

# POTENTIAL LINKS BETWEEN CRIMINAL GROUPS AND PROFESSIONAL GATEKEEPERS IN THE DYNAMICS OF ILLEGAL GOLD MINING IN COLOMBIA



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## POTENTIAL LINKS BETWEEN CRIMINAL GROUPS AND PROFESSIONAL GATEKEEPERS IN THE DYNAMICS OF ILLEGAL GOLD MINING IN COLOMBIA

Illegal gold mining in Colombia does not operate as an isolated illegal activity but rather as a territory-based criminal economy system backed by multiple actors. While some armed groups operating in Colombia, such as the Gulf Clan, the National Liberation Army (ELN), and dissidents from the Revolutionary Armed Forces of Colombia (FARC) exert control on mining areas, their financial and legal support is often mediated by professional gatekeepers, such as notaries, accountants, lawyers, mining cooperatives, and in some cases public officers, as we will see below.

The Financial Action Task Force (FATF)<sup>1</sup> defines gatekeepers as “professionals that wittingly or unwittingly, allow for illicit operations to be conducted through the use of their legal, accountancy, or financial services.”<sup>2</sup> The Colombian legal framework on money laundering and terrorist financing (ML/TF), recognizes that these actors may facilitate illicit activities through contractual simulation, accounting concealment, fraudulent legalization, and institutional omission.<sup>3</sup>

While these dynamics happen in many different contexts, this analysis is focused on the relations formed around illegal gold mining in subregions such as Bajo Cauca,<sup>4</sup> South Bolívar as well as in the departments of Chocó, where criminal groups have been operating with the help of professional gatekeepers involved in this activity.<sup>5</sup> These actors work through schemes, networks, and operational nodes that facilitate, conceal, and channel illicit extractive and financial operations.

In those areas, these actors play key roles within the criminal chain, from extraction to commercialization, including asset laundering and potential forms of institutional or community capture.<sup>6</sup> The latter is observed in social, economic, and environmental impacts including tax evasion, armed territorial control, community forced displacement, and institutional capture.

This document aims to outline the potential operational interactions between criminal armed actors and professional gatekeepers in illegal gold mining areas. Its importance lies in providing a technical analysis helping to identify roles, interactions, and territories where these articulations support illicit extractive operations.

1 An international agency setting global standards to prevent asset laundering, terrorist financing, and the proliferation of mass-destruction weapons.

2 Financial Action Task Force (FATF) “Estándares internacionales sobre la lucha contra el lavado de activos y el financiamiento del terrorismo y la proliferación; Las recomendaciones del GAFI,” December, 2023.

3 Colombia, National Planning Department, “Política nacional antilavado de activos, contra la financiación del terrorismo y contra la financiación de la proliferación de armas de destrucción masiva,” August 9, 2021.

4 A northern sub-region of the department of Antioquia comprising the municipalities of Caucasia, Nechí, El Bagre, Zaragoza, Tarazá, and Cáceres.

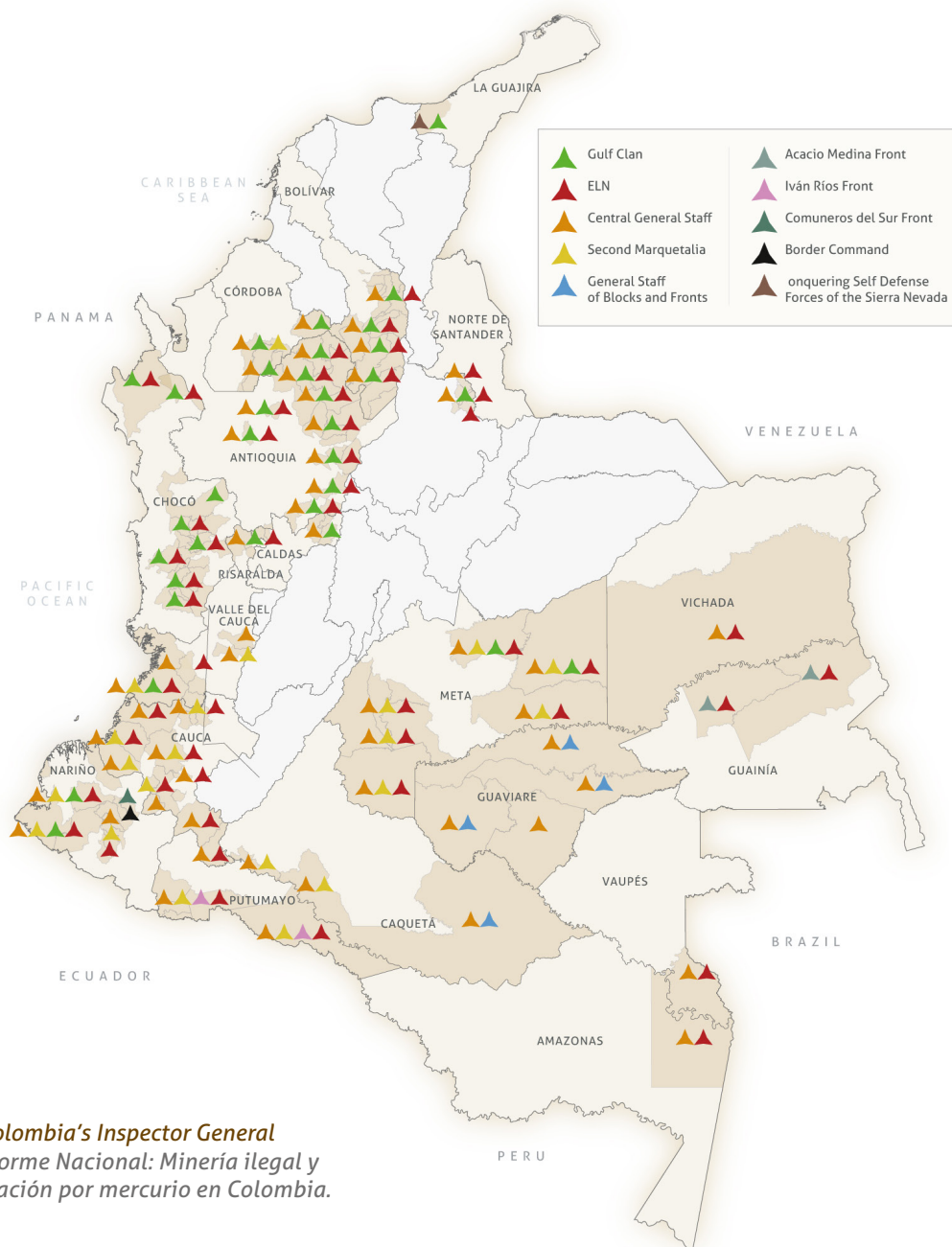
5 Colombia’s Inspector General Office, “Informe Nacional: Minería Illegal y Contaminación por Mercurio en Colombia,” 2024.

6 Rutas del Conflicto [Pathways of the Conflict], “La sofisticada estrategia para lavar la extracción ilícita de oro en Bajo Cauca,” August 21, 2025.

## TERRITORIAL DISTRIBUTION OF CRIMINAL ARMED ACTORS ACROSS SEVERAL ILLEGAL MINING AREAS IN COLOMBIA

While this document focuses on three mining hotspots, Bajo Cauca, the department of Chocó, and South Bolívar, illegal gold mining in Colombia is a nationwide phenomenon, with established presence of armed structures across many regions in the country.

The map below marks overlaps between illegal extraction areas and active criminal structures, showing that the criminal economic system does not operate in isolated spots, but extends nationwide. Operating relations between armed actors and professional gatekeepers including notaries, accountants, lawyers, and local authorities, as analyzed in these three hotspots, may be observed in other areas too.



Source: Colombia's Inspector General Office, Informe Nacional: Minería ilegal y contaminación por mercurio en Colombia.

## ■ Defining Operational Roles per Mining Hotspot

The territorial factsheets below show the potential operational interactions between organized crime groups and professional gatekeepers in three illegal mining hotspots: Bajo Cauca, Chocó, and South Bolívar, areas identified by Colombia’s Inspector General Office as highly affected by illegal mining.<sup>7</sup> Each factsheet presents the roles these actors play to support illegal mining extractive, logistical, and financial operations, showing interactions between criminal groups and simulated legality in contexts where institutional intervention may be limited, fragmented, or altogether ignored.

### Department of Antioquia

#### Subregion: Bajo Cauca

##### Controlling criminal group:

The Gulf Clan<sup>8</sup>

##### Potential Gatekeepers involved:

-  Notaries
-  Accountants
-  Local authorities
-  Lawyers



In this area, The Gulf Clan operates as the controlling criminal group, with the power to exert sustained territorial control over illegal gold mining areas. Their presence is manifested, according to several sources, in armed patrolling, local law enforcement, systematic extortion of informal miners, violent regulation of the access to machinery and commercialization routes.<sup>9</sup> Furthermore, population control mechanisms have been reported, through threats, forced displacement, and co-opting community leaders.<sup>10</sup> According to news outlet Infobae, one of the sub-structures operating in the region, perpetrated a criminal scheme combining armed coercion with feigned legalization that facilitated illicit extractive operations.<sup>11</sup>

7 Colombia’s Inspector General Office, “Informe Nacional: Minería Ilegal y Contaminación por Mercurio en Colombia,” 2024.

8 Comisión de la Verdad [Commission of Truth], “Caso «Autodefensas Gaitanistas de Colombia (AGC) o Clan del Golfo y las disputas con los denominados Caparros» Reconfiguración actual del conflicto armado en el Bajo Cauca antioqueño y sur de Córdoba,” 2022.

9 Rutas del Conflicto, “La sofisticada estrategia para lavar la extracción ilícita de oro en Bajo Cauca,” August 21, 2025; Ombudsman’s Office, “Alerta Temprana 003 del 2024,” May 15, 2024.

10 Instituto de estudios para el Desarrollo y la Paz [Center of Studies for Peace and Development], “Informe especial: la historia de 9 conflictos internos que no acaban,” June 30, 2025.

11 Rodríguez, Daniel, “Operativo contra el Clan del Golfo deja destrucción de maquinaria por \$55.000 millones en el Bajo Cauca,” Infobae, June 29, 2025; Diario del Cauca, “Extinción de dominio en Antioquia debilita al Clan del Golfo y a redes del oro ilegal,” September 13, 2025.

## Potential operating interactions with professional gatekeepers:



**Notaries:** Likely legalization of contracts for the sale of mining properties used by third parties linked to the Gulf Clan.<sup>12</sup>



**Local authorities:** Likely omission of environmental oversight and the granting of mining licenses without origin verification.<sup>14</sup>



**Accountants:** Accounting fraud in front companies that channel illegal gold.<sup>13</sup>



**Lawyers:** Contractual shielding in sales operations between frontmen.<sup>15</sup>

## Department of Chocó

### Controlling criminal group:

ELN<sup>16</sup>

### Potential Gatekeepers involved:



Local authorities



Notaries



Accountants



Mining cooperatives



12 Superintendencia de Notariado y Registro [The Superintende of Notaries and Registry], "Circular CIR 2025-000180-4," May 13, 2025; Saavedra Frank, "El Clan del Golfo está invadiendo fincas y predios, aseguró el director de la ANT: "Hay un riesgo inminente,"" Infobae, May 7, 2025.

13 Portafolio, "Por blanqueo de oro condenan a 15 empresarios y a contadores," February 10, 2025.

14 Centro Sociojurídico para la Defensa Ambiental [Socio-Juridical Center for Environmental Defense], "30 años de licencias ambientales en Colombia y ¿dónde están? La necesidad de superar el régimen de transición ambiental," November 2023; Noticias Caracol, "Paisajes sin vida: este es el impacto de la minería ilegal en el Bajo Cauca antioqueño," April 10, 2019.

15 29 Municipal Civil Court, Medellín, Antioquia, "Sentencia No 075," June 8, 2020; El Tiempo, "La delicada denuncia sobre un millonario contrato para defender a Colombia de un pleito por una mina de oro," March 25, 2025.

16 Páez Murillo, C. A., Isaza Quebrada, J. A., Baracaldo Sierra, S. M., & Fernández-Osorio, A. E. (2025). Minería ilegal en Río Quito: actores, soberanía y narrativas de legitimación en el corazón del departamento de Chocó. *Revista Criminalidad*, 67(1), 147-165. <https://doi.org/10.47741/17943108.648>

In Chocó, the ELN control waterways and rural roads, particularly in municipalities such as Río Quito, Medio San Juan, and Litoral del San Juan (river), where armed patrolling, extortion charges, and control over machinery movement have been reported.<sup>17</sup> According to news outlet Vorágine, illegal mining operations rely on informal arrangements with local agents, feigning legality through mining cooperatives, and institutional obliteration in hard-to-reach areas.<sup>18</sup>

### Potential operational interactions with professional gatekeepers:



**Mining cooperatives:** make illegally mined gold seem legal through fraudulent contracts, invoices, and records.<sup>19</sup>



**Notaries:** authenticate sales agreements, cessions, or certifications of the mineral without actually certifying its origin, which allows for the appearance of legality before financial entities, trading firms, or mining authorities.<sup>20</sup>



**Local authorities:** likely use fake contracts to justify the presence of machinery in areas under the influence of the ELN, using the pretense of road maintenance or community projects to conceal their being used in illegal extractive activities.<sup>21</sup>



**Accountants:** conceal illicit financial flows related to illegal gold mining through accounting triangulation.<sup>22</sup>

17 Semana Magazine, "Atención: ELN y Clan del Golfo tienen en jaque a población del medio San Juan, Chocó; suplican por ayuda," July 11, 2023; Radio Nacional, "Grave crisis humanitaria en el San Juan, Chocó," August 13, 2024.

18 Vorágine, "Servidores públicos y Policía: cómplices de la minería ilegal en el Chocó," October 27, 2024.

19 Ámbito Jurídico, "Autoridades descubren millonario patrimonio de cooperativas que simulaban legalidad en minería," September 10, 2025.

20 Rivas Lucero, "El conflicto asociado a la extracción ilícita de minerales en los municipios de Nóvita, Istmina y Condoto – Chocó, desde el enfoque laboral colombiano," Universidad Externado de Colombia, 2021.

21 Ombudsman's Office, "Alerta Temprana 004-22," February 17, 2022.

22 Bedoya Diana, "Análisis de la participación del contador público en el lavado de activos," Universidad Cooperativa de Colombia, 2020.

## Departamento of Bolívar

### Subregión: South Bolivar

#### Controlling criminal group:

FARC dissidents<sup>23</sup>

#### Potential Gatekeepers involved:

-  Notaries
-  Accountants
-  Local authorities
-  Lawyers



FARC dissidents operate in alliance with the ELN, by establishing territorial control schemes over illegal mining areas. Their presence is manifested through mobility restrictions, armed strikes, systematic extortion to mining operators, and direct pressure targeting rural communities.<sup>24</sup> According to newspaper El Espectador, the fight over criminal proceeds from illegal mining has led to confrontations with other armed groups, while maintaining operational agreements to sustain the extractive and financial chain under fraudulent schemes.<sup>25</sup>

<sup>23</sup> Conflict Responses, "Las disidencias de las FARC -EP, dos caminos de una guerra en construcción," March 1, 2024.

<sup>24</sup> Gallo, Daniela, "Así funciona la alianza entre el ELN y las disidencias de Farc para evitar la entrada del Clan del Golfo en cinco departamentos," Infobae, 10 de enero de 2024.

<sup>25</sup> El Espectador, "Amenazas de muerte, minas y desplazamiento: crece alerta por guerra en Sur de Bolívar," February 20, 2025.

### Potential operational interactions with professional gatekeepers:



**Lawyers:** legalize gold trade through shell companies, concealing gold origin in the absence of substantial verification.<sup>26</sup>



**Accountants:** simulate mining income to justify financial movements, enabling illicit gold trading through accounting records that obscure the mineral's origin.<sup>28</sup>



**Local authorities:** may engage in willful omission that simulates oversight thus enabling illegal operations go virtually unchecked.<sup>27</sup>



**Notaries:** legalize real estate sale agreements between frontmen with ties to armed groups.<sup>29</sup>

## RECOMMENDATIONS TO PREVENT ILLICIT ACTIVITIES FACILITATION BY DESIGNATED NON-FINANCIAL PROFESSIONS:

**1. Establish a comprehensive regulatory framework** for professional gatekeepers following a risk-based approach. Likewise, threats and vulnerabilities related to their potential ties with mining activities should be identified, by limiting roles, responsibilities, and operational restrictions in areas where illegal mining is highly concentrated.

Such a framework should consider documentary traceability criteria and territorial control, in order to prevent that professional gatekeepers such as notaries, accountants, lawyers or mining cooperatives operate without effective institutional verification and oversight.

**2. Train professionals** that may be exposed to financial crime in mining areas, in light of their particular conditions. Local authorities, regulation organizations, and professionals themselves should promote data sharing, disseminate regulations, international recommendations, and best practices to prevent and mitigate related crimes, all of which may prevent those actors from becoming key gatekeepers in those crimes.

<sup>26</sup> Garzón, David, "Desmantelan banda delictuosa que comercializaba oro de manera ilegal en el bajo Cauca y el sur de Bolívar," Infobae, October 26, 2024.

<sup>27</sup> Ombudsman's Office, "Alerta Temprana 003 del 2024," May 15, 2024.

<sup>28</sup> Ibid.

<sup>29</sup> Garzón, David, "Desmantelan banda delictuosa que comercializaba oro de manera ilegal en el bajo Cauca y el sur de Bolívar," Infobae, October 26, 2024.

**3. Implement multidimensional territorial control mechanisms** with an emphasis on preventing financial crimes, particularly focusing on notaries, accountant businesses, and mining cooperatives. Thus, a strategy should be supported to prioritize areas with presence of criminal groups, a history of fraudulent legalization of extractive activities, and proof of omission or institutional weakness.

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**4. Strengthen cross-check mechanisms** by the authorities for professions exposed to financial crimes. This can be done through an effective implementation of inter-institutional agreements on the matter between Colombia's Prosecutor's Office, the Superintendence of Public Notary and Registry, The Superintendency of Societies, The Ministry of Mines and Energy, and autonomous territorial entities. Such agreements may allow for articulate and efficient monitoring of professional gatekeepers' behavior in places where armed actors are present.