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Hezbollah in Colombia Past and Present Modus Operandi and the Need for Greater Scrutiny

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ezbollah is a multifaceted organization whose presence and wide range of activities in Latin America are well documented.^{1*} While Venezuela and the Tri-Border Area, covering Argentina, Paraguay, and Brazil, have been the dominant focal point for research on the terrorist group's Latin American operations, recent events demonstrate that Hezbollah's activities in less noted countries warrant increased scrutiny in order to identify, understand, and proactively disrupt Hezbollah's operations in the Western Hemisphere.

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While Hezbollah has not successfully executed an international terrorist attack since 2012.² when operatives bombed a bus in Burgas, Bulgaria, the disruption of Hezbollah's operations in Latin America over the last several years indicates the group is more likely to strike in a country where it does not maintain an overt presence and is not traditionally considered a significant threat. For example, in 2014, Peruvian police arrested a Hezbollah operative in Lima's Surquillo district for planning a terrorist operation, and according to the U.S. Department of the Treasury, security services in the region also successfully disrupted a Hezbollah terrorist plot targeting innocent civilians in Chile.³ In 2017, Bolivian authorities identified a Hezbollahaffiliated warehouse and seized enough explosive precursor material to produce a two-and-a-half-ton bomb, as well as a vehicle-borne improvised explosive device (VBIED).⁴ More recently, in fall of 2021, Colombia's El Tiempo newspaper brought to light that Hezbollah was planning to assassinate an Israeli national in the country as part of a broader operation that also targeted Americans, reportedly to avenge the January 2020 killing of Oasem Soleimani, commander of the Qods Force of Iran's Islamic Revolutionary Guard Corps.⁵ Prior to these disruptions, little was known publicly about the extent of Hezbollah's operational activities in these countries.

Abbreviations

- AMIA Asociación Mutual Israelita Argentina
- DEA U.S. Drug Enforcement Administration
- ESO External Security Organization (aka Islamic Jihad Organization)
- IJ/IJO Islamic Jihad / Islamic Jihad Organization (aka External Security Organization)
- TFTC Terrorist Financing Targeting Center
- VBIED vehicle-borne improvised explosive device

Hezbollah's Islamic Jihad Organization

Hezbollah has built an expansive worldwide infrastructure that enables it to enhance its readiness to plan and carry out attacks in various countries.⁶ The complexity of Hezbollah's organization and networks, as well as the group's clandestine nature and use of commercial cover, can often obfuscate its operational activities and the way it leverages relationships with non-Hezbollah individuals.⁷ For instance, a report by the newspaper *Israel Hayom* stated that the Qods Force, rather than Hezbollah, was behind the assassination plot and targeting of Americans and Israelis in Colombia;⁸ responsibility, however, need not lie with one organization alone. Following the death of Qasem Soleimani, both Iran and Hezbollah swore revenge and directed their threats toward the United States and Israel.9

The ideological alliance Hezbollah shares with Iran has driven many of the terrorist group's activities abroad. Historically, Hezbollah's Islamic Jihad Organization (IJO), the apparatus responsible for planning, preparing, and executing terrorist attacks outside Lebanon, has conducted lethal operations at the behest of Iran, and Iran has similarly been pivotal in enabling Hezbollah's lethal operations.¹⁰ One example of this is the 1994 attack against the Asociación Mutual Israelita Argentina (AMIA) cultural center in Buenos Aires, which to date remains the deadliest terrorist attack ever conducted in Latin America.¹¹ The operation demonstrates moreover that Hezbollah and Iran have previously worked closely together to carry out an attack in Latin America. A key facilitator for the AMIA bombing was Mohsen Rabbani, an Iranian national then serving as cultural attaché at the Iranian embassy in Argentina.¹² It is well established that the Qods Force maintains operatives in foreign embassies, charities, and religious and cultural institutions throughout Latin America to advance its objectives,¹³ and diplomatic immunity enabled Rabbani specifically-along

with Hezbollah and additional Iranian officials—to plan, prepare, and execute the attack.¹⁴

One of the most prominent figures behind the AMIA bombing was Hezbollah Islamic Jihad (IJ) operative Salman Raouf Salman.¹⁵ Another IJ operative suspected of involvement, according to a report by the Atlantic Council, was Amer Mohamed Akil Rada, who is thought to have provided the detonators used in the attack, which set off a VBIED containing 300 kilograms of ammonium nitrate.¹⁶ Salman reportedly worked closely with Amer throughout the 1990s to case various targets for Hezbollah's IJO in Argentina, Brazil, Colombia, and Venezuela.¹⁷ Argentine authorities suspect Amer was also involved in the 1992 bombing of the Israeli embassy in Buenos Aires.¹⁸ According to a report by the Argentine newspaper Clarin, Amer entered Argentina in 1992, before the embassy attack.¹⁹

Following the AMIA attack, Salman fled the region, but he eventually returned a few years later.²⁰ According to the U.S. Department of the Treasury, Salman rose to a position of leadership within the IJO and became responsible for directing and supporting Hezbollah terrorist activities in the Western Hemisphere.²¹ In 1997, he was involved in a flurry of operational missions and made three visits to Panama, two to Colombia, and one to Brazil.²² He was also the handler for IJ operative Mohammed Hamdar (aka Mohamed Amadar), whom Peruvian law enforcement arrested in 2014 for planning a terrorist operation in the country.²³

Modus Operandi Points to Use of Colombian Citizenship

While Hezbollah's IJO, aka External Security Organization (ESO) or Unit 910, is one of the group's most sophisticated and elusive units, it is not without vulnerabilities.²⁴ Closer scrutiny of the activities of IJ operatives in Latin America in the lead-up to the AMIA attack reveal that their access to Colombia may have been central in enabling their operations. Additionally, examination of the IJO's historical modus operandi along with the current activities of IJ operatives reveals patterns that could help unravel Hezbollah's networks and enhance the understanding of its intent and operations in the region. For example, Hezbollah has a long history of producing counterfeit documents as well as procuring legitimate passports to be doctored into fraudulent documents for Hezbollah operatives.²⁵ This practice has been clearly seen among operatives in Latin America, particularly in Colombia.

Specifically, IJ operative Salman Raouf Salman operated in Latin America under the false identity of Samuel Salman El Reda, a Colombian citizen.²⁶ Salman used his false citizenship to live comfortably and appear to work as a businessman in the La Guajira area of Colombia, located on the Caribbean Sea, until moving to Buenos Aires in 1989.²⁷ For twenty-four years, Salman took advantage of the benefits of Colombian citizenship, and over that time was issued three passports to travel to countries including Argentina, Panama, Venezuela, Brazil, Paraguay, Peru, Italy, France, and the United States.²⁸

Salman's brother, known as Jose Salman El Reda, suspected of involvement in the 1992 attack against the Israeli embassy in Buenos Aires,²⁹ also held Colombian citizenship, which he acquired illegally.³⁰ Jose's documents were reportedly counterfeited, but his ability to obtain them enabled him to avoid raising suspicion of his activities in the region.³¹ The Colombian citizenship of IJ operative Amer Mohamed Akil Rada³² has evidently gone undetected despite the increased exposure of his activities in Latin America in recent years.³³ Publicly, Amer has been identified solely as a dual Venezuelan-Lebanese national, but he in fact holds Colombian Citizenship Card Number (CC) 84049010.³⁴

As with Salman's family, members of Amer's family also hold Colombian citizenship.³⁵ Amer's wife, Fatima Helbawi, holds CC 56081323,³⁶ and one of their children, Mahdy Akil Helbawi, holds CC 1126038243.³⁷ It is unclear whether the Colombian citizenship of Amer, Fatima, and Mahdy is genuine, but Amer appears to have previously attempted to fraudulently obtain Colombian citizenship for another of his children, Hassan Akil Helbawi, who holds Colombian Personal Identification Number (NUIP) 1124077256.³⁸

During summer of 2021, Colombia's National Civil Registry annulled Hassan's civil registration, owing to false information submitted by Amer as part of Hassan's "Untimely Birth Registration"—an official process that allows Colombian citizens to submit birth registrations well after a child is born. Hassan was reportedly born in Haret Hreik, Lebanon, on January 8, 1997, but Amer submitted Hassan's information to Colombia's National Civil Registry over a year later, on August 27, 1998. When submitting the documents, Amer provided false information in the "Witnesses" section, where he included the witness names Ahmad Kabalan and Constanza L. Valencia: the discrepancy involved his listing of a citizenship number for Valencia-a legitimate Colombian citizenship card holder-that actually belonged to another woman ³⁹

In spring 2021, a Colombian newspaper revealed that a decade-long investigation by authorities found clear and conclusive information indicating that Hezbollah members "legally" reside in Colombia and possess "authentic" citizenship.⁴⁰ According to the report by *El Heraldo*, the investigation revealed that within the registrar's offices of various municipalities, a network of individuals had amassed more than \$8 billion processing documents to fraudulently grant individuals Colombian citizenship certificates through the Untimely Birth Registration service.⁴¹ The report stated that at least 70,000 fraudulent civil registrations had been processed and provided to nationals of Venezuela, Cuba, China, Lithuania, Syria, Iran, and Lebanon.⁴²

Hezbollah Islamic Jihad's Colombia Business Activities

Findings from the same Colombian investigation revealed that many of the individuals who fraudulently obtained Colombian citizenship—among them members of Hezbollah—used the documentation to create companies. The investigation revealed that Hezbollah members in Colombia portrayed themselves as businesspeople and that their newly acquired nationality afforded them and their companies unspecified protections.⁴³

This is consistent with the historical behavior of IJ operatives in Colombia, who have used their companies both as commercial cover and to raise funds for the group. For example, Salman Raouf Salman and his brother Jose began operating in Colombia in the 1980s and presented themselves as businessmen.⁴⁴ In 1987, Jose along with his uncle Musa El Reda formed a Hezbollah cell that operated in Maicao, Colombia.⁴⁵ While not much is known about Musa, Jose was reportedly in charge of raising funds and circulating counterfeit dollars.⁴⁶ Argentine authorities exposed Jose in 1992 while he was trying to exchange counterfeit currency at a bank located in Argentina and subsequently arrested him.⁴⁷

IJ operative Amer Mohamed Akil Rada has also been involved in commercial activity in Colombia.⁴⁸ Amer's name was first exposed publicly in April 2018 by the Argentine website Infobae, where he was identified as a Hezbollah operational leader who coordinates the sale of charcoal exports from Colombia to Lebanon.⁴⁹ The same report claimed that 80 percent of the proceeds yielded by Amer's charcoal sales are sent to Lebanon to finance Hezbollah, with the remaining 20 percent reinvested in commercial operations in Colombia and Panama.⁵⁰ Yet while his involvement in Colombia-associated commercial activities has been continuously exposed in recent years,⁵¹ few details about the extent of his business activities have been revealed.

Scrutiny of Amer Akil's Colombia Business Activities

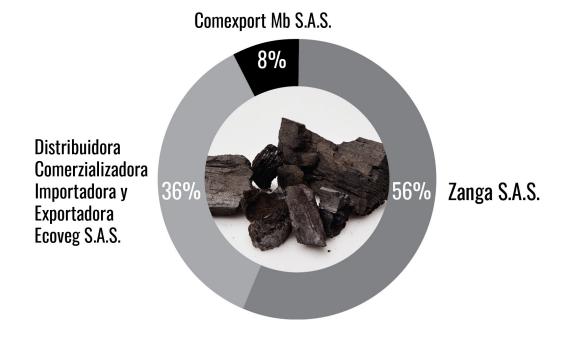
Scrutiny of Amer Mohamed Akil Rada's Colombia-tied business activities reveals that he has been importing charcoal to Lebanon from Colombia since at least 2016 (see figure 1);⁵² extensive analysis of corporate records and commercial shipping data indicates that Amer is using his children to conduct this activity.⁵³ Within Hezbollah's modus operandi, the use of family members is a well-documented practice to evade detection and also circumvent sanctions.⁵⁴

Amer reportedly fled Latin America in 2014,⁵⁵ and scrutiny of corporate records reveals that in January 2015 he established the Lebanon-based charcoal company Tucan Trading S.A.R.L., indicating that he had returned to Lebanon.⁵⁶ Amer himself is a 34 percent shareholder in Tucan Trading S.A.R.L., and his daughters Batoul Amer Akil and Sara Amer Akil each hold a 33 percent stake. $^{\rm 57}$

In March 2015, Amer's son Mahdy Akil Helbawi, then in his late twenties, established the Colombiabased charcoal company Zanga S.A.S.⁵⁸ Interestingly, despite the establishment of this and Amer's company in early 2015, neither began operating until mid-2016.⁵⁹ An evaluation of shipping records for both reveals that since mid-2016, Zanga S.A.S. has been the primary supplier for Tucan Trading S.A.R.L., indicating that Mahdy plays a key role in Amer's Hezbollah-related commercial activities.⁶⁰

In the past six years, Tucan Trading has been the consignee for at least twenty-five shipments of charcoal, receiving fourteen from Zanga and the remaining eleven from two other companies.⁶¹ During this same period, Zanga shipped at least twenty-nine additional charcoal shipments—so forty-three in total, when also accounting for the shipments to Tucan Trading—to companies

Figure 1. Colombian Charcoal Shipments to Tucan Trading S.A.R.L., 2016–21

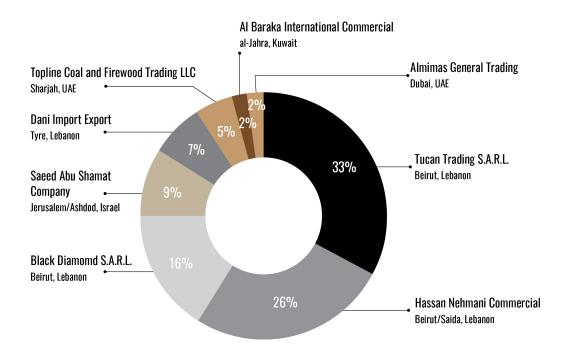


Source: Panjiva shipping records, Tucan Trading S.A.R.L.

throughout the Middle East, including Lebanon, Kuwait, the United Arab Emirates, and Israel (see figure 2).⁶²

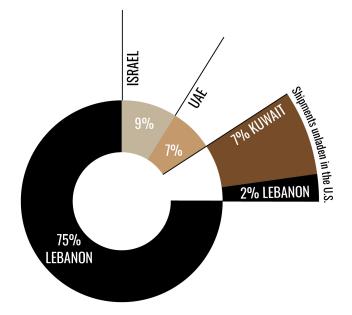
Scrutiny of shipping records from Zanga also reveal that between 2018 and 2021, at least four of its charcoal shipments—destined for Tucan Trading and two other Middle East companies—were unladen at Port Everglades in Fort Lauderdale, Florida.⁶³ It is unclear whether the final destination for these shipments was indeed the United States or if they were transshipped at Port Everglades, but if the latter is true, the containers could have been subjected to manipulation, with materials potentially added or removed. Either scenario should raise concerns, given Zanga's clear ties to an IJ operative (see figure 3).

Figure 2. Consignees of Charcoal Shipments from Zanga S.A.S., 2016–21



Source: Panjiva shipping records, Zanga S.A.S.





Source: Panjiva shipping records, Zanga S.A.S.

In addition to the direct IJO ties, the four shipments to the United States warrant extra scrutiny given patterns identified in the shipping records of Zanga S.A.S. that make the shipments suspiciously stand out. Namely, Zanga has used three unique addresses on its official shipping documents since its inception.⁶⁴ For all the company's shipments in 2016, it used an address in Cartagena, Colombia.65 Beginning in 2017, Zanga no longer used the Cartagena address and instead began exclusively using an address in Medellin for its commercial activities.66 The only exceptions to use of the Medellin address were the four shipments unladen in the United States-in these, and only these, instances Zanga used its officially registered address in Barranquilla.⁶⁷ This may imply that Mahdy did not want to draw U.S. attention to Zanga's facility in Medellin.

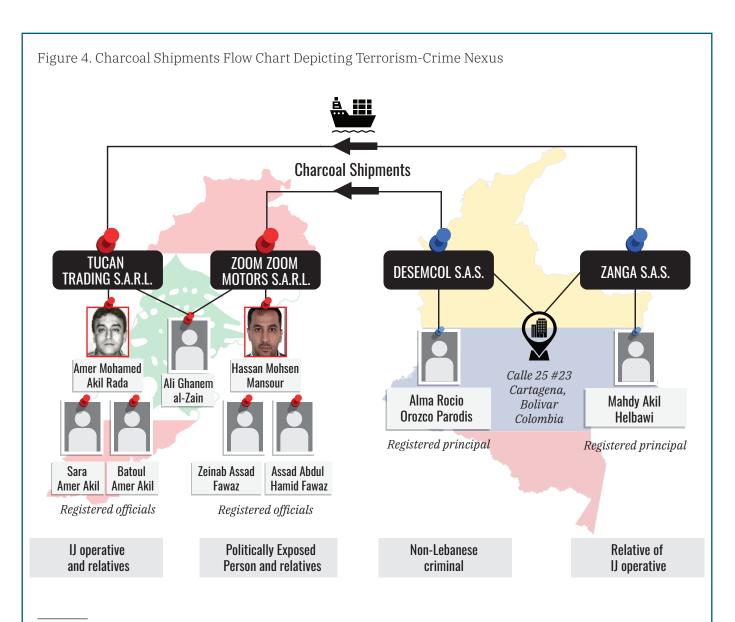
Unraveling the Terrorism-Crime Nexus

Further scrutiny of official corporate records and shipping data also reveals that both Zanga S.A.S. and Tucan Trading S.A.R.L. intersect with companies related to Hassan Mohsen Mansour, a dual Canadian-Lebanese citizen indicted in both the United States and France on drug money laundering charges.68 While often described as a Hezbollah associate,⁶⁹ Mansour himself is likely an Amal member, based on his marriage to the granddaughter of Nabih Berri, who is both Lebanon's speaker of parliament and the head of the Amal Party. Mansour was among those arrested in France in January 2016 as part of Operation Cedar-a multinational endeavor led by France and the U.S. Drug Enforcement Administration (DEA) that included several U.S. law enforcement agencies working in concert with Europol, Eurojust, and authorities in France, Germany, Italy, and Belgium.⁷⁰ The DEA's press release states that the operation targeted the IJO's financial apparatus involved in international criminal activities, such as drug trafficking and

money laundering of drug proceeds.⁷¹ Subsequently, Mansour was also indicted in the United States in 2016 on similar federal money laundering charges as part of the DEA's Project Cassandra,⁷² which targets a global Hezbollah network responsible for the movement of cocaine into the United States and Europe.⁷³

While additional scrutiny is needed to know the true extent of Mansour's interconnectivity with Amer and Mahdy's business activities, official records reveal similarities and overlap in their business operations between Colombia and Lebanon. For instance, Tucan Trading S.A.R.L. and Mansour's Lebanese company, Zoom Zoom Motors S.A.R.L., have the same attorney of record, Lebanese national Ali Ghanem al-Zain.⁷⁴ While this in and of itself is not enough to merit concern, the fact that Zoom Zoom Motors has received charcoal shipments from Colombia is reason for suspicion, particularly since it is described in its official corporate registration documents as a general trade and import/export company for motor vehicles.75 Shipping records reveal that in 2014 and 2015, Zoom Zoom Motors was the consignee for shipments of charcoal from at least two Colombian companies: C.I. Pelicanos S.A.S. and Desemcol S.A.S.⁷⁶ Additionally, further scrutiny of these companies reveals that Desemcol S.A.S. and Zanga S.A.S. have shared a physical address in Cartagena, Colombia.⁷⁷ (See figure 4.)

In 2015, Mansour revealed to undercover law enforcement officers that he used his trade as a cover to ship cocaine disguised as charcoal.⁷⁸ He also admitted that he had a business importing wood charcoal to Lebanon from Colombia, and that he had the necessary connections in Colombia to ensure the containers were not searched.⁷⁹ In addition to obfuscating the movement of cocaine in shipments of charcoal, Mansour boasted to undercover law enforcement officers about his money laundering abilities.⁸⁰ According to official French court records, during a meeting in Paris in 2015, Mansour claimed that he could move money out of Europe to any destination in the world, including Colombia, in just two days.



Note: In addition to using the same attorney and facility, IJ operative Amer Mohamed Akil Rada and criminally indicted Lebanese-Canadian citizen Hassan Mohsen Mansour both use family members in their charcoal-related commercial activities. Mansour is also a Politically Exposed Person by extension of his wife, Zeinab Assad Fawaz, who is the granddaughter of Lebanon's speaker of parliament, Nabih Berri. Assad Abdul Hamid Fawaz is Zeinab's father and Berri's son-in-law.

Sources: Lebanon Corporate Registry, Tucan Trading S.A.R.L., previously available at http://cr.justice.gov.lb/search/ result.aspx?id=1000118696; Panjiva shipping records: Tucan Trading S.A.R.L., Zanga S.A.S., Zoom Zoom Motors S.A.R.L., and Desemcol S.A.S.; Dun & Bradstreet, credit report on Zanga S.A.S.; Lebanese Corporate Registry, Zoom Zoom Motors S.A.R.L., previously available at http://cr.justice.gov.lb/search/result.aspx?id=1000103836; Joseph M. Humire, *The Maduro-Hezbollah Nexus: How Iran-Backed Networks Prop Up the Venezuelan Regime* (Washington DC: Atlantic Council, 2020), https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/the-maduro-hezbollah-nexus-how-iran-backed-networks-prop-up-the-venezuelan-regime/; and David Ovalle, "Hezbollah-Linked Group Laundered Drug Money Through Miami Banks," *Miami Herald*, October 11, 2016, https://www.miamiherald.com/ news/local/crime/article107366182.html.

Charcoal Shipments as Drug-Smuggling Tradecraft

Colombian cartels have combined cocaine with charcoal to evade detection by drug-sniffing dogs and chemical tests since at least 1999, when public awareness first emerged of black cocaine-a substance Colombian cartel chemists created that turns cocaine hydrochloride into "black bricks" that are disguised as charcoal to facilitate international cocaine smuggling.⁸¹ Recent reports of interdictions of cocaine concealed in shipments of charcoal originating in countries other than Colombia indicate that this tradecraft continues and has spread well beyond its country of origin.⁸² Moreover, while initially developed to smuggle Colombian cocaine, this tradecraft has expanded over the years and is now used to smuggle a variety of drugs. There are confirmed instances in recent years of charcoal shipments used to smuggle marijuana, methamphetamine, and Captagon.83

Scrutiny of Amer Akil's Relatives' Involvement in Drug Activity

The aforementioned Colombian investigation into the fraudulent acquisition of Colombian nationality concluded that Hezbollah members in Colombia not only portray themselves as businessmen, but have also adopted characteristics of local criminal groups.⁸⁴ The business operations of Amer and his relatives in Latin America clearly depict this behavior, and warrant additional scrutiny.

In the summer of 2013, Amer's brother Samer Mohamed Akil Rada—who holds Colombian Identification Number CIN 179029472 and has been identified as a member of Hezbollah responsible for logistics⁸⁵—was implicated in trafficking nearly 500 kilos of cocaine concealed in buckets of pineapple.⁸⁶ Anti-drug agents who used drug-sniffing dogs to find the cocaine, which was reportedly valued at approximately \$15 million, intercepted the vehicle involved in El Salvador.⁸⁷ While the vehicle bore Costa Rican license plates, it had allegedly arrived in the country from Panama and was destined to Belize's Corozal Free Zone, to companies registered in Samer's name.⁸⁸ It is believed that Samer likely fled Belize upon hearing the news of the seizure in El Salvador, as he had reportedly not been seen in the country since that day in July 2013.⁸⁹

According to Samer's LinkedIn account, he began working in Colombia's charcoal trade shortly after fleeing Belize. Beginning in 2014, he was the Purchasing Manager for the Colombian company Tucan Carbon, until 2016-the same year that Amer and Mahdy commenced their charcoal activities.⁹⁰ Shipping and corporate records for Tucan Carbon do not appear to be available, and may not exist, so it is difficult to evaluate Samer's charcoal-related activities. It is possible that Samer sought to adopt a new drug smuggling tradecraft that could evade detection by drug-sniffing dogs, particularly after the seizure in El Salvador. However, given the timing and his role as a logistics member,⁹¹ it is also possible that Samer was laying the groundwork for Amer and Mahdy's Colombia-related charcoal activities.

Further Scrutiny Needed on IJ-Tied Charcoal Shipments

Without insight into or interdiction of the charcoal shipments from Zanga S.A.S., or other Colombian charcoal shipments destined for Tucan Trading S.A.R.L., it is difficult to know for sure the precise nature of Amer and Mahdy's charcoal businesses. While Amer and Mahdy—like Mansour—may well have used their charcoal companies to illegally smuggle cocaine as a means to generate revenue, this should not be an automatic conclusion. Given the clandestine nature of the IJO. it cannot be discounted that Amer and complicit members of his family, such as Mahdy, have adopted this drug-smuggling tradecraft to obfuscate shipments of more dangerous materials, such as explosives or explosive precursors. Hezbollah has previously used drug-smuggling techniques and networks to smuggle explosives-a key example being the 2012 foiled plot to smuggle more than twenty kilograms of C4 from Lebanon into Israel with the help of a notorious Lebanese drug lord.92 In this case, the traffickers themselves were evidently not aware that they were smuggling explosives vice drugs.⁹³ Further, given Lebanon's enduring and desperate economic crisis,⁹⁴ it also cannot be discounted that Hezbollah's charcoal trade has been used to smuggle U.S. currency into Lebanon.

Charcoal can mask odors beyond those of drugs, making it possible that this tradecraft could also be adopted by smugglers to evade discovery of other commodities vulnerable to detection by trained dogs, such as cash or explosives.⁹⁵ In turn, advancement and implementation of new force-multiplying technologies that detect explosive traces and screen for smuggled currency strengthen the plausibility that illicit actors, including Hezbollah's IJ operatives, could use the charcoal tradecraft for these purposes.⁹⁶ Instances of this have not been observed publicly, however.

Opportunities

While it remains unclear whether the Colombian charcoal-related activities of Amer Mohamed Akil Rada and his son Mahdy Akil Helbawi are intended for financial or operational means, scrutiny of their commercial activities reveals strategic vulnerabilities that could allow multiple countries to commence investigations and potentially disrupt Hezbollah's Latin American initiatives. If each country that intersects with Amer and Mahdy's Colombia-based activities takes deliberate actions, the international community could achieve several significant outcomes that would disrupt and dismantle portions of the terrorist group's operational and financial infrastructures.

Law Enforcement Investigations and Action

Law enforcement actions could debilitate Hezbollah and enhance the national security of multiple countries.

Expose and disrupt the IJO in Colombia. The United States and Israel have an opportunity to partner with Colombian authorities to further scrutinize the activities of Mahdy and Zanga S.A.S., particularly those involving Tucan Trading S.A.R.L. Investigations into Zanga's associated addresses and employees, as well as Mahdy's travel patterns, could provide critical insight into the IJO's operations in Colombia and the region. Subsequent law enforcement actions by Colombian authorities could also publicly expose individuals and entities in the country, raise the profile of Hezbollah's operations in the Western Hemisphere, and potentially weaken the terrorist group's ability to conduct lethal operations in Colombia. This should be a top priority given the recent revelations of Hezbollah's operational targeting of Americans and Israelis in the country.

Expose the details of the IJO's charcoal trade, and disrupt recipient networks. As aforementioned, given the clandestine nature of the IJO, it cannot be discounted that operatives in Colombia have adopted drug-smuggling tradecraft to obfuscate shipments of more dangerous materials. It should be of great concern to the United States that shipments from Zanga S.A.S. were unladen in Florida. Likewise, Israel should be particularly concerned that IJ-tied shipments are being imported into its Port of Ashdod. Investigating these shipments and their recipients, and intercepting any future shipments, would enable law enforcement to reveal what the IJO is potentially smuggling into the United States and Israel, and could lead to the discovery of Hezbollah operatives on U.S. soil and within Israel.

Sanctions

Sanctions offer another avenue for undermining Hezbollah's activities in Latin America, and can result in almost immediate disruptions.

Debilitate Hezbollah's commercial activities.

U.S. sanctions against Zanga S.A.S and Tucan Trading S.A.R.L., and also against Amer Mohamed Akil Rada and his complicit children, could effectively cease-at least temporarily-Hezbollah's activities via these companies, be they for operational or financial purposes. As a company that operates internationally, Zanga likely conducts business in U.S. dollars, making it highly dependent on the U.S. financial sector and particularly vulnerable to U.S. sanctions. Additionally, publicly exposing the names of each company and individual, along with their ties to Hezbollah, would affect their ability to operate and move freely in several countries, particularly Colombia. This would impose a greater cost on Hezbollah's operations in Latin America, complicating at least some of its activities in the region.

Raise the profile of Hezbollah operations in the Western Hemisphere. While U.S. sanctions would likely be the most effective against Amer's network, the United States should not be the only country issuing them. Given Colombia's recent disruption of a Hezbollah assassination plot targeting Israelis and Americans in the country, designating Hezbollah IJ operatives tied to Colombia, and their associated companies, would raise the profile of the terrorist group's activities in the country and the Western Hemisphere, as well as send a strong message to Hezbollah.

Expose and disrupt Hezbollah activities between Latin America and the Gulf. Given the intersection between Zanga and Kuwait and the UAE, those two countries should designate the company, along with Amer and his son Mahdy Akil Helbawi and their connections in the Gulf. Kuwait and the UAE should also nominate for designation those same individuals and entities to the Terrorist Financing Targeting Center (TFTC)—a joint effort between the United States and Gulf Cooperation Council countries to expand and strengthen the seven member states' cooperation to counter the financing of terrorism.⁹⁷ Specifically, the TFTC facilitates coordinated disruptive actions, sharing of financial intelligence information, and memberstate capacity building to target terrorist financing networks and related activities that pose national security threats to TFTC members.⁹⁸

Diplomacy

U.S. diplomatic pressure on Lebanon specifically could be productive and potentially lead to new insights.

Bring criminals with political and Hezbollah

ties to justice. The intersection of Zanga S.A.S. and Tucan Trading S.A.R.L. with Canadian-Lebanese citizen Hassan Mohsen Mansour provides the United States with unique leverage to place diplomatic pressure on Lebanon's speaker of parliament. While Mansour was placed under house arrest in France in 2016,⁹⁹ he is no longer in French custody. By one account, the French released him;¹⁰⁰ by another, Mansour fled the country, presumably for Lebanon to evade prison with his trial pending.¹⁰¹ Nonetheless, Mansour remains an indicted criminal in the United States, ¹⁰² and U.S. officials should leverage Mansour's relationship to the prominent family of Lebanon's speaker of parliament, Nabih Berri, to bring him to justice, and also to potentially acquire more information about Amer and Tucan Trading.

Conclusion

Hezbollah has conducted commercial activities in Latin America since nearly its inception.¹⁰³ Examination of the Islamic Jihad Organization's historical modus operandi in the region reveals that operatives' business activities and fraudulent acquisition of Colombian citizenship have enabled them to hide in plain sight, under the guise of businesspeople. While it is well established that

Hezbollah generates revenue from its worldwide business infrastructure, the IJO's use of companies can easily be mistaken as part of Hezbollah's revenue-generating commercial ventures. Therefore, it cannot be assumed that all Hezbollah's commercial activities are established or operate with the intent of raising revenue.

Hezbollah's 2021 assassination plot against American and Israeli targets in Colombia indicates that the terrorist group was, and may still be, seeking to conduct a lethal operation in the Western Hemisphere. Although it is unclear if the network of Amer Mohamed Akil Rada was involved in the recent assassination plot, his status as an IJ operative and his ties to Colombia, particularly via his son Mahdy Akil Helbawi, should be of critical concern to the governments of all countries with which their operations intersect. Further scrutiny and extensive analysis of their commercial activities is needed to properly characterize at least some of Hezbollah's operations in Latin America, and potentially reveal key insights to help identify the terrorist group's operational intentions.

The IJO's use of commercial cover can easily obfuscate its operational plans and intentions, and operatives' involvement in financial activities, leverage of non-Hezbollah individuals, and use of criminal tradecraft can further blur the lines potentially leading to gross misdirection and resulting in deadly consequences. But if the United States and the international community identify patterns consistent with the IJO's modus operandi and take deliberate action to strategically exploit vulnerabilities within the terrorist group's commercial infrastructure, they could identify, disrupt, and debilitate Hezbollah's networks—both financial and operational—and potentially save innocent lives. ◆

NOTES

- 1. Matthew Levitt, "Breaking Hezbollah's 'Golden Rule': An Inside Look at the Modus Operandi of Hezbollah's Islamic Jihad Organization," *Perspectives on Terrorism* 14, no. 4 (August 2020), available at https://www.washing-toninstitute.org/media/367.
- 2. Ibid.
- 3. Ilan Berman, "Peril in Peru," *Foreign Affairs*, January 17, 2017, https://www.foreignaffairs.com/articles/ peru/2017-01-17/peril-peru; U.S. Department of the Treasury, "Treasury Targets Senior Hizballah Operative for Perpetrating and Plotting Terrorist Attacks in the Western Hemisphere," press release, July 19, 2019, https://home.treasury.gov/news/press-releases/sm737.
- 4. Levitt, "Breaking Hezbollah's Golden Rule," https://www.washingtoninstitute.org/media/367; and see U.S. Department of State, *Country Reports on Terrorism* 2017, https://www.state.gov/reports/country-reports-on-terrorism-2017/.
- 5. "El rastreo a los planes ocultos de Hezbolá en Bogotá," *El Tiempo*, November 14, 2021, https://www.eltiempo. com/unidad-investigativa/hezbola-indagan-planes-terroristas-en-bogota-planeados-en-venezuela-632121.
- 6. Levitt, "Breaking Hezbollah's 'Golden Rule," https://www.washingtoninstitute.org/media/367.
- 7. Ibid.
- 8. Damian Pachter, "Iran's Qods Force, Not Hezbollah, Behind Plot Targeting Israelis," *Israel Hayom*, November 17, 2021, https://www.israelhayom.com/2021/11/17/irans-quds-force-not-hezbollah-was-behind-plot-targeting-israelis/.
- 9. Emanuele Ottolenghi, "Iran's Quest for Soleimani's Revenge Goes to Latin America," Real Clear Defense, December 2, 2021, https://www.realcleardefense.com/articles/2021/12/02/irans_quest_for_soleimanis_revenge_goes_to_latin_america_806121.html.
- 10. Levitt, "Breaking Hezbollah's 'Golden Rule," https://www.washingtoninstitute.org/media/367.
- 11. Treasury Department, "Treasury Targets Senior Hizballah Operative," https://home.treasury.gov/news/ press-releases/sm737.
- 12. AlbertoNisman.org, "Nisman Report on Sleeper Cells," May 2013, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/.
- 13. U.S. Southern Command, "Statement of Admiral Craig S. Faller, Commander, United States Southern Command, Before the 117th Congress, Senate Armed Services Committee," March 16, 2021, https://bit.ly/3wikLO2.
- 14. Nisman, "Report on Sleeper Cells," http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/.
- 15. Ibid.; see also Treasury Department, "Treasury Targets Senior Hizballah Operative," https://home.treasury.gov/ news/press-releases/sm737.
- 16. Joseph M. Humire, *The Maduro-Hezbollah Nexus: How Iran-Backed Networks Prop Up the Venezuelan Regime* (Washington DC: Atlantic Council, 2020), https://www.atlanticcouncil.org/in-depth-research-reports/is-sue-brief/the-maduro-hezbollah-nexus-how-iran-backed-networks-prop-up-the-venezuelan-regime/.
- 17. Ibid.
- 18. Ibid.
- **19.** Daniel Santoro, "Otra pista de la ataque a la mutal judía," *Clarín*, October 9, 2020, https://www.clarin.com/politi-ca/dossier-vincula-libanes-negocios-chavismo-atentado-amia_0_1HJ2ul3bd.html.
- 20. Treasury Department, "Treasury Targets Senior Hizballah Operative," https://home.treasury.gov/news/ press-releases/sm737; U.S. Department of State, "Salman Raouf Salman," Rewards for Justice, https://rewardsforjustice.net/terrorist-rewards/salman-raouf-salman/.
- 21. Treasury Department, "Treasury Targets Senior Hezbollah Operative," https://home.treasury.gov/news/ press-releases/sm737.

- 22. Ibid.
- 23. Ibid.
- 24. Levitt, "Breaking Hezbollah's 'Golden Rule," https://www.washingtoninstitute.org/media/367.
- 25. Ibid.
- 26. "El colombiano de Hizbulá," *Semana*, April 7, 2018, https://www.semana.com/nacion/articulo/colombiano-coordinador-del-terrorismo-islamico-en-america-latina/562732/.
- 27. Ibid.
- 28. Nisman, "Report on Sleeper Cells," 207, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/.
- 29. Jewish Telegraphic Agency, "Argentine Court Seeks Arrest of Hezbollah Man for '92 Bombing," *Times of Israel*, October 2015, https://www.timesofisrael.com/argentine-court-seeks-arrest-of-hezbollah-man-for-92-bombing/.
- **30.** Nisman, "Report on Sleeper Cells," 209, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/; "El colombiano de Hizbulá," https://www.semana.com/nacion/articulo/colombiano-coordinador-del-terror-ismo-islamico-en-america-latina/562732/.
- **31.** Nisman, "Report on Sleeper Cells," 209, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/.
- **32.** Consulado de Colombia en Beirut, "Notificación por Aviso a Akil Helbawi Hassan de la Resolución 6370 de 2021 de la Dirección Nacional del Registro Civil," August 2021, previously available at https://beirut.consulado.gov. co/newsroom/news/2021-08-03/25809; Registraduria Nacional del Estado Civil, "Certificado de Inscripcion de Registro Civil: Akil Rada Amer Mohamed," https://consultasrc.registraduria.gov.co:28080/ProyectoSCCRC/.
- **33.** George Chaya, "Interpol detecta actividades ilícitas de Hezbollah en Colombia," Infobae, April 7, 2018, https:// www.infobae.com/america/colombia/2018/04/07/interpol-detecta-actividades-ilicitas-de-hezbollah-en-colombia/; Jesus J. Esquivel, "El acuerdo del Cisen con la CIA: espionaje a la carta," *Diaro Contra Poder en Chiapas,* August 19, 2019, http://www.diariocontrapoderenchiapas.com/v3/index.php/nacional/19126-el-acuerdo-del-cisen-con-la-cia-espionaje-a-la-carta; Humire, *The Maduro-Hezbollah Nexus*, https://www.atlanticcouncil. org/in-depth-research-reports/issue-brief/the-maduro-hezbollah-nexus-how-iran-backed-networks-prop-upthe-venezuelan-regime/; and Consulado de Colombia en Beirut, "Notificación por Aviso a Akil Helbawi Hassan," previously available at https://beirut.consulado.gov.co/newsroom/news/2021-08-03/25809.
- 34. Ibid. CC is the Spanish acronym for Cédula de Ciudadanía (Citizenship Card).
- **35.** Consulado de Colombia en Beirut, "Notificación por Aviso a Akil Helbawi Hassan," previously available at https://beirut.consulado.gov.co/newsroom/news/2021-08-03/25809; and Registraduria Nacional del Estado Civil, "Certificado: Akil Helbawi Mahdy," https://consultasrc.registraduria.gov.co:28080/ProyectoSCCRC/.
- **36.** Consulado de Colombia en Beirut, "Notificación por Aviso a Akil Helbawi Hassan," previously available at https://beirut.consulado.gov.co/newsroom/news/2021-08-03/25809.
- 37. Ministerio de Relaciones Exteriores de la Republica de Colombia, "Consulado Colombia en Colon Cedulas Para Entregar," available at https://es.scribd.com/doc/191089353/Consulado-Colombia-en-Colon-Cedulas-Para-Entregar.
- **38.** Consulado de Colombia en Beirut, "Notificación por Aviso a Akil Helbawi Hassan," previously available at https://beirut.consulado.gov.co/newsroom/news/2021-08-03/25809. In the Spanish acronym, NUIP stands for Número Único de Identificación Personal.
- **39.** See ibid. for all sourcing in this paragraph.
- 40. "Fichas de Hezbolá 'pasean' por Colombia con cédulas falsas," *El Heraldo*, May 2021, https://www.elheraldo.co/ colombia/fichas-de-hezbola-pasean-por-colombia-con-cedulas-falsas-819708.
- 41. Ibid.
- 42. Ibid.
- 43. Ibid.

- 44. Nisman, "Report on Sleeper Cells," 209, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/; "El colombiano de Hizbulá," https://www.semana.com/nacion/articulo/colombiano-coordinador-del-terror-ismo-islamico-en-america-latina/562732/.
- 45. Nisman, "Report on Sleeper Cells," 209, http://albertonisman.org/nisman-report-dictamina-on-sleeper-cells-full-text/.
- 46. Ibid.
- 47. Ibid.
- **48.** Chaya, "Interpol detecta actividades ilícitas," https://www.infobae.com/america/colombia/2018/04/07/inter-pol-detecta-actividades-ilicitas-de-hezbollah-en-colombia/.
- 49. Ibid.
- 50. Ibid.
- **51.** Ibid.; and Esquivel, "El acuerdo del Cisen con la CIA," http://www.diariocontrapoderenchiapas.com/v3/index.php/ nacional/19126-el-acuerdo-del-cisen-con-la-cia-espionaje-a-la-carta; Humire, *The Maduro-Hezbollah Nexus*, https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/the-maduro-hezbollah-nexus-how-iranbacked-networks-prop-up-the-venezuelan-regime/.
- 52. Panjiva shipping records, Tucan Trading S.A.R.L.
- **53.** Lebanon Corporate Registry, Tucan Trading S.A.R.L., previously available at http://cr.justice.gov.lb/search/result. aspx?id=1000118696; Panjiva shipping records, Tucan Trading S.A.R.L.
- 54. U.S. Department of the Treasury, "Treasury Continues to Expose and Disrupt Hizballah's Financial Support Networks," press release, October 4, 2018, https://home.treasury.gov/news/press-releases/sm501.
- **55.** Humire, *The Maduro-Hezbollah Nexus*, https://www.atlanticcouncil.org/in-depth-research-reports/issue-brief/the-maduro-hezbollah-nexus-how-iran-backed-networks-prop-up-the-venezuelan-regime/.
- **56.** Lebanon Corporate Registry, Tucan Trading S.A.R.L., previously available at http://cr.justice.gov.lb/search/result. aspx?id=1000118696.
- 57. Ibid.
- 58. Dun & Bradstreet, credit report on Zanga S.A.S.
- 59. Panjiva shipping records: Tucan Trading S.A.R.L. and Zanga S.A.S.
- **60.** The evaluation of shipping records includes complete Panjiva records for Tucan Trading S.A.R.L. and Zanga S.A.S. from 2019 and prior, but only publicly available Panjiva shipping records for the two companies from 2020–21.
- 61. Panjiva shipping records, Tucan Trading S.A.R.L.
- 62. Panjiva shipping records, Zanga S.A.S.
- 63. Ibid.
- 64. Ibid.
- 65. Ibid.
- 66. Ibid.
- 67. Ibid.; and Dun & Bradstreet, credit report on Zanga S.A.S.
- **68.** David Ovalle, "Hezbollah-Linked Group Laundered Drug Money Through Miami Banks," *Miami Herald*, October 11, 2016, https://www.miamiherald.com/news/local/crime/article107366182.html.
- 69. Ibid.
- 70. Matthew Levitt, *A Paris Reset on Hezbollah? Implications for French Interests and Lebanese Security*, Policy Note 87 (Washington DC: Washington Institute, 2020), https://www.washingtoninstitute.org/media/4120; U.S. Drug Enforcement Administration, "DEA and European Authorities Uncover Massive Hizballah Drug and Money Laundering Scheme," February 1, 2016, https://www.dea.gov/press-releases/2016/02/01/dea-and-european-authorities-uncover-massive-hizballah-drug-and-money.

- 71. Drug Enforcement Administration, "DEA and European Authorities Uncover Massive Hizballah Scheme," https://www.dea.gov/press-releases/2016/02/01/dea-and-european-authorities-uncover-massive-hizballah-drug-and-money.
- 72. Ovalle, "Hezbollah-Linked Group Laundered Drug Money," https://www.miamiherald.com/news/local/crime/article107366182.html.
- 73. Drug Enforcement Administration, "DEA and European Authorities Uncover Massive Hizballah Scheme," https://www.dea.gov/press-releases/2016/02/01/dea-and-european-authorities-uncover-massive-hizbal-lah-drug-and-money.
- 74. Lebanon Corporate Registry, Zoom Zoom Motors S.A.R.L., previously available at http://cr.justice.gov.lb/search/ result.aspx?id=1000103836; Lebanon Corporate Registry, Tucan Trading S.A.R.L., previously available at http://cr.justice.gov.lb/search/result.aspx?id=1000118696.
- 75. Lebanon Corporate Registry, Zoom Zoom Motors S.A.R.L., previously available at http://cr.justice.gov.lb/search/result.aspx?id=1000103836.
- 76. The shipping records include only publicly available Panjiva records for Zoom Zoom Motors S.A.R.L., but complete Panjiva shipping records for C.I. Pelicanos S.A.S. and Desemcol S.A.S.
- 77. Panjiva shipping records: Zanga S.A.S. and Desemcol S.A.S.
- 78. Emanuele Ottolenghi, *The Laundromat: Hezbollah's Money-Laundering and Drug-Trafficking Networks in Latin America*, Mideast Security and Policy Studies 194 (Ramat Gan: Begin-Sadat Center for Strategic Studies, 2021), https://besacenter.org/wp-content/uploads/2021/07/194web.pdf.
- 79. Ibid.
- 80. French court records.
- 81. U.S. General Accounting Office, *Narcotics Threat from Colombia Continues to Grow* (June 1999), fn. 4, available at https://web.archive.org/web/20051031162201/http://www.gao.gov/archive/1999/ns99136.pdf; William Branigin, "Cartels Shipping 'Black' Cocaine," *Washington Post*, April 28, 1999, https://www.washingtonpost.com/archive/pol-itics/1999/04/28/cartels-shipping-black-cocaine/e2959de9-d524-4636-bc1a-176d99ff2edf/.
- 82. "Cocaine Worth \$500M Found Hidden in Charcoal Shipment," BBC, October 21, 2020, https://www.bbc.com/ news/world-latin-america-54629249.
- 83. Habib Toumi, "1.5 Million Captagon Amphetamine Tablets Seized in Kuwait," *Gulf News*, August 2016, https://gulfnews.com/world/gulf/kuwait/15-million-captagon-amphetamine-tablets-seized-in-kuwait-1.1877360; Matthew Hendley, "Border Agents Find a Ton (Literally, 2,000 Pounds) of Weed Hidden in Charcoal," *Phoenix New Times*, May 20, 2013, https://www.phoenixnewtimes.com/news/border-agents-find-a-ton-literally-2-000-pounds-of-weed-hidden-in-charcoal-6663434; Michael Lohmuller, "Meth Sting Shows Role of LatAm Groups in Australia Drug Trade," *Insight Crime*, February 12, 2014, https://insightcrime.org/news/brief/meth-bust-shows-role-of-latam-groups-in-australia-drug-trade/; and U.S. Customs and Border Protection, "CBP Officers Seize Marijuana Valued at More Than \$560K in Charcoal Shipment at World Trade Bridge," media release, December 2, 2015, https://www.cbp.gov/newsroom/local-media-release/cbp-officers-seize-marijuana-valued-more-560k-charcoal-shipment-world.
- 84. "Fichas de Hezbolá 'pasean' por Colombia," https://www.elheraldo.co/colombia/fichas-de-hezbola-pasean-por-colombia-con-cedulas-falsas-819708.
- 85. For his Colombian ID, see Dun & Bradstreet, credit report on Akil Reda Samer Mohamed; also see Esquivel, "El acuerdo del Cisen con la CIA," http://www.diariocontrapoderenchiapas.com/v3/index.php/nacional/19126-el-ac-uerdo-del-cisen-con-la-cia-espionaje-a-la-carta.
- 86. "Corozal Free Zone Businessman Denies Connection to Huge Drug Bust in El Salvador," *Amandala* (Belize), August 9, 2013, http://www.amandala.com.bz/news/corozal-free-zone-businessman-denies-connection-hugedrug-bust-el-salvador/. CIN is the Spanish acronym for Cédula de Identificación Nacional.
- 87. Ibid.
- 88. Ibid.
- 89. Ibid.

- 90. See LinkedIn account of Samer Mohamed Akil Rada, https://ve.linkedin.com/in/samerakilrada.
- 91. Esquivel, "El acuerdo del Cisen con la CIA," http://www.diariocontrapoderenchiapas.com/v3/index.php/nacional/19126-el-acuerdo-del-cisen-con-la-cia-espionaje-a-la-carta.
- 92. Matthew Levitt, "Hezbollah's Criminal Networks: Useful Idiots, Henchmen, and Organized Criminal Facilitators," in *Beyond Convergence: World Without Order*, ed. Hilary Matfess and Michael Miklaucic (Washington DC: INSS, 2016), available at https://www.washingtoninstitute.org/policy-analysis/hezbollahs-criminal-networks-useful-id-iots-henchmen-and-organized-criminal; and Michael Shmulovich, "Terror Ring Busted After Smuggling 21 Kg of Explosives into Israel for Hezbollah," *Times of Israel*, August 8, 2012, https://www.timesofisrael.com/10-israeli-ar-abs-indicted-for-planning-to-carry-out-terror-attack-for-hezbollah/.
- 93. Ibid.
- 94. World Bank, "Lebanon's Crisis: Great Denial in the Deliberate Depression," press release, January 25, 2022, https://www.worldbank.org/en/news/press-release/2022/01/24/lebanon-s-crisis-great-denial-in-the-deliber-ate-depression.
- **95.** Simona Weinglass, "At Ben-Gurion, Cash-Sniffing Dog Catches Diamond Merchant's €200,000 Cache," *Times of Israel*, March 17, 2018, https://www.timesofisrael.com/at-ben-gurion-cash-sniffing-dog-catches-diamond-merchants-e200000-cache/; "Customs Dogs Sniff Out \$1M in Concealed Cash," *New Zealand Herald*, October 23, 2013, https://www.nzherald.co.nz/nz/customs-dogs-sniff-out-1m-in-concealed-cash/Q73R053HJIRU7WFWXEI-WFZW05I/; and "Bomb Sniffing Dogs Proven at Detecting Explosive Odors," MSA Security, https://www.msasecurity.net/explosive-odor-crowd-searches.
- 96. "A Non-Destructive Bulk Currency Detection System (BCDS) for Screening Smuggled Currency," KWJ Engineering Inc., http://www.kwjengineering.com/wp-content/uploads/2014/08/BCDS-Project-Summary.pdf.
- 97. U.S. Department of the Treasury, "U.S. and Saudi Arabia to Co-Chair New Terrorist Financing Targeting Center," press release, May 21, 2017, https://www.treasury.gov/press-center/press-releases/Pages/sm0092.aspx.
- 98. Ibid.
- 99. Levitt, A Paris Reset on Hezbollah? https://www.washingtoninstitute.org/media/4120.
- 100. Emanuele Ottolenghi, "How Hezbollah Collaborates with Latin American Drug Cartels," *The Dispatch*, September 22, 2020, https://thedispatch.com/p/how-hezbollah-collaborates-with-latin.
- 101. Levitt, A Paris Reset on Hezbollah? https://www.washingtoninstitute.org/media/4120.
- 102. Ibid.
- 103. Levitt, "Breaking Hezbollah's 'Golden Rule," https://www.washingtoninstitute.org/media/367.



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