International Human Rights Advisors

THE RED NOTICE TRAP

HOW CHINA AND HONG KONG TURN INTERPOL ALERTS INTO INSTRUMENTS OF RETURN

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About This Report

China and Hong Kong use INTERPOL for purposes it rules forbid. The bad notice is rarely an isolated event. It sits inside a wider system of recovery that also draws on extradition, immigration action, asset measures and pressure applied outside any legal process. Within that system a Red Notice finds and holds a target, and the other instruments then go to work. This is why the abuse is hard to see from the criminal file alone, and why its effects are felt long before any court decides whether return is lawful.

This report draws on public records, court judgments, INTERPOL materials, official Chinese and Hong Kong government documents, criminal proceedings, investigative reporting and civil society research. Official Chinese and Hong Kong sources are used to show how those authorities describe their own institutions, methods and results. They are not relied on to establish the guilt of anyone named. The method and evidential standards are set out in full at the end of the report.

Abbreviations

CCDI, Central Commission for Discipline Inspection, the disciplinary body of the Chinese Communist Party.
CCF, Commission for the Control of INTERPOL's Files, the independent body that decides requests to access, correct or delete INTERPOL data.
CFA, Court of Final Appeal of the HKSAR.
ECtHR, European Court of Human Rights.
HKSAR, Hong Kong Special Administrative Region of the PRC.
ICIJ, International Consortium of Investigative Journalists.
MPS, Ministry of Public Security of the PRC, which houses NCB China.
NCB, National Central Bureau, the office through which a member country deals with INTERPOL.
NCS, National Commission of Supervision, the state anticorruption body that works alongside the CCDI.
NDTF, Notices and Diffusions Task Force, the unit of the General Secretariat that reviews requests before publication.
NPCSC, Standing Committee of the National People's Congress of the PRC.
NSL, Law of the PRC on Safeguarding National Security in the HKSAR, in force since 30 June 2020.
PRC, People's Republic of China.
RPD, INTERPOL's Rules on the Processing of Data.
SNSO, Safeguarding National Security Ordinance, Hong Kong legislation in force since 23 March 2024.
UDHR, Universal Declaration of Human Rights.

Terminology

'China' means the authorities of the People's Republic of China. Hong Kong is named separately wherever its own authorities act, in particular under the NSL and the SNSO, and wherever the distinction affects the analysis. Hong Kong is not a member of INTERPOL in its own right. The Hong Kong Police act as a subordinate bureau of NCB China, so a request originating in Hong Kong reaches INTERPOL through the same national channel as one from the mainland. 'Return' covers extradition, deportation or immigration removal, surrender, and a person's decision to go back after persuasion. 'Coercive return' means return brought about by threats, unlawful pressure or the manipulation of legal processes.

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Executive Summary



1. A Red Notice is not an international arrest warrant. It is a police alert, circulated through INTERPOL, that rests on a national warrant or an equivalent judicial decision. The requesting state supplies the case. INTERPOL decides whether the data may circulate, and the state where the person is found decides what legal effect, if any, follows. INTERPOL itself arrests, prosecutes and extradites no one.[1]

2. The same notice can mean nothing in one country and immediate detention in another. It can also shape travel, immigration and banking decisions well before a court has looked at the allegation. The harm often starts long before extradition is even in issue.

3. Cases brought by China and Hong Kong add a further difficulty. Both pursue people beyond their borders by means that go far past the criminal file, as part of a wider pattern of transnational repression. Police, anticorruption and supervisory bodies may work in parallel with pressure on family members, asset restrictions, informal intermediaries and direct attempts to talk a person into coming home. A foreign authority may be shown a warrant and some financial evidence. It will usually see little of the political background, the pressure on relatives or the demands made outside the case.

4. Two separate questions therefore arise. Is the criminal allegation genuine, properly evidenced and suitable for international police cooperation? And has the wider effort to secure the person's return been lawful? A genuine fraud or corruption case does not answer the second question, and evidence of coercion does not on its own show the allegation to be false.

5. This report is published ahead of INTERPOL's 94th General Assembly, which Hong Kong will host from 30 November to 3 December 2026. Our concern is that the Assembly hands Beijing and the Hong Kong government a platform from which to present themselves as model partners in international policing, at a time when the evidence set out here shows INTERPOL's channels being used to pursue critics, dissidents and others abroad.

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1 INTERPOL, 'About Red Notices' <https://www.interpol.int/en/How-we-work/Notices/Red-Notices> accessed 31 August 2026.

Principal Findings

a. **China has abused INTERPOL.** It has procured notices whose purpose was never confined to arrest, secured their publication on information that did not meet INTERPOL's conditions, and used them to apply pressure for ends outside criminal justice.
b. **Hong Kong is now part of the same picture.** Its authorities have issued overseas national security warrants and bounties, cancelled passports and pursued relatives of those wanted abroad. Hong Kong's requests reach INTERPOL through NCB China, and in one documented case a senior Hong Kong national security official discussed cancelling a Red Notice if the target came back.
c. **INTERPOL magnifies the reach of a domestic request.** A notice can locate a person, trigger restrictions under national law and draw them into a process that strengthens the hand of those pressing for their return.
d. **The hardest cases look ordinary.** They present as conventional financial matters, while the political or coercive context sits outside the material given to the reviewers.
e. **Deletion often comes too late.** By the time data are corrected, detention, immigration or extradition proceedings may have acquired a momentum of their own.
f. **No single institution sees the whole campaign.** INTERPOL, the courts, immigration authorities and the agencies that counter foreign interference each hold part of it.

6. Section 9 of this report sets out the evidence for the first finding in detail. It also states the limits of that finding: not every notice from China or Hong Kong is abusive, and no rate of abuse can be calculated from the data INTERPOL publishes.

Extradition v INTERPOL

7. Red Notices and diffusions exist to locate people so that they can be extradited back to the country where the alleged offence occurred. However, evidence demonstrates that China uses INTERPOL to facilitate transnational repression. Once a person has been located, the authorities may turn to extrajudicial and unlawful methods to cajole or pressure them into returning to the mainland or to Hong Kong. China's own figures show why extradition is not the whole inquiry. According to the CCDI and the NCS, Operation Sky Net recovered 14,048 people from more than 120 countries and regions in its first decade to the end of 2024, among them 2,999 Party members and state functionaries, together with RMB 66.62 billion in assets. The same official account records 79 extraditions, 712 deportations or repatriations and 1,986 arrests abroad. These are Sky Net anticorruption figures and do not count Red Notices or every Fox Hunt case. They do, however, demonstrate how small a part formal extradition has played.[2]

8. The 2025 revision of the implementing regulations for the Supervision Law lists Red Notice requests alongside extradition, judicial assistance, law enforcement cooperation, prosecution abroad and asset recovery,[3] and it requires ideological education during overseas recovery work.[4] Official accounts of

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2 Central Commission for Discipline Inspection and National Commission of Supervision, 《有逃必追 一追到底》 ['Pursue every fugitive, pursue them to the end'] (27 March 2025), reproduced as "'天网行动"开展十年，追回外逃人员1.4万余人' ['Sky Net' marks ten years, recovering more than 14,000 fugitives] (*China Discipline Inspection and Supervision News*, republished by China News Service, 27 March 2025) <https://www.chinanews.com.cn/gn/2025/03-27/10389772.shtml> accessed 9 November 2026, reporting 14,048 people recovered from more than 120 countries and regions to the end of 2024, including 2,999 Party members and state functionaries and 62 of the 'Hundred Red Notice persons'; RMB 66.62 billion recovered; and 79 extraditions, 712 deportations or repatriations and 1,986 arrests abroad over the decade. The same account records 178 instruments on extradition, judicial assistance and the return of assets concluded with 83 countries.

3 中华人民共和国监察法实施条例 [Regulations for the Implementation of the Supervision Law of the People's Republic of China] (National Commission of Supervision, revised 27 April 2025, in force 1 June 2025) arts 276–81.

4 ibid art 274.

劝返 (quànfǎn), usually translated as 'persuasion to return', describe freezing assets, working through relatives and steadily narrowing the space in which a person can go on living abroad.[5] Whether a return was voluntary therefore depends on the sequence of events that produced it. The administrative label says very little.

The Safeguards, and Their Limits

9. Since 2016 INTERPOL has reviewed requests for compliance before publication through the NDTF, and the independent CCF can correct or delete data once a notice has been issued. Refusals are rising sharply. Reported figures show 558 notices and diffusions refused or cancelled in 2025 under Article 2 (respect for the UDHR) and Article 3 (the ban on activity of a political, military, religious or racial character) of the INTERPOL Constitution, against 305 in 2024 and 299 in 2023. These totals cover the whole organisation and cannot be attributed to any one country. The rise may reflect tougher screening as much as more abusive requests. What it does establish is that a substantial and growing number of requests fail INTERPOL's own constitutional tests.[6]

10. Remedies can still move more slowly than the national consequences of an alert, and the case of Idris Hasan shows how far the two can drift apart.[7] Hasan is a Uyghur activist who had been living in Turkey. In July 2021 he was arrested on arrival at Casablanca airport on a Red Notice requested by China, which accused him of terrorism-related offences.[8] Within two weeks, on 2 August 2021, INTERPOL suspended the notice; it was later cancelled. The safeguard had worked as designed, yet it changed nothing on the ground. The Moroccan extradition proceedings carried on regardless, and in December 2021 the Court of Cassation approved his surrender to China.[9]

11. The UN Committee against Torture had already asked Morocco not to extradite him while it examined his complaint, and in July 2024 it found that his extradition would breach Article 3 of the Convention against Torture.[10] Morocco did not carry out the extradition, but neither did it release him. Hasan remained in detention until 12 February 2025, some 43 months after an arrest made on a notice that INTERPOL itself had withdrawn within a fortnight.[11] His case shows the central weakness this report returns to:

5 阴衍哲 (Yin Yanzhe), "'天网猎狐六周年"系列报道丨缉捕与劝返 公安追到底' ['Sixth Anniversary of Sky Net and Fox Hunt' Series: Arrest and Persuasion to Return, the Police Pursue to the End] (人民法治 [People's Rule of Law], republished by 澎湃新闻 [The Paper], 15 October 2020) <https://www.thepaper.cn/newsDetail_forward_9576249> accessed 9 November 2026; 师长青 (Shi Changqing), '天堂梦碎记' [Record of a Shattered Dream of Paradise] (中国纪检监察杂志 [China Discipline Inspection and Supervision Magazine], 4 July [year to be confirmed]) <https://m.ccdi.gov.cn/content/88/bc/45997.html> accessed 9 November 2026; see also Safeguard Defenders, *Involuntary Returns: China's Covert Operation to Force 'Fugitives' Overseas Back Home* (Safeguard Defenders 2022).

6 INTERPOL, 'Compliance and review' <https://www.interpol.int/en/How-we-work/Notices/Compliance-and-review> accessed 31 August 2026 (statistics presented graphically only); NGM Lawyers, 'Deleted or cancelled Interpol notices and diffusions in 2024' <https://ngm.com.au/interpol-notices/deleted-or-cancelled-interpol-notices-and-diffusions-in-2024/> accessed 9 November 2026 (Red Notices and diffusions in 2024: 111 under art 2 and 194 under art 3, a total of 305); Charlie Magri, 'INTERPOL Red Notices 2025 Statistics: Record Volume, Record Rejections on Political Grounds' (Otherside, 16 April 2026) <https://otherside.law/interpol-red-notices-2025-statistics/> accessed 9 November 2026 (refused or cancelled under arts 2 and 3: 299 in 2023, as retroactively updated by INTERPOL; 305 in 2024; 558 in 2025).

7 Commission for the Control of INTERPOL's Files, *Annual Activity Report 2024* (CCF/134/X/12/2024, GA-2025-93-REP-09) paras 8, 61–62 and 72–75.

8 Radio Free Asia, 'Moroccan court rules in China's favor to extradite Uyghur accused of "terrorism"' (16 December 2021) <https://www.rfa.org/english/news/uyghur/idris-hasan-12162021175312.html> accessed 9 November 2026.

9 Amnesty International, 'Morocco/Western Sahara: Further Information: Uyghur Activist Released from Moroccan Prison: Idris Hasan (Official Chinese Name: Yidiresi Aishan)' (12 March 2025) MDE 29/9075/2025 <https://www.amnesty.org/en/documents/mde29/9075/2025/en/> accessed 9 November 2026, recording cancellation of the notice in August 2021, release on 12 February 2025 after 43 months' detention and resettlement in the United States on 14 February 2025; MENA Rights Group, 'Yidiresi Aishan (also known as Idris Hasan)' <https://menarights.org/en/case/yidiresi-aishan-also-known-idris-hasan> accessed 9 November 2026, recording arrest on 19 July 2021, suspension of the notice on 2 August 2021 and the Court of Cassation's decision of 15 December 2021.

10 *Yidiresi Aishan v Morocco* Communication No 1111/2021, UN Doc CAT/C/80/D/1111/2021 (Committee against Torture, 15 July 2024); Safeguard Defenders, 'UN Committee Against Torture requests Morocco halt extradition of Idris Hasan' (December 2021) <https://safeguarddefenders.com/en/blog/un-committee-against-torture-requests-morocco-halt-extradition-idris-hasan> accessed 9 November 2026 (interim measures requested on 20 December 2021).

11 Amnesty International (n 9).

INTERPOL can correct its own data, but it cannot undo what national authorities have already set in motion.

Hong Kong and the General Assembly

12. Since July 2023 the Hong Kong authorities have issued national security arrest warrants against activists living overseas, offered bounties for information leading to their arrest, cancelled their passports and imposed financial and property restrictions on them.[12]

13. The prosecution of Jimmy Lai has widened the circle. Lai was convicted of national security offences in December 2025 and sentenced in February 2026 to twenty years' imprisonment.[13] During his trial, foreign critics of the Hong Kong authorities, among them Sir William Browder KCMG and Luke de Pulford, were named as alleged co-conspirators for campaigning against the national security prosecutions. That has raised a real concern that Hong Kong will seek Red Notices against them and others named alongside Lai.

14. Hong Kong's courts are likely to be presented at the Assembly as independent, with the overseas judges who still sit on the Court of Final Appeal offered as proof. Section 10.1 explains why delegates, particularly those from the United Kingdom, Australia and New Zealand, should not treat their presence as an assurance that a request originating in Hong Kong has been through a fair process.

15. INTERPOL's 94th General Assembly meets in Hong Kong from 30 November to 3 December 2026, and all seven seats on the CCF are due to be filled by election there.[14] Hosting the Assembly, and presiding over the election of the body that is meant to check misuse of INTERPOL's channels, gives Beijing and the Hong Kong government a ready-made opportunity to present themselves to other governments, to international organisations and to the business world as responsible partners in international policing. Every image of a CCF election conducted smoothly in Hong Kong will be put forward as evidence of commitment to the rule of law and to INTERPOL's rules. That message would sit uneasily with the record set out in this report: notices traded for cooperation, relatives pressed and detained, overseas warrants and bounties issued against peaceful critics, and a senior Hong Kong national security official discussing the cancellation of a Red Notice in return for a man's homecoming. The CCF's authority rests on its independence, and on its being seen to be independent. It should not become the setting for an exercise in reassurance by the authorities whose data it may later have to delete.1. Arrest on Arrival

16. H's case, widely reported in the press, shows how much can turn on a single journey. In March 2021 French officers detained a naturalised Singaporean businessman born in China, identified in the reporting as H, as he stepped off a private jet at Bordeaux. The arrest followed a Red Notice requested

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12 Radio Free Asia, 'Hong Kong issues arrest warrants, bounties for eight overseas activists' (3 July 2023) <https://www.rfa.org/english/news/china/hong-kong-arrest-warrants-07032023154938.html> accessed 9 November 2026; Hong Kong SAR Government, 'Persons wanted for suspected contravention of Hong Kong National Security Law' (press release, 25 July 2025) <https://www.info.gov.hk/gia/general/202507/25/P2025072500736.htm> accessed 9 November 2026; Hong Kong SAR Government, 'Specification of absconders in respect of offences endangering national security and specification of measures applicable against relevant absconders under Safeguarding National Security Ordinance' (press release, 4 August 2025) <https://www.info.gov.hk/gia/general/202508/04/P2025080400303.htm> accessed 9 November 2026.

13 'Hong Kong tycoon Jimmy Lai sentenced to total of 20 years in national security trial' (Reuters, 9 February 2026); 'Hong Kong court convicts pro-democracy activist and mogul Jimmy Lai' (NPR, 15 December 2025); Index on Censorship, 'Jimmy Lai's "co-conspirators" speak out after being named in Hong Kong trial' (2024).

14 INTERPOL, 'Elections of the Commission for the Control of INTERPOL's Files' <https://www.interpol.int/en/Who-we-are/Commission-for-the-Control-of-INTERPOL-s-Files-CCF/Elections-of-the-Commission-for-the-Control-of-INTERPOL-s-Files> accessed 31 August 2026, recording that all seven positions become vacant on 11 March 2027, that the election will be held at the 94th General Assembly in Hong Kong from 30 November to 3 December 2026, and that candidates were deemed eligible by the Executive Committee at its 229th session on 24 and 25 June 2026.

Part I:
The Mechanism

by prosecutors in Dongguan, who accused him of money laundering and complicity in embezzlement. On paper it was an ordinary economic crime case.[15]

17. Investigative reporting based on French court records and recorded calls described a wider campaign that the notice did not mention. Chinese officials wanted H's cooperation in a separate investigation into Sun Lijun, a former vice minister of public security. According to those records, a senior discipline inspection official working on the Sun Lijun case offered H relief from prosecution, cancellation of the Red Notice and the unblocking of his bank accounts if he came back. Jack Ma, the founder of Alibaba, was reported to have telephoned H at the authorities' request to press the same message. H also said that his sister had been arrested. Li Jiangzhou, deputy director of the Central People's Government's Office for Safeguarding National Security in Hong Kong, was recorded telling H that his Red Notice would be cancelled if he returned to Hong Kong.[16]

18. The Bordeaux Court of Appeal refused extradition in July 2021, and in January 2022 the CCF deleted H's data. The CCF's reasoning has not been published, but a deletion of this kind is itself a finding that the data did not comply with INTERPOL's rules (see section 9.3). The author, who assisted H, regarded the request as politically motivated. It was accompanied by threats against H's family and by direct contact from prosecutors suggesting that he would be safe if he returned.

19. By the time H resisted, the notice had already found him, put him in custody and placed him inside a legal process that strengthened the hand of those pressing him to go back. That combination of an international police alert, national coercive power and pressure applied outside the file is the subject of the rest of this report.

2. INTERPOL's Role and Its Limits

20. Each member country runs a National Central Bureau (NCB) that links the country's police to INTERPOL. China's NCB sits within the MPS, and the Hong Kong Police operate as a subordinate bureau of NCB China for INTERPOL purposes.[17]

21. A Red Notice tells other member countries that a jurisdiction holds a national warrant or equivalent judicial decision and wants to locate the person for possible extradition, surrender or comparable lawful action. A diffusion is a less formal alert that an NCB sends directly to some or all other members through INTERPOL channels. Both are subject to INTERPOL's rules.[18][19]

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15 Scilla Alecci, 'Chinese authorities exploited Interpol and strong-armed one of the world's richest men to pursue a target' (International Consortium of Investigative Journalists, 29 April 2025) <https://www.icij.org/investigations/china-targets/interpol-red-notice-police-warrant-jack-ma/> accessed 9 November 2026 (published with Radio France and Le Monde).

16 Alecci (n 15), reporting the involvement of Jack Ma as an intermediary; recorded offers by Wei Fujie, then a deputy director of the unit led by the CCDI assigned to the Sun Lijun case; a recorded call in which Li Jiangzhou, deputy director of the Office for Safeguarding National Security of the Central People's Government in the HKSAR, told H: 'If you return to Hong Kong, your red notice will be cancelled'; that the Bordeaux Court of Appeal refused extradition in July 2021; and that a confidential CCF decision in January 2022 approved deletion of the data, stating that INTERPOL had done nothing wrong but citing the Bordeaux court's findings on the case's 'political character'.

17 INTERPOL, 'China' (member country page) accessed August 2026; Hong Kong Police Force, 'Hong Kong Fact Sheet: The Police' accessed August 2026.

18 INTERPOL, 'About Red Notices' (n 1).

19 INTERPOL, 'About Notices' accessed August 2026; INTERPOL, 'Compliance and review' (n 6).

2.1 Who Does What?

Stage	Main actor	Decision	Possible consequence
Request	Requesting authority / NCB	Is the person wanted under national law, and should INTERPOL cooperation be sought?	Information sent to INTERPOL
INTERPOL review	General Secretariat / NDTF	May the data be processed under the Constitution and data rules?	Publication, refusal, blocking or cancellation
National action	Police, border or immigration authority	What does domestic law permit?	Stop, questioning, detention, entry or immigration action
Return	Court or executive authority	May extradition, deportation or surrender lawfully occur?	Return, refusal, release or continuing litigation

22. Two constitutional rules frame the review. Article 2 ties police cooperation to respect for the UDHR, and Article 3 prohibits any INTERPOL activity of a political, military, religious or racial character. Where a case has both political and ordinary criminal elements, INTERPOL asks which predominates. The criminal allegation, the person's status, the source of the data, the positions taken by other states and the wider context all bear on the answer.[20]

23. The system depends on what member states put into it. Article 12 of the RPD requires data to be accurate, relevant, not excessive and up to date, and Article 5 makes each participant responsible for its own processing, so a bureau answers for the truth of what it supplies. Where it fails, the supervision chapter of the RPD provides remedies: examination under Article 128, interim measures under Article 129 and, under Articles 130 and 131, withdrawal of access rights, supervision of a bureau or suspension of its processing rights. A suspension of more than three months needs the approval of the Executive Committee. INTERPOL says it has applied such measures to different bureaux since 2012. The power to act against a non-compliant source therefore exists. However, INTERPOL does not publish when it has been used.[21]

24. The CCF is separate from the NDTF. Individuals can ask it whether INTERPOL holds data about them and can apply for correction or deletion. The CCF can request information from the source NCB and the General Secretariat, carry out open-source research and issue decisions that bind INTERPOL. It cannot weigh evidence of guilt, resolve disputed facts or rule on whether extradition is appropriate. Its mandate is limited to compliance with INTERPOL's rules.[22]

25. None of these bodies decides guilt or extradition. INTERPOL asks whether data may circulate under its rules. The receiving state decides whether its own law permits an arrest or immigration action, and an extradition court later decides whether surrender is lawful. The phrase 'wanted by INTERPOL' blursthese separate decisions. The person is wanted by a state, and any arrest, detention or removal that follows is carried out by national police, border officials or courts acting under their own law.

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20 Constitution of the ICPO-INTERPOL, arts 2–3; INTERPOL's Rules on the Processing of Data, arts 82–83; INTERPOL, *Repository of Practice* on Articles 2 and 3.

21 INTERPOL's Rules on the Processing of Data, arts 5 and 12 (responsibility of the source and quality of data) and arts 128–31 (examination procedure, interim measures and measures affecting access and processing rights); INTERPOL, 'Compliance and review' (n 6), section on interim and corrective measures, which states that such measures have been applied to different NCBs on different occasions since the Rules entered into force in 2012.

22 INTERPOL, 'About the CCF' and 'Frequently Asked Questions', accessed August 2026; CCF, *Annual Activity Report 2024* (n 7) para 39 (limits of the CCF's mandate).

Part II:
The System
Of Return



3. China's Machinery of Return

26. China's system for securing returns from abroad is spread across several agencies and legal routes. The MPS launched Operation Fox Hunt in 2014 as a police campaign against economic fugitives overseas. Operation Sky Net followed in 2015, a broader anticorruption programme combining return, asset recovery and work by several Party and state bodies.

27. Sky Net soon added public exposure to its methods. In April 2015 the authorities published the 'Hundred Red Notice' list, naming one hundred people already subject to Red Notices, with photographs and case details. Official reporting described the list as a way to strip targets of anonymity and make life abroad harder. None of this makes any particular notice abusive, but it turned an INTERPOL status into an instrument of domestic propaganda and pressure, well beyond its formal police purpose. The list recurs throughout this report.[23]

28. Sky Net 2026, launched on 2 April 2026, again divided the work. The NCS leads a campaign on overseas asset recovery in cases of duty crime. The MPS runs Fox Hunt. The People's Bank of China works with the MPS on offshore companies and underground banking, and the Party's Organisation Department works

23 CCDI, 'Hundred Red Notice Persons: first person caught in the net returns', 22 April 2017, recounting the list's launch on 22 April 2015; CCDI, 'Pursue you to the ends of the earth', 27 April 2017.

with the MPS and the National Immigration Administration on officials whose families live abroad. The coordinating office has been renamed to include cross-border corruption governance. At the launch the authorities also announced plans to legislate against cross-border corruption and claimed that no fugitive on the Hundred Red Notice list is still at large in Asia.[24]

29. The institutional roles need to be kept apart. The CCDI is the Party's disciplinary body and the NCS is its state counterpart. The MPS is the central policing ministry and houses NCB China. In a major corruption case, the supervision apparatus may drive the investigation while the police send the international request.

30. The 2025 revision of the Regulations for the Implementation of the Supervision Law, adopted on 27 April 2025 and in force from 1 June 2025, puts that arrangement on a formal footing. Its chapter on international anticorruption cooperation routes Red Notice requests in supervision cases through the NCS and then the MPS. The provisions that follow deal with extradition, judicial assistance, law enforcement cooperation, prosecution abroad and asset recovery. Another requires ideological education throughout overseas recovery work, to encourage the person to return, cooperate and repay.[25]

31. Hong Kong has its own legal route to a similar result. Since the NSL came into force in June 2020, and more so since the SNSO in 2024, the Hong Kong authorities have pursued people abroad for national security offences through warrants, bounties and measures against so-called absconders (see section 10). Because Hong Kong's INTERPOL functions run through NCB China, any request it makes enters the system through the same bureau that serves the mainland campaigns described here.[26]

32. China's relationship with INTERPOL has raised institutional questions too. In 2016 Meng Hongwei, then a vice minister of public security, was elected INTERPOL's President. Human rights organisations raised concerns about neutrality during his tenure, although the operational review of notices remained a matter for the General Secretariat. Meng disappeared after returning to China in September 2018 and was later convicted of bribery. The episode proved no Chinese control over INTERPOL, though it made plain why the organisation needs to stay independent of national policing.[27]

33. Of 1,335 returns reported for 2018, the official breakdown records 17 extraditions, 66 deportations, one prosecution abroad, 275 arrests abroad, 500 cases of persuasion to return, 202 'border hits', 198 arrests inside China and 76 voluntary surrenders or other returns. The categories are China's own. They are still enough to show that 'return' cannot be read as shorthand for judicial surrender.[28]

34. Extradition and deportation must also be kept apart. Extradition is surrender under criminal cooperation law, while deportation is an immigration measure. Either may be lawful, but deportation should never become a way round refugee protection, non-refoulement or the safeguards that would block an extradition.

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24 Xinhua, '强化标本兼治 保持高压震慑 "天网2026"行动正式启动' ['Operation Sky Net 2026 formally launched'] (2 April 2026) <https://www.xinhuanet.com/politics/20260402/426694aa94d74d52927644c1cd445258/c.html> accessed 9 November 2026, reporting the division of responsibilities among the National Commission of Supervision, Ministry of Public Security, People's Bank of China, Central Organisation Department and National Immigration Administration; the intention to legislate against cross-border corruption; and the claim that no listed 'Hundred Red Notice' fugitive remains at large in Asia.

25 Regulations for the Implementation of the Supervision Law (n 3) ch VI.

26 Hong Kong SAR Government (n 12); Hong Kong Police Force (n 17).

27 Human Rights Watch, 'Interpol's President Vanishes in China', 8 October 2018, and 'Where Is China's Interpol Chief?', 2 April 2019; Xinhua, 'Former senior public security official sentenced for bribery', 21 January 2020. Meng Hongwei served as INTERPOL President from 2016 to 2018 and remained a vice minister of public security during his presidency.

28 Xinhua, 《天网2018行动全国共追回外逃人员1335名》 [Sky Net 2018 recovered 1,335 fugitives nationwide], 9 January 2019; People's Daily/Xinhua review, 29 January 2019.

4. How a Return Campaign Unfolds

35. The method varies with the target, the allegation and the receiving state, so the system is easier to understand by following a target through the sequence than by sorting the campaign agency by agency. The same sequence can begin in Hong Kong as readily as on the mainland.

Stage	What happens
1. Selection	A person becomes important because of alleged crime, political activity, a factional rupture, assets or information.
2. Criminalisation	Authorities formulate an offence or attach an existing criminal case to the target.
3. Internationalisation	The case is carried beyond China or Hong Kong through one or more channels, whether INTERPOL data, an extradition request, immigration cooperation or direct contact between police forces.
4. Restriction	The person is stopped, detained, placed under conditions, exposed publicly or made afraid to travel.
5. Parallel pressure	Relatives, assets, business interests, intermediaries or covert agents are used to encourage or compel return.
6. Host state leverage	The receiving state decides how much legal and practical force to give the request.
7. Return or continuing punishment	The person returns, is removed, or remains abroad but with reduced mobility, money, security or willingness to speak.

4.1 Persuasion and Pressure

36. 'Persuasion to return' covers a wide range of conduct. It may describe a lawful negotiation over surrender. It may equally describe a deliberate strategy of making life abroad harder. A 2019 discipline inspection article says that persuasion combines pressure with inducement and describes identifying what matters most to a target and applying financial pressure where appropriate. A 2021 official account describes freezing property and bank accounts to cut off financial support, 'playing the family card' and narrowing the space in which a person can live overseas.[29]

37. A further CCDI account, concerning Chen Yijuan in Britain, describes 'persuasion as the main approach, deportation as the secondary approach'. Relatives, friends, a lawyer, asset freezes in China and her immigration position abroad were all brought to bear in the effort to bring her back.[30] These accounts come from the institutions doing the work. They explain why a person's decision to board the plane cannot be assessed on its own.

38. Three situations should be distinguished. Voluntary surrender follows a person's own decision, often after legal advice. Negotiated return may involve legitimate legal pressure, such as a valid warrant or a lawful restraint on assets. Coercive return relies on threats, unlawful pressure on family, unauthorised surveillance or manipulation that leaves no real choice. All three can be recorded under the same administrative label.

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29 China Discipline Inspection and Supervision Magazine, 《誓追穷寇记》, 2019; also reproduced by People's Daily anticorruption pages; official discipline inspection account of the Ha Tao and Jiang Shiqiang return work, 2021, republished by local discipline inspection authorities; original attributed to the discipline inspection and supervision group stationed at the Ministry of Justice.
30 CCDI, 'Overseas is not home, still less a haven from punishment: the return of Chen Yijuan', 2017.

39. The author's casework has included Chinese Red Notice matters in which people located through INTERPOL were then pressed to return, and in which relatives in China were arrested or questioned. Human Rights Watch documented similar methods in interviews with five people who were then the subject of notices originating in China, including detention, threats, exit bans and pressure on relatives. ICIJ's review of Chinese Red Notice files likewise identified the arrest of family members as a recurring tactic. Neither sample can establish how common these practices are. Both match Chinese official accounts and the evidence later heard in US criminal proceedings.[31]

40. Persuasion reaches well beyond Sky Net. In 2022 the MPS said that police had persuaded 210,000 people involved in overseas telecom fraud to return in the previous year, and 230,000 between April 2021 and July 2022. These figures belong to a separate fraud campaign and should not be added to the Sky Net totals. They show that 劝返 is a mainstream policing technique, used far beyond elite corruption cases.[32]

4.2 Police Stations Abroad

41. The telecom fraud campaign of 2021 and 2022 coincided with the growth of the network often called '110 Overseas'. Xi nhua reported that Fuzhou police had worked with overseas organisations to set up thirty service stations in twenty-five cities across twenty-one countries, officially to help Chinese nationals with administrative services.[33] A service point is not in itself evidence of covert policing. The problem arises where service infrastructure overlaps with police operations. Safeguard Defenders reproduced Chinese material describing a case in which police used information from Mozambique, contacted relatives in China and pressed a suspect abroad to return.[34]

42. US criminal proceedings give firmer evidence that at least one overseas station linked to the MPS crossed into undeclared state activity. Chen Jinping pleaded guilty in December 2024 to conspiring to act as an agent of the PRC in connection with an undeclared MPS station in lower Manhattan. In May 2026 his co-defendant Lu Jianwang was convicted of acting as an illegal agent of the PRC and of obstruction of justice and was acquitted on a related conspiracy count. The trial evidence included the station's banner identifying it as a Fuzhou police overseas service station, and testimony that Lu had attended a ceremony in Fujian at which the MPS announced thirty such stations worldwide, the same figure Xinhua had reported. Prosecutors said the station had been used to help locate a pro-democracy activist who had fled to the United States. These cases do not describe every overseas station, but after them no station can safely be assumed to be purely administrative.[35]

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31 Human Rights Watch, 'China: Families of Interpol Targets Harassed' (31 January 2018) <https://www.hrw.org/news/2018/01/31/china-families-interpol-targets-harassed> accessed 9 November 2026, reporting interviews with five Red Notice subjects and lawyers, including allegations of detention, threats, exit restrictions, asset pressure and overseas visits involving relatives or intermediaries; ICIJ, 'Inside China Targets: the data footprints of China's transnational repression' (2025), identifying arrest of family members among recurring pressure tactics across the cases reviewed.

32 'Telefraud still serious, but declining' *China Daily* (Beijing, 14 April 2022) <https://global.chinadaily.com.cn/a/202204/14/WS62580267a310fd2b29e570b0.html> accessed 9 November 2026; 'Public security ministry reports fraud prevention numbers' *China Daily* (Beijing, 17 August 2022) <https://www.chinadaily.com.cn/a/202208/17/WS62fcde0ba310fd2b29e72c94.html> accessed 9 November 2026, both reporting Ministry of Public Security figures. The reports record 210,000 people persuaded to return during the preceding year and 230,000 overseas telecom fraud suspects persuaded to return between April 2021 and July 2022.

33 Xinhua, 'East China city launches hotline to better serve overseas Chinese' (republished by Rednet, 24 April 2022) <https://english.rednet.cn/content/2022/04/24/11156701.html> accessed 9 November 2026, reporting Fuzhou Public Security Bureau cooperation with overseas organisations to establish an initial thirty service stations in 25 cities across 21 countries.

34 Safeguard Defenders, *110 Overseas: Chinese Transnational Policing Gone Wild* (Safeguard Defenders, September 2022) 11–12, reproducing Chinese official material concerning a case connected with Mozambique and the use of relatives in persuasion to return. The original China Peace webpage cited by the report was not reliably accessible when this report was completed.

35 US Department of Justice, Eastern District of New York, 'New York City Resident Pleads Guilty to Operating Secret Police Station of the Chinese Government in Lower Manhattan' (press release, 18 December 2024); US Department of Justice, Eastern District of New York, 'Bronx Man Convicted of Operating Police Station for the Chinese Government in New York City and Obstruction of Justice' (press release, 13 May 2026) <https://www.justice.gov/usao-edny/pr/bronx-man-convicted-operating-police-station-chinese-government-new-york-city-and> accessed 9 November 2026 (Lu Jianwang convicted by a jury on two counts before Judge Nina R Morrison and awaiting sentence; Chen Jinping, who pleaded guilty in December 2024, also awaiting sentence); contemporaneous trial reporting on the Fuzhou police overseas service station banner and the Fujian ceremony at which the Ministry of Public Security announced thirty overseas stations.

5. Who Is Targeted

43. The hardest files are often the least obviously political. A dissident wanted for peaceful speech raises a clear Article 3 issue. A businessperson accused of embezzlement, or a former official accused of corruption, may present a genuine criminal case and an improper return campaign at the same time. Hong Kong's overseas national security cases form a further category, discussed in section 10.

5.1 Political, Ethnic and Religious Cases

44. These cases show the burden of the system most plainly. Dolkun Isa, the Uyghur activist, lived for years under a China-requested Red Notice before INTERPOL deleted it in 2018. The notice restricted his travel and contributed to his being questioned or detained in several countries.[36] The CCF's reasoning was never published, which limits what can be said about the grounds for deletion, though not about the fact that the data were found wanting.

45. Idris Hasan's case shows a different problem. Morocco arrested him at Casablanca airport in July 2021 on a China-requested notice, and INTERPOL cancelled the notice within two weeks. The Court of Cassation nonetheless approved his extradition in December 2021, and he stayed in custody until February 2025.[37] In July 2024 the UN Committee against Torture, which had asked Morocco in 2021 not to extradite him while it examined his complaint, issued its decision on that complaint, finding that his extradition would breach Article 3 of the Convention against Torture.[38]

5.2 When a Civil Dispute Becomes Fraud

46. Business cases call for more discipline. Fraud, embezzlement and failed investment schemes are real problems in China, and neither wealth nor conflict with officials proves innocence. The question is whether the criminal allegation explains the international pursuit as a whole. H's case shows the difficulty: a financial allegation sat alongside a reported demand for cooperation in a separate and politically sensitive investigation.

47. ICIJ reviewed documents on nearly fifty people pursued through INTERPOL after the 2016 reforms. It reported complaints of inconsistent warrants, thin factual summaries and financial allegations that were hard to assess, though its material was not a statistical sample.[39] The author's casework has included more than ten Chinese matters in which the author considered the underlying dispute to be essentially civil, while the international request described it as criminal. That experience does not show prevalence, but it does point to a question reviewers should ask. Where a case began as a debt, shareholder or transfer dispute, what dishonest act is said to have turned it into fraud?

5.3 Corruption Cases and Coercion

48. Former officials sit on the line between ordinary anticorruption law and political discipline. US prosecutions provide unusually firm evidence of unlawful conduct running alongside formal cooperation. In June 2023 a federal jury convicted Michael McMahon, a retired New York Police Department officer, and two others over a campaign against a New Jersey resident. Prosecutors said Red Notices had been obtained against the resident and his wife while surveillance and threats were carried out in the United

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36 Fair Trials, 'INTERPOL deletes Red Notice against persecuted Uyghur dissident Dolkun Isa' (23 February 2018) <https://www.fairtrials.org/interpol-deletes-red-notice-against-persecuted-uyghur-dissident-dolkun-isa/> accessed 9 November 2026; contemporaneous reporting on China's response.

37 Radio Free Asia (n 8); Amnesty International (n 9).

38 *Yidiresi Aishan v Morocco* (n 10).

39 ICIJ, 'China Targets' (investigation, April 2025) <https://www.icij.org/investigations/china-targets/> accessed 9 November 2026, including documents and confidential CCF material concerning nearly fifty cases originating in China after the 2016 reforms.

States.[4041] In a separate case Quanzhong An pleaded guilty in May 2024 and was sentenced in March 2025 to twenty months' imprisonment and financial penalties of about US$5 million, including roughly US$1.3 million in restitution, for acting as an illegal agent of the PRC in an Operation Fox Hunt campaign against a US resident and his family. The target was reportedly a former executive of a state-owned enterprise named on the 2015 Hundred Red Notice list.[42]

49. These convictions establish unlawful coercion on American soil. They do not establish that the underlying Red Notices breached Article 3, and the difference matters. A requesting state may hold real evidence of corruption and still use unlawful means to bring someone back.

5.4 Counterexamples

50. Two cases guard against overstatement. Yang Xiuzhu, first on the 2015 Hundred Red Notice list, withdrew her US asylum claim and returned to China in 2016. No public CCF decision has found her notice abusive.[43] *Liu v Poland* concerned an ordinary telecom fraud allegation arising from a joint Chinese and Spanish investigation. The ECtHR held that extradition to China would expose the applicant to a real risk of inhuman or degrading treatment, and it reached that view without finding the case politically motivated.[44] INTERPOL's Article 3 test of political character and Article 3 of the European Convention on Human Rights answer different questions.

51. Annex A sets out the indicators that should trigger enhanced contextual review.

40 US Department of Justice, Eastern District of New York, 'Federal Jury Convicts Three Defendants of Interstate Stalking of Chinese Nationals in the U.S.' (press release, 20 June 2023).

41 'Obama Warns China on Agents in US Pressuring Fugitives to Return' (VOA, 17 August 2015); US Department of Justice, 'Private Investigator Sentenced to Prison for Interstate Stalking and Harassment of Chinese Nationals on Behalf of the People's Republic of China' (press release, January 2025).

42 US Department of Justice, 'Leader of Multi-Year "Operation Fox Hunt" Repatriation Campaign Directed by the People's Republic of China Sentenced to 20 Months in Prison' (press release, 19 March 2025) <https://www.justice.gov/usao-edny/pr/leader-multi-year-operation-fox-hunt-repatriation-campaign-directed-peoples-republic> accessed 9 November 2026, recording a sentence imposed by Judge Kiyo A Matsumoto and a financial penalty of approximately US$5 million including approximately US$1.3 million in restitution and a US$50,000 fine; guilty plea in May 2024; charged October 2022. The identification of the target as a 'Hundred Red Notice' listee rests on contemporaneous press reporting, not the DOJ release.

43 Xinhua and Reuters reporting on Yang Xiuzhu's return, November 2016; CCDI/CCTV, 《红色通缉》, 2019.

44 *Liu v Poland* App no 37610/18 (ECtHR, 6 October 2022), finding a violation of Article 3 in the event of extradition and a violation of Article 5 § 1(f) in respect of detention pending extradition.

Part III: Consequences and Safeguards


POLICIA

6. Same Notice, Different Outcomes

52. A Red Notice has no uniform effect, because national law supplies the coercive power. Some states require a further judicial step before arrest. Others permit provisional detention on INTERPOL information alone. Border and immigration officers may refuse entry, open a file or alert the police. The same data can be harmless at one airport and ruinous at another.

53. Even strong courts can stop a surrender only once the process has begun. In 2019 the Swedish Supreme Court found probable cause for several of the offences alleged in a Chinese financial crime case yet refused extradition on grounds of political persecution and human rights risk and gave little weight to Chinese assurances that would be hard to verify.[45] Evidence of ordinary criminality does not settle whether surrender is lawful.

54. Transit is especially dangerous. An alert may surface in a country where the traveller has no home, no lawyer and no one to call. Gao Jianhuan was arrested in Sharjah in 2023 and released when China did not pursue extradition there. Fifteen months later, with a CCF challenge pending, he was arrested again in Benin. He was eventually deported to China.[46]

55. Receiving states have a sovereignty interest of their own. Where foreign officials or their proxies carry out surveillance, threats or coercive persuasion without consent, more is at stake than the target's rights. Domestic criminal and national security agencies need the same picture as the police and extradition authorities handling the formal request. The same applies to Hong Kong's overseas national security campaign and the pressure it puts on relatives and associates, described in section 10.

7. Where Review Falls Short

56. INTERPOL has safeguards against manipulation of the system. The weaknesses that keep recurring lie in information, speed, transparency and national implementation.

7.1 Information

57. The source country controls the first account of the case. It knows which officials are involved, what dispute came before the charge, whether relatives are being approached and whether an unrelated demand has been made. INTERPOL may receive a warrant, an offence label and financial material that would be enough for ordinary cooperation but leave out the one fact that changes the character of the case. The CCF can ask for more information and carry out open-source research. Hidden context is still hardest to find for people who are not internationally known.

7.2 Speed

58. CCF access requests are generally to be decided within four months and deletion requests within nine, subject to extensions. In 2024 only 30 per cent of access requests were completed within four months, and 30 per cent of deletion requests took longer than nine. The Commission put the delay down to a record caseload, limited resources, restrictions on disclosure and the growing complexity of cases spanning several countries, financial schemes and political issues.[47] A border check takes seconds, and a pending CCF challenge does not automatically neutralise the data.

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45 NJA 2019 s 611 (Högsta domstolen (Supreme Court of Sweden), Ö 2479-19, 9 July 2019). The Court found impediments to extradition under Swedish law and Articles 2, 3 and 6 of the European Convention, and considered that Chinese assurances could not be given decisive weight because effective verification would be difficult.

46 Alecci (n 15), reporting UAE judicial records and filings in Benin concerning Gao Jianhuan.

47 *CCF, Annual Activity Report 2024* (n 7) paras 73–79; CCF, 'Frequently Asked Questions' (current timeframes).

7.3 Transparency

59. Most Red Notices are not public, and INTERPOL publishes no figures by country for requests, refusals or deletions. Aggregate figures therefore cannot show how often data from China, including data originating in Hong Kong, fail to comply. Country-level statistics, suitably anonymised, would allow scrutiny of repeat patterns without exposing live investigations.

7.4 What the CCF Figures Show

60. The CCF's 2024 annual report shows that review changes outcomes. Of 703 admissible deletion requests closed in 2024 where the applicant was the subject of data, 164 ended in deletion before the CCF reached a decision. Of the remaining 539 decided cases, 217 were found compliant and 322 non-compliant, an overall compliance rate of 40 per cent. Fifty of the adverse findings followed a complete failure by the source NCB to cooperate.[48] These are contested cases, not the whole database, so they cannot support a general rate of abuse. They do show a corrective system that works for those who use it. Getting there is the hard part. A person must know that data exist, understand that they can be challenged and be able to instruct someone to do it.

61. Screening before publication tells a similar story. Reported figures show that INTERPOL refused or cancelled 2,462 notices and diffusions in 2024, up from 1,598 the year before, and that 305 of the 2024 refusals were made under Articles 2 and 3. That figure rose again, to 558, in 2025. Two qualifications apply. The totals cover the organisation as a whole and are not broken down by requesting country. And more refusals may simply mean closer review, so the rise does not by itself prove that more states are misusing the system.[49]

7.5 Reprisals, and What Deletion Leaves Behind

62. The CCF has recorded occasional reports of retaliation against applicants, their families or their lawyers, and has discussed with the General Secretariat how such conduct should be handled.[50] Retaliation of that kind is itself information about compliance and should be treated as such.

63. Deletion within INTERPOL does not automatically erase police, border or immigration records created at national level. INTERPOL notifies member countries of Red Notice deletions daily and of CCF deletion decisions weekly. It can issue a certificate confirming that a person is no longer the subject of a notice, and it will remind states to update their national databases where problems persist. The machinery exists; the gap is in domestic implementation. Where INTERPOL data were a material trigger for coercive action, suspension or deletion should prompt a fresh national review of the legal basis for continuing it.[51]

64. The UK Parliament's Joint Committee on Human Rights reached a similar conclusion in 2025. It called for better tracking of malicious, vexatious and politically motivated Red Notices, coordinated work with Five Eyes partners and closer attention to their effects on immigration and protection decisions.[52] A remedy has to cross the same institutional boundaries as the original alert.

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48 CCF, *Annual Activity Report 2024* (n 7) paras 61–64.
49 INTERPOL, 'Compliance and review' (n 6); NGM Lawyers (n 6); Magri (n 6).
50 CCF, *Annual Activity Report 2024* (n 7) para 72.
51 INTERPOL, 'Compliance and review' (n 6), sections on review of existing Notices and Diffusions and on Red Notice deletion (daily notification of deletions, weekly notification of CCF decisions, deletion certificates).
52 Joint Committee on Human Rights, *Transnational Repression in the UK* (HL 2024–26, 160, HC 2024–26, 681) (30 July 2025); Joint Committee on Human Rights, *Transnational Repression in the UK: Government Response* (HC 2024–26, 1405), received 6 October 2025 and published 30 October 2025; debated in the House of Lords, 26 February 2026.

8. The Punishment Before Return

65. A successful challenge may come too late, and the process can become the punishment.

66. Idris Hasan spent 43 months in Moroccan custody even though INTERPOL cancelled the underlying notice within two weeks of his arrest. He was released on 12 February 2025 and resettled in the United States two days later.[53] In *Liu v Poland* the ECtHR found that extradition to China would breach Article 3 and, separately, that more than four years' detention pending extradition, prolonged by unjustified delay, violated Article 5 § 1(f).[54] In Ancona, Italy, a woman spent more than 200 days in detention before extradition was refused, and she was later awarded about US$52,000 in compensation for unjust detention.[55] None of these people was returned. Each had already paid a heavy price.

67. The harm goes beyond formal orders. A person who knows or suspects that a Red Notice exists may stop travelling altogether. Banks, employers and compliance screening services may treat 'wanted by INTERPOL' as a risk marker, although a notice is neither a conviction nor a finding of guilt by INTERPOL, and an entry in a commercial screening database may outlast the notice itself. Recommendations addressed to them appear in section 11.4. Family pressure, meanwhile, imposes costs on people who never left China or Hong Kong.

68. A return campaign can therefore succeed without any surrender. Detention, immobility, financial loss, isolation and silence can all be achieved while the target stays abroad. Misuse also costs INTERPOL the trust on which legitimate police cooperation depends.

9. Has China Abused INTERPOL?

69. China has abused INTERPOL. It has procured notices whose purpose was never confined to the arrest they sought, secured their publication on information that did not meet the conditions INTERPOL's rules impose, and used them as bargaining tools for ends outside criminal justice. Each of these propositions is made out below on material from INTERPOL itself, from foreign courts or from the Chinese state. In H's case the pressure came from Hong Kong officials as well as mainland ones.

70. Two limits go with that position. Not every notice originating in China or Hong Kong is abusive. Many concern ordinary crime, and some concern crime of the gravest kind. And no rate of abuse can be calculated, because INTERPOL does not publish figures broken down by country.

9.1 Measuring Against INTERPOL's Rules

71. Abuse is measured here against INTERPOL's rules, not a general standard of fairness. Article 3 of the Constitution forbids activity of a political character, and Article 2 ties cooperation to the UDHR. Article 83 of the RPD sets the conditions for publishing a Red Notice, including a reference to a valid arrest warrant. Article 12 requires data to be accurate and up to date, and Article 5 makes the supplying bureau answerable for their accuracy.[56]

72. One consequence follows. A request that breaches those rules is abusive whether or not bad faith is shown. Bad faith is a separate and harder question, and it is addressed below only where the evidence reaches it.

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53 Amnesty International (n 9).
54 *Liu v Poland* (n 44).
55 Alecci (n 15), reporting the Ancona proceedings and an award of about US$52,000 in compensation for unjust detention.
56 Constitution of the ICPO-INTERPOL and INTERPOL's Rules on the Processing of Data (n 20); see also n 21.

9.2 The Wider Purpose

73. The implementing regulations for the Supervision Law place Red Notice requests in the same chapter as extradition, asset recovery and prosecution abroad. On its own that proves nothing, since any state might gather its routes of cooperation in one place. Two other features of the chapter are unusual. It requires ideological education throughout the recovery of a person from abroad, which has no place in criminal cooperation. And the official accounts of how recovery is achieved describe freezing accounts, approaching relatives and narrowing the space in which a person can live overseas.[57] [58]

74. The numbers point the same way. Over Sky Net's first decade, extradition accounted for 79 of 14,048 recoveries.[59] Not every recovery involved a Red Notice, so the ratio does not measure what notices achieve. What it shows is that the programme within which notices are requested is, for the most part, something other than an extradition programme.

75. H's case shows what else a notice can be for. Chinese officials offered to cancel it if he returned and gave evidence in the Sun Lijun investigation, and a Hong Kong national security official discussed the same bargain. A notice that could be traded for cooperation in a separate political matter was never held for the purpose of arrest alone.[60]

9.3 Non-Compliant Data

76. INTERPOL's own review bodies have repeatedly found that data supplied by China should not have been circulating. The CCF deleted the data in H's case. INTERPOL deleted the notice against Dolkun Isa, a prominent Uyghur activist, after it had restricted his movement for years, and it cancelled the notice against Idris Hasan within two weeks of the arrest it caused.[61] The reasoning in these cases has not been published, but the deletions are still evidence of non-compliance. Where the source country has not itself withdrawn the data, INTERPOL removes them only after concluding that they breach its rules, so the missing reasoning leaves open which rule was breached, not whether one was.[62] How many such findings exist cannot be known. Most Red Notices are not public, CCF decisions are confidential, and INTERPOL publishes no figures broken down by country (see section 7.3).

77. The She Zhijiang case goes further, through an unpromising subject. He was accused of running online gambling and fraud operations at Shwe Kokko in Myanmar, and he and his company are under UK and US sanctions. A Red Notice against him was published in May 2021, and he was arrested in Bangkok in August 2022. In 2024 Safeguard Defenders reported, based on documents filed in the Thai extradition proceedings, that the Chinese arrest warrant was issued some months after the notice, and that the warrant date declared to INTERPOL did not match the date in those filings.

78. The date is what matters. Article 83(2)(b)(v) of the RPD requires a request to refer to a valid arrest warrant or equivalent judicial decision, so a warrant that did not yet exist is a defect in the request. A date that does not match the court record is worse. It is a false statement to the organisation, and Articles 5 and 12 make the bureau that supplied it responsible for its accuracy. The allegation has not been tested by the CCF or by any court, and it comes from an advocacy organisation. Even so, it is the most specific

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57 Regulations for the Implementation of the Supervision Law (n 3).
58 Yin (n 5); see also the accounts cited in n 29.
59 Central Commission for Discipline Inspection and National Commission of Supervision (n 2).
60 Alecci (n 15) and n 16.
61 Alecci (n 15); Fair Trials (n 36); Amnesty International (n 9).
62 INTERPOL, 'About the CCF' (n 22).

claim in this field, resting on an identified rule, a documentary basis and a date that can be checked. Thailand extradited She Zhijiang to China in November 2025.[63]

9.4 Notices Traded for Return

79. H was offered relief from prosecution, cancellation of his notice and the release of his bank accounts if he returned and gave evidence. She Zhijiang's lawyers wrote to INTERPOL in January 2025 alleging that he had been held in solitary confinement and in restraints, denied medical treatment and family contact, and visited without notice by Chinese officials who suggested that his family and friends might need the embassy's help.[64]

80. The mechanism is the same in both cases. The notice put the person in custody in a foreign state, and that custody gave the requesting state an opening for approaches made outside any legal process. In H's case the French court and later the CCF were able to take that context into account. In many cases nobody does. US courts have convicted defendants over pressure campaigns of this kind: McMahon and his co-defendants after a jury trial in 2023, Quanzhong An on his guilty plea, sentenced in 2025, and Lu Jianwang after a jury trial in 2026.[65] [66] [67] Those convictions establish the method. They do not show that any particular notice was invalid, for the reason given in section 5.3.

9.5 Conclusion on Abuse

81. The three propositions are made out. The requesting state's own instruments place the Red Notice inside a coercive recovery operation. INTERPOL's review bodies have repeatedly ordered the deletion of data China supplied. One documented case points to a notice published on a warrant reference that did not match the court record. And two men held on such notices were approached in foreign custody with offers and threats delivered outside any legal process, one of them with the involvement of a Hong Kong national security official.

82. None of this shows any particular criminal allegation to be false, and none of it supports a general rate. If the same evidence concerned any other member state, it would be called an abuse of the system. It should be called that here.

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63 Safeguard Defenders, 'Repeat offender: China's violations of INTERPOL rules continue in Benin and Thailand' (24 October 2024) <https://safeguarddefenders.com/en/blog/repeat-offender-chinas-violations-interpol-rules-continue-benin-and-thailand> accessed 9 November 2026, reporting that the Chinese arrest warrant was issued after the Red Notice and that the date declared to INTERPOL did not match documents filed in the Thai extradition proceedings; INTERPOL Rules on the Processing of Data, art 83(2)(b)(v) (requirement of a reference to a valid arrest warrant or judicial decision having the same effect); AFP reporting on the Red Notice published in May 2021; Reuters and AFP reporting on the arrest in Bangkok in August 2022, the Thai criminal court's extradition ruling of May 2024, the appeal court's decision of 10 November 2025 and the extradition on 12 November 2025; UK and US sanctions designations and US Department of the Treasury statements concerning Shwe Kokko. The Article 83 allegation has not been adjudicated by the CCF or by any court and originates with an advocacy organisation; it is presented here as a specific, documented claim, not as an established finding.

64 Poppy McPherson and Panu Wongcha-um, 'Gambling tycoon abused in Thai jail after saying he spied for China, lawyers say' (Reuters, 24 January 2025), reporting on a letter from She Zhijiang's lawyers to INTERPOL dated 9 January 2025, seen by Reuters, alleging solitary confinement, restraints, denial of medical treatment for a spinal injury, denial of family contact, and visits by Chinese officials. INTERPOL declined to comment beyond restating that notices must comply with rules forbidding activity of a political, military, religious or racial nature. Thailand's Ministry of Justice referred questions to the Department of Corrections, which did not respond. The allegations are those of the applicant's lawyers and have not been independently established.

65 US Department of Justice (n 40).

66 US Department of Justice (n 42).

67 US Department of Justice (n 35).

Part IV: Hong Kong and Reform



10. Hong Kong's Overseas Campaign

83. Since 2023 Hong Kong's authorities have issued successive lists of people wanted overseas for national security offences, offered bounties for their capture, cancelled passports and imposed financial, property and business restrictions on people living abroad. There is no public evidence that any of them is the subject of a Red Notice. On 25 July 2025 the National Security Department announced warrants and bounties for nineteen people accused of organising, setting up or taking part in a body that calls itself the 'Hong Kong Parliament'. On 4 August 2025 the Secretary for Security specified sixteen of them as absconders and imposed measures on them under the SNSO.[68]

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68 Hong Kong SAR Government, 12 June 2024 and 24 December 2024 measures against specified absconders; Hong Kong Police, 25 July 2025 announcement of wanted persons concerning nineteen individuals; Security Bureau, 4 August 2025 specification of sixteen relevant absconders and measures under the Safeguarding National Security Ordinance.

84. Two features of the campaign bear on the INTERPOL question. It is cumulative: four rounds of warrants and bounties have been issued since July 2023. And the pressure is not confined to those named. Monitoring groups report that scores of people in Hong Kong, mostly relatives and former associates of those wanted abroad, have been arrested, questioned or investigated in connection with the overseas cases.[69] This is the technique already seen in mainland practice on persuasion to return, applied to the people a target has left behind.

85. The Hong Kong government says these are lawful measures against people wanted for serious national security offences. The governments of the United Kingdom, the United States, Australia and Canada condemned the first warrants and bounties in July 2023, and more than eighty human rights organisations called on governments to respond when a further round followed in December 2023.[70] The immediate INTERPOL question is narrower. An openly political request founded on peaceful advocacy should fail under Article 3. The harder case would be a related allegation of fraud, money laundering, false documents or mishandling of funds, in which the political origin of the dispute is less visible.

86. Hong Kong is not a separate INTERPOL member. According to the Hong Kong Police, its Liaison Bureau acts as a subordinate bureau of NCB China and carries out INTERPOL functions in the territory.[71] That does not show mainland direction of any particular request. It does mean that any future request originating in Hong Kong should be reviewed with attention to the originating investigation, the national security context and any mainland involvement.

10.1 Overseas Judges and the Credibility of Hong Kong's Courts

87. Hong Kong's Court of Final Appeal has, since its creation in 1997, included non-permanent judges drawn from other common law jurisdictions. Six now sit, or are due to sit, on the court: Lord Hoffmann and Lord Neuberger from the United Kingdom, James Allsop and Patrick Keane from Australia, and Sir William Young and Sir Terence Arnold from New Zealand. Lord Hoffmann has served the longest, having joined the court in 1998. On 16 October 2026 the Chief Executive accepted the Judicial Officers Recommendation Commission's recommendation that Sir Terence be appointed; the appointment awaits the endorsement of the Legislative Council.[72] Their participation was intended to sustain confidence in the independence of Hong Kong's courts after the handover.

88. The legal setting in which they sit has changed fundamentally. The NSL was imposed by Beijing on 30 June 2020 with unusual speed and secrecy; the Hong Kong Bar Association observed that 'lawyers, judges, police and Hong Kong residents were given no opportunity to familiarise themselves' with it before it entered into force.[73] The SNSO followed in 2024. Under the NSL the Chief Executive, who answers to Beijing, designates the judges who may hear national security cases (Article 44); trials

69 Kong Tsung-gan, 'Timeline of Arrest Warrants and Bounties Issued for Overseas Hong Kongers' (Hong Kong Repression Monitor, updated October 2025) <https://briankernkongtsunggan.substack.com/p/timeline-of-arrest-warrants-and-bounties> accessed 9 November 2026, recording four batches of warrants and rewards between 3 July 2023 and 25 July 2025 and at least eighty people in Hong Kong arrested, detained for questioning or placed under investigation in connection with the overseas cases. This is civil society monitoring, not an official figure.

70 Al Jazeera, 'Australia, UK, US condemn Hong Kong bounty for exiled activists' (4 July 2023); The Globe and Mail, 'Ottawa denounces Hong Kong arrest warrants' (July 2023); Freedom House, 'Over 80 human rights organisations sign joint statement urging government action in response to latest arrest warrants and bounties' (December 2023).

71 Hong Kong Police Force, 'Hong Kong Fact Sheet: The Police'; 'Commissioner meets Secretary General of INTERPOL', August 2025.

72 HKSAR Government, 'Appointment of non-permanent judge from another common law jurisdiction of Court of Final Appeal' (press release, 16 October 2026); 'New Zealand jurist Sir Terence Arnold recommended for Hong Kong top court' *The Standard* (Hong Kong, 16 October 2026) <https://www.thestandard.com.hk/news/article/345708/New-Zealand-jurist-Sir-Terence-Arnold-recommended-for-Hong-Kong-top-court> accessed 9 November 2026; *China Daily Hong Kong* (22 October 2026) (listing the five serving overseas non-permanent judges).

73 Hong Kong Bar Association, statement on the Law of the PRC on Safeguarding National Security in the HKSAR (1 July 2020), as reported in *Asia Times* (2 July 2020) <https://asiatimes.com/2020/07/hk-bar-association-gravely-concerned-by-new-law/> accessed 9 November 2026.

may be held in closed court (Article 41) and without a jury (Article 46). Monitoring groups count 1,932 people imprisoned on political charges since the protests began in June 2019, of whom 619 remained in custody at the end of 2025.[74]

89. The authority of the Court of Final Appeal itself has been qualified. In November 2022 the court refused the Secretary for Justice leave to appeal against the admission of the British barrister Timothy Owen KC to represent Jimmy Lai. The Chief Executive, John Lee, then sought an interpretation of the NSL from the NPCSC, which in December 2022 made the participation of overseas lawyers in national security cases subject to executive approval. Owen did not appear for Lai.[75]

90. Overseas judges have sat on politically significant appeals. In January 2024 a panel that included Murray Gleeson of Australia reinstated the conviction of the barrister and activist Chow Hang-tung for inciting others to take part in the banned 2021 Tiananmen vigil. In April 2025 James Allsop sat in the 3–2 majority that restored the conviction of the former legislator Lam Cheuk-ting for disclosing the identity of a person under investigation by the Independent Commission Against Corruption.[76] In August 2024 Lord Neuberger sat on the panel that unanimously dismissed the appeals of Lai, Margaret Ng, Albert Ho, Martin Lee, Leung Kwok-hung, Lee Cheuk-yan and Cyd Ho against their convictions for taking part in an unauthorised procession in August 2019. Lord Neuberger is a former President of the Supreme Court of the United Kingdom and former Master of the Rolls, and sits as a crossbencher in the House of Lords. The case shows Hong Kong's courts being used to criminalise peaceful democratic activity, and the standing of the judges who sit on such appeals lends those outcomes an international legitimacy they would otherwise lack.

91. A growing number of overseas judges have concluded that they can no longer sit. In March 2022 Lord Reed, President of the Supreme Court of the United Kingdom, and Lord Hodge resigned, Lord Reed stating that the Hong Kong administration had 'departed from values of political freedom, and freedom of expression'.[77] During 2024 and early 2025 six further overseas judges left the court: Murray Gleeson, Lord Collins, Lord Sumption, Beverley McLachlin, Lord Phillips and Robert French. Lord Sumption wrote publicly of the diminishing independence of Hong Kong's courts and of an 'impossible political environment created by China'.[78] Those who remain are drawn from a shrinking pool of jurists who see no difficulty in continuing to serve.

92. This bears directly on INTERPOL. Hong Kong's national security laws reach conduct outside the territory. Of the nineteen people named in July 2025, fifteen were named for the first time, each with a bounty of HK$200,000; the other four already carried bounties of HK$1 million from earlier rounds, some of which concerned conduct that was lawful where it took place. That round brought to 34 the number of people living overseas who are wanted under the national security laws. Should Hong Kong seek Red Notices or other cooperation against any of them, the request will come from a legal system whose reputation abroad rests in part on the names of the overseas judges. Their presence is not a guarantee of fair proceedings or of protection from political prosecution. The Court of Final Appeal hears few cases and has no control over how national security trials are designated, conducted or decided at first instance.

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74 Kong Tsung-gan, 'End-of-2025 Update on Hong Kong Political Prisoners' (12 December 2025, updated 29 December 2025) <https://briankernkongtsunggan.substack.com/p/end-of-2025-update-on-hong-kong-political> accessed 9 November 2026, counting 1,932 people imprisoned on political charges since 9 June 2019 and 619 still in custody at the end of 2025; Committee for Freedom in Hong Kong Foundation, Prisoner Profile Database.

75 Standing Committee of the National People's Congress, Interpretation of Article 14 and Article 47 of the Law of the PRC on Safeguarding National Security in the HKSAR (30 December 2022); *Secretary for Justice v Timothy Wynn Owen KC* [2022] HKCFA 23, (2022) 25 HKCFAR 288.

76 *HKSAR v Chow Hang Tung* (CFA, 25 January 2024); *Lai Chee Ying v HKSAR* (CFA, 12 August 2024); *HKSAR v Lam Cheuk Ting* [2025] HKCFA 7 (1 April 2025). [Placeholder: insert neutral citations for the 2024 judgments.]

77 Supreme Court of the United Kingdom, 'Statement from the President of the Supreme Court, Lord Reed' (30 March 2022).

78 Lord Sumption, 'The rule of law in Hong Kong is in grave danger' *Financial Times* (London, 10 June 2024); *Hong Kong Free Press* (11 June 2024).

Delegates to the 94th General Assembly, particularly those from the United Kingdom, Australia and New Zealand, should not treat the composition of the court as an answer to the questions the NDTF, the CCF and receiving states must ask of each request.

10.2 The 94th General Assembly: Electing the CCF in Hong Kong

93. The timing matters for governance. INTERPOL's 94th General Assembly will be held at the Hong Kong Convention and Exhibition Centre from 30 November to 3 December 2026. All seven CCF seats fall vacant on 11 March 2027, when the current terms expire, and will be filled by election at the Assembly. The Executive Committee found twenty candidates eligible at its 229th session in June 2026, of whom nineteen remain. New members serve five years, and re-elected members a further three.[79] The venue does not prove Chinese control of INTERPOL. It does make the independence, human rights expertise and transparency of the candidates unusually important.

94. Governments do not have to choose between ignoring the venue and boycotting the meeting. If the Assembly goes ahead, they should resist any restriction on scrutiny, coordinate behind qualified and independent CCF candidates and press for specific reforms. The real test is unchanged. Can INTERPOL and a receiving state recognise a political or coercive context when it sits behind an ordinary criminal file?

11. Recommendations

95. Reform should protect ordinary criminal cooperation while making each institution answer its own question. Is the police information compliant? Is there a lawful domestic basis for coercion? Is return permitted? Is any parallel pressure on the target or the family lawful?

Priorities before 30 November 2026. Three things can realistically be secured before the Hong Kong General Assembly: agreement among like-minded governments on a slate of demonstrably independent CCF candidates; a commitment from the General Secretariat to publish country-level figures on requests, refusals and deletions; and a public assurance that scrutiny, observation and civil society access at the Assembly will not be restricted.

11.1 For INTERPOL

a. Apply enhanced contextual review where the risk indicators in Annex A are present and require the requesting NCB to disclose known refugee decisions, significant extradition refusals and other foreign judgments bearing on Articles 2 or 3.
b. Create a rapid interim mechanism for credible Article 2 or 3 cases involving actual or imminent detention, so that data can be temporarily blocked or flagged while the constitutional issue is examined.
c. Treat credible reprisals against CCF applicants, their relatives or their lawyers as new compliance information requiring urgent review.
d. Publish country-level figures on requests for wanted persons, refusals and deletions, showing requests originating in Hong Kong separately from those of the mainland, together with more anonymised CCF reasoning in cases that mix political and ordinary criminal elements.
e. Publish the use of existing interim and corrective measures against NCBs that repeatedly submit non-compliant material or fail to cooperate. The powers already exist under Articles 129 to 131 of the RPD. What is missing is visibility.
f. Complete the review of the CCF Statute without weakening the Commission's independence and match any increase in its caseload with the resources and processing times the Statute requires.

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79 INTERPOL, 'Elections of the Commission for the Control of INTERPOL's Files' (n 14).

11.2 For Governments

a. Make clear in law and police guidance that a Red Notice is neither a finding of guilt nor an extradition order and require an identifiable domestic legal basis for any arrest, detention or movement restriction triggered by INTERPOL data.
b. Ensure that refugee decisions, significant findings of foreign courts and later INTERPOL deletion decisions reach the police, border, immigration and extradition authorities whose actions depend on the alert. INTERPOL already notifies states of deletions. The failure usually lies in distribution at home.
c. Create a transnational repression referral mechanism linking the NCB, the extradition authority, immigration and refugee agencies, the police and national security bodies, so that evidence of threats or foreign interference does not sit in a separate file.
d. Investigate threats, surveillance and coercive intermediaries even where the requesting state has a plausible criminal case and ensure that deportation or immigration removal respects non-refoulement and safeguards equivalent to those in extradition.
e. Do not treat the participation of overseas judges in Hong Kong's Court of Final Appeal as evidence of fair proceedings when assessing extradition, mutual legal assistance or police cooperation requests originating in Hong Kong.

11.3 At the Assembly

a. At the Hong Kong General Assembly, treat the CCF vote as the selection of an independent oversight body, and support candidates with demonstrated independence, data protection expertise and human rights competence.
b. Hong Kong civil society groups should keep secure chronologies that separate domestic warrants, any INTERPOL data, extradition steps and informal pressure, prepare concise dossiers for people at credible risk, and identify specialist local counsel before any travel that carries real risk.
c. Public advocacy should use precise legal language. A Hong Kong arrest warrant, a Red Notice, a diffusion and an extradition request are different instruments, and accuracy makes abuse easier to prove and legitimate cooperation easier to defend.
d. Delegates from common law jurisdictions, especially the United Kingdom, Australia and New Zealand, should make clear that the presence of their judges on the Court of Final Appeal does not lessen the scrutiny that requests originating in Hong Kong require.

11.4 For Banks and Screening Providers

a. Financial regulators should issue guidance that the existence, or reported existence, of a Red Notice is not on its own a sufficient basis for refusing or closing an account, and that firms need an independent basis in the underlying facts before acting.
b. Commercial screening providers should record the source and date of any INTERPOL-related entry, check regularly whether the notice is still in force, and remove or annotate the entry promptly once deletion is confirmed, including on production of an INTERPOL deletion certificate.
c. Banks and employers should give the person concerned a chance to respond before acting on a screening match based on INTERPOL data and should treat a CCF deletion or a foreign court's refusal of extradition as material information.

11.5 For Overseas Judges of the Court of Final Appeal

a. The remaining overseas non-permanent judges should follow the six who have left the Court of Final Appeal since the start of 2024 and step down, so that their standing is not used to legitimise national security prosecutions or the requests for international cooperation that follow them.

Conclusion



96. A Red Notice is an international police alert, not a global arrest warrant. What follows from it happens at national level: detention, immigration action, travel restrictions and, in cases brought by China and Hong Kong, pressure applied through assets, relatives or intermediaries before any court has decided whether surrender is lawful.

97. One weakness runs through the cases. The requesting state knows the whole context, while INTERPOL and the receiving state each see only part of it. China's own regulations and case accounts place Red Notices, extradition, deportation, persuasion and asset recovery within a single recovery effort, and its own figures show that formal extradition has been a minor route within that system.

98. On the evidence in section 9, China has abused INTERPOL in three ways. It has procured notices whose purpose was never confined to arrest. It has secured their publication on information that did not satisfy the rules. And it has used them as bargaining tools. None of this requires any criminal allegation to be false, because a genuine fraud or corruption case can coexist with unlawful coercion and with demands that have nothing to do with the charge.

99. The remedy is institutional: connect the files, test the chronology, and require every coercive step to rest on its own lawful basis. The General Assembly in Hong Kong will show whether INTERPOL and its members are prepared to do that when the political context is hard to see.

Annex A: Indicators for Enhanced Review



100. Enhanced review should be triggered by combinations of the indicators below. No single one proves innocence or abuse. Taken together, they signal the need to reconstruct the chronology and ask what the request is really being used to achieve.

- Refugee status, subsidiary protection or a pending protection claim in another state.
- An elite purge, factional rupture or public political conflict in the requesting state, connected in time to the charge.
- An ordinary financial charge paired with an unrelated political demand, or with a request that the subject give evidence in a separate case.
- An offer made directly or through intermediaries, to cancel the notice or drop the charge in exchange for return or cooperation, as in H's case.
- A warrant dated after the notice was requested, or a warrant date declared to INTERPOL that does not match the domestic court record, as alleged in the She Zhijiang case.
- Detention, questioning, exit bans or asset measures directed at the subject's relatives.
- Foreign court findings against return, including extradition refusals and non-refoulement decisions.
- Use of intermediaries outside formal law enforcement, including business figures, community organisations or relatives passing on official messages.
- Reprisals, threats or new proceedings following a challenge to INTERPOL data.
- A request originating in Hong Kong where the subject is also wanted, or has been named, in national security proceedings.
- A significant gap between the underlying civil or commercial dispute and the dishonesty alleged in the international request.

Annex B: The Return Campaign in Chinese State Media



101. State broadcasting helps show how the institutions behind the return campaign present it. This material is official messaging, not evidence of any individual operation, and it is set out separately for that reason.

102. 《红色通缉》 *(Red Notice)*, a five-part CCTV documentary produced with the CCDI and the NCS and broadcast in January 2019, examined fifteen cases and was filmed in seventeen countries and regions.[80] Its fourth episode says that China makes comprehensive use of 'extradition, deportation, persuasion to return and prosecution in another jurisdiction'.[81] The legal routes differ, but the official narrative presents them as one operational menu.

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80 CCTV News, 《电视专题片〈红色通缉〉明晚开播》 [Television documentary *Red Notice* begins tomorrow], 9 January 2019; CCTV, 《红色通缉》 programme page, January 2019; Procuratorate Daily, 《15个案例见证海外不是腐败分子避罪天堂》 [Fifteen cases show that overseas is not a haven from punishment], 1 February 2019; People's Daily, list of the fifteenth Five One Project awards, 2 August 2019.

81 CCTV News, 《红色通缉》第四集《携手》 [*Red Notice*, episode 4, Joining Hands], 13 January 2019, opening narration.

103. The documentary also presents exposure, and life abroad itself, as forms of pressure. One subject on the Hundred Red Notice list describes avoiding other Chinese people and fearing that even looking at the wanted list online might give him away. The programme says his theory about that particular digital lead was wrong, but it records the fear all the same.[82] Other subjects, filmed in London, Cambodia and Canada, describe isolation, poor work and money worries.[83] These are edited state narratives, not independent evidence of anyone's circumstances. What matters is the message. Flight leads to dwindling options, and return is the sensible end of a failed escape.

104. Fiction carries less evidential weight, though its origins are revealing. 《人民的名义》 (*In the Name of the People*), initiated by the Supreme People's Procuratorate's film centre, follows a fictional deputy mayor, Ding Yizhen, after he flees to the United States. Officials discuss a Red Notice even though there is no extradition treaty between the two countries. Later a dedicated recovery team travels to the United States, works through relatives, a Chinese liaison and community contacts, and finds Ding in a San Francisco restaurant. The officers acknowledge that they have no police powers under US law and turn to contact and persuasion.[84] [85] [86] Overseas pursuit appears here as a layered network of information and operations, with INTERPOL as one tool among several.

105. 《猎狐》 (*Fox Hunt*), a drama backed by the MPS, carried the same message to audiences in China and overseas. Official reporting said the production drew on the experience of economic crime police and was distributed in Southeast Asia and North America.[87] Its best-known line tells a target that he faces 'the power of an entire state'.[88] As drama it proves no individual operation. As official messaging it shows how the institutions responsible for fugitive recovery want their reach, staying power and state capacity to be understood.

106. The broadcasts support one inference and no more. The Chinese authorities openly present formal cooperation, persuasion and overseas pursuit as parts of a single recovery strategy, and the programmes help create the atmosphere in which persuasion works. They cannot prove guilt, coercion or illegality in any particular case.

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82 CCTV News, 《红色通缉》第三集《出击》 [*Red Notice*, episode 3, Striking Out], 12 January 2019, Fu Yaobo segment concerning his efforts to avoid Chinese residents and his concern about visiting the Hundred Red Notice webpage.
83 CCTV News, 《红色通缉》第二集《织网》 [*Red Notice*, episode 2, Weaving the Net], 11 January 2019, Dai Xuemin segment; episode 3, 12 January 2019, Sun Xin segment; episode 4, 13 January 2019, Jiang Qian segment.
84 Supreme People's Procuratorate, 《反腐力作〈人民的名义〉3月28日起播出》 [Anticorruption drama *In the Name of the People* begins broadcasting 28 March], 28 March 2017; Supreme People's Procuratorate, retrospective on its Film and Television Centre, 26 April 2024; People's Daily and CCTV reporting on the drama's audience, April and May 2017.
85 People's Daily and China Daily episode summaries, April 2017, on Ding Yizhen's flight to the United States, the proposed Red Notice and the absence of an extradition treaty.
86 CCTV Entertainment, 《〈人民〉侯亮平遭逮捕？陈海屡招暗算危在旦夕》, 12 April 2017; People's Daily and China Daily episode summaries, 10 and 11 April 2017, on the pursuit team's travel to the United States, the Los Angeles liaison, Ding's sister and Chinese contacts, the encounter in a San Francisco restaurant, and the use of persuasion in the absence of US police powers.
87 Xinhua, 《电视剧〈猎狐〉聚焦新时代经侦警察》 [*Fox Hunt* focuses on the new generation of economic crime police], 14 April 2020; People's Daily, 17 April 2020; People's Daily Overseas Edition, 《〈猎狐〉：聚焦经侦战场》, 8 May 2020, on Ministry of Public Security participation and overseas distribution.
88 《猎狐》 [*Fox Hunt*], 2020, line reproduced in Chinese coverage of the series.

Methodology and Evidential Standards



107. This report uses a qualitative institutional method. It examines how INTERPOL data interact with extradition, immigration, policing, Chinese and Hong Kong state institutions and informal pressure. No reliable public figure exists from which a rate of abuse could be calculated for Red Notices originating in China or Hong Kong.

108. Primary legal materials are used for institutional powers and procedures. Chinese and Hong Kong statutes, regulations and official media are used to show how those authorities describe their own programmes, methods and statistics, not to establish the guilt of anyone named. Court judgments, treaty body decisions and criminal convictions carry the greatest weight on disputed facts.

109. Investigative journalism and civil society material are used where they reveal records or mechanisms not otherwise available, with attribution and limits stated. The author's casework is used only to explain recurring mechanisms. Identifying details from confidential matters are omitted, and no confidential client document is cited. Throughout, the report distinguishes established fact, official claim, reported allegation and analytical inference.

110. The Sky Net figures cited here concern its anticorruption recovery programme. They are not a baseline for all Fox Hunt activity, economic crime cases or INTERPOL requests originating in China. INTERPOL's published refusal statistics cover the organisation as a whole and are not broken down by requesting country. They are used to show trend and scale, not to attribute non-compliance to China.

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