> (accessed 27 April 2026).

270 Amnesty International interview with witness and Organization 2, 2026.

271 The Palermo Protocol requires states to assist and protect victims of trafficking in persons – something that would require states to first identify victims of human trafficking. Guideline 2 of the OHCHR Recommended Principles and Guidelines on Human Rights and Human Trafficking says that states should consider “Developing guidelines and procedures for relevant State authorities and officials such as police, border guards, immigration officials and others involved in the detection, detention, reception and processing of irregular migrants, to permit the rapid and accurate identification of trafficked person”.

272 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 5.6.

273 Palermo Protocol, Article 6(5).

- (a) Appropriate housing;
- (b) Counselling and information, in particular as regards their legal rights, in a language that the victims of trafficking in persons can understand;
- (c) Medical, psychological and material assistance;
- (d) Employment, educational and training opportunities.²⁷⁴

Identification should happen as early as possible to ensure their rights and prevent further traumatization,²⁷⁵ and should be carried out by a multi-disciplinary team, rather than exclusively by law enforcement or immigration authorities.²⁷⁶

The OHCHR Recommended Principles and Guidelines on Human Rights and Human Trafficking requires states to ensure that anti-trafficking measures do not adversely affect human rights,²⁷⁷ including by taking “measures to ensure that ‘rescue’ operations do not further harm the rights and dignity of trafficked persons”²⁷⁸ and by effectively investigating, prosecuting and adjudicating trafficking, including its component acts and related conduct, whether committed by governmental or non-State actors.²⁷⁹ The obligation to investigate extends to prosecuting those

responsible such as compound managers and their associates and bringing them to justice.

Finally, as a matter of good practice under the Recommended Principles and Guidelines on Human Rights and Human Trafficking, states should facilitate the “safe and, where possible, voluntary return of trafficked persons” and “explor[e] the option of residency in the country of destination or third-country resettlement in specific circumstances”.²⁸⁰

To prevent delays in accessing protection and assistance, a presumption of an individual’s status as a victim of trafficking should be adopted if there are reasonable grounds to believe that person has been trafficked.²⁸¹ Cambodia itself endorsed this principle in its 2015 Guidelines on forms and procedures for identification of victims of human trafficking for appropriate service provision.²⁸² According to the UN Special Rapporteur on trafficking, presumed victims should, pending formal determination, have immediate access to protection and assistance and should not be detained or otherwise deprived of their liberty, as such measures would breach the principle of non-punishment.²⁸³ A 2009 Policy on Protection of the Rights of Victims of Human Trafficking further clarified that a “[i]f there is inconclusive evidence on whether a person identified is [a] victim, it should be assumed that the

274 Palermo Protocol, Articles 6(2) and 6(3).

275 See, for example, CEDAW Committee, General Recommendation 38 (previously cited), para. 38; OHCHR Recommended Principles and Guidelines on Human Rights and Human Trafficking, Guideline 2 (previously cited); Special Rapporteur on Trafficking in Persons, Report on the Implementation of the Non-Punishment Principle (previously cited), paras 58-59.

276 CEDAW Committee, General Recommendation 38 (previously cited), para. 78.

277 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 3: Anti-trafficking measures shall not adversely affect the human rights and dignity of persons, in particular the rights of those who have been trafficked, and of migrants, internally displaced persons, refugees and asylum-seekers.

278 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 5.6.

279 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Principle 13. Note also that domestically, Cambodia adopted the Law on the Suppression of Human Trafficking in Cambodia (2008) with the aim of implementing the Palermo Protocol “or other international instruments or agreements with regard to human trafficking that the Kingdom of Cambodia has ratified or signed”, see the Law on the Suppression of Human Trafficking in Cambodia (2008), Article 1.

280 OHCHR, Recommended Principles and Guidelines on Human Rights and Human Trafficking (previously cited), Guideline 6.7.

281 Special Rapporteur on Trafficking in Persons, Report on the Implementation of the Non-Punishment Principle (previously cited); Council of the European Union, Framework Decision of 15 March 2001 on the standing of victims in criminal proceedings, https://eur-lex.europa.eu/eli/dec_framw/2001/220/oj/eng; ASEAN, Report on Strengthening National and Regional Referral Mechanisms on Trafficking in Persons in ASEAN: Gaps and Promising Practices, 2023, <https://aichr.org/wp-content/uploads/2024/01/Adopted-Report-on-Strengthening-National-and-Regional-Referral-Mechanisms-on-TIP-in-ASEAN.docx>, p. 11.

282 NCCT Guidelines, p. 7.

283 Special Rapporteur on Trafficking in Persons, Report on the Implementation of the Non-Punishment Principle (previously cited), para 58-59.

individual is a victim. This individual should have their rights respected and access to services in the same way as persons that are absolutely known to be victims of human trafficking."²⁸⁴ The policy outlines that victim identification can occur anywhere, and mentions that short-term and long-term shelters that provide support are available after victim identification, but does not clarify which centres or if they are government run.²⁸⁵

During the crackdown period, the Cambodian government has failed to adequately protect, identify and support victims of human trafficking. None of the victims interviewed by Amnesty International during the crackdown period had been recognized by the state as victims of human trafficking, despite Amnesty's research documenting how all of them met the Palermo Protocol's definition of a trafficked person,²⁸⁶ having been tricked or deceived into coming to Cambodia, subjected to forced labour, threatened with violence and deprived of their liberty, and in many cases tortured. Since 2022, Amnesty International has interviewed 133 people from scamming compounds, of which 131 provided testimony that indicated they met the definition contained in the Palermo protocol.

The requirement to presume victim status, as set out in the government's own human trafficking guidelines, has not been implemented. Instead, **the government routinely detains victims and potential victims of human trafficking in immigration detention centres – rather than victim-appropriate shelters. Victims are often treated like criminals, not told how long they will be in detention, not provided access to lawyers or their embassies, and are often kept in cells without bedding, that are typically overcrowded and are sometimes subjected to violence from other people inside.**

7.5 FAILURE TO PROTECT AGAINST INTIMIDATION

The 2014 Protocol to ILO Forced Labour Convention requires states to protect victims from punishment for criminal activities they were compelled to commit.²⁸⁷ This is in keeping with the finding of the UN Committee on the Elimination of Discrimination Against Women, which provides a general requirement to take "all appropriate measures" to suppress all forms of trafficking, to provide a specific requirement to "[e]nsure that all women and girls who are victims of trafficking, without exception, are not subject to arrest, charge, detention, prosecution or penalty or are otherwise punished for irregular entry or stay in countries of transit and destination for the absence of documentation or for their involvement in unlawful activities to the extent that such involvement is a direct consequence of their situation as victims of trafficking."²⁸⁸ Further, the Convention Against Torture requires protections for individuals who allege to be victims of torture, especially against "intimidation as a consequence" of the giving of evidence on torture.²⁸⁹

The current operation of immigration centres and the apparent refusal to acknowledge victims of human trafficking as such amounts to punishment for overstaying their visas or illegal entry into Cambodia.²⁹⁰ Additionally, the **Case Study: Poipet Police** shows several cases in which victims of human trafficking identified themselves to police and yet the police not only failed to assist them, but threatened them with arrest.

Based on this evidence, **the state is not meeting its obligations to protect victims of trafficking from punishment and intimidation.**

284 Government of Cambodia, Policy on Protection of The Rights of Victims of Human Trafficking, 9 September 2009, https://lib.ncdd.gov.kh/storage/app/public/library_backend/CAT_24591_1/2009-Policies-Standards-Policy on Protection of Rights of Victims of Human Trafficking-En.pdf, p. 10.

285 Government of Cambodia, Policy on Protection of The Rights of Victims of Human Trafficking (previously cited), p. 10.

286 Amnesty International has identified all but two of the 133 victims it has interviewed in the last three years as victims of human trafficking. The other two victims were subjected to forced labour and torture or other ill-treatment.

287 Protocol of 2014 to ILO Forced Labour Convention, Article 4(2). Note that states are also required to ensure access to effective remedies, irrespective of victims' legal status in the country under Article 4(1).

288 CEDAW Committee, General Recommendation 38 (previously cited), para. 98.

289 Convention Against Torture, Article 13.

290 Amnesty International interviews with Organization 1, 2 and 3; Amnesty International interviews with Simba and Aditya, 2026.

7.6 LACK OF TRANSPARENCY

International human rights law obliges states to maintain transparency in the fulfilment of their treaty obligations. The ICCPR,²⁹¹ the Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW),²⁹² the Convention on the Rights of the Child (CRC),²⁹³ and the ILO Forced Labour Convention,²⁹⁴ each impose reporting obligations to demonstrate progress in meeting their objectives. In the context of Cambodia's crackdown, this includes providing information to relevant treaty bodies not only on legislative measures taken, but also on the difficulties encountered and the operational steps taken to combat the scamming industry, including data on which locations were investigated, particularly where those locations are well-documented sites of human rights abuse widely known to the public and civil society.

The Palermo Protocol additionally requires states to "undertake measures such as research, information and mass media campaigns and social and economic initiatives to prevent and combat trafficking in persons."²⁹⁵ Fulfilling these obligations in a meaningful way requires a degree of transparency about whether and how anti-trafficking operations have been conducted.

Article 19 of the ICCPR, which safeguards the right to freedom of expression, encompasses a right of access to information held by public bodies.²⁹⁶ The UN Human Rights Committee has confirmed that states must proactively place government information of public interest in the public domain and ensure easy, prompt and practical access to it, including by enacting necessary procedures such as freedom of information legislation.²⁹⁷ The Global Principles on National Security and the Right to

Information, while non-binding, affirm a strong presumption of disclosure for information concerning human rights violations.²⁹⁸

Where investigations touch potential violations of the right to life, the UN Human Rights Committee has made clear that such investigations must be "independent, impartial, prompt, thorough, effective, credible and transparent" [emphasis added]. The Palermo Protocol further requires states to keep victims of trafficking informed of the status of legal proceedings and administrative measures taken in their cases.²⁹⁹

A lack of transparency may amount to a failure to uphold these obligations. Any exception on grounds of operational necessity must be narrowly construed, strictly necessary for the purposes of an effective investigation and time-limited.

As established in **Section 5.1** above, there are few specific publicly available details on the crackdown. Across the crackdown period, and even before it began, the Cambodian government has demonstrated a lack of transparency about how it reports on its actions during the scamming crisis. Even in publicly documented interventions, **the state has not been transparent about what it does during an intervention, what evidence it collects or where the intervention took place.** In most cases, Amnesty International had to geolocate scamming compounds where state interventions had occurred, because the government did not publish the locations.

The Cambodian government should inform the public about human trafficking and its risks in cooperation with civil society. But in this case, it has instead chosen to attack civil society by arresting journalists and rescuers who report on scamming compounds

291 ICCPR, Article 40.

292 Convention on the Elimination of All Forms of Discrimination Against Women (CEDAW), Article 18.

293 Convention on the Rights of the Child (CRC), Article 44.

294 ILO Forced Labour Convention, Article 22.

295 Palermo Protocol, Article 9(2).

296 ICCPR, Article 19.

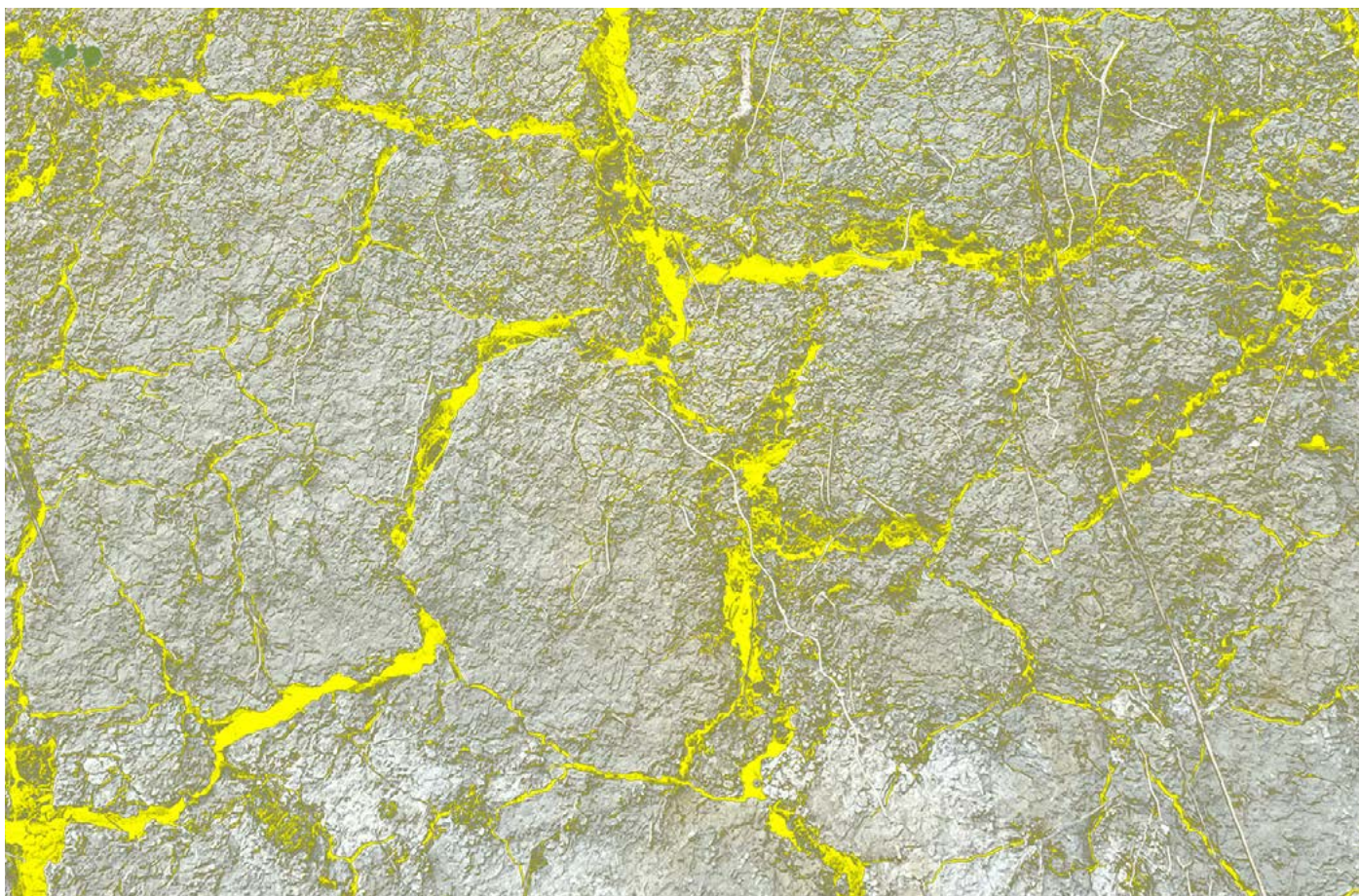
297 UN Human Rights Committee, General Comment 34 (previously cited), para. 19.

298 Open Society Foundation, The Global Principles on National Security and the Right to Information (the Tshwane Principles), 2013, <https://www.justiceinitiative.org/publications/global-principles-national-security-and-freedom-information-tshwane-principles>, Principle 10(A).

299 Palermo Protocol, Article 6 (2): "Each State Party shall ensure that its domestic legal or administrative system contains measures that provide to victims of trafficking in persons, in appropriate cases: (a) Information on relevant court and administrative proceedings".

and shuttering news outlets. Four journalists were arrested during the crackdown period alone.³⁰⁰

Based on this information, or lack thereof, the overwhelming conclusion is that **the Cambodian government is not attempting to be transparent and share information that would better allow assessments of its response to the scamming industry.** Instead, it is actively working against attempts at transparency and accountability by **arresting journalists and intimidating civil society and survivors** who attempt to report or provide information on the crisis. This undermines the claims of the Cambodian government and casts further doubt on its purported successes as it is impossible to verify them, and those who have attempted to do so have faced persecution.



300 KiriPost, "Detained Journalist Released After Deleting Photos of Suspected Scam Centre Raid in Dara Sakor" (previously cited); LICADHO, "Immediately release and drop charges against journalist Hem Vanna" (previously cited).



08

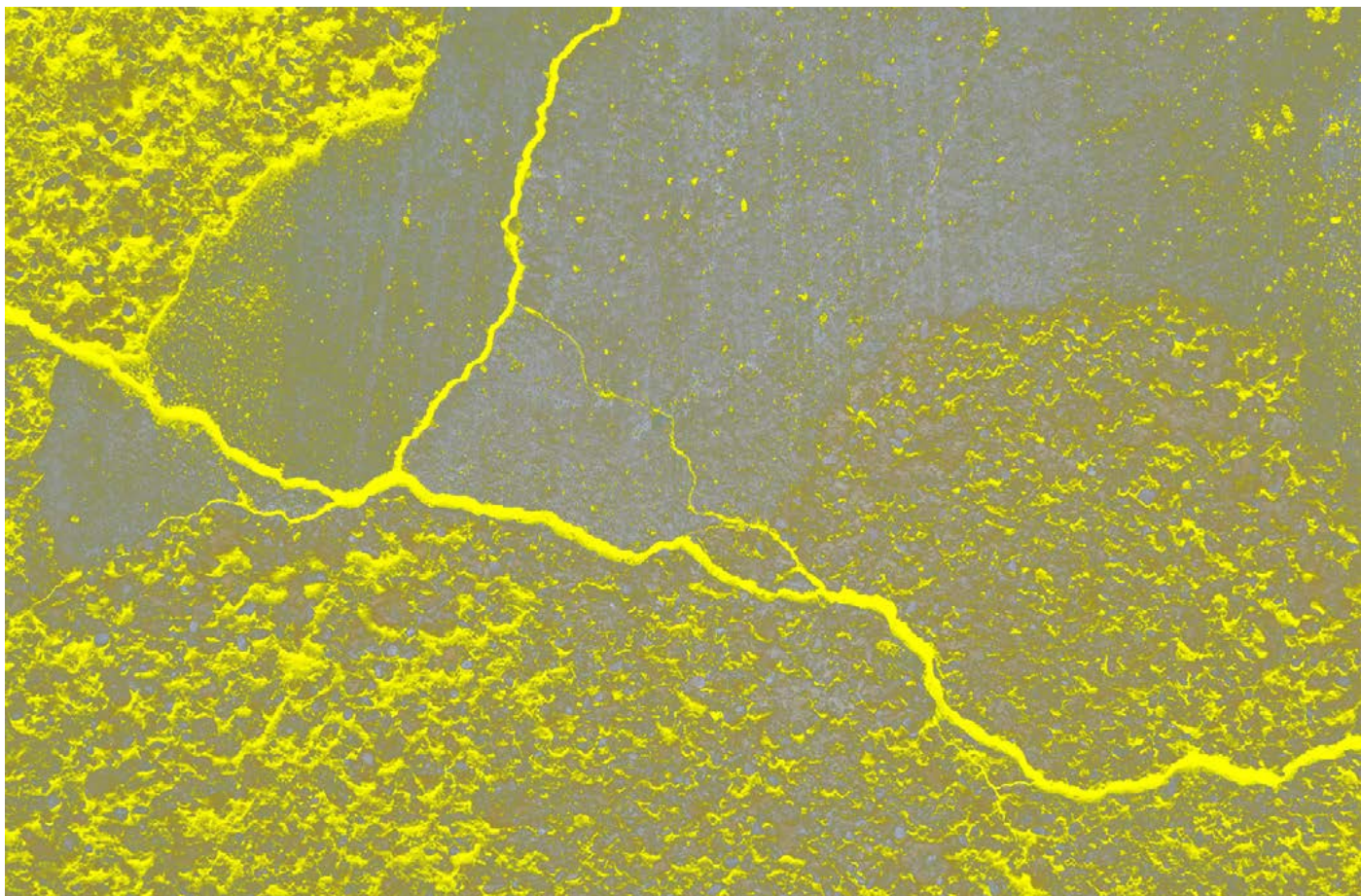
CONCLUSION

Cambodia's July 2025 to April 2026 crackdown on scamming compounds has fallen significantly short of its stated aims. Despite government claims of more than 250 interventions, Amnesty International found evidence of state action at only 24 of the 86 compounds it identified, and even those interventions were frequently reactive, incomplete or undermined by apparent collusion between compound managers and local authorities. The crackdown likely contributed to the release of thousands of people from conditions of slavery and forced labour, and that should be acknowledged. But the same crackdown left compounds operating for months after publicized raids, and in at least three cases human rights abuses continued at sites authorities claimed to have addressed. Meanwhile, authorities approved casino licences for facilities linked to known scamming operations.

The government's treatment of survivors has compounded the harm. Not one of the 73 survivors interviewed by Amnesty International was recognised as a victim of human trafficking by Cambodian authorities, despite all of them meeting the internationally agreed legal definition. Instead of

receiving protection, authorities have consistently treated people fleeing or being released from scamming compounds as irregular migrants and have not provided them the support they need. This is despite Cambodia having had victim identification guidelines since 2015 and years of public reporting to put it on notice. This reflects a failure of political will, and it has left thousands of human trafficking victims without recourse after suffering rape, torture and enslavement.

The Cambodian government must now act on what this crackdown has exposed rather than on the image it has tried to project. That means opening genuine investigations into all 86 identified compounds and the individuals and companies that profited from or enabled abuses on their premises; immediately implementing its own victim identification guidelines and providing survivors with the support and legal protection they are owed; and holding accountable those officials whose conduct – whether through inaction, collusion or active obstruction – has allowed this industry to persist.





09

RECOMMENDATIONS

9.1 TO THE CAMBODIAN GOVERNMENT

- Prioritise the protection of victims of human trafficking by ensuring shelters can operate, providing funding to shelters and assisting victims to stay in hotels or other safe locations until immigration processes can occur. The state should also consider opening shelters, not immigration detention facilities, for this specific purpose.
- Uphold the non-punishment principle by refraining from arresting, detaining or prosecuting identified or presumed victims of human trafficking for immigration or alleged criminal offences that may have been carried out as a direct consequence of their human trafficking.
- Urgently conduct a thorough and effective investigation into each of the scamming compounds identified in **Annex I** of this report, as well as **Annex I** of Amnesty International's June 2025 report, *Someone else's property*.
- Urgently conduct a thorough and effective investigation into each of the suspicious locations identified in **Annex III** of this report, as well as **Annex II** of the June 2025 report, *Someone else's property*.
- Review the implementation of the crackdown against the documented failures in this report and implement the review process of officials as outlined in the 9-Point Order.
- Implement a **proactive investigation** regime that continues the crackdown beyond the current period.
- Establish (or in the case they already exist: review) policies, regulations and protocols – in line with international law, notably the Palermo Protocol – regarding the response required as soon as police have knowledge about places with potential victims of human trafficking, ill-treatment, torture, deprivation of liberty and/or other human rights abuses,

and ensure that these policies, regulations and protocols are rigorously followed and enforced, and that failure to do so is followed by disciplinary and – where appropriate – criminal sanctions for responsible law enforcement officials.

- Immediately suspend the gambling licenses of the casinos named in this report and conduct a full, independent and transparent investigation into the violations documented at these sites. Investigate all those suspected of individual responsibility for crimes under international law or other gross human rights violations, including the owners, financiers and operators of these casinos.

With respect to the protection of victims of human trafficking and forced criminality:

- Ensure accurate and timely identification of victims and presumed victims of trafficking for all forms of exploitation, including forced criminality, to facilitate access to justice, assistance and remedy. This should include:
 - Guaranteeing the principle of non-punishment of presumed or identified trafficked persons, including for forced criminality and immigration-related offences, as soon as there are reasonable grounds to suggest that a person has been trafficked or as soon as a trafficking defence has been raised. This should include implementing specific legislation on the non-punishment principle, providing training to state authorities, and ensuring that trafficked persons are never held in immigration detention or other forms of custody;
 - Providing early and continuing support and assistance, including legal advice and safe access to shelter, psychological and material assistance, to trafficked persons, irrespective of their migration status or ability or willingness to cooperate in investigations;

- Ensure child victims of human trafficking are rapidly identified and dealt with separately from adults in relation to laws, policies, programmes and interventions, given the particular physical, psychological and psychosocial harm suffered by children who have been trafficked. Ensure that the child's best interests are considered paramount at all times;
 - Provide effective access to remedies and ensure that trafficked persons can remain safely in the country to pursue justice and reparations;
 - Waive all visa-overstay fees for victims and presumed victims of human trafficking.
 - Adopt guidelines for interventions at scamming compounds that require the presumption of victim of human trafficking status for foreign nationals at the location.
- Release and drop all charges against journalists who have been arrested and charged with crimes because of their reporting on the scamming industry, and encourage citizens and journalists to report on the presence of scamming compounds.
 - Investigate all allegations of torture or other ill-treatment and bring alleged perpetrators to justice through fair trials.
 - Ensure thoroughly independent and impartial investigations into all possible police wrongdoings, such as collusion with compound managers, failures in the duty to protect victims once they heard about cases of torture, as well as extortion and threatening of victims, in particular, but not limited to the cases presented in this report.

9.2 TO GOVERNMENTS OF COUNTRIES WHOSE NATIONALS ARE BEING TRAFFICKED INTO CAMBODIA

- Ensure that embassies are sufficiently resourced to provide information and urgent support to people in distress in Cambodia. Consider visiting immigration detention centres regularly to monitor conditions and speak with trafficked nationals.
- Take measures to alleviate the factors that make persons, especially women and children, vulnerable to trafficking and utilize other measures, both legislative and otherwise, including awareness raising campaigns, to discourage the demand that fosters all forms of exploitation of persons, especially women and children, that leads to trafficking,³⁰¹
- Screen repatriated persons for being victims of human trafficking and provide assistance to returned victims of human trafficking. Do not prosecute victims of human trafficking for crimes alleged to have been committed as a result of them being trafficked.

9.3 TO ALL OTHER STATES, INCLUDING THOSE WHOSE NATIONALS ARE BEING SCAMMED

- Continue to use the powers at their disposal, in line with international human rights law and standards, to compel the Cambodian government to take further action.
- Prioritise funding rescue shelters and civil society organizations that are working on this issue and supporting the victims.

301 Palermo Protocol, Article 9(4),(5).



ANNEX I

NEWLY CONFIRMED

SCAMMING COMPOUNDS

DESCRIPTION OF KEY ITEMS IN ANNEX

This Annex includes a “profile” for each new location that Amnesty International has determined to have been or be a scamming compound as of the date of publication. It does not include the former 53 scamming compounds that were identified in Amnesty International’s “Someone else’s property” 2025 report. As a result, these 33 new compounds are in addition to the 53 compounds previously identified. The total number of compounds that Amnesty International has now identified in Cambodia is 86.

For the purposes of this report and Annex, scamming compounds are locations where Amnesty International has determined with a level of confidence that online scamming or gambling is likely occurring, and where one or more trafficked persons or migrant workers, involved directly or indirectly in such operations, are subjected to deprivation of liberty and/or other human rights abuses carried out primarily by organised criminal actors, with the assistance of security guards.

Amnesty International has made this determination on the basis of the “totality of the circumstances”,³⁰² a common law and civil law legal standard that requires courts or judges to consider all relevant facts, circumstances and contributing factors surrounding a particular situation, rather than relying on a single factor or a bright-line. The evidence included for each profile is typically comprised of primary and secondary evidence which, jointly, have allowed Amnesty International to conclude that a certain location was at some point or is at the time of publication a scamming compound.

Coordinates: The coordinates included in each profile are mostly of the entry point to, what appears to be the entrance gate/door of, or the approximate location of the entrance of, the compound. Evidence considered in identifying the coordinates include, but is not limited to, geolocation based on photos taken by a survivor at the actual building while they were confined; a location identified by a survivor when shown photos of the site; site visits by Amnesty International researchers; and/or satellite imagery.

Satellite image: A satellite image is used to show each compound. A yellow box highlights the general area of the compound based on the coordinates described above.

Timeline: The timeline provides a (noncomprehensive) selection of events from primary and secondary sources that provide relevant information on the scamming compound, including whether human rights abuse took place at the site, instances of state (military, police or otherwise) intervention, Amnesty International site visits, evidence relating to “rescues” or escapes and others.

Physical and organizational security features: Amnesty International collected evidence indicating that these features were present at the scamming compound as of a certain date through site visits, use of photo-mapping platforms, satellite imagery and other sources.

Human rights abuse: This section outlines the key human rights abuses that occurred at the compound according to information obtained by Amnesty International.

State responsibility: This section summarises the determination by Amnesty International of the acts or omissions of the Cambodian state that indicate its failure to respect, protect and fulfil certain human rights.

Note: For security purposes, precise dates and details relating to testimony provided to Amnesty International are not always included.

302 Legal Information Institute and Cornell Law School, “totality of circumstances”, *Wex*, June 2024, https://www.law.cornell.edu/wex/totality_of_circumstances

TABLE OF NEWLY IDENTIFIED SCAMMING COMPOUNDS

	ID NUMBER	COORDINATES	HUMAN RIGHTS ABUSES	STATE RESPONSIBILITY	PAGE
Bavet					
54	BA01	11.0793, 106.1689	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
55	BA08	11.0734, 106.1718	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
Banteay Mean Chey					
56	BM02	13.5506, 102.5692	Human trafficking, forced labour, child labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened during the crackdown period.	
57	BM03	13.7471, 102.7406	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
58	BM04	13.7649, 102.7021	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
59	BM05	13.6786, 102.6198	Deprivation of liberty	State authorities intervened during the crackdown period.	
Chrey Thum					
60	CT08	10.9396, 105.0260	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
Kampot					
61	KA03	10.6665, 104.0162	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened during the crackdown period; human rights abuses documented after intervention.	

62	KA04	10.6275, 104.0486	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound, but the compound appears to be shuttered.
Mondulkiri				
63	MD01	12.4338, 107.1882	Human trafficking, forced labour, and deprivation of liberty	State intervention documented at some point in 2025. Location appears to be abandoned.
64	MD02	12.3891, 107.3124	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened during the crackdown period; human rights abuses documented after intervention.
Poipet				
65	P017	13.6495, 102.5977	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
66	P021	13.6674, 102.5755	Human trafficking, forced labour, deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
67	P022	13.6721, 102.5730	Human trafficking, forced labour, deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
68	P023	13.6676, 102.5646	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
69	P024	13.6787, 102.5685	Human trafficking, deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
70	P025	13.6604, 102.5545	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
71	P026	13.6706, 102.5772	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.

Phnom Penh				
72	PP19	11.5702, 104.8602	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
P'sar Prum (Pailin)				
73	PSP02	12.9332, 102.4934	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
Prey Veng				
74	PV01	11.6129, 105.7854	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	State authorities intervened during the crackdown period.
75	PV02	10.9664, 105.4189	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
Sihanoukville				
76	SI03	10.5733, 103.5578	Human trafficking, forced labour, torture and other-ill treatment, deprivation of liberty, enslavement	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
77	SI29	10.5905, 103.5398	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
78	SI52	10.6323, 103.5076	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
79	SI54	10.6411, 103.5362	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
Svay Rieng				
80	SV04	10.9991, 106.1904	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.

Tbong Kmum				
81	TBK02	11.6427, 105.8266	Human trafficking, forced labour, and deprivation of liberty, enslavement	State authorities intervened during the crackdown period.
82	TBK03	11.6733, 105.9745	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
83	TBK04	11.6901, 105.9706	Human trafficking, forced labour, and deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
84	TBK05	11.7138, 105.9638	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
85	TBK08	11.6686, 105.9789	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.
Thma Da				
86	TD01H	12.1211, 102.7455	Deprivation of liberty	There is no publicly available information indicating that state authorities have investigated or shut down this compound.

BA01

Amnesty International considers BA01 to be, or to have been, a scamming compound.

**LOCATION: BAVET,
SVAY RIENG PROVINCE;
11.0793, 106.1689**



TIMELINE

- **Mid-2024:** Amnesty International visits the site and documents security features.
- **Late 2025:** Amnesty International visits the site and documents security features.
- **Early 2026:** Two victims tell Amnesty International they were trafficked to the site in 2025 and deprived of their liberty there during the crackdown period. Both victims identify the location from photographs and confirm the videos shared with the organization are from the site.³⁰³

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁰⁴ satellite imagery and/or survivor testimony, the compound, as of early-2026, had the following security features:

- Perimeter fencing with barbed or razor wire.
- More than four security guards at the entrance/exit points.
- Strategic placements of guards on the interior perimeter wall.³⁰⁵

303 Amnesty International interviews with survivors, 2026.

304 Amnesty International site visit, late 2025.

305 Identified using satellite imagery and confirmed by survivor, 2026.

HUMAN RIGHTS ABUSES

Two survivors interviewed by Amnesty International said they spent months at this compound; they were lied to during recruitment about what kind of work they would be doing; one of them reported being hit and kicked by security guards and managers; and believed they could not escape because of the presence of security guards.

Based on this testimony, Amnesty International determined that these survivors were highly likely to have been trafficked into the compound, forced to work and deprived of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Amnesty International was unable to find information indicating that state authorities have investigated this compound during the crackdown period.

BA08

Amnesty International considers BA08 to be, or to have been, a scamming compound.

**LOCATION: BAVET,
SVAY RIENG PROVINCE;
11.0734, 106.1718**



TIMELINE

- **April 2022:** Police report that a Vietnamese man died after leaping from a building at the compound.³⁰⁶
- **May 2022:** Police report that a Vietnamese man died after falling from a building at the site.³⁰⁷
- **Late 2022:** An organization reports four victims (all Vietnamese), including one child, are being held at the compound and are victims of human trafficking.³⁰⁸ The victims reported later being “sold” to BA06 compound, along with eight other foreign nationals.
- **October 2022:** Bavet city police chief tells VoD that a man died inside the location a day before – allegedly after falling from a building. Additionally, a local tuk-tuk driver told VoD that he had seen hundreds of people leaving the location for the past three days.³⁰⁹

306 Khmer Times, “Foreigner dies in casino leap”, 28 April 2022, <https://www.khmertimeskh.com/501065815/foreigner-dies-in-casino-leap/> (accessed 27 April 2026).

307 VoD, “Falling Death and Senator’s Border Casino”, 13 May 2022, <https://vodenglish.news/falling-death-at-senators-border-casino/>, (accessed 27 April 2026).

308 Information provided by organization 1 on file with Amnesty International.

309 VoD, “Chaotic Scenes in Bavet Amid Apparent Exodus”, 26 October 2022, <https://vodenglish.news/chaotic-scenes-in-bavet-amid-apparent-exodus/>, (accessed 27 April 2026).

- **October 2022:** VoD reports that a tuk-tuk driver saw four buses bringing people to the BA08 compound around the time the crackdown began in Sihanoukville 20 days earlier. The driver also said he had heard of escape attempts and that he was not allowed inside of the compound.³¹⁰
- **Mid-2024:** Amnesty International visits the site and documents security features.³¹¹
- **June 2025:** The location is listed on Amnesty International's 'suspicious locations' list and published.³¹²
- **Late 2025:** Amnesty International visits the site and documents security features.³¹³
- **Early 2026:** Two victims tell Amnesty International they were trafficked to the site and deprived of their liberty there during the crackdown period. Both victims identify the location from photographs.³¹⁴
- **April 2026:** Amnesty International publishes an investigation that links BA08 to Crown Bavet Casino, the maps of which were approved by the CGMC-approved during the crackdown.³¹⁵

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³¹⁶ satellite imagery and/or survivor testimony, the compound, as of late-2025, had the following security features:

- Perimeter fencing with barbed or razor wire (some of which has now been removed).
- More than four security guards at the entrance/exit points.

HUMAN RIGHTS ABUSES

Two survivors interviewed by Amnesty International said they spent months at this compound; they were lied to during recruitment; forced to work under threat of violence; and they believed they could not escape because of the presence of security guards.

Based on this testimony, Amnesty International determined that these survivors were trafficked into the compound, their labour was exploited, and they were deprived of their liberty. Additionally, records provided by a rescue organization indicate children were also trafficked to the site.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Despite several media reports, multiple police visits to the site over the years and Amnesty International's allegation in April 2026 that the property of Crown Bavet Casino included this compound, it remains unclear whether the location has ever been formally investigated.

310 VoD, "Echoes of Sihanoukville Troubles in Cambodian Border Town", 11 October 2022, Echoes of Sihanoukville Troubles in Cambodian Border Town, (accessed 27 April 2026).

311 Amnesty International site visit, mid-2024.

312 See Annex III of "*I was someone else's property*" (previously cited).

313 Amnesty International site visit, late 2025.

314 Amnesty International interview with survivors, 2026.

315 Amnesty International, "Cambodia: Casinos get state approval despite links to human rights abuse at scamming compounds", 2 April 2026, <https://www.amnesty.org/en/latest/news/2026/04/cambodia-casinos-get-state-approval-despite-links-to-human-rights-abuse-at-scramming-compounds/>

316 Amnesty International site visit, late 2025.

BM02

Amnesty International considers BM02 to be, or to have been, a scamming compound.

**LOCATION: BANTEAY
MEANCHEY PROVINCE;
13.5506, 102.5692**



TIMELINE

- **Late-2025:** Amnesty International visits the site and documents security features.
- **January 2026:** Survivor M contacts Amnesty International with information that suggests they are at the BM02 compound, including providing photographs that can be geolocated to the site. The person also provides evidence of crimes being committed at the site including torture or other ill-treatment and confinement.³¹⁷
- **Early 2026:** Survivor F tells Amnesty International they were trafficked to the site and deprived of their liberty there during the crackdown period. The victim identifies the location from photographs.³¹⁸
- **Early 2026:** Survivor M tells Amnesty International the site is being raided by authorities. The survivor provides photographs of people escaping the location.³¹⁹

³¹⁷ Amnesty International interview with survivor, 2026.

³¹⁸ Amnesty International interview with survivor, 2026.

³¹⁹ Amnesty International interview with survivor, 2026.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³²⁰ satellite imagery and/or survivor testimony,³²¹ the compound, as of early-2026, had the following security features:

- Perimeter fencing.
- More than four security guards at entrance/exit points.
- Security guards and guard posts at internal checkpoints.
- People in possession of electric shock batons.³²²

HUMAN RIGHTS ABUSES

Two survivors interviewed by Amnesty International said they spent weeks at this compound; one of them (Survivor F) was lied to during recruitment about the work they would be doing; believed they could not escape because of the presence of security guards; and was subjected to torture or other ill-treatment.

A second survivor (Survivor M) had their passport confiscated by managers, was deprived of their liberty at the site, told Amnesty International they witnessed the torture and other ill-treatment of other people at the site (including Survivor F) and provided photographs to corroborate some of the story.

Based on this testimony, Amnesty International determined that Survivor F was highly likely trafficked into the compound, they were forced to work, they were subjected to torture or other ill-treatment, and they were deprived of their liberty. Additionally, Amnesty International determined that Survivor M was likely deprived of their liberty at the site and was a victim of human trafficking.

320 Amnesty International site visit, late-2025.

321 Amnesty International interviews with survivors, 2026.

322 Amnesty International interview with survivor, 2026.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Evidence from a survivor suggests that BM02 has been subjected to intervention by police or other state authorities.

BM03

Amnesty International considers BM03 to be, or to have been, a scamming compound.

**LOCATION: BANTEAY
MEANCHEY PROVINCE;
13.74407, 102.7464**



Image: 2 January 2026
© 2026 Planet Labs PBC

TIMELINE

- **January 2025:** SBM News reports that a local resident said the BM03 site was being developed into an online casino and call centre. The source reported foreigners working at the site and security guards preventing them from leaving.³²³
- **July 2025:** On the Grounds (金边现场) reported that a 36-year-old man from China disappeared two days after arriving in Cambodia. The last location that he sent to his family was reportedly the BM03 site.³²⁵
- **May 2025:** According to Khmer Times, a Chinese man's body was found near the BM03 site and police arrested five Myanmar nationals after police investigated a "Chinese company".³²⁴
- **Late 2025:** An organization reports that more than 60 victims are rescued by police from this site.³²⁶

323 SBM News, "Leaked News of Online Call Center Scammers Inside a Khmer-Chinese Company in a Three-Story Warehouse", 14 January 2025, <https://sbm.news/articles/6785d55033b180e23ed06548> (accessed 20 April 2026).

324 Khmer Times, "5 now arrested after foreigner's body discovered in shallow grave", 27 May 2025, <https://www.khmertimeskh.com/501690434/5-now-arrested-after-foreigners-body-discovered-in-shallow-grave/>, (accessed 20 April 2026); The Cambodia China Times, "Chinese man's body buried in jungle in Budi Mitchee province Police detain 2 suspects", 21 May 2025, <https://cc-times.com/posts/28358>, (accessed 20 April 2026.) <https://cc-times.com/posts/28358>

325 Jinbiannews, "Come to Cambodia to "apply for a loan"? Sichuan man is suspected of being taken to a border casino and lost contact", 11 July 2025, <https://jinbiannews.com/archives/1176>, (accessed 26 April 2026).

326 Information provided by organization 1 on file with Amnesty International.

- **Late 2025:** Amnesty International visits the site and documents security features.
- **December 2025:** This location is linked to plans approved by and published by the CGMC for the Jin Dicheng casino.³²⁷

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³²⁸ the compound, as of late 2025, had the following security features:

- Perimeter fencing;
- Internal-facing security cameras;
- More than four security guards at entrance/exit points;
- License-plate reading cameras;
- Security guards and guard posts at internal checkpoints; and
- Cages or bars on windows.

HUMAN RIGHTS ABUSES

Given information provided to Amnesty International by an organization that more than 60 individuals were removed from the site and the security features present at this site, Amnesty International believes it is highly likely that people were being deprived of their liberty at the compound.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Despite a state intervention in May 2025 that may have led to the police investigating the BMO3 site, as well as police rescuing more than 60 victims from the site in late 2025, Amnesty International was unable to find any information indicating that state authorities have investigated this compound during the crackdown period.

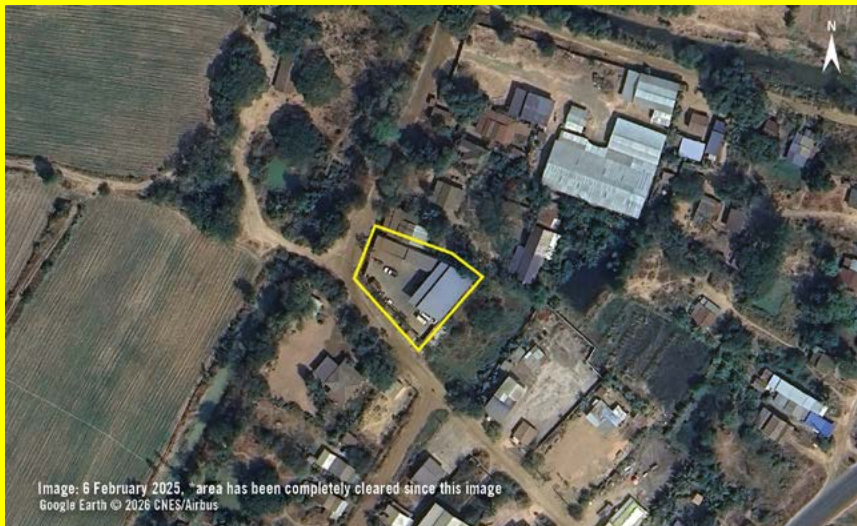
³²⁷ See Section 5.4.

³²⁸ Amnesty International site visit, late 2025.

BM04

Amnesty International considers BM04 to be, or to have been, a scamming compound.

**LOCATION: BANTEAY
MEANCHEY PROVINCE;
13.7649, 102.7021**



TIMELINE

- **Late 2025:** Amnesty International interviews a victim who identifies this location as the site in which she was deprived of her liberty after being trafficked into Cambodia.³²⁹
- **Late 2025:** Amnesty International interviews five victims who identify this border town and describe the journey to the town from another compound in Poipet.³³⁰ In combination with the testimony from the first victim, Amnesty International believes all the victims were trafficked to this location.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International was unable to visit this location due to the border conflict between Thailand and Cambodia.

329 Amnesty International interview with one survivor, 2025.

330 Amnesty International interview with five survivors, 2025.

HUMAN RIGHTS ABUSES

All five survivors interviewed by Amnesty International described being trafficked into Cambodia for labour exploitation at a compound in Poipet, which the organization believes to be this one. They believed they could not escape and were subjected to threat of violence. In addition, they were forcibly transferred from other compounds to this location where they were deprived of their liberty. Based on their testimonies, Amnesty International has concluded they were deprived of their liberty while at this compound and were victims of human trafficking and forced labour.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

It is unclear whether the state was aware of this location, and Amnesty International was unable to find information indicating that state authorities have investigated this compound during the crackdown period.

BM05

Amnesty International considers BM05 to be, or to have been, a scamming compound.

LOCATION: BANTEAY MEANCHEY PROVINCE; 13.6786, 102.6198



TIMELINE

- **Late 2025:** Amnesty International visits the site and documents security features.
- **August 2025:** An organization reports that a rescue is sought from a person at this location.³³¹
- **Late 2025/early 2026:** An organization reports a rescue is sought from a person at this location.³³²
- **6 May 2026:** Authorities intervened at the site, photographs indicate electric shock batons were seized.³³³

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International’s site visits,³³⁴ the compound, as of late-2025, had the following security features:

- Perimeter fencing.
- More than five security guards at entrance/exit gates.

331 Information provided by organization 3 on file with Amnesty International.
 332 Information provided by organization 1 on file with Amnesty International.
 333 Fresh News, “រដ្ឋបាលខេត្តបន្ទាយមានជ័យ បង្កហាញលទ្ធផលប្តូរតិបត្តិការ ចុះបង្កក្បាបបទល្មើស លើករណីបង្កប់មនុស្សសុខុសច្បាប់ នៅក្នុង ជំនួយប័ណ្ណ”, 5 June 2026, <https://freshnews.com.kh/localnews/426881-2026-05-06-18-23-56> (accessed 20 May 2026).
 334 Amnesty International site visit, late-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Authorities intervened at this site in May 2026.³³⁵

335 Fresh News, “រដ្ឋបាលខេត្តបន្ទាយមានជ័យ បង្កហេតុឧក្រិដ្ឋលក្ខណៈប្រតិបត្តិការ ចុះបង្អួករាបបទល្មើស លើករណី Online Scams និងការបង្ខំខ្លាំងមនុស្សសុខុមច្នាប់ នៅក្នុង ជំនួយប័ណ្ណ” (previously cited).

CT08

Amnesty International considers CT08 to be, or to have been, a scamming compound.

**LOCATION:
CHREY THUM,
KANDAL PROVINCE;
10.9396, 105.0260**



TIMELINE

- **Late-2025:** Amnesty International receives a request for rescue from a person who says they are at this location.³³⁶
- **Late-2025:** A local organization reports that a man was previously trafficked and deprived of his liberty at this site. The organization provides photographs and a video from what they believe is the site, but Amnesty International was unable to geolocate the video to the site.³³⁷ Other images provided by the organization match the site.
- **Late-2025:** Amnesty International visits the site and documents security features and speaks with local people nearby. One person says the area is for “foreigners” and that many of them aren’t allowed to leave and are secured by security guards.³³⁸

336 On file with Amnesty International.

337 Information provided by organization 3 on file with Amnesty International.

338 Amnesty International site visit and interview with local person, late 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³³⁹ imagery and/or survivor testimony, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Flood lights on perimeter walls.
- More than five security guards at entrance/exit gates.
- Security guards at internal checkpoints and in strategic positions along perimeters.
- Caged windows.

HUMAN RIGHTS ABUSES

Given a local organization provided some evidence that a man was confined at this site, a request for help that includes a map marker for this location and the presence of security features that are consistent with other scamming compounds, Amnesty International believes it is likely the site was/is depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

339 Amnesty International site visit, late 2025.

KA03

Amnesty International considers KA03 to be, or to have been, a scamming compound.

**LOCATION:
BOKOR MOUNTAIN,
KAMPOT PROVINCE;
10.6665, 104.0162**



TIMELINE

- **Early 2025:** An organization reports a victim seeking to be rescued from this site.³⁴⁰
- **Mid-2025:** Amnesty International lists this site as a suspicious location, the details of which are shared with the Cambodian government.³⁴¹
- **Mid-2025 (pre-crackdown):** An organization reports two victims are seeking to be rescued from this site.³⁴²
- **8 August 2025:** A South Korean man is found dead, with signs of torture. Media reports that investigations were focused on Bokor mountain and led to the arrests of suspects.³⁴³
- **19 August 2025:** Police investigate a location on Bokor mountain over the death of the South Korean man and publish an image of the gate to KA03, suggesting that this was the compound they investigated at that time.³⁴⁴

340 Information provided by organization 1 on file with Amnesty International.

341 See Annex II of "Someone else's property" (previously cited).

342 Information provided by organization 1 on file with Amnesty International.

343 Phnom Penh Post, "Chinese nationals charged for high-profile murder of South Korean", 11 October 2025, <https://phnompenhpost.com/national/chinese-nationals-charged-for-high-profile-murder-of-south-korean/>, (accessed 20 May 2026).

344 Cambodian Ministry of Information, "Large-scale crackdown operations on tech phishing offenses have culminated in the detention and detention of suspects in murder, human trafficking, and the rescue of multiple victims", 19 August 2025, <https://www.information.gov.kh/articles/167444>, (accessed 20 May 2026).

- **Mid to late-2025:** An organization reports 36 victims are rescued from the site with the assistance of local authorities over several interventions.³⁴⁵
- **Late 2025:** Amnesty International visits the site and documents security guards at the gates and other security features.
- **November 2025:** Three victims tell Amnesty International they were deprived of their liberty at the site, which they identify from photographs, for nearly 11 months during 2025 and only escaped in November 2025.³⁴⁶

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits³⁴⁷ and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

HUMAN RIGHTS ABUSES

Three survivors interviewed by Amnesty International said they spent nearly a year at this compound; they were lied to during recruitment; forced to work and they believed they could not escape because of the presence of security guards.

Additionally, given information provided by organizations that at least 39 individuals were seeking to be removed from the site and security features present at the site, Amnesty International believes it is highly likely the site was depriving people of their liberty for the purposes of forced labour and perpetrators at the site may have been inflicting torture or other ill-treatment.

Based on this information, Amnesty International determined that the three survivors it interviewed were highly likely trafficked into the compound, subjected to forced labour and deprived of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Despite police having intervened at the location before and around the time of the death of a South Korean man, Amnesty International spoke with three survivors who reported being at the location during the period in which the intervention occurred. They were not rescued by police and reported being subjected to human rights abuses afterwards. Three victims told Amnesty International they escaped in November, when security guards and managers began fleeing because "police were coming".³⁴⁸

345 Information provided by organization 1 on file with Amnesty International.

346 Amnesty International interviews with three survivors, 2026.

347 Amnesty International site visit, mid 2025.

348 Amnesty International interviews with three survivors, 2026.

KA04

Amnesty International considers KA04 to be, or to have been, a scamming compound.

**LOCATION:
BOKOR MOUNTAIN,
KAMPOT PROVINCE;
10.6275, 104.0486**



TIMELINE

- **Mid-2025:** An organization reports that victim A is rescued from this site.³⁴⁹
- **Mid-2025:** An organization reports that victim B is rescued from this site.³⁵⁰
- **Late 2025:** Amnesty International visits the site during the crackdown period and documents security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits³⁵¹ and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing.

349 Information provided by organization 1 on file with Amnesty International.

350 Information provided by organization 1 on file with Amnesty International.

351 Amnesty International site visit, late-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that two individuals were seeking to be removed from the site on two separate occasions Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

The site appeared to be inactive during site visits in late-2025. It is not known if the site was investigated by authorities during the crackdown, but authorities were made aware of this site in mid-2025 when an organization reports rescues were made from the location.

MD01

Amnesty International considers MD01 to have been a scamming compound.

**LOCATION:
MONDULKIRI PROVINCE;
12.4339, 107.1890**



TIMELINE

- **Early 2025:** An organization reports rescues from this site on two separate occasions.³⁵²
- **Mid-2025:** Amnesty International visits the site and documents security features but it does not appear to be active.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁵³ satellite imagery and/or survivor testimony, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with internally placed barbed or razor wire.
- Internal-facing security cameras.

352 Information provided by organization 1 on file with Amnesty International.

353 Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization of at least four individuals were seeking to be removed from the site, as well as the extensive security features observed during site visits, Amnesty International believes it is highly likely the site was depriving people of their liberty as of early 2025.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

The location appears to be inactive and was likely shuttered before the crackdown period or during it by authorities.

MD02

Amnesty International considers MD02 to be, or to have been, a scamming compound.

**LOCATION:
MONDULKIRI PROVINCE;
12.3872, 107.3147**



TIMELINE

- **Early 2025:** Amnesty International interviewed a survivor who was very likely at the site at this time. The survivor identified the road to the compound, described travel times that matched the driving times required to have gone from another compound to this compound, and described the scenery in a way that was consistent with the area.³⁵⁴
- **21 July 2025:** The site is investigated by provincial police. According to Kohsantepheap Daily, 139 people were arrested during the intervention, of which all were foreign nationals except for 35 Cambodian guards, cleaners and gardeners.³⁵⁵
- **Mid-2025:** Amnesty International visits the site and documents security guards at the gates and other security features. Amnesty International observes the site from vantage points and found it continues to be heavily guarded and there are still people inside.
- **Mid-2025:** Amnesty International interviewed a survivor, who was at the site at this time and identified pictures of the site.³⁵⁶

354 Amnesty International interview with survivor, 2025.

355 Koh Santepheap Daily, "Details of the case of illegal online suppression in the cultivation area, Mondul Kiri Province", 22 July 2025, <https://kohsantepheapdaily.com.kh/article/2105319.html>, (accessed 20 May 2026).

356 Amnesty International interview with survivor, 2025.

● **Late 2025:** Amnesty International interviewed two survivors, who were at the site at this time and identified pictures of the site and provided images of security guard logos. Additionally, they identified a man they said was a translator in the compound from a news report about the location. The identified man was pictured standing with police while others, possibly under arrest, were sitting.³⁵⁷

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁵⁸ satellite imagery and/or survivor testimony,³⁵⁹ the compound, as of mid-2025, had the following security features:

- Perimeter fencing.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards and guard posts at internal checkpoints.
- Strategic positioning of guard posts within perimeter walls.

HUMAN RIGHTS ABUSES

A survivor interviewed by Amnesty International said they spent only a few days at this compound; they were lied to during recruitment; they were forcibly taken to the compound and forcibly transferred to another compound afterwards where they were subjected to torture or other ill-treatment. Another survivor described being trafficked into the country before being taken to this compound from another compound.

Finally, two survivors told Amnesty International they were trafficked into the country into the TBK02 compound. They were lied to during recruitment, threatened with violence if they did not work and were deprived of their liberty by security guards that did not let them leave. Both survivors said they were transferred with "the whole company" from TBK02 compound to MD01 compound because the crackdown had begun and the company needed to relocate to escape it. Both survivors were able to identify people in pictures from the news when the police visited the compound but said they were not freed at that time and were taken with other people to a part of the compound which was not searched by police during the intervention. The person they described as their "translator", a Cambodian man who was involved in the scamming operations, was identified pictures standing with police during the intervention.

As a result of the above testimony, and in combination with the security features present at the site, Amnesty International is confident the victims were victims of human trafficking and forced labor and were subjected to deprivation of liberty while at the MD02 site.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Despite intervening on 21 July 2025 and making arrests, the site appeared to be operational afterwards. Amnesty International researchers observed people inside the location and two victims told Amnesty International they were not freed during the police intervention. Additionally, despite police reporting that guards had been arrested, and photographs confirming that some guards from a security company were handcuffed, during Amnesty International site visits the same security guard company was seen guarding the entrances and exits to the site. Further, the two victims who were deprived of their liberty after the intervention also identified the logo of the company and said the

357 Amnesty International interview with survivors, 2025.

358 Amnesty International site visit, mid-2025.

359 Amnesty International interview with survivors, 2025.

company continued to guard the location after the intervention. Finally, both victims also identified some of the people from the company that had trafficked them as being in pictures with police from the Koh Santepheap news article, but were not handcuffed like other people in the pictures.

There is no publicly available information indicating that state authorities have further investigated or shut down this compound since the intervention in July 2025, which did not rescue all victims at that time.

P017

Amnesty International considers P017 to be, or to have been, a scamming compound.

LOCATION:
POIPET CITY;
13.6495, 102.5977



TIMELINE

- **Late-2025:** Amnesty International visits the site and documents security guards at the gates and other security features.
- **January 2026:** An organization reports a rescue from this site of seven people in January 2026.³⁶⁰
- **29 April 2025:** A video published by Fresh News appears to show authorities intervening at the site.³⁶¹

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International’s site visits,³⁶² the compound, as of late 2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Cages or bars on windows.

360 Information provided by organization 3 on file with Amnesty International.

361 Fresh News, “កម្ពុជាកំពុងសម្របសម្រួលចេញទុះអារុយនៃក្រុមប្រតិបត្តិការយ៉ាងក្តៅគគុកបង្កការបបទល្មើស Scam Online នៅក្នុងប្រទេសកម្ពុជា (Video inside)”, 29 April 2026, <https://freshnews.com.kh/localnews/426099-2026-04-29-15-30-32>, (accessed 20 May 2026).

362 Amnesty International site visit, late 2025.

HUMAN RIGHTS ABUSES

Based on a rescue reported by an organization, and in combination with the physical and organizational security features present at the site, Amnesty International considers it highly likely that PO17 was used to deprive people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Authorities intervened at the site on 29 April 2025.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

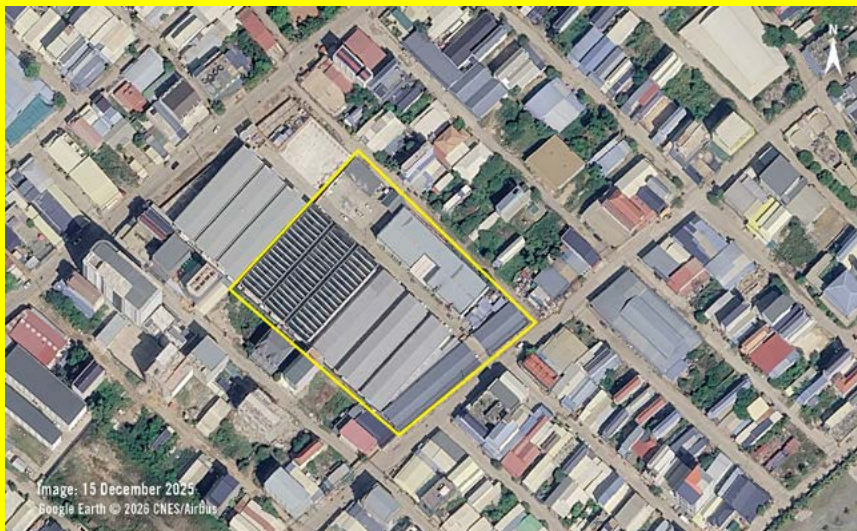
Authorities intervened at the site on 29 April 2025.
Human rights abuses

Based on a rescue reported by an organization, and in combination with the physical and organizational security features present at the site, Amnesty International considers it highly likely that PO17 was used to deprive people of their liberty.

P021

Amnesty International considers P021 to be, or to have been, a scamming compound.

**LOCATION:
POIPET CITY;
13.6673, 102.5762**



TIMELINE

- **Mid-2025:** Amnesty International interviewed five survivors who were at the compound during the crackdown period and were able to identify the P021 compound buildings from pictures taken of the entrance gate.³⁶³
- **Late-2025:** Amnesty International visits the site and documents the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁶⁴ satellite imagery and/or survivor testimony,³⁶⁵ the compound, as of late-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Cages or bars on windows.

HUMAN RIGHTS ABUSES

³⁶³ Amnesty International interview with survivors, 2025.

³⁶⁴ Amnesty International site visit, late 2025.

³⁶⁵ Amnesty International interview with survivors, 2025.

All five of the victims interviewed by Amnesty International said they were lied to during recruitment; and they were monitored at all times by managers and guards, leading them to believe they could not escape. The survivors described seeing and interacting with many other people at this site who were subjected to similar treatment. One survivor described being subjected to torture and other ill-treatment, including being beaten with batons by security guards to the point that he could not sit down for a week.

Based on this testimony, Amnesty International determined that these survivors were trafficked to the site, their labor was exploited, they were deprived of their liberty, they were threatened with, and in some cases subjected to torture and other ill-treatment and this extreme control exerted over them amounts to enslavement.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

P022

Amnesty International considers P022 to be, or to have been, a scamming compound.

**LOCATION:
POIPET CITY;
13.6721, 102.5730**



TIMELINE

- **Mid-2025:** Amnesty International interviewed a survivor who was at the site during the crackdown period and provided images of the building, including pictures taken of the exterior which matched site visits.³⁶⁶
- **Late 2025:** Amnesty International visits the site.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on survivor testimony,³⁶⁷ the compound, as of mid-2025, had the following security features:

- Security guards or other people with electric shock batons.³⁶⁸

366 Amnesty International interview with survivor, 2025.

367 Amnesty International interview with survivor, 2025.

368 Photographs of the weapons on file with Amnesty International.

HUMAN RIGHTS ABUSES

The victim interviewed by Amnesty International said they were lied to during recruitment; and they were monitored at all times by managers and guards, leading them to believe they could not escape. The survivor described seeing and interacting with many other people at this site who were subjected to similar treatment and provided videos of a man with a baton and an electric shock baton.

Based on this testimony, Amnesty International determined that the survivor was trafficked to the site, their labor was exploited, they were deprived of their liberty, and they were threatened with violence.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound. The testimony from the victim indicates police went to the compound with the survivor, indicating they knew the location of the compound, but did not further intervene to remove other people or to shutter it at that time.

P023

Amnesty International considers P023 to be, or to have been, a scamming compound.

**LOCATION:
POIPET CITY;
13.6676, 102.5646**



TIMELINE

- **Early-2026:** Amnesty International received a plea for help from a person who said they were at the site. The person, or persons, identified pictures sent by Amnesty International and confirmed they were held at the location and were in imminent danger.³⁶⁹

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International did not visit the location during the research period.

HUMAN RIGHTS ABUSES

Based on the information received and the specific location provided, Amnesty International believes it is likely this location was used for depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

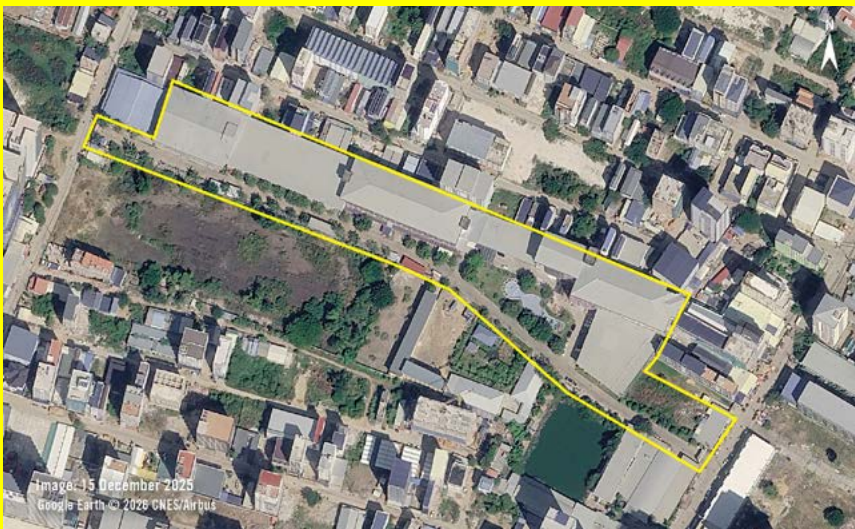
There is no publicly available information indicating that state authorities have investigated or shut down this compound.

³⁶⁹ Requests for help on file with Amnesty International.

P024

Amnesty International considers P024 to be, or to have been, a scamming compound.

**LOCATION:
POIPET CITY;
13.6787, 102.5685**



TIMELINE

- **Mid-2025:** Amnesty International interviews two survivors who said they were deprived of their liberty at this location during the crackdown period. The survivors identified pictures of the site.³⁷⁰
- **January 2026:** This location is linked to plans approved by and published by the CGMC for the Gold Planet Casino & Resort.³⁷¹

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International did not visit the location during the research period.

370 Amnesty International interview with survivors, 2025.

371 See **Section 5.4**.

HUMAN RIGHTS ABUSES

The victims interviewed by Amnesty International said they were lied to during recruitment and monitored at all times by managers and guards, leading them to believe they could not escape.

Based on this testimony, Amnesty International determined that the survivors were highly likely trafficked to the site, were forced to work, they were deprived of their liberty, and they were threatened with violence.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

P025

Amnesty International considers P025 to be, or to have been, a scamming compound.

**LOCATION:
POIPET, BANTEAY
MEANCHEY PROVINCE;
13.6604, 102.5545**



TIMELINE

- **Late 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.³⁷²

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International did not visit the location during the research period.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

³⁷² Information provided by organization 1 on file with Amnesty International.

P026

Amnesty International considers P026 to be, or to have been, a scamming compound.

**LOCATION:
POIPET, BANTEAY
MEANCHEY PROVINCE;
13.6710, 102.5770**



TIMELINE

- **Mid-2025 (before the crackdown period):**
An organization reports a person is rescued with the assistance of local authorities from this location.³⁷³
- **Late 2025:** Amnesty International visits the site during the crackdown period and documents security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits³⁷⁴ and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- More than three Security guards at gates.
- Security cameras along perimeter walls.

373 Information provided by organization 1 on file with Amnesty International.

374 Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

PP19

Amnesty International considers PP19 to be, or to have been, a scamming compound.

**LOCATION:
PHNOM PENH;
11.5702, 104.8602**



TIMELINE

- **June 2025:** The location is listed on Amnesty International's 'suspicious locations' list and published.³⁷⁵
- **July 2025 (before the crackdown period):** An organization reports a person is rescued with the assistance of local authorities from this location.³⁷⁶

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁷⁷ and satellite imagery, the compound, as of early-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Security guards at gates.
- Cages on windows of buildings.

³⁷⁵ See Annex III of "*I was someone else's property*" (previously cited).

³⁷⁶ Information provided by organization 1 on file with Amnesty International.

³⁷⁷ Amnesty International site visit, early-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

PSP02

Amnesty International considers PSP02 to be, or to have been, a scamming compound.

**LOCATION:
PSAR PRUM,
PAILIN PROVINCE;
12.9332, 102.4934**



TIMELINE

- **Mid-2024:** Amnesty International visits the site and documents security guards at the gates and other security features.
- **Early 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.³⁷⁸
- **Mid-2025:** An organization reports a person is rescued with the assistance of local authorities from this location.³⁷⁹
- **Mid-2025:** The site was previously listed on the suspicious locations list due to its security features and links to PSP01.
- **Late 2025:** Amnesty International visits the site and documents security guards at the gates and other security features.³⁸⁰

378 Information provided by organization 1 on file with Amnesty International.

379 Information provided by organization 1 on file with Amnesty International.

380 Amnesty International site visit, late 2025.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁸¹ the compound, as of late-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards or other people with firearms.³⁸²
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

HUMAN RIGHTS ABUSES

Given information provided by an organization that two individuals were seeking to be removed from the site, and in combination with the security features present at the site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

381 Amnesty International site visit, mid-2024.

382 On file with Amnesty International.

PV01

Amnesty International considers PV01 to be, or to have been, a scamming compound.

**LOCATION:
REY VENG PROVINCE;
11.6111, 105.7847**



TIMELINE

- **Late 2024:** An organization reports victim A is rescued with the assistance of local authorities from this location.³⁸³
- **Late 2024:** An organization reports victim B is rescued with the assistance of local authorities from this location.³⁸⁴
- **Early 2025:** An organization reports victim C is rescued with the assistance of local authorities from this location.³⁸⁵
- **Mid-2025:** Amnesty International visits the site during the crackdown period and documents security features.
- **Late 2025:** Amnesty International interviews a victim who says she was deprived of her liberty at the site up until late-2025.³⁸⁶
- **Early 2026:** Amnesty International interviews nine victims who were inside of PV01 during the crackdown period, many of whom were inside until late 2025 or early 2026.³⁸⁷

383 Information provided by organization 1 on file with Amnesty International.

384 Information provided by organization 1 on file with Amnesty International.

385 Information provided by organization 1 on file with Amnesty International.

386 Amnesty International interview with survivor, 2025.

387 Amnesty International interviews with survivors, 2025, 2026.

- **Early 2026:** Amnesty International interviews a victim who reported being moved from this compound in January 2026 to the TBK02 compound.³⁸⁸
- **April 2026:** Mekong Independent reports an investigating judge visited the site.³⁸⁹

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits³⁹⁰ and satellite imagery, as of mid-2025, had the following security features:

- Perimeter fencing.
- Double-gate systems.
- Security guards and guard posts at internal checkpoints.
- Security guards with electric shock batons.
- Security guards with firearms.³⁹¹

HUMAN RIGHTS ABUSES

Amnesty International interviewed ten victims from the site who reported being lied to during recruitment; threatened with violence; tortured; raped; forced to work; and were monitored at all times by managers and guards, leading them to believe they could not escape. The survivors described seeing and interacting with many other people at this site who were subjected to similar treatment, including seeing or hearing about people dying inside.

Based on this testimony, Amnesty International determined that the survivors were trafficked to the site, their labor was exploited, they were deprived of their liberty, they were threatened with, and in some cases subjected to torture and other ill-treatment and this extreme control exerted over them amounts to enslavement.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound. Only one victim interviewed by Amnesty International described managers telling him that police were coming, but he never saw police arrive at the compound. Several other victims told Amnesty International that police regularly came to the location to remove dead bodies or to have coffee. On two occasions, rescues occurred at the site, indicating police were involved in interventions before the crackdown in 2024 and early 2025. In April 2026, the Mekong Independent reported that an investigating judge visited the site.³⁹²

388 Amnesty International interview with survivor, 2026.

389 Mekong Independent, "Cambodia says new law tightens net on online scams", 4 April 2026, <https://mekongindependent.com/2026/04/cambodia-says-new-law-tightens-net-on-online-scams/>, (accessed 20 May 2026).

390 Amnesty International site visit, mid-2025.

391 Amnesty International interviews with survivors, 2025, 2026.

392 Mekong Independent, "Cambodia says new law tightens net on online scams" (previously cited). <https://mekongindependent.com/2026/04/cambodia-says-new-law-tightens-net-on-online-scams/>

PV02

Amnesty International considers PV02 to be, or to have been, a scamming compound.

**LOCATION:
PREY VENG PROVINCE;
10.9664, 105.4189**



TIMELINE

- **Late 2024:** An organization reports two people are rescued with the assistance of local authorities from this location.³⁹³
- **Early 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.³⁹⁴

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International was unable to visit the location during the research period.

HUMAN RIGHTS ABUSES

Given information provided by different organizations of at least three individuals seeking to be removed from the site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

393 Information provided by organization 1 on file with Amnesty International.

394 Information provided by organization 1 on file with Amnesty International.

SI03

Amnesty International considers SI03 to be, or to have been, a scamming compound.

**LOCATION:
SIHANOUKVILLE;
10.5733, 103.5578**



TIMELINE

- **June 2025:** The location is listed on Amnesty International's 'suspicious locations' list and published.³⁹⁵
- **Late 2025:** Amnesty International visits the site and documents security features.³⁹⁶
- **Early 2026:** Five victims tell Amnesty International they were trafficked to the site and deprived of their liberty there during 2025 and during the crackdown period. The victims identify the location from photographs, including identifying a security guard.³⁹⁷

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,³⁹⁸ satellite imagery and/or survivor testimony, the compound, as of late-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- More than four security guards at the entrance/exit points.
- Strategic placements of guards on the interior perimeter wall.
- Security guards with electric shock batons.³⁹⁹

395 See Annex III of "*I was someone else's property*" (previously cited).

396 Amnesty International site visit, late 2025.

397 Amnesty International interview with survivors, 2026.

398 Amnesty International site visit, late 2025.

399 Amnesty International interview with survivors, 2026.

HUMAN RIGHTS ABUSES

Amnesty International interviewed five victims from the site who reported being lied to during recruitment; threatened with violence; and were monitored at all times by managers and guards, leading them to believe they could not escape. The survivors described seeing and interacting with many other people at this site who were subjected to similar treatment.

Based on this testimony, Amnesty International determined that the survivors were trafficked to the site, their labour was exploited, they were deprived of their liberty, they were threatened with, and in some cases subjected to torture and other ill-treatment and this extreme control exerted over them amounts to enslavement.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound. Victims told Amnesty International that the security guards and managers one day abandoned the location and they walked out after that point. They did not see any police or other state authorities when they were leaving the compound.

SI29

Amnesty International considers SI29 to be, or to have been, a scamming compound.

**LOCATION:
SIHANOUKVILLE CITY,
SIHANOUKVILLE
PROVINCE;
10.5905, 103.5398**



TIMELINE

- **Mid-2024:** Amnesty International visits the site and documents security features.
- **Late 2025:** Amnesty International visits the site and documents security features.
- **Late 2025/early 2026:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴⁰⁰

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International’s site visits,⁴⁰¹ satellite imagery and/or survivor testimony, the compound, as of late-2025, had the following security features:

- Perimeter fencing.
- More than four security guards at the entrance/exit points.

400 Information provided by organization 1 on file with Amnesty International.

401 Amnesty International site visit, late 2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

SI52

Amnesty International considers SI52 to be, or to have been, a scamming compound.

**LOCATION:
SIHANOUKVILLE CITY,
SIHANOUKVILLE
PROVINCE;
10.6323, 103.5076**



TIMELINE

- **Late 2025/early 2026:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴⁰²

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International did not visit this location during the research period.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

402 Information provided by organization 1 on file with Amnesty International.

SI54

Amnesty International considers SI54 to be, or to have been, a scamming compound.

**LOCATION:
SIHANOUKVILLE, PREAH
SIHANOUK PROVINCE;
10.6411, 103.5362**



TIMELINE

- **Mid-2024:** Amnesty International visits the site and documents security features.
- **Mid-2025:** Amnesty International visits the site and documents security features.
- **Early-2025 (pre-crackdown):** An organization reports a person is rescued with the assistance of local authorities from this location.⁴⁰³

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,⁴⁰⁴ satellite imagery and/or survivor testimony, the compound, as of mid-2025, had the following security features:

- Perimeter fencing.
- Security guards at entrance/exits gates.

403 Information provided by organization 1 on file with Amnesty International.

404 Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

SV04

Amnesty International considers SV04 to be, or to have been, a scamming compound.

**LOCATION:
SVAY RIENG PROVINCE;
10.9991, 106.1904**



TIMELINE

- **Mid-2025:** Amnesty International visits the site and documents security features.
- **August-September 2025:** An organization reports two people are rescued with the assistance of local authorities from this location.⁴⁰⁵

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,⁴⁰⁶ satellite imagery and/or survivor testimony, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Guards at entrance/exits gates.
- Security guards and guard posts at internal checkpoints.

⁴⁰⁵ Information provided by organization 1 on file with Amnesty International.

⁴⁰⁶ Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that two individuals were seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

TBK02

Amnesty International considers TBK02 to be, or to have been, a scamming compound.

**LOCATION:
TBONG KHMUM
PROVINCE;
11.6427, 105.8266**



TIMELINE

- **Mid-2025:** Amnesty International interviewed two survivors who were at the site at this time (during the crackdown period) and were able to identify TBK02 compound buildings from pictures taken from the exterior.⁴⁰⁷
- **Mid-2025:** Amnesty International visits the site and documents security guards at the gates and other security features but finds the location to be largely inactive.
- **Early 2026:** A survivor tells Amnesty International he was forcibly moved to the site from PV01 to escape a police intervention. The survivor identified TBK02 from pictures of the gate and main building. The police then intervened at the site, and the survivor was told to leave the area.⁴⁰⁸

407 Amnesty International interview with survivors, 2025.

408 Amnesty International interview with survivor, 2026.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,⁴⁰⁹ satellite imagery and/or survivor testimony,⁴¹⁰ the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.

HUMAN RIGHTS ABUSES

Two survivors, Survivor A and Survivor B, told Amnesty International they were trafficked into the country into the TBK02 compound. They were lied to during recruitment, threatened with violence if they did not work and were deprived of their liberty by security guards that did not let them leave. Both survivors said they were forcibly transferred from TBK02 compound to MD01 compound because police were coming and the company needed to relocate to escape them.

An additional survivor, Survivor C, told Amnesty International he was trafficked into the PV01 compound using fraudulent recruitment practices and then forcibly transferred to the TBK02 site during January 2026.

As a result of the above testimony, and in combination with the security features present at the site, Amnesty International is confident the victims were victims of human trafficking and forced labor and were subjected to deprivation of liberty while at the TBK02 site.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

Survivor A and B said they never saw state authorities at this compound. However, Survivor C said that authorities intervened at the compound during January 2026 and he was told by authorities to leave the area. He was not arrested but was not screened for being a victim of human trafficking during that time and was told to leave or face being arrested if he stayed at the location. Survivor C told Amnesty International he was not provided with any assistance from the state.

409 Amnesty International site visit, mid-2025.

410 Amnesty International interview with survivors, 2025.

TBK03

Amnesty International considers TBK03 to be, or to have been, a scamming compound.

**LOCATION:
TBONG KHMUM PROVINCE;
11.6733, 105.9745**



TIMELINE

- **August 2025:** An organization reports three people are rescued with the assistance of local authorities from this location.⁴¹¹
- **Mid-2025:** Amnesty International visits the site during the crackdown period and documents security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits,⁴¹² and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Evidence of previously installed electric wire.
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

411 Information provided by organization 1 on file with Amnesty International.

412 Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization of at least three individuals seeking to be removed from the site and the security features at this site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

TBK04

Amnesty International considers TBK04 to be, or to have been, a scamming compound.

**LOCATION:
TBONG KHMUM PROVINCE;
11.6900, 105.9702**



TIMELINE

- **Late 2024:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴¹³ Photographs of the victim show injuries.
- **July 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴¹⁴
- **August 2025:** An organization reports 12 victims are rescued from this site.⁴¹⁵
- **Mid-2025:** Amnesty International visits the site during the crackdown period and documents security features.

413 Information provided by organization 1 on file with Amnesty International.

414 Information provided by organization 1 on file with Amnesty International.

415 Information provided by organization 3 on file with Amnesty International.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International's site visits⁴¹⁶ and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

HUMAN RIGHTS ABUSES

Given information provided by two different organizations of at least 13 individuals seeking to be removed from the site and the security features present at this site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

416 Amnesty International site visit, mid-2025.

TBK05

Amnesty International considers TBK05 to be, or to have been, a scamming compound.

**LOCATION:
TBONG KHMUM PROVINCE;
11.7138, 105.9638**



TIMELINE

- **Mid-2025:** Amnesty International visits the site during the crackdown period and documents security features.
- **Late 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴¹⁷
- **Late 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴¹⁸

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International’s site visits,⁴¹⁹ and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Internal-facing security cameras.
- Floodlights along perimeters.
- Security guards and guard posts at internal checkpoints.
- Cages or bars on windows.

417 Information provided by organization 1 on file with Amnesty International.

418 Information provided by organization 1 on file with Amnesty International.

419 Amnesty International site visit, mid-2025.

HUMAN RIGHTS ABUSES

Given information provided by an organization that indicates two individuals were seeking to be removed from different locations within the site and the security features present at this site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

TBK08

Amnesty International considers TBK08 to be, or to have been, a scamming compound.

**LOCATION:
TBONG KHMUM PROVINCE;
11.6686, 105.9789**



TIMELINE

- **August-September 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴²⁰

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Amnesty International did not visit the site during the research period.

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.

⁴²⁰ Information provided by Organization 1 on file with Amnesty International.

TD01H

Amnesty International considers TD01H to be, or to have been, a scamming compound.

**LOCATION:
THMA DA,
PURSAT PROVINCE;
12.1211, 102.7455**



TIMELINE

- **Early 2025:** An organization reports a person is rescued with the assistance of local authorities from this location.⁴²¹
- **June 2025:** Amnesty International publishes the TD01 compound which provides a full history or other compounds at this location which are or were scamming compounds – including multiple rescues by police and news reports about torture on the same special economic zone which TD01H is located on.⁴²²
- **Late 2025:** Amnesty International visits the site and documents security guards at the gates and other security features.

PHYSICAL AND ORGANIZATIONAL SECURITY FEATURES

Based on Amnesty International’s site visits and satellite imagery, the compound, as of mid-2025, had the following security features:

- Perimeter fencing with barbed or razor wire.
- Security guards and guard posts at internal checkpoints.

421 Information provided by organization 1 on file with Amnesty International.

422 See Annex I of “Someone Else’s Property” (previously cited).

HUMAN RIGHTS ABUSES

Given information provided by an organization that an individual was seeking to be removed from the site and the security features present at this site, Amnesty International believes it is highly likely the site was depriving people of their liberty.

STATE RESPONSIBILITY AND INTERVENTION DURING THE CRACKDOWN

There is no publicly available information indicating that state authorities have investigated or shut down this compound.



ANNEX II

**SCAMMING COMPOUNDS
AND INTERVENTIONS LIST**

DESCRIPTION OF KEY ITEMS IN ANNEX

This Annex provides a list of every location that Amnesty International has determined to have been or be a scamming compound as of the date of publication. It includes the 53 scamming compounds that were identified in Amnesty International's June 2025 report, as well as the 33 newly identified compounds (see Annex I for the evidence used to establish the "new" scamming compounds). The total number of compounds that Amnesty International has now identified in Cambodia is 86.

Coordinates: The coordinates provided are often the entry point to, what appears to be the entrance gate/door of, or the approximate location of the entrance of, the compound. Evidence considered in identifying the coordinates include, but is not limited to, geolocation based on photos taken by a survivor at the actual building while they were confined; a location identified by a survivor when shown photos of the site; site visits by Amnesty International researchers; and/or satellite imagery.

Interventions: Interventions refer to incidents in which the state, local people, victims or videos and pictures found online show that police or other state actors entered a scamming compound to remove victims. An intervention does not imply that all victims were removed, or that victims were treated as victims of human trafficking after their removal, or that perpetrators of abuses were prosecuted because of the intervention, or that the scamming compound was shut down. It is possible that police conducted interventions that Amnesty International was not aware of, this table only lists the police or other state actor interventions where Amnesty International obtained evidence that such interventions occurred.

Assessment of status: An assessment of the status of the compound as at a specified date is given based on evidence collected from site visits, interviews with victims, interviews with local people and or reviews of videos and photos from online. Assessments are designed to understand whether a noticeable change in patterns at the compound has occurred, which could suggest a compound has been closed or that it remains operational. Things like clothes in windows or multiple security guards at gates suggest people remain inside of a compound. The absence of these features, as well as testimony from witnesses that buses were seen leaving a location, may suggest that a compound has been abandoned.

Other: This section is used to describe other evidence that does not fit into the above criteria. An example is where the compound was hit by explosives during the Thai-Cambodia conflicts of 2025.

State responsibility: This section summarises the determination by Amnesty International of the acts or omissions of the Cambodian state that indicate its failure to respect, protect and fulfil certain human rights.

Note: For security purposes, precise dates and details relating to testimony provided to Amnesty International are not always included.

OVERVIEW OF STATE INTERVENTIONS AT SCAMMING COMPOUNDS

CLASSIFICATION	TOTAL NUMBER OF COMPOUNDS (LISTED COMPOUNDS)
State intervention at the compound	24
1.1 Documented abuse at the compound after state intervention	3
2. Compound is abandoned	3
2.1 Evidence of mass releases or evacuations or mass escapes	16
3. No evidence of state intervention	68

DOCUMENTED STATE INTERVENTIONS AT SCAMMING COMPOUNDS

NO.	CODE	COORDINATES	EVIDENCE OF POLICE INTERVENTION BETWEEN JULY 2025 – APRIL 2026	OTHER
1	BA01	11.0793,106.1689	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
2	BA02	11.0772, 106.1649	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
3	BA03	11.0782, 106.1635	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino license for the location renewed in January 2026.
4	BA05	11.0698, 106.1752	August 2025: A child requests rescue from the site. ⁴²³ November 2025: Two people request rescue from the site. ⁴²⁴ January 2026: Mekong Independent reports speaking to a local person that said police came to the site to arrest people. ⁴²⁵ In April 2026, police entered the compound to install security cameras. ⁴²⁶	
5	BA06	11.0689, 106.1714	22 October 2025: Videos and photos republished by Cyber Scam Monitor show police at the location. ⁴²⁷ January 2026: Mekong Independent reports speaking to local people who said police came to the site. ⁴²⁸ A possible mass release was also reported during January.	

423 On file with Amnesty International.

424 On file with Amnesty International.

425 Mekong Independent, "Barbed wire comes down at Bavet scam-linked compound", 24 January 2026, <https://mekongindependent.com/2026/01/barbed-wire-comes-down-at-bavet-scam-compound/>, (accessed 20 May 2026).

426 Svay Rieng Police Commissariat, Facebook post, 8 April 2026, <https://www.facebook.com/SvayRiengProvincialPoliceCommissariat/posts/pfbid02ErfGDBQhvhUSoafE6ozTVGmCQEg3nJj89z9jiTuQQQjUaxxg9CHxZEwxzsxGpl>, (accessed 20 May 2026).

427 *Cyber Scam Monitor*, Official X (Twitter) Account, available at: <https://x.com/CyberScamWatch> (accessed 29 April 2026).

428 Mekong Independent, "Barbed wire comes down at Bavet scam-linked compound" (previously cited). <https://mekongindependent.com/2026/01/barbed-wire-comes-down-at-bavet-scam-compound/>

6	BA08	11.0734, 106.1718	There is no publicly available information indicating that state authorities have investigated or shut down this compound. A possible mass release/evacuation was also reported. ⁴²⁹	*Newly confirmed compound. Casino license for the location renewed in December 2025.
7	BA11	11.0699, 106.1631	November: A man requests a rescue from this compound. ⁴³⁰ 20 April 2026: Police say they investigated the BA11 compound and made arrests. ⁴³¹ Videos posted to Telegram chatgroups by multiple anonymous users on show what appear to be military or police cars at the site and inside the casino building. ⁴³²	
8	BA13	11.0775, 106.1696	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
9	BM02	13.5506, 102.5692	A victim from the location reports police at or near the site on 13 March 2026. Videos posted to Telegram chatgroups by multiple anonymous users on 14 March 2026 show what appear to be military or police at a neighbouring location. ⁴³³	*Newly confirmed compound.
10	BM03	13.7440, 102.7464	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Reports of releases or people leaving the site. ⁴³⁴	*Newly confirmed compound.
11	BM04	13.7649, 102.7021	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.

429 Mekong Independent, "Barbed wire comes down at Bavet scam-linked compound" (previously cited). <https://mekongindependent.com/2026/01/barbed-wire-comes-down-at-bavet-scam-compound/>

430 On file with Amnesty International.

431 Facebook, *Post on Facebook*, available at: <https://www.facebook.com/share/1BEkaEnexw/> (accessed 29 April 2026).

432 On file with Amnesty International.

433 On file with Amnesty International.

434 On file with Amnesty International.

12	BM05	13.6786, 102.6198	August 2025: A man seeks rescue from this location. ⁴³⁵ 6 May 2026: Authorities intervened at the site, photographs indicate electric shock batons were seized. ⁴³⁶	*Newly confirmed compound.
13	BS02	10.8885, 103.1465	No information indicating state authorities have investigated.	
14	BS04	10.9093, 103.1264	11 February 2026: Videos posted to Twitter show large numbers of authorities at the entrance area to BS04. ⁴³⁷	
15	CH01	14.3432, 104.0557	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Location appears to be hit during Thai-Cambodia conflict. ⁴³⁸
16	CK01	14.3334, 103.1766	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Location appears to be hit during Thai-Cambodia conflict. ⁴³⁹
17	CT01	10.9476, 105.0781	Two survivors told Amnesty International they were moved from this location after being told by a manager that police were coming. ⁴⁴⁰ Amnesty International could not confirm police visited the location. Survivors were taken to BM02.	
18	CT02	10.9511, 105.0703	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Possibly expanded during the crackdown period.
19	CT03	10.9594, 105.0740	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in December 2025.

435 On file with Amnesty International.

436 Fresh News, “រដ្ឋបាលខេត្តតបន្តទាយមានជ័យ បង្កហាញលទ្ធផលប្តូរតិបត្តិការ ចុះបង្អួករាបបទល្មើស Online Scams និងការបង្ខំខ្លាំងមនុស្សសុខុសច្បាប់ នៅក្នុងតំបន់យប់តៃ” (previously cited).

437 Post on X (formerly Twitter): “Cambodia Raids Scam Compound Locations in Koh Kong”, 27 April 2026, <https://x.com/jacobincambodia/status/2021255450042470617> (accessed 29 April 2026).

438 According to Bangkok Post, a Thai fighter jet was spotted dropping bombs on a casino across the border from Chong An Ma in Nam Yuen district of Ubon Ratchathani. Thai Army spokesman Major General Winthai Suvaree said the casino had served as a command centre. <https://www.bangkokpost.com/thailand/general/3152530/thai-f16-razes-border-casino> According to CambJA News, at least six casinos and suspected online scamming complexes in Oddar Meanchey, Preah Vihear and Pursat provinces were struck by Thai aircraft, artillery and drones. Most of these sites had been documented as hosting scam operations by Cyber Scam Monitor. A senior police official said “until now, no one dares to enter the casinos where Thai forces bombed.” <https://cambojanews.com/after-thai-strikes-hit-cambodian-elites-casinos-trafficked-workers-feared-inside/> Amnesty International was not able to independently confirm whether any of these attacks hit CH01, but they may have given the proximity to the locations reportedly being hit.

439 Cyber Scam Monitor, Official X (Twitter) Account, available at: <https://x.com/CyberScamWatch>, (accessed 29 April 2026).

440 Amnesty International interview with survivors, 2026.

20	CT05	10.9636, 105.0607	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Reports from an organization that buses had been seen leaving the compound in early 2026. ⁴⁴¹
21	CT08	10.9396, 105.0260	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
22	KA01	10.6337, 104.0149	There is no publicly available information indicating that state authorities have investigated or shut down this compound. The site was previously found abandoned by Amnesty International researchers in late 2024, following an investigation by police. ⁴⁴² Five victims were rescued from the site in 2025, including one during the crackdown period. ⁴⁴³	
23	KA02	10.4400, 104.4423	10 February 2026: Intervention documented at the site. ⁴⁴⁴ Mass releases occurred on 15 January with managers telling victims to leave because "police were coming", weeks before the intervention. ⁴⁴⁵	
24	KA03	10.6665, 104.0162	Intervention documented at the site in August 2025. ⁴⁴⁶ Abuses recorded at the site after intervention. ⁴⁴⁷ Mass releases in November ahead of reported "police raid" according to three survivors. ⁴⁴⁸	*Newly confirmed compound.
25	KA04	10.6275, 104.0486	There is no publicly available information indicating that state authorities have investigated or shut down this compound, but the compound appears to be shuttered.	*Newly confirmed compound.

441 Amnesty International interview with organization 4, 2025.

442 CamboJA News, Scams, "Human Trafficking Thrived at Bokor Mountain Behind Tycoon's Luxury Hotel", 9 February 2023, <https://cambojanews.com/scams-human-trafficking-thrived-at-bokor-mountain-behind-tycoons-luxury-hotel/>, (accessed 30 April 2026).

443 Information shared by an organization on file with Amnesty International.

444 AML Intelligence.com, "Cambodia shuts nearly 200 scam centers in fraud crackdown", 12 February 2026, <https://www.amlintelligence.com/2026/02/news-cambodia-shuts-nearly-200-scam-centers-in-fraud-crackdown/>, (accessed 20 May 2026).

445 Videos from Telegram public group, on file with Amnesty International.

446 See Annex I: KA03.

447 See Annex I: KA03.

448 Amnesty International interview with three survivors, 2026.

26	KK01	11.6473, 102.9138	May 2025: A news report suggests the location was likely subjected to an intervention and ongoing monitoring, but the date of the intervention is unknown. ⁴⁴⁹	
27	MD01	12.4338, 107.1882	Documented intervention at the site (likely pre-crackdown). ⁴⁵⁰	*Newly confirmed compound. Appears abandoned.
28	MD02	12.3891, 107.3124	Intervention documented at the site in August 2025. ⁴⁵¹ Amnesty International documented abuses against two victims who said they were at this compound during and after the intervention. ⁴⁵²	*Newly confirmed compound. Abuses recorded at the site after state intervention.
29	OS01	14.4330, 103.7005	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
30	OS02	14.4334, 103.6978	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Location currently controlled by Thai military. ⁴⁵³
31	PO07	13.6403, 102.5765	11 November 2025: Videos republished by Cyber Scam Monitor show authorities at the compound. ⁴⁵⁴	
32	PO10	13.6657, 102.5657	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
33	PO16	13.6296, 102.6112	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
34	PO17	13.6495, 102.5977	29 April 2025: A video published by Fresh News appears to show authorities intervening at the site. ⁴⁵⁵	*Newly confirmed compound.

449 Khmer Times, “Koh Kong casino inspections reinforce confidence in regulated gaming sector”, 18 May 2026, <https://www.khmertimeskh.com/501899468/koh-kong-casino-inspections-reinforce-confidence-in-regulated-gaming-sector/>, (accessed 20 May 2026).

450 See Annex I: MD01.

451 Khmer Times, “In Pictures: 149 foreigners detained in Mondulkiri online scam raid”, (previously cited).

452 See Annex I: MD02.

453 ABC, “Thai raid finds Cambodian scam centre had personal details of 300 Australians”, 13 February 2026, <https://www.abc.net.au/news/2026-02-13/australians-targeted-by-cambodian-scam-compound/106335866> (accessed 21 May 2026).

454 *Cyber Scam Monitor, Official X (Twitter) Account*, available at: <https://x.com/CyberScamWatch> (accessed 29 April 2026).

455 Fresh News, “កម្ពុជានិងសមត្ថកិច្ចចាត់វិធានការបង្ក្រាបបណ្តាញស្កាមអនឡាញ ក្នុងតំបន់ប្រទេសកម្ពុជា និងប្រទេសជុំវិញ ក្នុងបណ្តាញស្កាមអនឡាញ (Video inside)”, (previously cited).

35	PO18	13.6635, 102.5522	29 April 2026: Suspects were arrested during a raid on this location. ⁴⁵⁶	Casino plans for this site were recognized by the CGMC in January 2026.
36	PO20	13.6714, 102.5751	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
37	PO21	13.6674, 102.5755	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
38	PO22	13.6726, 102.5733	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
39	PO23	13.6676, 102.5646	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
40	PO24	13.6787, 102.5684	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
41	PO25	13.6604, 102.5545	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
42	PO26	13.6703, 102.5748	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Videos anonymously posted to Telegram chat groups in April 2026 show people may be leaving the location. ⁴⁵⁷	*Newly confirmed compound.
43	PP04	11.5399, 104.9074	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	

456 Phnom Penh Post, “Chinese scam leaders, Cambodian guards ordered into pre-trial detention”, 11 May 2026, <https://phnompenhpost.com/national/chinese-scam-leaders-cambodian-guards-ordered-into-pre-trial-detention/>, (accessed 20 May 2026).

457 Videos on file with Amnesty International.

44	PP09	11.3759, 104.7529	Videos anonymously posted to Telegram chat groups in July 2025 show people have fled the location. ⁴⁵⁸ Amnesty International researchers visited the location and found it abandoned as of late 2025. ⁴⁵⁹	
45	PP13	11.5986, 104.8703	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
46	PP19	11.5707, 104.8600	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
47	PP23	11.5859, 104.9039	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
48	PSP01	12.9361, 102.5391	Photos anonymously posted to Telegram on 16 February 2026 show Cambodian authorities walking through the site. ⁴⁶⁰	
49	PSP02	12.9351, 102.4924	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
50	PV01	11.6129, 105.7854	Videos republished by Cyber Scam Monitor on 14 February 2026 show people walking away from the PV01 area, a remote area. However, there is no videos or testimony suggesting state authorities have investigated the site. April 2026: Mekong Independent suggests an investigating judge visited the site. ⁴⁶¹	*Newly confirmed compound. Mass releases occurred in February 2026. ⁴⁶²
51	PV02	10.9664, 105.4189	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.

458 On file with Amnesty International.

459 Amnesty International site visits, 2025.

460 Images from Telegram public group, on file with Amnesty International.

461 Mekong Independent, "Cambodia says new law tightens net on online scams, (previously cited).

462 Videos from Telegram public group, on file with Amnesty International.

52	SI01	10.5791, 103.5561	7 October 2025: Police reportedly investigated the site after a protest by Pakistani and Bangladeshi nationals. 2,910 foreigners were detained. ⁴⁶³ In November 2025, three people were rescued from the site. ⁴⁶⁴ Possible mass releases in January 2026. ⁴⁶⁵	
53	SI02	10.5763, 103.5544	15 December 2025: Fresh News reports authorities intervened at the compound. Pictures show authorities inside the compound. ⁴⁶⁶ Compound possibly had mass releases/evacuations in January 2026. ⁴⁶⁷	
54	SI03	10.5733, 103.5578	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Testimony from victims indicates managers and security guards left the location fearing police intervention in January 2026 which prompted a mass release. ⁴⁶⁸ Amnesty International was unable to confirm if there was an intervention at the site.	*Newly confirmed compound.
55	SI04	10.5867, 103.5733	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Compound possibly had mass releases/evacuations in January 2026. ⁴⁶⁹	
56	SI08	10.6094, 103.5335	15 January 2026: Videos republished by Cyber Scam Monitor show what appear to be authorities inside of the compound, including reports of releases immediately beforehand. ⁴⁷⁰ The location was stripped of its casino license by the CGMC in November 2025. ⁴⁷¹	

463 Post on X (formerly Twitter), available at: <https://t.co/8d2pG3tfwd> (accessed 29 April 2026)

464 Information shared by an organization on file with Amnesty International.

465 The Conversation, "They escaped appalling conditions in scam factories. Now, they are living on the streets in Cambodia", 11 February 2026, <https://theconversation.com/they-escaped-appalling-conditions-in-scam-factories-now-they-are-living-on-the-streets-in-cambodia-275218>, (accessed 26 May 2026).

466 Fresh News, សមត្ថកិច្ចចាប់បង្ខំបុគ្គលិកតុលាការចុះសួររដ្ឋបាលរឿងកាស៊ីណូ ជីងស្វយ នៅក្នុងព្រះសីហនុ ក្នុងរយៈពេលសង្គ្រោះមានការបង្ខំខ្លាំងមនុស្ស [Authorities Launch Investigation at Jing Suoy Casino in Preah Sihanouk City Following Suspicions of Human Confinement], 24 April 2026, https://freshnews.com.kh/localnews/412097-2025-12-15-15-00-50?fbclid=IwY2xjawR6MKtleHRuA2FlbQlxMQBicmlkETF2UU9BTWZGbjRiMnVDNTY2c3JOYwZhcHBfaWQQMjlyMDM5MTc4ODIwMDg5MgABHvLgW3ZhmvdSjaKoWjU_EbPhI6WzuPYm7_7SYyLOejTGzANVF2K_zlZuC_1A_aem_XI2ZZ5KdLYZLUyVDCMEIw, (accessed 29 April 2026).

467 The Conversation, "They escaped appalling conditions in scam factories. Now, they are living on the streets in Cambodia", (previously cited).

468 Amnesty International interviews with five survivors, 2026.

469 The Conversation, "They escaped appalling conditions in scam factories. Now, they are living on the streets in Cambodia", (previously cited).

470 Cyber Scam Monitor, Official X (Twitter) Account, available at: <https://x.com/CyberScamWatch> (accessed 29 April 2026).

471 CamboJA News, "Four S'ville Casino Licenses, Including Jin Bei, Suspended", 26 April 2026, <https://cambojanews.com/four-sville-casino-licenses-including-jin-bei-suspended/> (accessed 29 April 2026).

57	SI11	10.6404, 103.5236	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
58	SI12	10.6340, 103.5066	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in December 2025.
59	SI15	10.6264, 103.5021	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Former director of the company operating the casino license and owning buildings at the site was arrested by the Cambodian police for scam-related crimes in January 2026. ⁴⁷² Amnesty International interview with Organization 5. ⁴⁷³	Casino plans for this site were recognized by the CGMC in January 2026.
60	SI16	10.6237, 103.5023	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Former director of the company operating the casino license and owning buildings at the site was arrested by the Cambodian police for scam-related crimes in January 2026. ⁴⁷⁴ Reported releases or evacuations from the site. ⁴⁷⁵	Casino plans for this site were recognized by the CGMC in December 2025.
61	SI20	10.6062, 103.5035	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in January 2026.
62	SI21	10.6148, 103.5178	There is no publicly available information indicating that state authorities have investigated or shut down this compound. The location was stripped of its casino license by the CGMC in November 2025. ⁵¹⁴	

472 BBC News, "Cambodia's Crackdown on Online Scam Compounds Leaves Thousands Detained and Deported", 25 April 2026, <https://www.bbc.com/news/articles/cwy8v31kkv1o> (accessed 29 April 2026).

473 Amnesty International interview with Organization 5.

474 BBC News, "Cambodia's Crackdown on Online Scam Compounds Leaves Thousands Detained and Deported", (previously cited).

475 Amnesty International interview with Organization 5.

63	SI22	10.6120, 103.5252	There is no publicly available information indicating that state authorities have investigated or shut down this compound. The location was stripped of its casino license by the CGMC in November 2025. ⁴⁷⁶	
64	SI29	10.5905, 103.5398	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Releases reported in January 2026. ⁴⁷⁷	*Newly confirmed compound.
65	SI32	10.6368, 103.5271	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in December 2025.
66	SI33	10.6407, 103.5086	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
67	SI35	10.6104, 103.5167	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
68	SI36	10.6087, 103.5161	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
69	SI37	10.6036, 103.5322	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
70	SI39	10.6210, 103.5002	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in December 2025.
71	SI42	10.5857, 103.5510	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in January 2026.
72	SI44	10.6059, 103.5275	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	

476 CamboJA News, "Four S'ville Casino Licenses, Including Jin Bei, Suspended", (previously cited).

477 Mekong Independent, "Foreign workers flee ahead of online scam raids, Sihanoukville locals say", 19 January 2026, <https://mekongindependent.com/2026/01/foreign-workers-flee-ahead-of-online-scam-raids-sihanoukville-locals-say/>, (accessed 26 May 2026).

73	SI45	10.6410, 103.5316	A news report suggests this location was raided in March 2026. ⁴⁷⁸	
74	SI48	10.6220, 103.5058	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
75	SI50	10.6371, 103.5029	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	Casino plans for this site were recognized by the CGMC in January 2026.
76	SI52	10.6323, 103.5076	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
77	SI54	10.6411, 103.5362	There is no publicly available information indicating that state authorities have investigated or shut down this compound. Possible evacuation/releases in January 2026. ⁴⁷⁹	*Newly confirmed compound.
78	SV04	10.9991, 106.1904	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
79	TBK02	11.6422, 105.8262	Two survivors reported being abused at this location and then forcibly transferred to MD02 after being told by managers "police were coming" in mid-2025. ⁴⁸⁰ In January 2026, a survivor reported police intervened at the location after he was forcibly transferred to the location from PV01. The survivor was not identified as a victim of human trafficking and police told him to leave the area. ⁴⁸¹	*Newly confirmed compound.
80	TBK03	11.6725, 105.9732	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.

478 Ministry of Information, "Cambodia Detains 49 in Phnom Penh Raid on Online Scam Operation", 23 March 2026, <https://www.information.gov.kh/articles/189210>, (accessed 29 April 2026).

479 Mekong Independent, "Foreign workers flee ahead of online scam raids, Sihanoukville locals say", 19 January 2026, <https://mekongindependent.com/2026/01/foreign-workers-flee-ahead-of-online-scam-raids-sihanoukville-locals-say/>, (accessed 26 May 2026).

480 Amnesty International interviews with *Andres* and *Valentina*, 2025.

481 Amnesty International interview with *Mo*, 2026.

81	TBK04	11.6901, 105.9706	Possible evacuation/releases in January 2026. ⁴⁸² Intervention documented in April 2026. ⁴⁸³	*Newly confirmed compound.
82	TBK05	11.7138, 105.9638	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
83	TBK08	11.6686, 105.9789	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*Newly confirmed compound.
84	TD01	12.1278, 102.7390	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	
85	TD01H	12.1211, 102.7455	There is no publicly available information indicating that state authorities have investigated or shut down this compound.	*TD01H is a new compound within the TD series of compounds. **Location partially under control of Thai military.
86	TK01	11.3304, 104.7501	Compound is abandoned and now under the control of the Cambodian authorities. ⁴⁸⁴	Amnesty International evidence suggests compound has moved part of its operations to PV01. ⁴⁸⁵

482 Mekong Independent, "Scam exodus reaches remote compounds", 21 January 2026, <https://mekongindependent.com/2026/01/scam-exodus-reaches-remote-compounds/>, (accessed 29 April 2026).

483 *Cyber Scam Monitor*, Official X (Twitter) Account, available at: <https://x.com/CyberScamWatch> (accessed 29 April 2026).

484 CamboJA News, "Scam Hub 'Mango Park 2' Shut, Converted to Holding Center", (previously cited).

485 See Case study: PV01.



ANNEX III


SUSPICIOUS LOCATIONS


CODE	COORDINATES	SECURITY FEATURES
BA04	11.0742, 106.1640	Security guards, double-gate system.
BA07	11.0680, 106.1698	Security guards, razor wire on perimeter walls.
BA10	11.0676, 106.1614	Security guards, razor wire on perimeter walls, strategic positions of probably guard posts within perimeter walls.
BA19	11.0788, 106.1638	Security guards, probable guard towers.
BA21	11.0607 106.1791	Security guards, razor wire on perimeter walls, strategic positions of probably guard posts within perimeter walls.
BA22	11.0623, 106.1776	Security guards, strategic positions of likely guard posts within perimeter walls.
BA23	11.0752, 106.1512	Appears abandoned after video showing mass escape/evacuation, heavy use of razor wire on perimeter walls.
BT01	13.1974, 102.4016	Security guards, razor wire on perimeter walls.
CH02	14.3405, 104.0587	Security guards, razor wire on perimeter walls.
CT06	10.9594, 105.0607	Security guards, razor wire on perimeter walls.
CT07	10.9555, 105.0594	Security guards, strategic positions of likely guard posts within perimeter walls.
CT09	10.9564, 105.0599	Security guards, caged windows.
CT10	10.9536, 105.0593	Security guards.
CT11	10.9420, 105.0543	Security guards, electric wire on perimeter walls.
CT12	10.9784, 105.0417	Security guards.
KCC01	11.8855, 104.7094	Security guards, internal facing barbed or razor wire on perimeter walls, internal facing cameras.
PO02	13.6521, 102.5582	Barbed or razor wire on perimeters, caged windows.
PO11	13.6635, 102.5562	Security guards.
PP02	11.4530, 104.8561	Security guards, barbed or razor wire on perimeter walls, internally facing security cameras, cages on windows and other areas.

PP11	11.4107, 104.6514	Security guards, barbed or razor wire on perimeter walls, cages on windows and other areas.
PP14	11.5985, 104.8683	Security guards, barbed or razor wire on perimeter walls, internally facing security cameras, cages or bars on windows and other areas.
PP21	11.6048, 104.8691	Multiple layers of barbed or razor wire on perimeters, cages on windows.
PSP06	12.9227, 102.4968	Security guards, double-gate at entrance/exit, barbed or razor wire on perimeter walls, internally facing security cameras, cages or metal bars on windows.
SI05	10.5964, 103.6315	Security guards.
SI07	10.6099, 103.5349	Security guards, razor wire on perimeter walls, cages on windows.
SI10	10.6162, 103.5652	Security guards, razor wire on perimeter walls.
SI14	10.6323, 103.5068	Security guards, cages on windows.
SI17	10.6246, 103.5009	Security guards.
SI18	10.6250, 103.4977	Security guards, razor wire on perimeter walls.
SI23	10.6150, 103.5271	Razor wire on perimeter walls.
SI31	10.6058, 103.5287	Security guards, cages on windows.
SI38	10.6214, 103.5126	Security guards, internal facing cameras.
SI41	10.6212, 103.5019	Security guards, electric wire on perimeter fences, cages on windows.
SV01	10.9829, 106.1954	Strategic positions of likely guard posts within perimeter walls.
SV02	10.9292, 106.1441	Security guards.
TBK01	11.6419, 105.8159	Security guards, internal facing cameras.

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FALLING THROUGH THE CRACKS

CAMBODIA'S "CRACKDOWN" ON SCAMMING
COMPOUNDS AND THE VICTIMS IT HAS FAILED

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