ACAMS South Florida Chapter

The Challenges of Terrorist Financing in 2016 and Beyond

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The Challenges of Terrorist Financing

- Global Terrorist Landscape
- Evolution of Financial Supply Chain
- Funding Flows Required to Sustain Terrorist Organizations
- Perspectives, Partnerships and Proactive Measures
- Business Model for a Terrorist Organization
- The Power of Financial Intelligence
- Takeaways
Global Terrorist Landscape

TERRORISM

Getting to the root of the matter.
Our Challenge

• Harsh reality
  ▫ *No country immune from terrorism*

• Threat preceded 9/11, magnified on 9/11, reinforced many times since 9/11

• Challenge in confronting terrorism threefold:
  ▫ Continue to contain and disrupt the threat of terrorism through military, diplomatic, intelligence, law enforcement and sanctions counterterrorism measures
    • Public sector interagency collaboration
  ▫ Work with diverse communities to educate and counter radicalization and violent extremism
    • Public and private sector partnership
  ▫ *To disrupt and prevent the flow of funds to and from terrorist organizations and operatives*
    • Public and private sector partnership
Understand the Threat

• To address the threat, you must understand the threat

  ▫ Hate crimes / right wing extremists
    • Chattanooga (Dylann Roof) (July 16, 2015)
    • Colorado Springs (Robert Lewis Dear) (November 27, 2015)

  ▫ San Bernardino County Care Facility (December 2, 2015)
    • Syed Rizwan Farook and Tashfeen Malik
    • ISIL inspired / leaderless
    • Homegrown violent extremists

  ▫ Paris (November 13, 2015) / Brussells (March 22, 2016)
    • Belgium cell / (blended) network
    • Returning foreign fighters and homegrown violent extremists
    • ISIL command and control
Observations About Recent Attacks

• Paris and Brussels
  ▫ Network of foreign terrorist fighters and violent homegrown extremists
  ▫ ISIL directed from Syria (blended)

• Istanbul and Dhaka
  ▫ Teams of individuals (wolf pack)
  ▫ Leaderless / inspired by ISIL

• San Bernardino
  ▫ Homegrown violent extremists
  ▫ Leaderless / pledged allegiance to ISIL

• Orlando and Nice
  ▫ Homegrown violent extremists with personal issues
  ▫ Leaderless / pledged allegiance to ISIL / pre-planning

• Ansbach suicide bombing, German train attack and church attack near Rouen
  ▫ Immigrants influenced by ISIL / leaderless
How Terrorist Trends Develop

• Developments in terrorism are driven by numerous factors
  ▫ Inherent factors
    • Ideology
    • Politics
  ▫ Adaptive factors
    • Technology
    • Counterterrorism tactics

• Financing falls under counterterrorism tactics
  ▫ The financial system serves as both a facilitation tool and detective mechanism
  ▫ Finance is one of the biggest terrorist vulnerabilities
Changing Terrorist Landscape

What will alter the terrorist landscape in 2016?

- Sunni v. Shiite dynamics and conflict
- Evolution or devolution of terrorist groups
  - ISIL loss of territory in Syria and Iraq
  - Spread of ISIL to Libya, Egypt, Algeria, Afghanistan, other countries
- Hizballah foothold in Syria
- Counter-offensives / coalitions
- Diplomatic initiatives (Assad exit strategy)
- Anti-corruption initiatives (Iraq)
- Status of foreign fighters
  - Recruitment
  - Return to home country
- Homegrown violent extremists
- Conflict between ISIL and al-Qaeda
- Continued convergence of criminals and terrorists
  - Internet / social media sophistication (Inspire / Dabiq) (hacking)
Evolution of Terrorist Threats in 2016

- Groups
  - Core terrorist organizations
  - Groups affiliated with core terrorist organizations

- Cells / networks
  - Directed by affiliate and / or core groups (directed)
  - Influenced by affiliate and / or core groups (leaderless)

- Individuals
  - Violent homegrown extremists
    - Leaderless / directed
    - Motivation
  - Foreign terrorist fighters
    - Directed / leaderless
Comey Assessment of Current Terrorist Threat

- Comments from FBI Director James Comey during a speech given to the Society of Former Special Agents of the FBI on 9/26/2016
  - ISIL still the dominant (global) threat
  - The U.S. and our allies are making great progress on the foreign fighter front
    - Far less travelers to Syria and Iraq
  - ISIL caliphate going to be crushed in next 12 months
    - U.S led military coalition operations
    - Multi-lateral government initiatives
  - As a result of crushing ISIL, really bad people will escape from the caliphate and go to Europe and other countries
    - The ultimate dream of ISIL is to bring their terrorist acts directly to the U.S.
Contrasting E.U. and U.S. Threats

• Threat in Europe more acute
  ▫ Geographic risk
  ▫ Cultural risk
  ▫ Information sharing

• Foreign fighters
  ▫ Greater numbers from Europe
  ▫ Long term integration of returning fighters to Europe
  ▫ Coordination with homegrown violent extremists in disenfranchised communities in Europe
  ▫ Command and control from Syria

• Homegrown violent extremists
  ▫ Bigger challenge in U.S. (more ethnic diversity)
  ▫ Leaderless / more aspirational
ISIL Use of Social Media

• Comments from FBI Director James Comey during a speech given to the Society of Former Special Agents of the FBI on 9/4/2015
  ▫ ISIL preaches to the world through twitter
    • Come to the caliphate → come to fight
    • If you can’t come → kill where you are
  ▫ ISIL reaches troubled souls
    • Non-stop messaging 24/7 → kill, kill, kill
  ▫ Get recruits on public internet where serious recruiters go into encrypted communications mode
    • Going dark
  ▫ FBI has investigations in all 56 field offices
    • FBI mission to find “unstable” needles in the haystack
Recruitment Made Easy
Example of Home Grown Threat

- Abdi Nur (20) (Minneapolis)
  - Joined ISIL in Syria
  - Encourage friends via internet to join him
    - At least six friends convicted trying to travel from Minneapolis to Syria

- Jaelyn Young (19) & Muhammed Dakhlla (22) (Mississippi)
  - College students at Mississippi State University
  - Arrested attempting to travel to Syria to join ISIL

- Jalil Ibn Ameer Aziz (19) (Harrisburg)
  - Lived in his parents basement
  - Communicated online with ISIL
    - Provided names / addresses of military personnel

- Nicholas Young (35) (Washington DC)
  - Washington DC Transit Police Officer
  - Attempted to fund ISIL overseas with gift cards

- All to many other individuals susceptible to radicalization
The Challenge of Identifying Homegrown Violent Extremists

- Little likelihood of identification through transaction monitoring or normal AML filters
- Negative news hits not likely until attack, attempted attack or law enforcement disruption takes place
- Banking activity will likely involve legitimate employment compensation or petty crimes that can be reasonably explained for due diligence purposes
- In most instances, financial institutions would not identify having facilitated a terrorist as a customer until after the fact
  - Requires “urgent” reactive response
  - Immediate contact should be made with FBI’s TFOS and / or JTTF in the attack / event jurisdiction
Evolution of the Financial Supply Chain

Getting to the root of the matter.
Triggers for Financial Trends

- Evolving sources of funds
  - Legitimate to illegitimate (*growing reliance on criminal activity*)
- Terrorist and criminal organizations must have continuous access to funds
- Global money laundering requires the use of facilitation tools
- Facilitation tools used by terrorist and criminal organizations are dependent on world events and governance
  - Local to regional to global
- *Trends regarding financial mechanisms used by terrorist and criminal organizations are driven by adaptability / opportunity*
Pre-9/11 Terrorist Financing Model

Vehicle
1. More overt financial support to terrorist organizations
2. Frequent use of charities and religious institutions to raise and transfer funds
3. Open use of the formal financial sector
4. Known operating locations and safe haven status

Example
1. Deep pocket donors, large businesses, and political elite
2. Religious clerics, relief and welfare organizations, Diaspora
3. Very little effort to mask true originator or beneficiary of funds
4. Training camps out in open, terrorist leaders living/operating in public
Pre 9/11 Example: Financing the 9/11 Hijackers

Khalid Sheik Mohammed

Ali Abd Aziz Ali

Ramzi Binalshibh

Mustafa al Hawsawi

9/11 Hijackers

$10,000 in cash each to 13 hijackers in Pakistan

$120,000 in cash to Ali

$128,000 in cash through MSBs to bank accounts of hijackers in US

$21,000 in cash through MSBs to hijackers

$14,000 wired to Binalshibh

$12,600 in cash and bank deposits to hijackers

Bank & MSB & transfers
Post 9/11 Terrorist Financing Model

**Impact**
1. Top financiers arrested, blacklisted or sanctioned
2. Known front companies shutdown, blacklisted or sanctioned
3. Complicit banks and charities shutdown, blacklisted or sanctioned
4. Others became fearful of overt support or just walked away altogether

**Response**
1. Increased use of cut-outs and financial facilitators
2. New generation of front businesses spanning the globe
3. Migration to advanced money-laundering techniques to obtain banks accounts
4. Black market, underground, and off-the-grid activities used to raise, move, and spend money
Post 9/11 Example: Financing the Times Square Bombing

FEB 2010: Use of informal transfers - Hawalas

Faisal Shahzad
The Changing Operational Model

Two major drivers of sweeping operational changes of terrorist networks

Effective Targeting of Terrorists

- US PATRIOT Act resulted in unprecedented targeting of terrorists and their networks
- Networks immediately began moving underground and off the grid
- Many began seeking safe-haven status in under-governed countries or in countries with high levels of instability
- Many had to find new sources of revenue and ways to move it

Franchising of Terrorist Networks

- Al Qaida franchised globally
  - Iraq
  - Yemen
  - Africa
- The Taliban franchised regionally
  - Pakistan
  - Africa
- ISIL is franchising globally
- Many terrorist or insurgent groups began aligning with one of more of the above organizations
Global Flash Points

• Transnational criminal organizations and terrorist groups thrive and prosper in regions fraught with conflict and corruption.

• Countries / regions where chaos prevails and criminal organizations and terrorist groups thrive:
  - Syria
  - Iraq
  - Afghanistan
  - Yemen
  - Libya
  - Various others
Intersection of Crime & Conflict

• Criminal organizations and terrorist groups have increasingly found common ground of mutual benefit
  ▫ Each have learned how to benefit from conflict
  ▫ Each have benefited from convergence and diversification
    • Convergence: the intersection where criminals and terrorists work together to support each other with the goal to maximize the benefit to their individual causes
      ▫ Mutual and individual benefit
    • Diversification: as organizations mature in operations and sophistication, they diversify into different activities and thereby grow and strengthen their operations
      ▫ Rely on legitimate and illegitimate fronts
        • Haqqani network
        • Mexican cartels
Convergence: Crime-Terror Continuum

Organized Crime

Alliance with Terrorist

Terrorist Activities

Convergence

Criminal Activities

Alliance with TOC

Terrorist
Anatomy of a Global Narco-Terrorist Operation

- Case study demonstrating how criminal, drug trafficking and terrorist organizations collaborated in a multi-billion dollar worldwide narco-terrorist drug trafficking and money laundering enterprise
  - Mutually beneficial operation involving:
    - Joumma drug trafficking / criminal organization
    - Hizballah
    - Los Zetas Mexican drug cartel
    - Colombian and Venezuelan drug suppliers
  - Exploitation of financial institutions
  - Exploitation of facilitation tools and financial mechanisms
  - Exploitation of systemic vulnerabilities
  - Exploitation of Lebanon’s financial system
Factors Facilitating DTO Operations

- Lebanese Canadian Bank
  - Management complicity and support for Hizzballah
  - Ineffective due diligence
  - Ineffective internal controls

- Money exchange houses / hawalas
- Bulk cash shipment / smuggling
- Cross border wire transfers
- Correspondent banking
- Payable through accounts
- Shell companies / front companies
- Corruption
- Structuring
- Money laundering
- Trade based money laundering
- Black market peso exchange
The Challenges of Terrorist Financing

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Foreign Narcotics Kingpin Designation Act
January 2011

Criminal Associates and Front Companies:
Lebanon, Colombia, Panama

JOUMAA
Drug Trafficking & Money Laundering Organization

Ayman Saied JOMAA
a.k.a. Aiman Said JOMAA
DOB 21 Jun 1964
POB Al Karouan, Lebanon
Passport RL 0235074 (Lebanon)
Cedula No. 84075050 (Colombia)

Hassan Ayash Exchange: Lebanon

Republic of the Congo

U.S. Department of the Treasury
Office of Foreign Assets Control

Ellissa Group:
Lebanon, Benin, Republic of the Congo

Separate Image: Document content related to the above entities.

Separate Image: Contact information for Discussing as the text of the matter.
Drug & Laundering Flow Involving U.S.
Drug & Laundering Flow Involving Asia

- United States
- Lebanon
- Middle East
- Asia
- West Africa
- Colombia

Getting to the root of the matter.

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Joumaa – Los Zetas Trafficking Flow

- United States
- Los Zetas
- Mexico City
- Colombia
- Venezuela

Joumaa collects 8% to 14%
Case Conclusion

• This case demonstrates how criminals and terrorists can benefit financially by collaborating together
• Drug trafficking remains the most prolific funding mechanism for criminals and terrorists
• Money laundering essential to successful operations
• The exploitation of systemic vulnerabilities facilitated operations
Funding Flows Required to Sustain Terrorist Operations
Terrorist Financing

• **Funding is the lifeblood of terrorist organizations**
  - Require financial support to succeed
  - Must have effective financial infrastructures and support mechanisms

• **There will be more successful terrorist attacks in the U.S.**
  - The best chance to prevent terrorists from succeeding is to disrupt their ability to raise, move and access money
  - Need for proactive and reactive strategies
Understanding & Disrupting Funding Flows

- Must understand four dimensions
  - Organization
  - Funding capacity
    - Source of funds
    - Means to launder money
    - Availability of funds
  - Funding mechanism
    - Formal financial system
    - Informal system
  - Group members
- Funding cycle
  - Raise
  - Move
  - Store
  - Spend
Disruption of Funding Flows

• Back to origin / forward to strike teams
  ▫ Funding to networks / organizations from point of origin
    • Ranging from hundreds to millions of dollars
  ▫ Funding to operations
    • Ranging from thousands to hundreds of thousands of dollars
  ▫ Funding to individuals, cells, or groups
    • Ranging from hundreds to thousands of dollars
Funding Sources

• Groups
  ▫ Private donations
  ▫ Abuse and misuse of non-profit organizations
  ▫ Proceeds of criminal activity
  ▫ Extorting local and diaspora populations and businesses
  ▫ Kidnapping for ransom
  ▫ Legitimate commercial enterprise
  ▫ State sponsors of terrorism
  
  Source: FATF Report October 2015 (Emerging Terrorist Financing Risks)

• Cells / networks
  ▫ Group funded
  ▫ Self funded

• Individuals
  ▫ Self funded
  ▫ Group funded
ISIL Funding Sources

- Illicit proceeds from occupation of territory including extortion and theft
  - Bank looting, extortion and human trafficking
  - Control of oil and gas reservoirs
  - Extorting agriculture
  - Other resource extraction and production facilities
  - Cultural artifacts
  - Illicit taxation of goods and cash that transit territories where ISIL operates
  - Salary payments to Iraqi government employees
- Kidnapping for ransom
- Donations including by or through non-profit organizations (NPOs)
- Material support to include foreign fighters
- Fundraising through modern communications networks

Source: FATF Report February 2015 (Financing of the Terrorist Organization ISIL)
Foreign Terrorist Fighter (FTF) Self Funding Sources

- Employment income
- Social assistance
- Family support
- Bank loans
- Sale of assets, including personal belongings and assets purchased on credit just prior to the FTFs planned travel
- Criminal activity

Source: FATF Report October 2015 (Emerging Terrorist Financing Risks)
Perspectives, Partnerships and Proactive Measures
Tools for Fight Against Terrorist Financing

- Intelligence gathering / operations
- Criminal / intelligence investigations
- Regulatory and enforcement actions
- Diplomatic initiatives
- Military action (threat finance)
- Outreach:
  - Government & private sectors
    - Financial institutions (gateway to financial intelligence)
  - International
- Technical assistance & training initiatives
Perspectives, Partnerships and Proactive Measures

**Perspectives**
Understand perspective of partners / overcome impediments / strive for win - win situation

**Partnerships**
Leverage capabilities and capacity of partners

**Proactive Measures**
Develop sustainable, innovative and impactful proactive measures to support law enforcement investigative initiatives
Proactive Measures

• Understand and balance perspectives
• Build sustainable partnerships
• Requires cooperation, communication and coordination
• Examples of meaningful partnerships
  ▫ SWIFT Terrorist Financing Tracking Program  
    • Presentation by SWIFT General Counsel on 4/14/2015
  ▫ Western Union Targeted Monitoring Initiative
  ▫ JPMorgan Chase / HSI Human Trafficking Initiative  
    • ACAMS special award
  ▫ Other initiatives
Business Model for a Terrorist Organization

Getting to the root of the matter.
Compliance Countermeasures

- Terrorist groups have organizational and individual similarities yet possess unique footprints (*Business Model*)
  - Understand terrorist organizations / individual jihadists
  - Understand regional risk of terrorist groups
    - Importance of due diligence / enhanced due diligence
    - Importance of technology / analytics
- Importance of collaboration and innovation as proactive tool
  - Proactive exploitation of financial intelligence
Business Model for a Terrorist Organization

- Mission statement
- Desired infrastructure
  - Political and or social wing(s)
  - Military wing
- Funding requirements
  - Must have ability to raise, move, store and spend money to sustain organization and operations
  - Desired capacity
- Funding sources
  - Licit / illicit
  - Must be sufficient to support infrastructure and capacity
- Funding mechanisms
  - Formal / informal financial mechanisms
Success of Islamic State

- How did Islamic State become so dangerous?
  - Precision and sophistication
    - Can function as military or insurgency group
  - Members
    - Veterans
    - Westerners
  - Financial management
    - Incredible wealth
  - Territory (caliphate)
    - Syria / Iraq
    - Sunni population (Sectarian divide)
  - Propaganda
    - Media savvy
Initiatives to Disrupt ISIL’s Funding Flows

- FATF Reports (February 2015)(October 2015)
  - Financing of the Terrorist Organization Islamic State in Iraq and the Levant (ISIL)
    - The reports highlight new and existing measures to disrupt ISIL financing
- Counter-ISIL Financing Group (CIFG)
  - Representatives from 26 countries and several multilateral organizations met in March 2015, to agree on action plan to further understanding ISIL’s financial and economic activity
    - Group has grown to 62 nations
- Bipartisan task force to investigate terrorist financing
  - Formed by House Financial Services Committee
  - Created to improve U.S. efforts to choke of terrorist financing
- Egmont Group analytical study of foreign fighters
  - FBI TFOS / FinCEN analysis of U.S. foreign fighters
ISIL Funding

- **2014**
  - Considered to be wealthiest terrorist organization
    - Robust funding sources
    - Territorial expansion
    - Ample funding for governance
- **2016**
  - Funding constraints
    - International coordination to restrict funding streams
    - Loss of territory in Iraq and Syria
      - Expansion into Libya and other countries
    - Air strikes against financial targets
      - Oil fields, refineries and tankers
      - Financial repositories of hard currency
    - Funding shortfalls for governance
The Power of Financial Intelligence
Importance of Financial Information

* • As criminals and our financial system continue to become more sophisticated, financial transactional information becomes more relevant as a critically important investigative mechanism
  
  ▫ *Finance, communications and greed are biggest vulnerabilities to bad guys*
  
  • An investigator’s ability to collect and use financial information can be devastating to terrorists and criminals
  
  • Without money, terrorist and criminal organizations cannot adequately function
  
  • Financial investigations should be integral part of investigative strategies

* • Knowing what financial information is relevant, where to collect it from, and how to use it are facts all investigators can benefit from*
Financial Intelligence / Investigative Methodologies

- Strategic
  - Trend analysis
    - Identify emerging trends
- Tactical
  - Operational / proactive
    - Disruption of six terrorist attacks
- Historic
  - Traditional / reactive
    - Saudi Embassy bank account analysis
The Challenges of Terrorist Financing

Contrasts of Using Financial System

• In using the financial system, terrorists are confronted with distinct contrasts
  ▫ *Facilitation tool v. detection mechanism*

• Serves as facilitation tool by providing continuous access to funds
  ▫ Financing the lifeblood of terrorist organizations

• Serves as detection mechanism because funds can be identified through monitoring and / or investigation
  ▫ Financing a major vulnerability
The SWAT Team Concept for Financial Institutions

• Special Weapons and Tactics (SWAT) Teams were formed by law enforcement to deal with extremely dangerous and violent criminal confrontational situations
  ▫ SWAT officers receive regular intensive training
  ▫ SWAT duties are normally collateral to primary investigative responsibilities

• Analogous to the SWAT Team concept, financial institutions should form **Critical Incident Response Teams** to deal with a BSA / AML response to emergency situations such as terrorist attacks
  ▫ Should be comprised of specially trained BSA / AML investigators / analysts as conducive to the financial institution
    • Conduct “urgent” reactive investigations following a violent event
    • Conduct proactive and targeted monitoring initiatives
    • Establish, and maintain appropriate law enforcement contacts
Building a SWAT or Critical Incident Response Team

- Dedication and commitment
  - Dedicated financial institution investigators and / or analysts who commit themselves to the SWAT or Critical Incident Response Team concept

- Understanding
  - Understanding the terrorist threats or crime problem
  - Understanding the general flow of funds

- Assessment
  - Assessing media and selective open source intelligence reporting to identify methods of operation (scenarios) and emerging trends on a daily basis

- Training
  - Obtain specialized training to better identify financial intelligence
  - Conduct tabletop exercises to practice response to specific events

- Partnerships
  - Establish and maintain contact with appropriate law enforcement agencies
Building Critical Incident Response
Team Best Practices

- Establishing consistent workflow process
  - Proper planning
  - Documentation
  - Develop and mature “urgently” reactive and proactive methodologies

- Training
  - Ongoing and evolving process
  - Basic to advanced

- Establishing law enforcement liaison
  - Know who to contact when a significant incident occurs
  - Understand perspective
  - Information sharing

- Post incident review (after action assessment)
  - Critique Critical Team performance and enhance best practices
    - Use as a training tool
Situational Awareness

• The importance of being aware of your surroundings
  ▫ The same concept applies to physical security and AML compliance

• Best practices include:
  ▫ Identify potential threats and dangerous situations
    • Is something out of the ordinary or unusual?
  ▫ More mindset than skill
  ▫ Recognize that threats exist
  ▫ Take responsibility for your security
  ▫ Trust your “gut” or intuition
The Terrorist Attack Cycle and Situational Awareness

- Terrorist attack cycle (six stages)
  - Target selection
  - Planning
  - Deployment
  - Attack
  - Escape
  - Exploitation
  Source: Stratfor

- Situational awareness
  - Being aware of physical surroundings for personal safety and security
    - See something, say something
  - Being aware of, understanding and disrupting funding flows
Identifying Terrorist Financing

- There are numerous alerting mechanisms that financial institutions can use to identify terrorist financing
  - Proactive and reactive
  - Challenging
    - Targeted transaction monitoring
    - Media reports
    - Law enforcement
      - Requests
      - Process
    - Transaction monitoring
    - Front line employees
    - Hotline
    - Other mechanisms
Financial Red Flags

- IP logins in areas of conflict
  - Transactions in Syrian border area (Turkey / Jordan / Lebanon)
  - Transactions in Yemen and Pakistan
- Periods of transaction dormancy
  - Training camps / combat
- ATM cash withdrawals in areas of conflict
- Wire transfers to areas of conflict
- Charitable activity in areas of conflict
  - Particularly in Syria
- Uptick in student loans / account closures / bill payments
  - Purchase airline tickets to travel overseas
Developing Typologies Through Case Studies

• Carnival Ice Cream Shop
  ▫ Illegal money remitter
  ▫ $22.2 million flowed through 12 bank accounts (1996 through 2003)

• Hizballah Tri-Border Electronics Case (Argentina)
  ▫ Electronics shipped to store owned by designated Hizballah leader
  ▫ False invoicing scheme

• Mumbai Bombing
  ▫ Used front company (offered immigration services)
  ▫ IP address traced to ISI headquarters (O'Neill connection)

• Lebanese Canadian Bank Case
  ▫ Trade based money laundering (used cars / other commodities)
  ▫ Criminal – terror nexus (Hizballah / Joumaa family / Las Zetas)

• Foreign Fighter Model (travel to Syria)
  ▫ Bulk cash
  ▫ Account closure / pay down debts / travel
Takeaways
Answering Our Challenge

• Challenge in confronting terrorism threefold:
  ▫ Continue to contain and disrupt the threat of terrorism through military, diplomatic, intelligence, law enforcement and sanctions counterterrorism measures
    • Public sector interagency collaboration
    • Requires cooperation, communication, coordination
  ▫ Work with diverse communities to educate and counter radicalization and violent extremism
    • Public and private sector partnership
    • Take opportunity to exploit rift between al-Qaeda and ISIL by exposing the falsity of their internet / social media propaganda
  ▫ To disrupt and prevent the flow of funds to and from terrorist organizations and operatives
    • Public and private sector partnership
    • Identify and exploit financial chokepoints and vulnerabilities of terrorist groups
Takeaways

- **Understand**
  - The enemy
  - Perspective
  - Importance of financial intelligence

- **Contain and disrupt**
  - Requires “urgent” reactive strategies

- **Collaborate and counter**
  - Importance of partnerships

- **Disrupt and prevent**
  - Requires proactive strategies
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