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PUBLIC  
PROSECUTOR'S  
OFFICE

## IOTA Forum on Combating VAT Fraud “VAT fraud cases in import and export”

EPPO-led transnational response to VAT fraud on  
import/export/transit

07/05/2026

**Luxembourg, EPPO**

The VAT Fraud Team (VFT)

Nelson MACEDO DA CRUZ

Protecting EU  
taxpayers' money  
from criminals

www

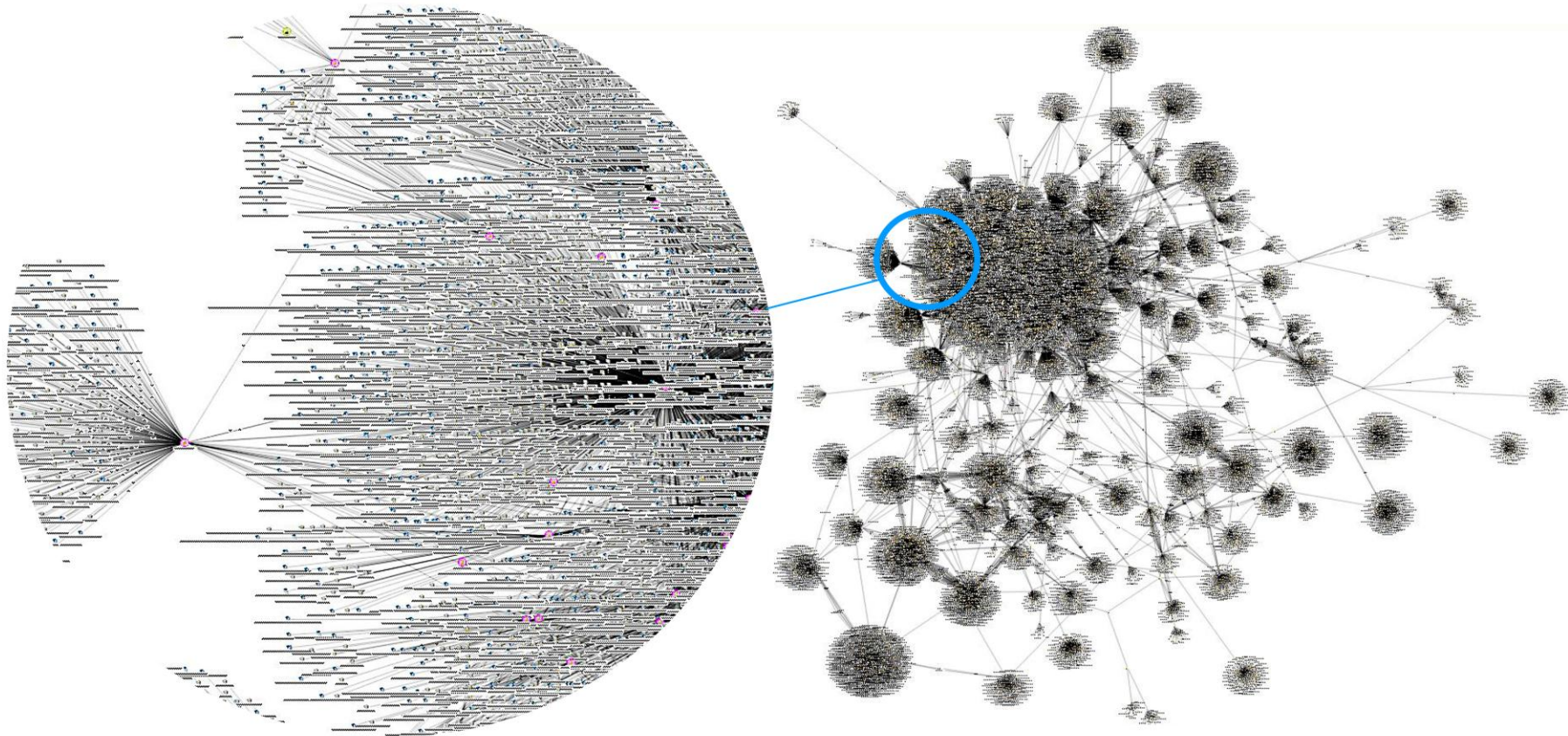
# 1

## The approach



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# Single Office



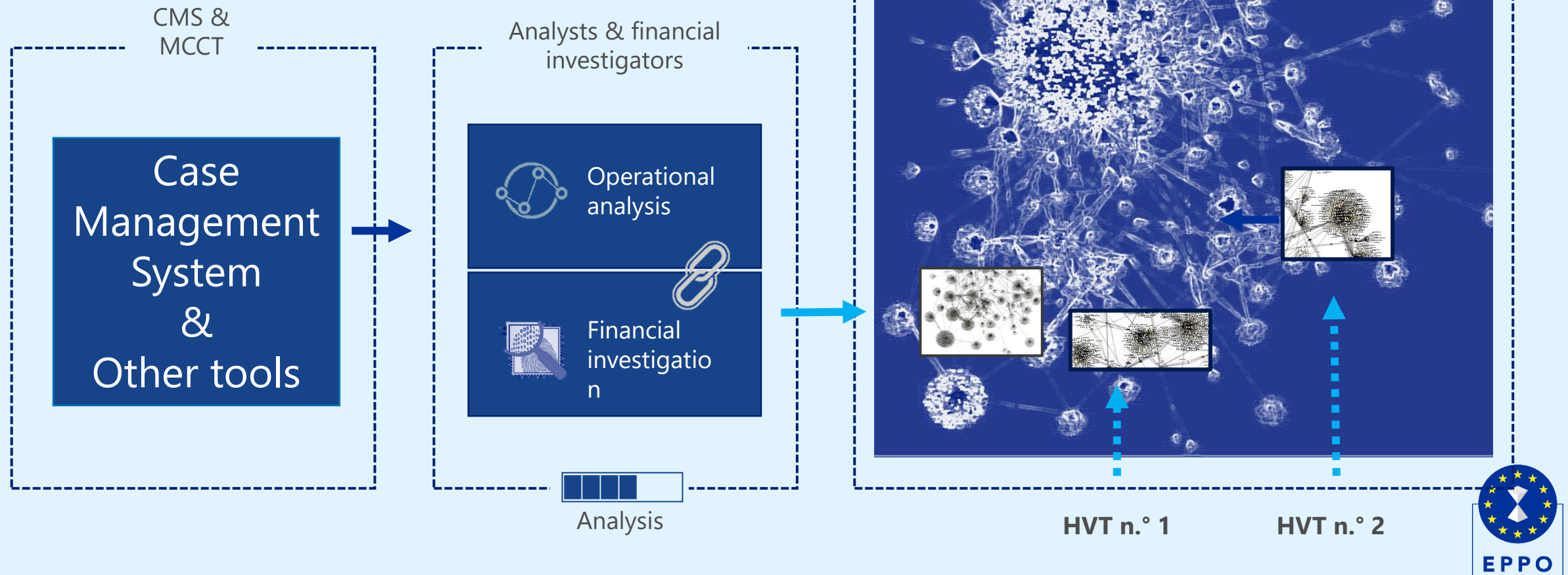
**Consistency**

**Efficiency**



# Cross-checking and High-Value Targeting by CO

Making data talk



# EPPO's Impact on VAT Fraud in the EU

STAGE 1



**2021**

VAT fraud reported to EPPO

STAGE 2



**2021-2022**

EPPO is investigating, only administrative measures are taken by the responsible authorities

STAGE 3

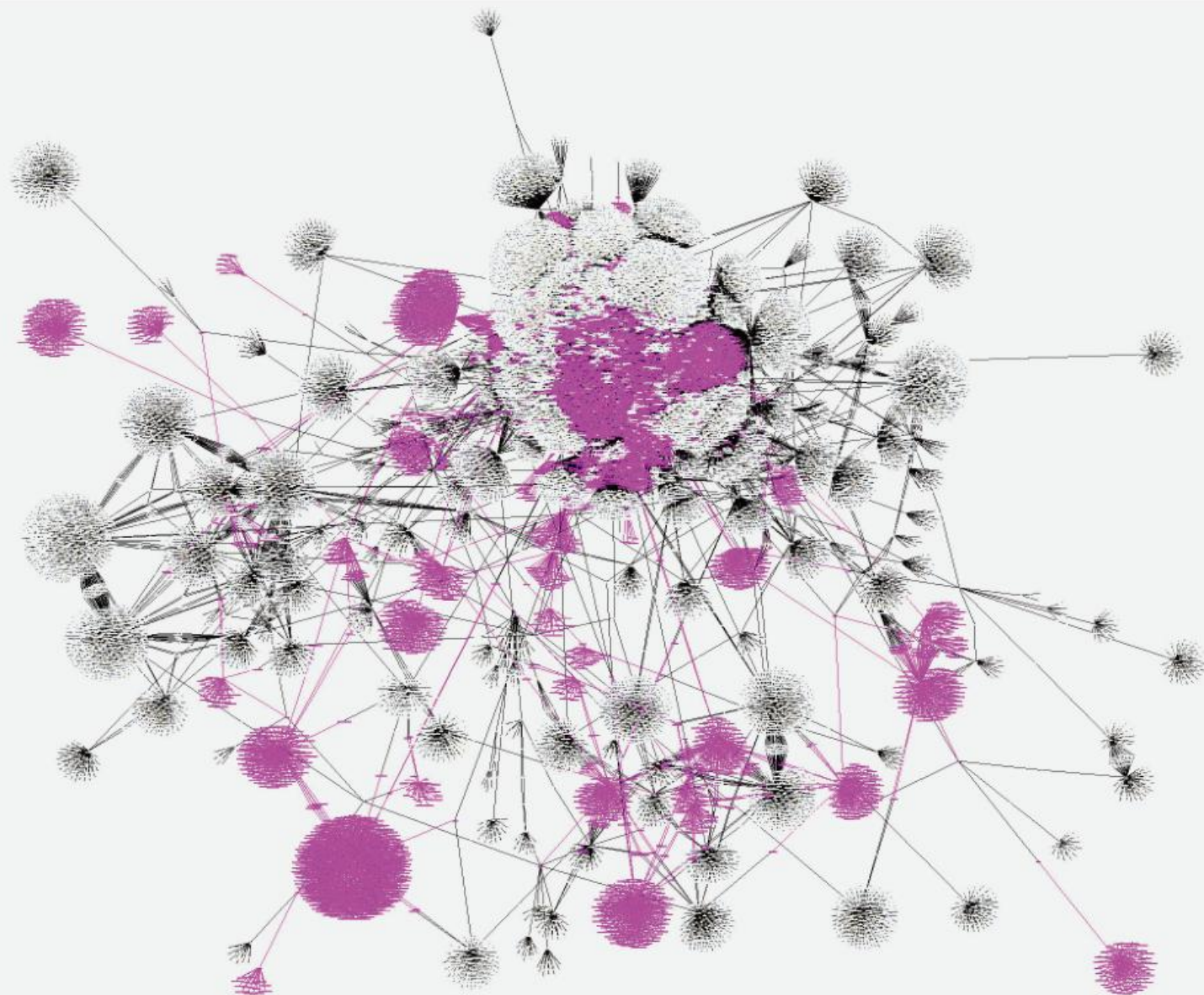


**2022-2024**

EPPO moves - Impact of 4 major investigations (Admiral, Moby Dick, Midas, Goliath): this is what remains of the initial VAT fraud cluster

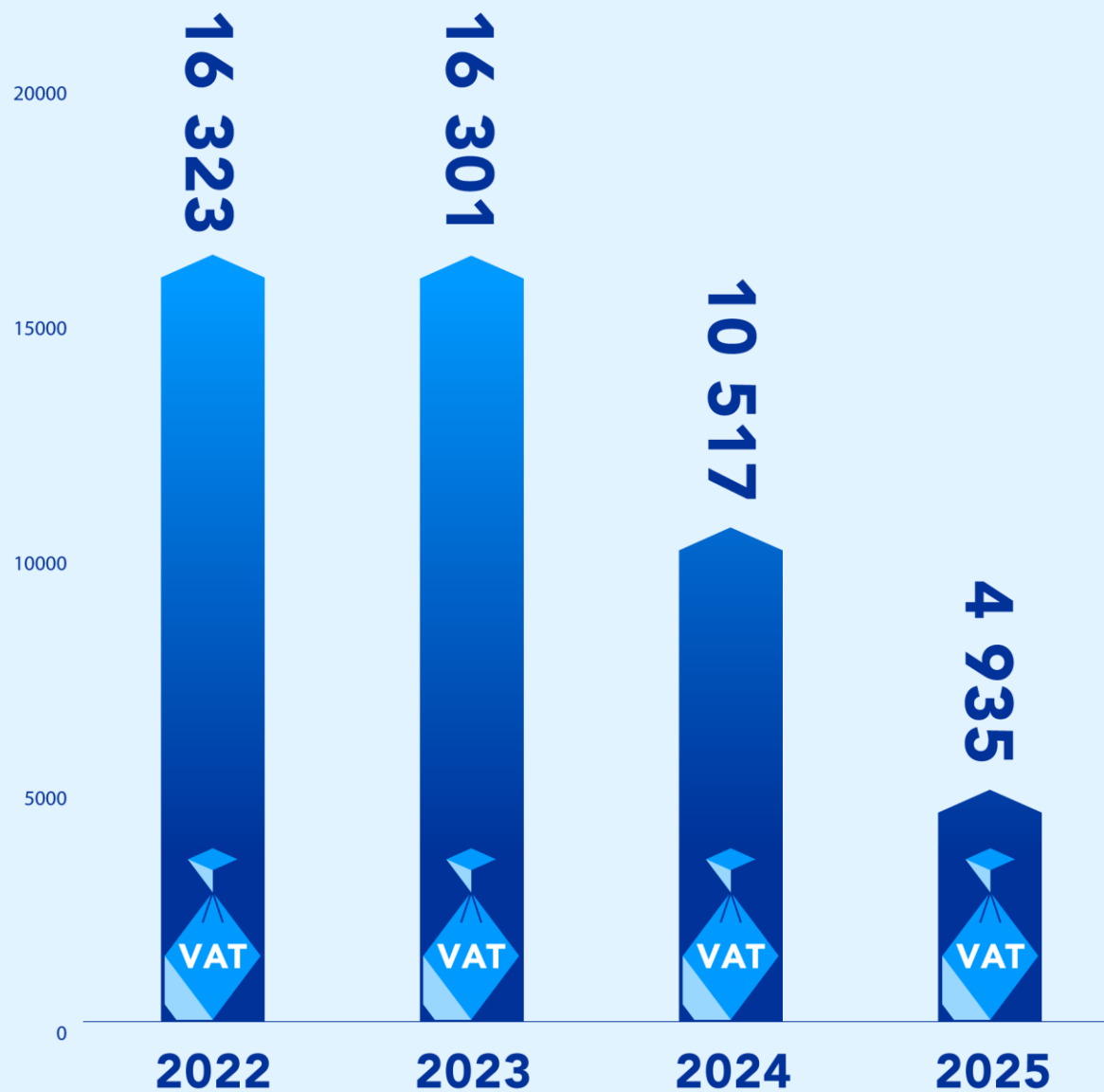
# What the EPPO sees today

## Legend:



# EPPO Impact

2025



Fraudulent Operators

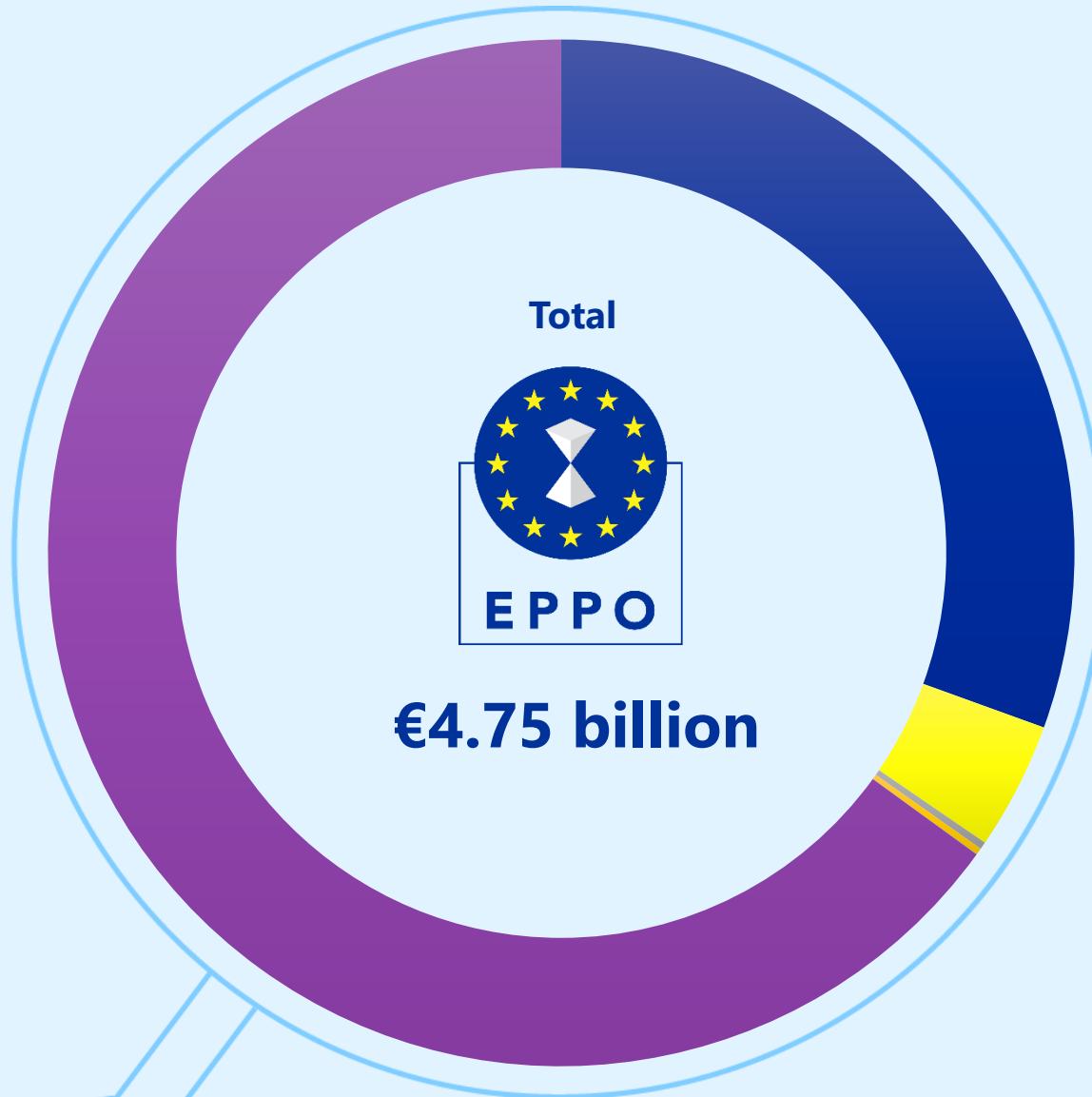
Source: CMS



# Financial impact 2021 - 2025



Investigated VAT  
damages object of  
prosecution



# Financial impact

2025



€31  
billion

TOTAL  
EPPO  
VAT  
damage

 €1.93 billion

 €1.3 billion

 €171.71 million

 €76 million

 €65 million

 €45 million

# 2

## The practice



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OFFICE

INVESTIGATION

# CALYPSO

€ 700  
million



ESTIMATED  
DAMAGES



COUNTRIES  
INVOLVED

14



SEARCHES

101



ARRESTS

10



REAL DESTINATION  
OF IMPORTED GOODS

FALSELY DECLARED  
DESTINATION OF  
IMPORTED GOODS

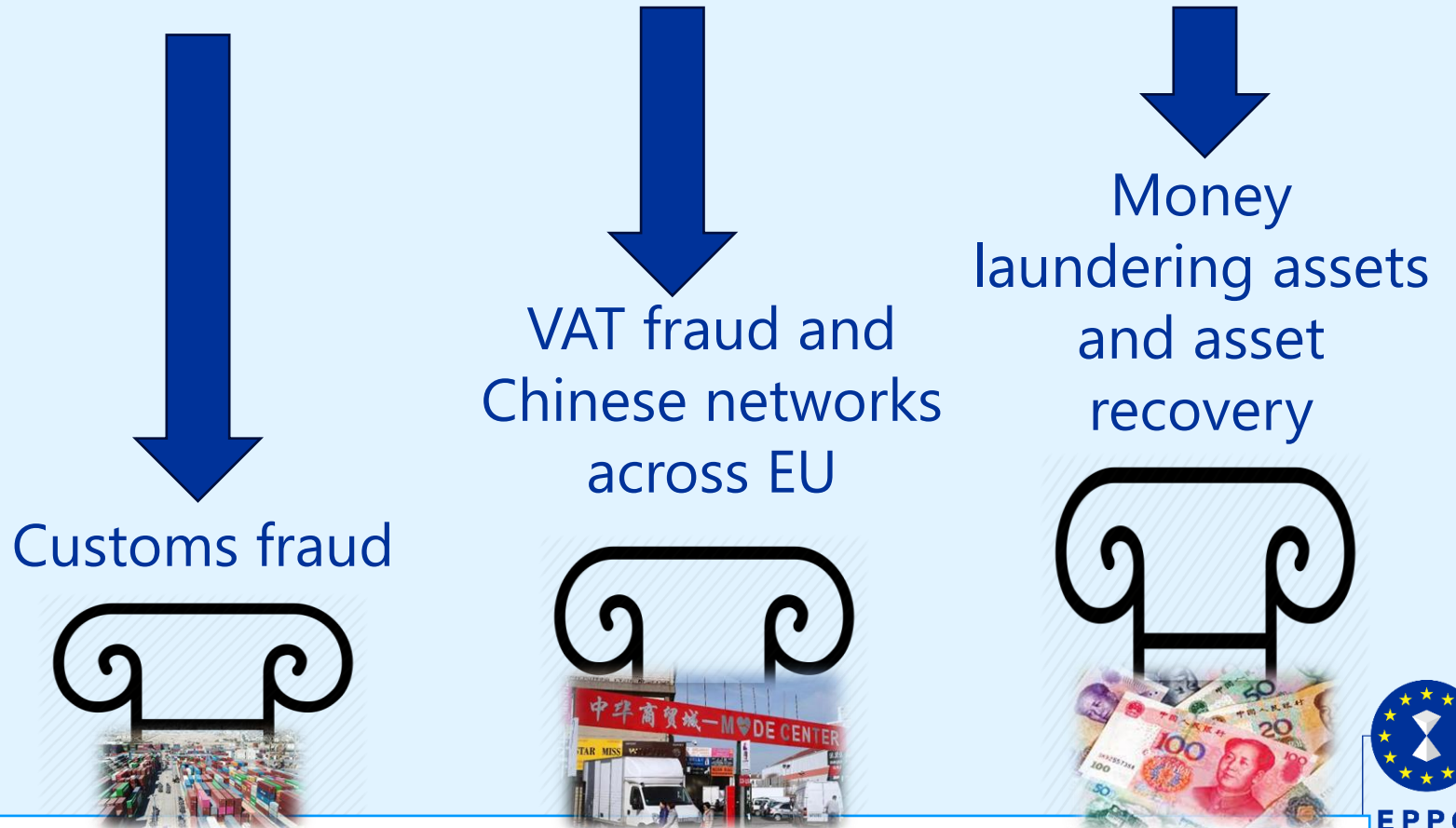
COUNTRY OF ORIGIN OF THE GOODS, WHERE THE MONEY FLOWS BACK TO



# Game-changer: Calypso Operation

## ► Cases:

I.000914/2024 (ES), I.001009/2024 (BG), I.000832/2024 (EL),  
I.000524/2022 (EL), I.000114/2024 (EL), I.001112/2024 (EL), I.000459/2025,  
I.000345/2021 (FR), I.000502/2025 (FR)



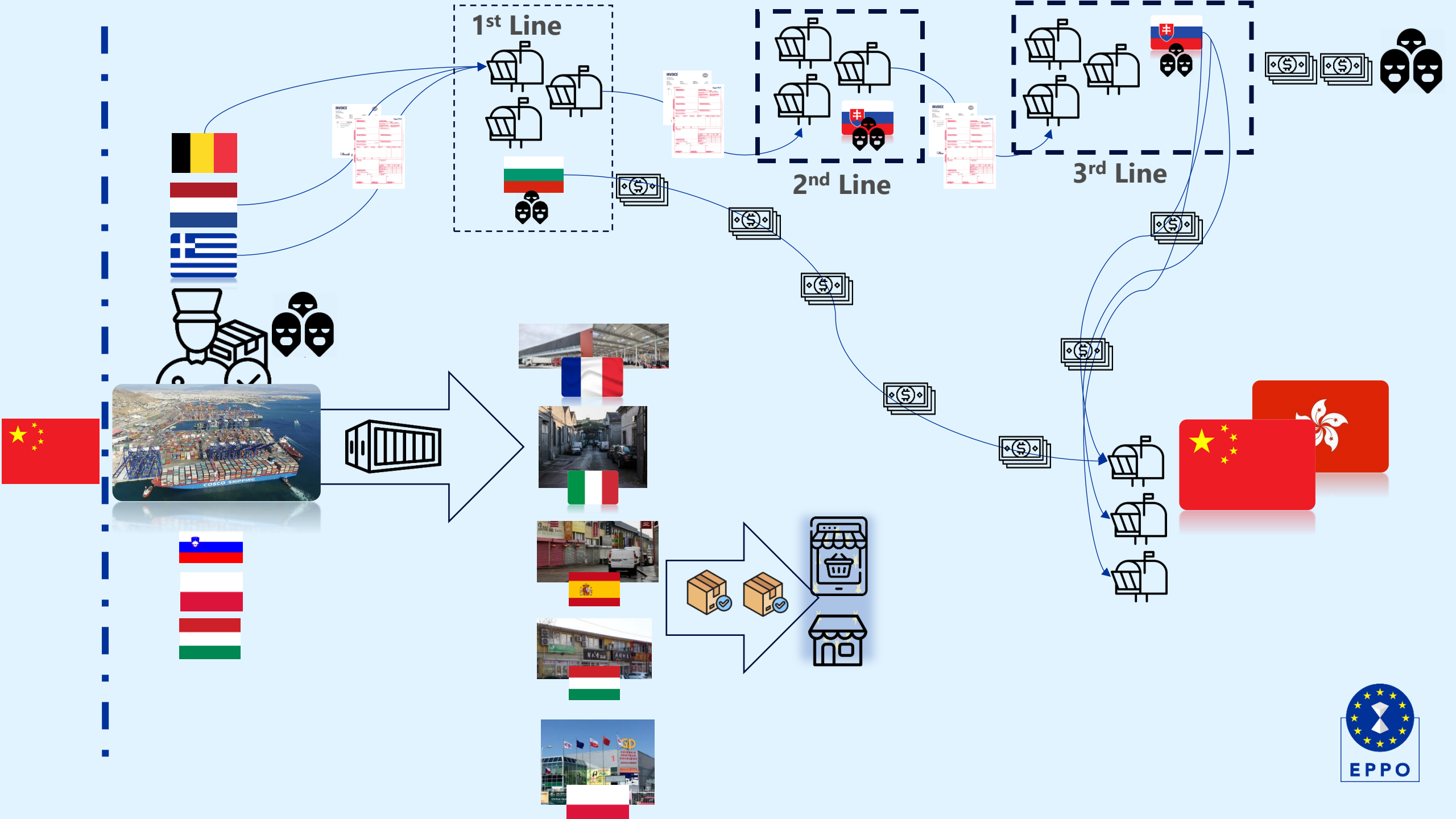
Customs fraud

VAT fraud and Chinese networks across EU

Money laundering assets and asset recovery

€ 1.1 Billion





# Regional managers and “enabling” OCGs

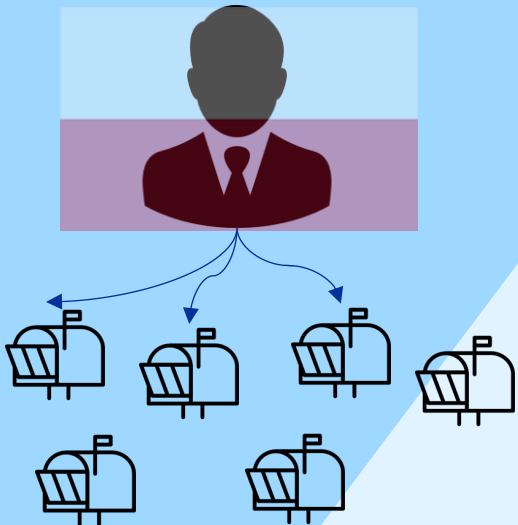
Regional “managers” responsible for overseeing continuous introduction of goods into the EU and their “passage” to the “Regional Managers”.

ANDA, OULIAN, NEW OUDA and JIATING: EU-wide distribution

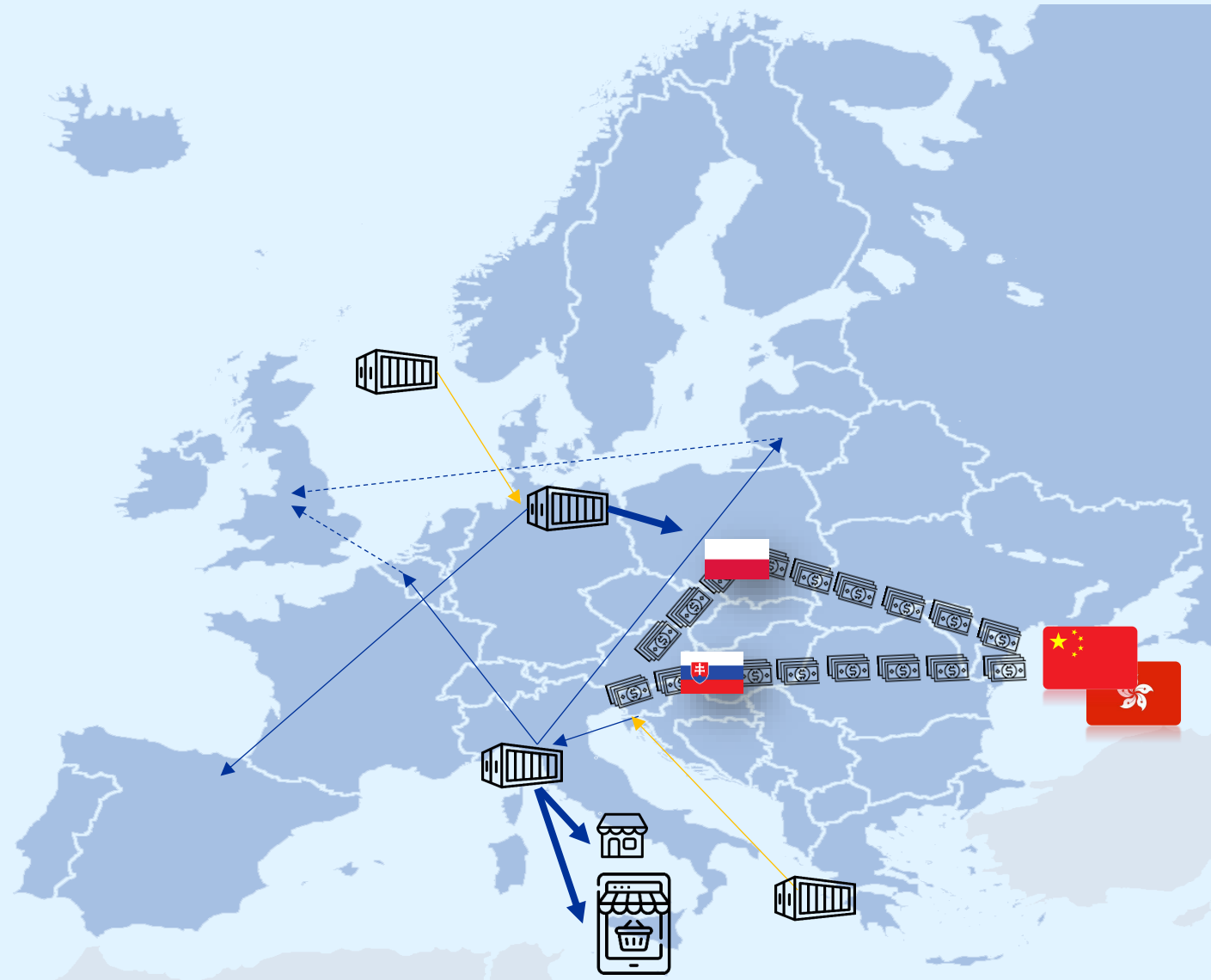
Responsible for creating “companies” and “bank accounts” and operating them under the direction of Chinese “line managers” in EU soil, against a fee.

Management from “Chinese Line Managers” via e-mails and WeChat.

Operating, in substance, the entire customs, VAT fraud and money laundering mechanism.



# Operation ODISSEO: Fraud system post-Calypso



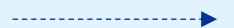
Importation



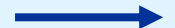
T1



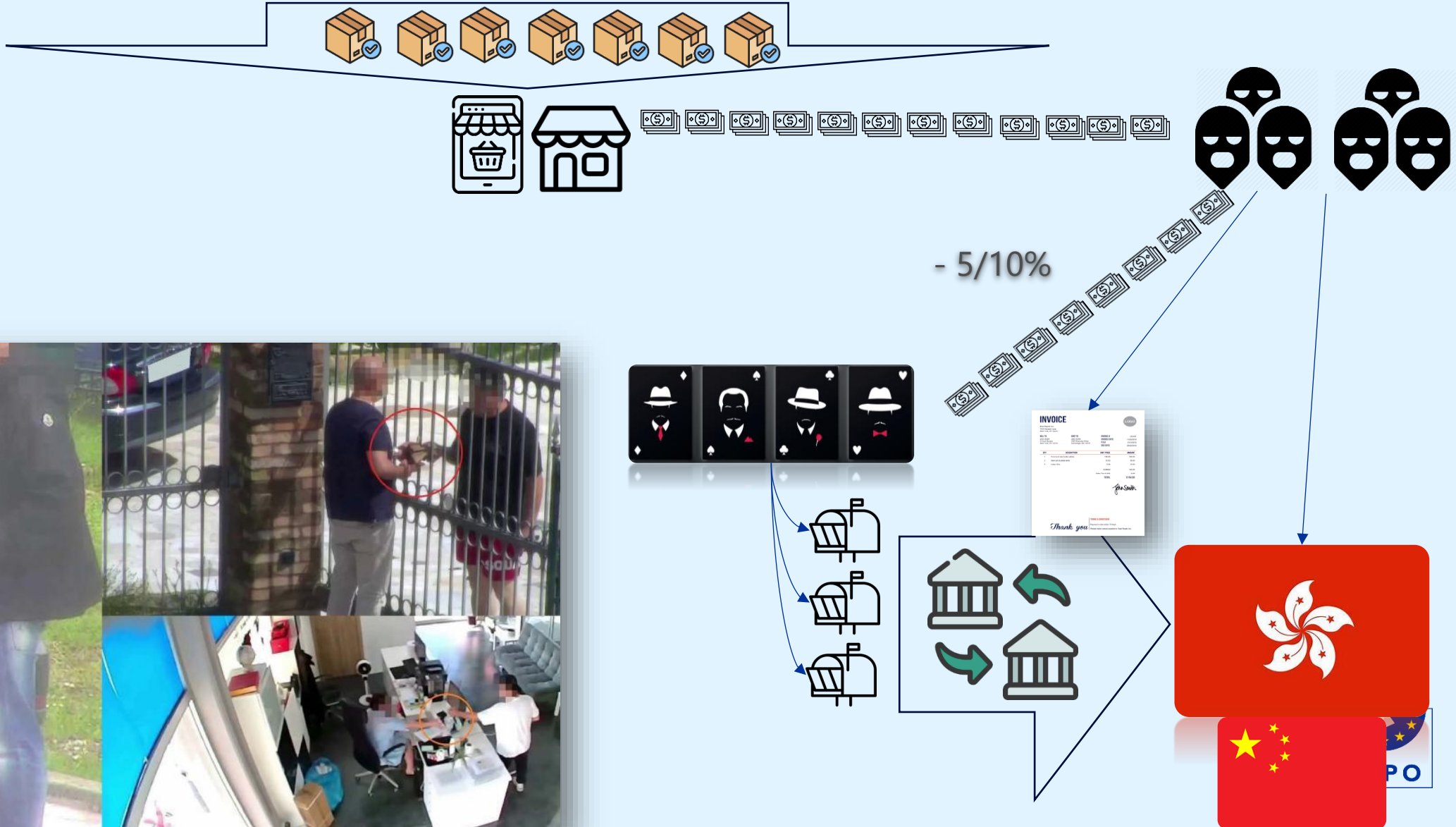
Final destination



Real flow of the goods



# "Surplus" from Black Market for Laundering as a service

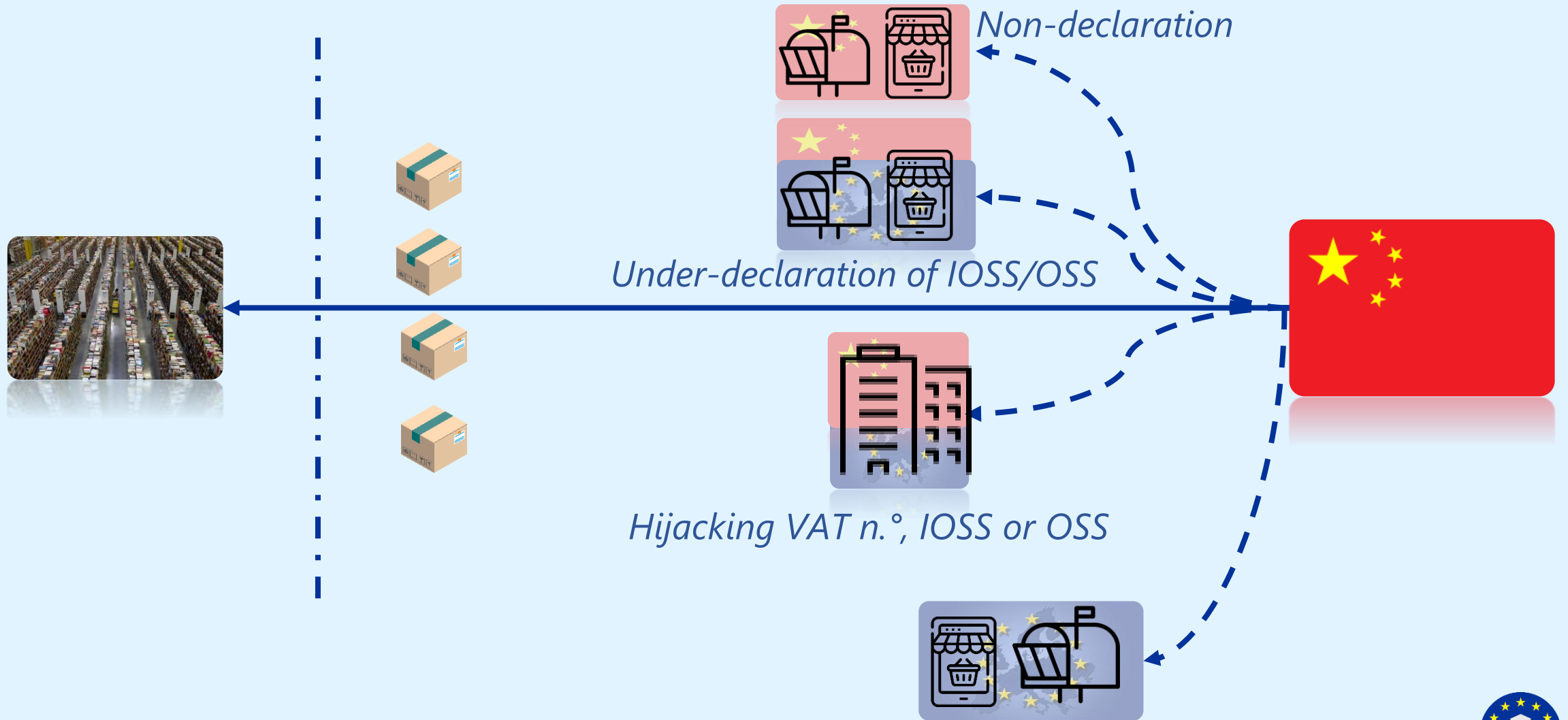




# E- commerce



# Fraud system by abusing ViDA rules



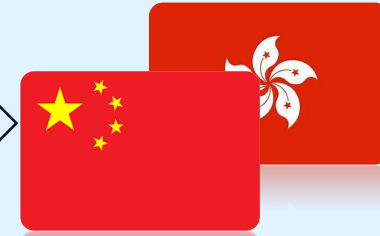
« Fictitious » permanent establishment, registration to domiciliation addresses and intentional circumvention of deemed supplier

# The key: PSPs, vIBANs and financial side

Before the transaction: **expenses**

The **only** moment when **profit** is generated

EU Bank Account



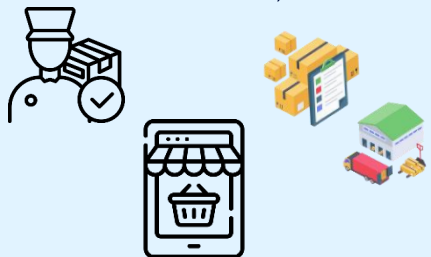
Payment Service Providers

MS 2

MS 3

MS 4

Customs and tax avoidance (including VAT)



# Investigation & Analysis



## Case (EPPO)

*Centralized storage and collaborative operational analysis*

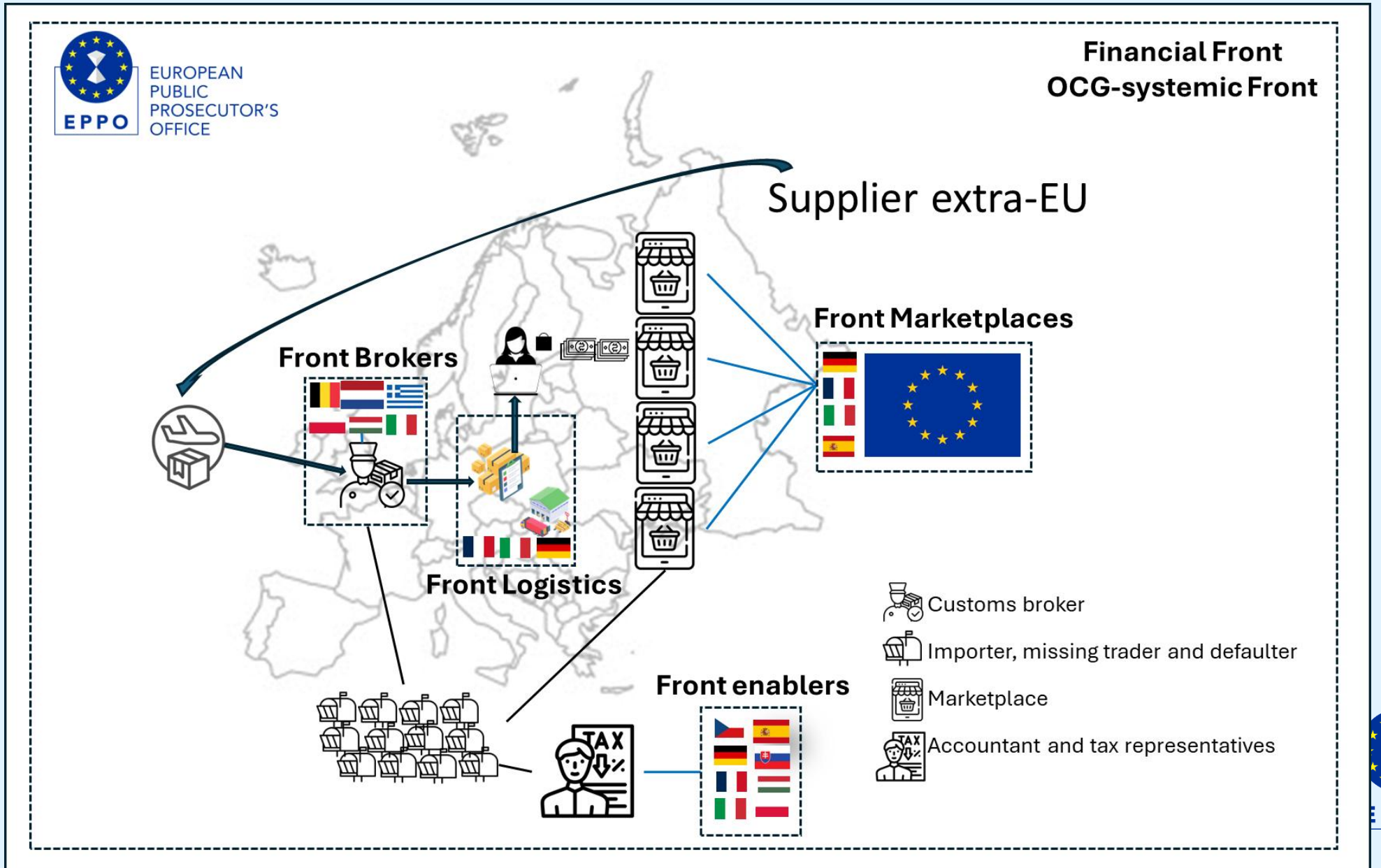
CMS



*Operational analysis*



# EPPO Front



# Seeing the big picture: holistic approach



## Intelligence

- Public Records
- Images/Videos
- Websites
- Social Media Platforms
- News Media
- Libraries

## H7 IOSS data

Year	Quarter	Month	Number of transactions	Net amount €	Original currency	Payment Method	Payee country	Transmitting country	Physical initiated	Refund	Payee group ID	
2024	1	1	30	675,097.02	5,034.24	Bank transfer	DK	DK	CY	False		
2024	1	2	2	656,233.01	4,802.24	Bank transfer	GB	DK	CY	False		
2024	1	3	25	685,985.80	5,115.27	Bank transfer	GB	DK	CY	False		
2024	1	4	1	617	447,225.58	Euro	CH	NL	AT	False		
2024	1	5	1	1,338	484,474.58	Euro	CH	NL	AT	False		
2024	1	6	1	38	42,061.79	Euro	CH	NL	AT	False		
2024	1	7	1	38,168	497,639.42	Euro	IE	IE	AT	False		
2024	1	8	1	3,034	49,022.17	Euro	IE	IE	AT	False		
2024	1	9	1	1,509	429,054.49	Euro	IE	IE	AT	False		
2024	1	10	1	3,500	430,196.20	Euro	IE	IE	AT	False		
2024	1	11	1	2,273	431,843.89	Euro	IE	IE	AT	False		
2024	1	12	1	341	40,796.41	Euro	IE	IE	AT	False		
2024	1	1	1	4,700	430,160.93	Euro	None	CH	IE	AT	False	
2024	1	2	1	336	425,312.56	Euro	None	CH	IE	AT	False	
2024	1	3	1	25	41,164.28	Euro	None	IE	IE	AT	False	
2024	1	4	1	471	442,989.31	Euro	None	IE	IE	AT	False	
2024	1	5	1	36	45,572.00	Euro	None	IE	IE	AT	False	
2024	1	6	1	10,026	431,944.23	Euro	None	IE	IE	AT	False	
2024	1	7	1	5,652	434,152.60	Euro	None	IE	IE	AT	False	
2024	1	8	1	15	41,150.04	Euro	Other	CH	NL	AT	False	
2024	1	9	1	979	454,527.44	Euro	Other	IE	IE	AT	False	
2024	1	10	1	263	431,899.47	Euro	Other	IE	IE	AT	False	
2024	1	11	1	235	44,667.06	Euro	Other	IE	IE	AT	False	
2024	1	12	1	783	651,927.91	Euro	Card payment	CH	NL	BE	False	
2024	1	1	1	1,790	430,341.32	Euro	Card payment	CH	NL	BE	False	
2024	1	2	1	79	41,209.80	Euro	Card payment	CH	NL	BE	False	
2024	1	3	1	451,044	422,369,457.85	Euro	Card payment	IE	IE	BE	False	
2024	1	4	1	280	434,031.19	Euro	Card payment	IE	IE	BE	False	

## CESOP data

Year	Quarter	Month	Number of transactions	Net amount €	Original currency	Payment Method	Payee country	Transmitting country	Physical initiated	Refund	Payee group ID	
2024	1	1	30	675,097.02	5,034.24	Bank transfer	DK	DK	CY	False		
2024	1	2	2	656,233.01	4,802.24	Bank transfer	GB	DK	CY	False		
2024	1	3	25	685,985.80	5,115.27	Bank transfer	GB	DK	CY	False		
2024	1	4	1	617	447,225.58	Euro	CH	NL	AT	False		
2024	1	5	1	1,338	484,474.58	Euro	CH	NL	AT	False		
2024	1	6	1	38	42,061.79	Euro	CH	NL	AT	False		
2024	1	7	1	38,168	497,639.42	Euro	IE	IE	AT	False		
2024	1	8	1	3,034	49,022.17	Euro	IE	IE	AT	False		
2024	1	9	1	1,509	429,054.49	Euro	IE	IE	AT	False		
2024	1	10	1	3,500	430,196.20	Euro	IE	IE	AT	False		
2024	1	11	1	2,273	431,843.89	Euro	IE	IE	AT	False		
2024	1	12	1	341	40,796.41	Euro	IE	IE	AT	False		
2024	1	1	1	4,700	430,160.93	Euro	None	CH	IE	AT	False	
2024	1	2	1	336	425,312.56	Euro	None	CH	IE	AT	False	
2024	1	3	1	25	41,164.28	Euro	None	IE	IE	AT	False	
2024	1	4	1	471	442,989.31	Euro	None	IE	IE	AT	False	
2024	1	5	1	36	45,572.00	Euro	None	IE	IE	AT	False	
2024	1	6	1	10,026	431,944.23	Euro	None	IE	IE	AT	False	
2024	1	7	1	5,652	434,152.60	Euro	None	IE	IE	AT	False	
2024	1	8	1	15	41,150.04	Euro	Other	CH	NL	AT	False	
2024	1	9	1	979	454,527.44	Euro	Other	IE	IE	AT	False	
2024	1	10	1	263	431,899.47	Euro	Other	IE	IE	AT	False	
2024	1	11	1	235	44,667.06	Euro	Other	IE	IE	AT	False	
2024	1	12	1	783	651,927.91	Euro	Card payment	CH	NL	BE	False	
2024	1	1	1	1,790	430,341.32	Euro	Card payment	CH	NL	BE	False	
2024	1	2	1	79	41,209.80	Euro	Card payment	CH	NL	BE	False	
2024	1	3	1	451,044	422,369,457.85	Euro	Card payment	IE	IE	BE	False	
2024	1	4	1	280	434,031.19	Euro	Card payment	IE	IE	BE	False	

## Marketplaces data

FBA Shipment ID	Amazon Seller ID	Seller Storefront Name
FBA15HG6V1Y1	188049450912	CUNAOUK
FBA15HG649R	200477232412	Septillar UK
FBA15GCKD7P	239004737112	Blueswan UK
FBA15GBRXSRG	239004737112	Blueswan UK
FBA15H4L31FD	239004737112	Blueswan UK
FBA15H2BM13	239004737112	Blueswan UK
FBA15H57GDMG	239004737112	Blueswan UK
FBA15GV8GCHX	239004737112	Blueswan UK
FBA15GV6GBBD	239004737112	Blueswan UK
FBA15GV8CXP	239004737112	Blueswan UK
FBA15GV3CBVS	239004737112	Blueswan UK
FBA15HG80SWG	239004737112	Blueswan UK
FBA15G7NS5FF	272247725612	Anatole
FBA15G0FFXFM	272247725612	Anatole

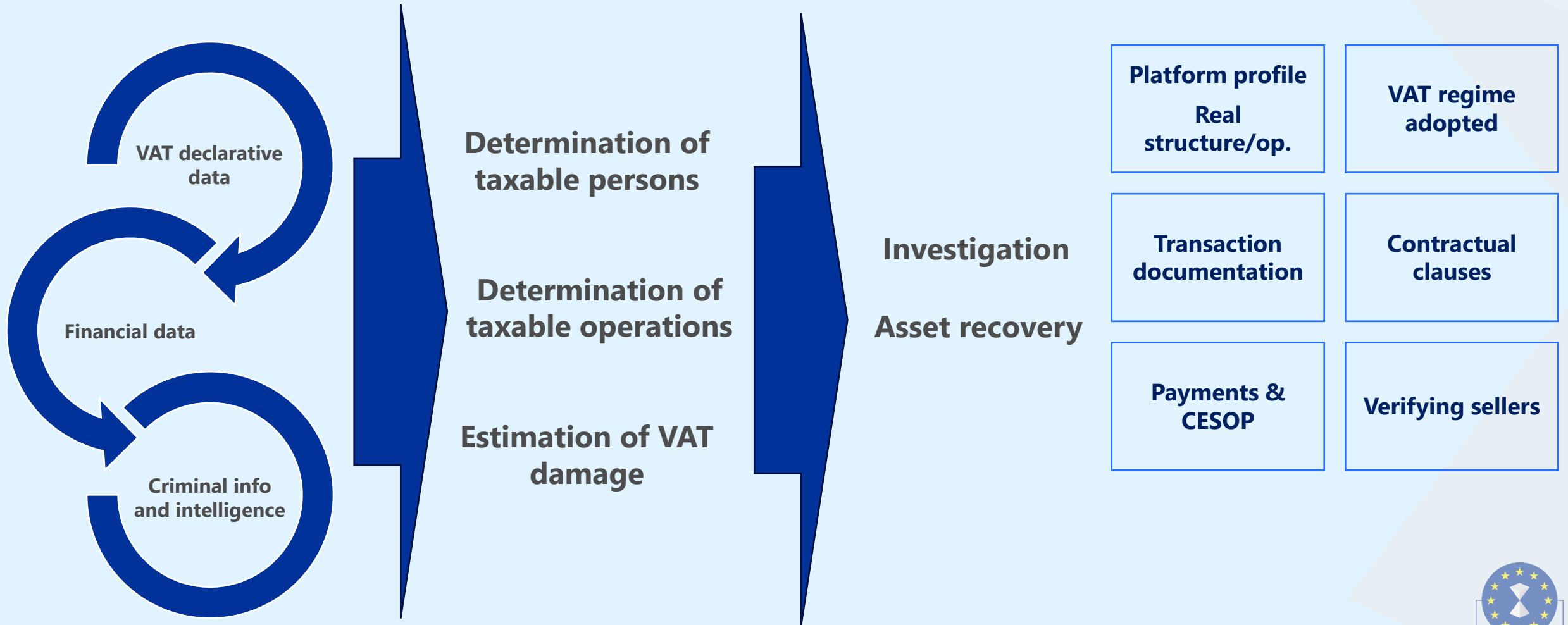
## IOSS/OSS data

Customer Number	MSID Number	MSID A	Company Name	Exclusi	Exclusi	Return Reference Number	MSCOR	VAT Amount of Correct	Amended Return Reference	Amended VAT Return P
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-3.32	IE/IM3720014058/M06.2023	M06.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-2.42	IE/IM3720014058/M08.2023	M08.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-110.13	IE/IM3720014058/M09.2023	M09.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-204.33	IE/IM3720014058/M10.2023	M10.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-50.62	IE/IM3720014058/M11.2023	M11.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-57.82	IE/IM3720014058/M12.2023	M12.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-80.89	IE/IM3720014058/M01.2024	M01.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-85.29	IE/IM3720014058/M02.2024	M02.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-65.77	IE/IM3720014058/M03.2024	M03.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-64.17	IE/IM3720014058/M04.2024	M04.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-63.55	IE/IM3720014058/M05.2024	M05.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-90.89	IE/IM3720014058/M06.2024	M06.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-131.66	IE/IM3720014058/M07.2024	M07.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-124.93	IE/IM3720014058/M08.2024	M08.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-1241.93	IE/IM3720014058/M09.2024	M09.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-42249.99	IE/IM3720014058/M10.2024	M10.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-130130.91	IE/IM3720014058/M11.2024	M11.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 AT		-367205.61	IE/IM3720014058/M12.2024	M12.2024
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 BE		-19	IE/IM3720014058/M06.2023	M06.2023
40496471TH	IM3720014058	IE	WHALEO TECHNOLOGY LIMITED			IE/IM3720014058/M01.2025 BE		-16.31	IE/IM3720014058/M07.2023	M07.2023
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## IOSS/OSS data (continued)

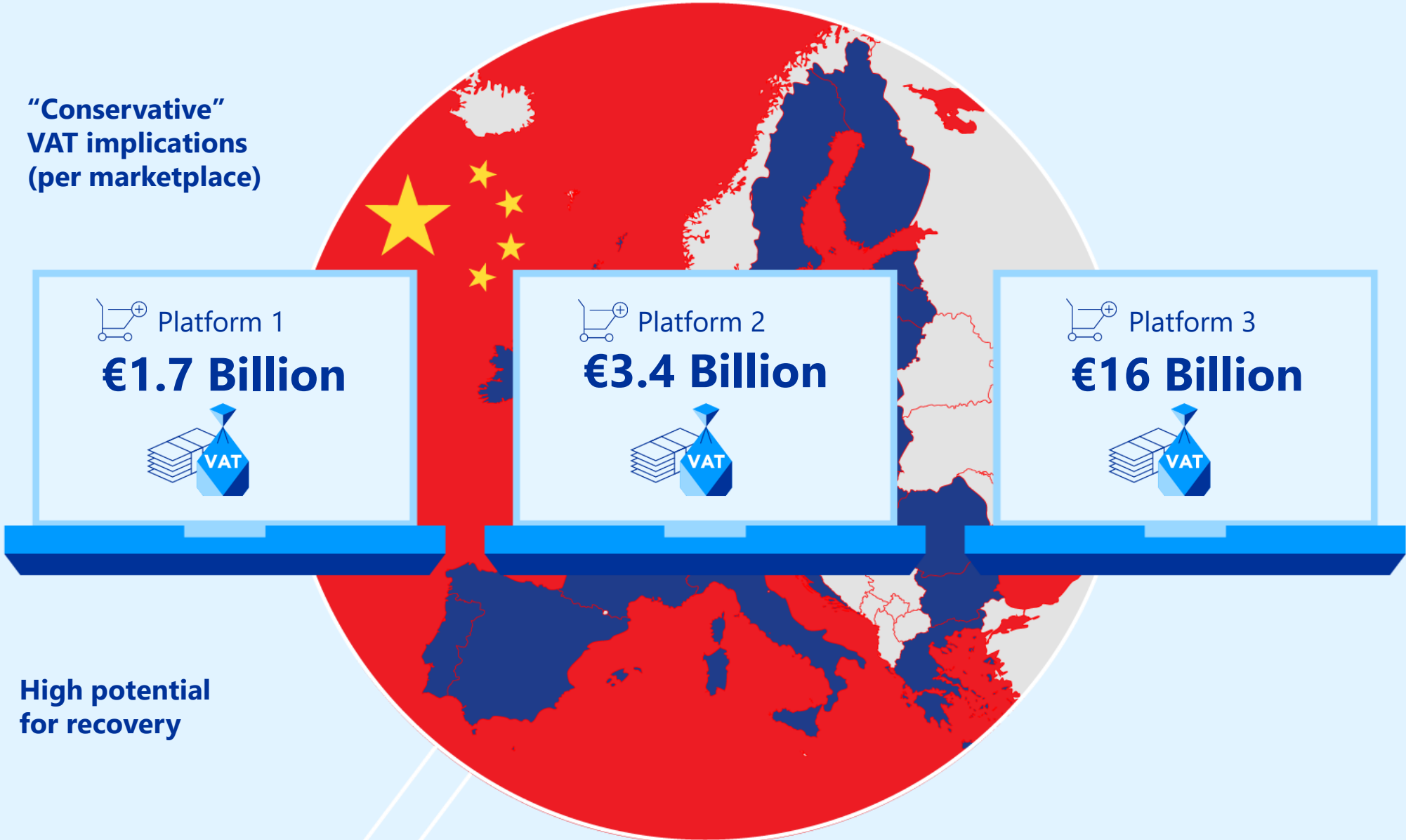
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2024	1	3	25	685,985.80	5,115.27	Bank transfer	GB	DK	CY	False	
2024	1	4	1	617	447,225.58	Euro	CH	NL	AT	False	
2024	1	5	1	1,338	484,474.58	Euro	CH	NL	AT	False	
2024	1	6	1	38	42,061.79	Euro	CH	NL	AT	False	
2024	1	7	1	38,168	497,639.42	Euro	IE	IE	AT	False	
2024	1	8	1	3,034	49,022.17	Euro	IE	IE	AT	False	
2024	1	9	1	1,509	429,054.49	Euro	IE	IE	AT	False	
2024	1	10	1	3,500	430,196.20	Euro	IE	IE	AT	False	
2024	1	11	1	2,273	431,843.89	Euro	IE	IE	AT	False	
2024	1	12	1	341	40,796.41	Euro	IE	IE	AT	False	
2024	1	1	1	4,700	430,160.93	Euro	None	CH	IE	AT	False
2024	1										

# Investigative path



# E-commerce fraud - Estimated VAT damage

- “Conservative” VAT implications (per marketplace)



- High potential for recovery

# 3

## Challenges

**Reporting, real time access to information and big data/digital evidence analysis**

**Fragmentation and different approaches**

**Prioritization and resources**

**Special investigative measures**

**Going fast Vs. Going together (or going fast together)**



THANK YOU

Q&As

**VAT Fraud Team:** [EPPO-VAT-FRAUD-TEAM@eppo.europa.eu](mailto:EPPO-VAT-FRAUD-TEAM@eppo.europa.eu)