

Hezbollah's Criminal Networks: Useful Idiots, Henchmen, and Organized Criminal Facilitators

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Hezbollah's Nodal Model of Criminal Enterprise

Since its inception, Hezbollah has leveraged a worldwide networks of supporters—from formal operatives to informal sympathizers—to provide financial, logistical, and sometimes even operational support. Through these networks, the group is able to raise funds, procure weapons and dual-use items, obtain false documents, and more. Some of these are formal Hezbollah networks, run and supervised by Hezbollah operatives on the ground and back in Lebanon. But most are intentionally structured to be more informal than formal. That is, the links back to formal Hezbollah structures are opaque, providing distance and a measure of deniability for Hezbollah leaders. Generally, the Hezbollah criminal enterprise tends to be organized around loosely connected nodes, and does not depend on hierarchical links up the Hezbollah chain of command. The types of operatives and supporters involved in criminal activities benefiting Hezbollah run the gamut from trained and committed Hezbollah henchmen to what one Federal Bureau of Investigation (FBI) official experienced in Hezbollah investigations describes as “useful idiots who want to be associated with a glorious cause but don’t need or want to know more.”¹ Hezbollah also plugs into preexisting criminal networks that provide specialized services to any client who pays.

But make no mistake: Hezbollah operates as a transnational and transregional criminal organization. To cite just one recent finding, note the March 2013 conviction in the Cypriot criminal court of Hussam Yaacoub, a Hezbollah operative involved in planning attacks against Israeli tourists visiting the island nation. The head of the three-judge panel concluded, “It has been proven that Hezbollah is an organization that operates under complete secrecy. There is no doubt that this group has multiple members and proceeds with various activities, including military training of its members. Therefore, the court rules that Hezbollah acts as a criminal organization.”²

Hezbollah has, since its inception, benefited from Iranian largesse, including the assurance of hundreds of millions of dollars in cash and generous material support in the form of weapons and other goods. But over the years, due to the impact of sanctions, a drop in the price of oil, and other considerations, Iran has cut back its direct support in favor of proxy support—sometimes very suddenly.³ As a result, Hezbollah has, in recent years, significantly expanded both its formal and informal criminal enterprises, as a means

of diversifying its financial portfolio and insulating its budget from the impact of Iranian belt-tightening. And while the group does raise funds through charities fronting for the group, the big money comes from a range of criminal activities, from arms smuggling and counterfeiting operations to credit card fraud and narcotics trafficking.

To facilitate its criminal activities, Hezbollah and Hezbollah-affiliated supporters cooperate with a broad range of facilitators who have less definite ties to the group itself, if any. In other words, Hezbollah often leverages the services of cut-outs, people only loosely connected to the organization, and even completely unaffiliated criminal middlemen and facilitators. The Hezbollah fingerprint is often more opaque than was the case with Yaacoub in Cyprus. Indeed, Hezbollah purposefully structures the command and control of its covert operations and illicit criminal activities to be as opaque as possible.

Hezbollah is deeply involved in criminal enterprises, including running illicit networks of its own and plugging into those of other criminal entities. There remains, however, deep disagreement within U.S. government circles about the extent to which some of these are truly Hezbollah enterprises or merely the criminal activities of individual Hezbollah members or supporters. These members or supporters share the proceeds of their crimes with Hezbollah, but they do not always act under the direction of Hezbollah leadership. Indeed, while both situations exist, the question may be based on a distinction that makes little difference. As far back as the Lebanon hostage crisis in the 1980s, Hezbollah's involvement in crimes and operations has often been driven less by a hierarchical organization chart than by particular relationships. And yet, these still benefit the group overall. A similar dynamic is at play today, governing a loosely structured, untransparent, but organized Hezbollah effort to leverage criminal enterprises for financial, logistical, and even operational benefit. At a time when Hezbollah is deeply involved in the Syrian civil war, has been caught planning terrorist attacks in three continents, and is active on the ground in battlefields as far afield as Iraq and Yemen, identifying and targeting Hezbollah's fundraising and logistics operations through criminal enterprise is a priority for intelligence, law enforcement, and policymakers alike.

Hezbollah's Useful Idiots: Small-Scale Crime

In the diaspora in particular, Hezbollah has successfully motivated and bullied fellow Lebanese and Shia (whether from Lebanon or not) to donate funds to the group and sometimes to engage in criminal activities specifically intended to support it. Often working with only a few people with actual ties to the organization, committed Hezbollah operatives and supporters abroad have created conditions within which they can facilitate and leverage the criminal activities of a larger community to fund Hezbollah.

Consider, for example, the tri-border area (TBA) in South America where the borders of Brazil, Argentina, and Paraguay meet at the famous Iguazu Falls. Described as "the United Nations of Crime," the region is a counterfeiting hot spot where "just about everything that is not biodegradable is fake."⁷⁴ There, Hezbollah found a vastly under-regulated free trade zone ripe for exploitation. According to a study conducted for the

U.S. Special Operations Command, “Hezbollah clerics reportedly began planting agents and recruiting sympathizers among Arab and Muslim immigrants in the TBA at the height of the Lebanese Civil War in the mid-1980s.”⁵ The result was the establishment of both formal Hezbollah cells and the comparably amorphous networks of individuals of Lebanese descent, particularly Shia Muslims, who provided some measure of financial support to Hezbollah.

As the Muslim community in the TBA grew, so did its need for educational, cultural, and religious institutions catering to the local Arab and Muslim communities. One such institution, the Profeta Mahoma mosque in Ciudad del Este, was reportedly built by a prominent member of the local Arab community, Mohammad Yousef Abdallah, who had been living in the city since July 1980. According to Argentine intelligence officials, Abdallah was one of the first Hezbollah members to settle in the TBA, though they did not know it at the time.⁶ Only four years later, in April 1984, would the Argentine Federal Police see the first indications of a Hezbollah network in the TBA.⁷ By mid-2000, experts would put the estimated number of Hezbollah operatives living and working in the TBA at several hundred.⁸ The number of supporters or sympathizers who are neither trained operatives nor official group members, but still provide services or support (out of a more general affinity or to improve the lot of their families back home in Lebanon), is believed to be much larger.

The State Department’s “Country Reports on Terrorism 2009” summarized global concerns about terrorist supporters and a flourishing black market economy being co-located in the TBA. Terrorist supporters “take advantage of loosely regulated territory” in the TBA “to participate in a wide range of illicit activities,” including “arms and drugs smuggling, document fraud, money laundering, trafficking in persons, and the manufacture and movement of contraband goods through the TBA.”⁹ Some of that was carried out by active Hezbollah supporters, but far more of that was the product of criminals of Lebanese descent who were happy to donate a portion of their profits to Hezbollah, as the price for plugging into Hezbollah networks in the TBA and those back home in Lebanon.

For example, the “Barakat network” in the TBA was led by Hezbollah Secretary-General Hassan Nasrallah’s personal representative to the region, Assad Ahmad Barakat. Some criminal supporters of Hezbollah—like Barakat—maintained close and meaningful ties to the organization. But Barakat’s network also created space for others to support Hezbollah more passively. Consider, for example, the Galeria Page shopping center in Ciudad del Este, Paraguay, which served as both a major source of fundraising and as the local headquarters for Hezbollah in the TBA. According to the U.S. Department of Treasury, Galeria Page “is managed and owned by TBA Hezbollah members, including members of the Barakat network.”¹⁰ The U.S. Treasury left no doubt as to Assad Barakat’s place in Hezbollah, describing him as “a key terrorist financier in South America who has used every financial crime in the book, including his businesses, to generate funding for Hezbollah.... From counterfeiting to extortion, this Hezbollah sympathizer committed financial crimes and utilized front companies to underwrite terror.”¹¹ But the shopping

center—and others like it—also served as a place where less committed supporters and “useful idiots” seeking association with a glorious cause could also work in the area’s gray economy and donate some of their profits to the cause.

As in South America, the large Lebanese diaspora in Africa has long made the continent a rich source of financial and logistical support for Hezbollah, allowing it to effectively hide its operatives and criminal activities in plain sight. Crime and corruption are endemic in Africa, making the continent an attractive place for individuals and organizations engaged in illicit activities. In one representative assessment, a senior law enforcement advisor for Africa at the United Nations Office on Drugs and Crime (UNODC) explains that Africa attracts international organized crime because it consists of weak states, often characterized by corruption, dominated by weak and uncoordinated law enforcement agencies, and accustomed to the involvement of high-level officials in criminal activity.¹² By 1988, support for Hezbollah had already become so entrenched within the Lebanese immigrant community in Africa that the Central Intelligence Agency’s (CIA) Directorate of Intelligence wrote an 18-page analytical report on “the economic and political roles of Lebanese communities in the region [sub-Saharan Africa].”¹³

Tactics used by Hezbollah (and Amal before it) to raise funds from Lebanese communities in Africa have included “appealing to their religious convictions, appealing to their Lebanese identity or using threats and even outright violence,” according to one nongovernmental organization’s report.¹⁴ For those expatriates who have resisted solicitations to support various groups back home, including Hezbollah, the response has often been attacks on commercial properties by organized groups of Lebanese thugs.¹⁵ The more continuous expense for legitimate Shia businessmen involves “taxes” levied by Hezbollah, with payment enforced through mafia-style racketeering. In 2004, U.S. diplomats in West Africa publicly charged that Hezbollah was “systematically siphoning profits” from the region’s lucrative diamond trade, in part by threatening Lebanese merchants. The deputy chief of mission at the U.S. Embassy in Sierra Leone was emphatic: “One thing that’s incontrovertible is the financing of Hezbollah.” Citing interviews by embassy staff with the targets of Hezbollah racketeering schemes, the deputy mission chief said, “It’s not even an open secret; there is no secret. There’s a lot of social pressure and extortionate pressure brought to bear: ‘You had better support our cause, or we’ll visit your people back home.’”¹⁶

Hezbollah sympathizers have proved able to function just as easily within fully developed economies with functioning regulatory and law enforcement oversight. Hezbollah has long seen North America as a cash cow, where its supporters and operatives have run charities and engaged in a vast array of criminal activities to raise money and procure material for the organization. Consider the case of a group of North Carolina-based Hezbollah operatives in 2002, who were convicted of channeling some of their profits from an interstate cigarette smuggling scheme—an estimated \$1.5 million—back to a Hezbollah commander in Lebanon. Investigators calculated that the Charlotte Hezbollah cell purchased more than \$8.5 million worth of cigarettes, making an estimated \$2 million in profits.¹⁷ Members of the cell also collected donations to be funneled to Hezbollah

through the group's charities, and in some cases, held onto receipts they received for their donations.¹⁸ The group had well-established connections back to Hezbollah, to be sure, but most of the people indicted in the Charlotte case for their roles in the group's various criminal schemes—especially visa fraud and other basic crimes—were useful idiots.

In the authorities' successful prosecution of the Charlotte Hezbollah network, one witness stood out. Said Harb was, as one agent describes him, "a one-man crime wave."¹⁹ Wherever Harb could make a buck, he would. He was involved in an internet pornography business that, he conceded, was "religiously...wrong," adding, "I'm not a religious person."²⁰ Some of the drivers who transported cigarettes to Michigan for Harb complained that he ripped them off. As one driver put it, "I mean, what was I going to do, go to the local police?"²¹ When a female driver threatened to quit, Harb retorted that he would go to the restaurant where she worked, "kick everybody's ass," and blow it up.²² Neither particularly religious nor a blood relative of other members of the Charlotte network (as several others were), Harb was at the center of nearly all of the network's criminal enterprises, from credit card and bank fraud to cigarette smuggling to dual-use procurement efforts.

Given his profile, the amount of jail time he faced, and the evidence U.S. and Canadian authorities had compiled, investigators were keen to "flip" Harb—that is, offer him a reduced sentence in return for testifying against the rest of the network. As it turned out, Harb was the critical link between the Charlotte cigarette smuggling ring and a parallel Canadian dual-use procurement ring. One of the major players in the Canadian Hezbollah network was a childhood friend of Harb's, and Harb provided him with false IDs that the Hezbollah operatives in Canada used to replicate Harb's credit card "bust out" scams. An expert in using multiple identities, Harb had four different ringtones on his cell phone, each for a different identity.²³

In Charlotte, Harb proved to be more of a criminal logistician and opportunist than a committed Hezbollah henchman. But a few key people, like ringleader Mohamad Hammoud, were well-connected Hezbollah operatives. In the end, the financial investigation into what was dubbed Operation *Smokescreen* included some 500 bank and credit card accounts, and the overall investigation encompassed so many agencies that it led to the formation of the North Carolina Joint Terrorist Task Force (JTTF).²⁴

In Los Angeles, another Hezbollah-linked case offers a representative example of the kind of criminal enterprise loosely tied to Hezbollah that the FBI typically finds across the country. These often involve investigations into petty criminal activities, including food stamp fraud, watered-down baby formula, misuse of grocery coupons, and sale of unlicensed T-shirts, and also involve criminal fundraising plots with ties to Hezbollah.

In November 2007, after a two-year investigation centered on the Los Angeles garment district, a multiagency task force arrested a dozen suspects on narcotics trafficking, sale of counterfeit goods, and money laundering charges. The investigation, dubbed Operation *Bell Bottoms*, culminated in the arrests of Ali Khalil Elreda and his associates. Elreda was detained at the Los Angeles International Airport (LAX) while attempting to smuggle \$123,000 in money orders and cashier's checks to Lebanon, all of which were

stuffed in a child's toy.²⁵ Counterfeiting crimes by Hezbollah supporters predate the Elreda group's arrest, as affirmed in a 2005 congressional testimony by John Stedman of the Los Angeles Sheriff's Department, who recounted two notable instances in particular. In one instance, during a search of a suspect's home in which thousands of dollars in counterfeit clothing were seized, Stedman saw small Hezbollah flags displayed next to a photograph of Nasrallah. When Stedman identified Nasrallah in the photo, the suspect's wife said, "We love him because he protects us from the Jews." Also in the home were dozens of audiotapes of Nasrallah's speeches and a locket containing Nasrallah's picture. In 2004, while serving a search warrant at a Los Angeles County clothing store, detectives recovered thousands of dollars in counterfeit clothing and two unregistered firearms. The suspect—typical of the "useful idiot" model—was found to have a tattoo of the Hezbollah flag when he was booked into custody.²⁶

The financial rewards from petty crime like counterfeiting can be immense, but the practice makes it difficult for a criminal network to use traditional banking practices. In a Los Angeles case, investigators discovered more than \$800,000 in cash throughout the suspect's home, hidden under the bed in trash bags and stashed in trash cans and the attic, with over \$10,000 in a child's piggy bank. In another case, U.S. Customs officers at LAX stopped a Lebanon-bound woman with \$230,000 in cash strapped to her body. The woman told the customs officers that she was heading to Lebanon for vacation. According to Stedman, authorities learned that the woman owned a chain of cigarette shops. In their raids, the authorities seized more than a thousand cartons of counterfeit cigarettes and an additional \$70,000 in cash, along with documentation of wire transfers to banks throughout the world.²⁷

Hezbollah's Henchmen: Running Criminal Networks

Not all Hezbollah supporters are small-time crooks donating a portion of their profits to the cause. Others are either themselves actual Hezbollah operatives or close associates who can, by virtue of their ties to Hezbollah operatives, plug into Hezbollah networks, as in the case of the Galeria Page shopping center in the TBA.

Assad Barakat's network was largely run out of the Galeria Page shopping center, where he also maintained stores of his own. Authorities determined that Galeria Page served "as a cover for Hezbollah fundraising activities and as a way to transfer information to and from Hezbollah operatives." Barakat used one of his companies, Barakat Import Export Ltd., to raise money for Hezbollah "by mortgaging the company in order to borrow money from a bank in a fraud scheme."²⁸ The extent of Barakat's criminal activity in support of Hezbollah was impressive. From distributing and selling counterfeit U.S. dollars to shaking down local shopkeepers for donations to Hezbollah, Barakat was accused by the U.S. Treasury Department of engaging in "every financial crime in the book" to generate funds for the group.²⁹

"Barakat is more than a financier," explains a Paraguayan investigator.³⁰ According to Argentine authorities, Barakat was a card-carrying member of Hezbollah's Islamic Jihad Organization (IJO) terrorist wing.³¹ He and his network collected sensitive information

about the activities of other Arabs in the TBA, including those who traveled to the United States or Israel. This was of particular interest to the group and duly collected and passed along to Hezbollah's Foreign Relations Department (FRD) in Lebanon.³² Even in his fundraising role, Barakat's heavy-handed tactics underscored the fact that he was no mere fundraiser. His threats to shopkeepers are a case in point: instead of threatening local store owners themselves, Barakat threatened that their family members in Lebanon would be put on a "Hezbollah blacklist" if they did not pay their quota through him.³³

As a result of evidence collected during raids of Assad Barakat's store in 2001, Brazilian police eventually arrested Barakat in June 2002 on tax evasion charges, just as Barakat was making plans to flee to Angola. The arrest prompted a leader of the Husseinia Iman al-Khomeini mosque in Foz, where Barakat served as deputy financial director, to ban all non-Hezbollah members from attending services.³⁴

In the wake of the 1994 bombing of the Asociación Mutual Israelita Argentina (AMIA), a Jewish community center in Buenos Aires, early reports from Argentinean intelligence focused on Mohammad Youssef Abdallah and Farouk Abdul Omairi, among others, as two of the "main activists" suspected of being members of an Islamist terrorist organization that provided support for the bombing.³⁵ According to an FBI informant, Mohammad Abdallah was regarded as "the principal leader of Hezbollah in the region," and his brother, Adnan Yousef Abdallah, functioned as his deputy. As the "second most important Hezbollah figure in the tri-border area," the FBI reported, Adnan "oversees the clandestine extremist activities of the Abdallah clan."³⁶ Only much later, in December 2006, would the U.S. government publicly designate Mohammad Abdallah as a Hezbollah terrorist.³⁷

Prosecutors were especially interested in Omairi's contacts with the recently minted Iranian diplomat Mohsen Rabbani.³⁸ In time, these connections would be leveraged by Rabbani to help execute the AMIA bombing, as demonstrated through telephone calls traced to and from the travel agency co-owned by Omairi and Abdallah, *Piloto Turismo*. Intelligence officers would later determine that *Piloto Turismo* was not just a business that provided a convenient cover for illicit conduct, but rather that it was opened with start-up funds supplied by Hezbollah and that it was explicitly meant to serve as a Hezbollah front company.³⁹

After the AMIA attack, Omairi would run a new travel agency for a time before authorities arrested him and his son on charges of using the travel agency and a money exchange business to falsify documents and launder drug money.⁴⁰ The arrests were the result of a 2006 Brazilian Federal Police counternarcotics investigation dubbed *Operation Camel*, which determined that Omairi provided travel support to drug mules transporting cocaine and that he had obtained Brazilian citizenship illegally.⁴¹ The arrests came within months of the U.S. Treasury Department's designation of Omairi and Abdallah as Hezbollah operatives. Omairi, the U.S. Treasury stated, served as a regional coordinator for Hezbollah and procured false Brazilian and Paraguayan documentation with which he helped people illegally obtain Brazilian citizenship. He was also involved in trafficking narcotics between South America, Europe, and the Middle East.⁴²

Abdallah's role included personally carrying monies raised in the region to Hezbollah in Lebanon, where he met with senior Hezbollah officials and members of Hezbollah's security division, the U.S. Treasury revealed. Sometimes, money flowed in the reverse direction, and Hezbollah would send Abdallah back with funds intended to support the Hezbollah network in the TBA.⁴³

As with the useful idiots, similarly organized Hezbollah networks operate elsewhere around the world, including in Africa. While the precise numbers are unknown, Hezbollah raises significant funds within the Lebanese diaspora communities in Africa. One person who reportedly facilitated such donations was Sheikh Abd al-Menhem Qubaysi, a Lebanese national living in the Ivory Coast. In May 2009, the U.S. Treasury Department designated Qubaysi as a terrorist financier who played a public and prominent role in Hezbollah activities in the Ivory Coast. According to intelligence released by the U.S. Treasury, Qubaysi served as Hassan Nasrallah's personal representative in West Africa. "Qubaysi communicates with Hezbollah leaders and has hosted senior Hezbollah officials traveling to Cote d'Ivoire and other parts of Africa to raise money for Hizballah," the U.S. Treasury added. Beyond fundraising, the U.S. Treasury found that Qubaysi helped establish an official Hezbollah foundation in the Ivory Coast "which has been used to recruit new members for Hizballah's military ranks in Lebanon."⁴⁴

According to U.S. intelligence, "Hezbollah maintains several front companies in sub-Saharan Africa."⁴⁵ In May 2009, the U.S. Treasury Department designated Kassim Tajideen as "an important financial contributor to Hezbollah who operates a network of businesses in Lebanon and Africa."⁴⁶ According to the U.S. Treasury's fact sheet, Tajideen contributed tens of millions of dollars to Hezbollah and funneled money to the group through his brother, a Hezbollah commander in Lebanon. Tajideen, a dual citizen of Lebanon and Sierra Leone, was joined by his brothers in running "cover companies" for Hezbollah in Africa, the Treasury revealed.⁴⁷

In fact, Tajideen had already been under investigation six years earlier. In May 2003, after a four-month international investigation by Belgium's Economic Crimes Unit, Belgian Judicial Police raided the Antwerp offices of Soafrimex, a Lebanese export company owned by Kassim Tajideen, arrested several of its officials, and froze its bank accounts on charges of "large-scale tax fraud, money laundering, and trade in diamonds of doubtful origin, to the value of tens of millions of euros." Tajideen and his wife were also arrested in connection with the charges. A few months later, Belgian authorities informed officials from the Congolese Embassy that an investigation conducted on the ground in the Democratic Republic of the Congo (DRC) demonstrated that "the company systematically undervalued its imports, shipping and insurance costs and that it filed false customs declarations."⁴⁸

In December 2010, the Treasury Department targeted two more Tajideen brothers—Ali and Husayn—as Hezbollah financiers, designating them and several of their companies, including Arosfram.⁴⁹ Described as "two of Hezbollah's top financiers in Africa," the two brothers ran a multinational network that generated millions of dollars for Hezbollah,

according to the U.S. Treasury. The businesses targeted by the Treasury Department were located as far afield as The Gambia, Sierra Leone, the DRC, Angola, the British Virgin Islands, and Lebanon. The Treasury added that Ali alone provided huge cash payments to Hezbollah, in amounts as large as \$1 million. And while he was apparently a major donor to Hezbollah, Ali Tajideen was no mere fundraiser, the Treasury stressed; he was also “a former Hezbollah commander” in Lebanon.⁵⁰

Direct Hezbollah connections would be found in North America as well. According to a former senior Canadian intelligence official, by 1997, a covert network of 50 to 100 Hezbollah operatives—above and beyond the significantly larger pool of Hezbollah sympathizers and supporters—was “directly involved in Hezbollah activities in Canada.” Just a week before his comments, the Canadian Security Intelligence Service informed a Canadian court that Hezbollah had established an “infrastructure” in Canada involving individuals who “receive and comply with direction from the Hezbollah leadership hierarchy in Lebanon.”⁵¹

For example, consider the Hezbollah procurement network in Canada that was tied to the cigarette smuggling Hezbollah fundraising networks based in Charlotte and Detroit. The Hezbollah procurement agents in Canada operated under the command of Haj Hasan Hilu Laqis, Hezbollah’s chief military procurement officer. Funded in part with money that Laqis sent from Lebanon, in addition to their own criminal activities in Canada (primarily credit card and banking scams), the cell obtained night vision goggles, global positioning systems, stun guns, naval equipment, nitrogen cutters, and laser rangefinders to be smuggled into Lebanon.⁵²

One of the largest series of Hezbollah investigations in the United States—Operation *Bathwater*—involved no small number of bit criminal players who fell short of actual Hezbollah ties, but the FBI focused its effort on higher-level figures with ties to the group who were running the network. *Bathwater* grew out of a 1999 U.S. Secret Service case investigating what proved to be one of the largest credit card fraud schemes in the country at the time.⁵³ The investigation would turn up bank fraud, credit card fraud, mortgage fraud, cigarette smuggling, and much more, and would lead investigators to several suspects with impressive Hezbollah resumes.

Consider Elias Akhdar, who was involved in cigarette smuggling and other crimes in the United States. Akhdar first received military training from Islamic Amal and later engaged in Hezbollah military campaigns within Lebanon. Once he built up his criminal enterprise, prosecutors added, he contributed a portion of his illicit profits to Hezbollah.⁵⁴ One of Akhdar’s partners, Salim Awde, threatened a potential government witness, saying, “If you are working with the FBI, I will blow you away.”⁵⁵ Getting to the heart of the matter—the group’s ties to Hezbollah—the government requested that Awde be detained without bond pending trial, stating that Hezbollah “would be motivated to assist Awde in fleeing the United States.”⁵⁶ Prosecutors also opposed bail for another co-conspirator, Hassan Makki. One of the reasons Makki had joined the criminal conspiracy in the first place, prosecutors maintained, was to raise money for Hezbollah.⁵⁷ Once, he was stopped

at the U.S.-Canada border with half a million dollars in checks and cash, some of which were meant for Hezbollah.⁵⁸ He solicited money for Hezbollah from other members of the smuggling ring and admitted to holding “membership/official status with Hezbollah.” He would “telephone Sheiks in Lebanon and in Iran to clear criminal acts that he was committing.” Materials seized in a raid of Makki’s home included a photomontage of Hezbollah leaders and spiritual figures, militants in battle fatigues, funeral processions, celebrations, tanks, rockets, and firearms.⁵⁹

Later, another one of Makki’s criminal partners, Imad Hammoud, was publicly indicted along with 18 other individuals in a parallel criminal conspiracy case. Hammoud’s criminal enterprise crisscrossed the United States from Michigan, California, Florida, Georgia, Illinois, Kentucky, Missouri, New York, and North Carolina to West Virginia (and, prosecutors stressed, points in between) and spanned the globe from the United States and Canada to Lebanon, Brazil, Paraguay, and China. Members obtained counterfeit cigarette stamps from Paraguay and Brazil, prompting Detroit JTTF agents to travel to the TBA to investigate that end of the conspiracy’s activities. The U.S. agents’ efforts enabled Brazilian authorities to apprehend a major counterfeit ring that manufactured not only false cigarette stamps, but also passports, national identity cards, and more.⁶⁰ Other elements in the conspiracy involved the import of counterfeit Viagra pills from China and Zig-Zag-branded cigarette paper from Indonesia.⁶¹

Individuals who were critical of Hezbollah were confronted and kicked out of Hammoud’s crew. Hammoud and his partner, Hassan Makki, both charged a “resistance tax,” an additional fee over the black market cost per carton of contraband cigarettes, which customers were told would go to Hezbollah. They also maintained collection boxes for Hezbollah donations and set aside additional chunks of money for transfer to the group in Lebanon.⁶²

Another reason why prosecutors saw Hammoud as a priority target was his enterprise’s close ties to senior Hezbollah leaders. One sign of this intimacy was the involvement of co-conspirator Hassan Ali Moussawi, the Beirut-based brother of Islamic Amal founder and then Hezbollah leader Hussein Moussawi.⁶³ Now a Hezbollah Member of Parliament in Lebanon, Hussein’s brother was caught raising money for Hezbollah by selling counterfeit Viagra in the United States. According to prosecutors, some of the funds raised for Hezbollah were sent to Lebanon through Hassan Moussawi, “who had a close personal relationship with upper echelon Hezbollah officials.” While some of the conspirators were driven by personal gain and supported Hezbollah as a bonus, “Al-Mosawi’s participation with the conspiracy was expressly for the purpose of benefitting Hezbollah; and virtually all of the conspirators’ collaboration with al-Mosawi was to garner favor from Hezbollah.”⁶⁴ In September 2012, the Moussawis would be tied to a similar scheme producing another counterfeit drug back in Lebanon.⁶⁵

Formal Hezbollah operatives continue to be actively involved in Hezbollah’s criminal activities around the world, sometimes even in direct support of Hezbollah’s military or terrorist activities. Several examples are discussed below.

The United States designated Hezbollah operative Ali Mohamad Saleh as both a narcotics kingpin (in 2011) and a global terrorist (in 2012). Saleh operated as a money launderer for an established criminal organization, but at the same time also served as “a key Hezbollah facilitator who has directed and coordinated Hezbollah activity in Colombia.” A former Hezbollah fighter, Saleh led a Hezbollah support cell in Maicao, Colombia, that raised funds for the group and also served as a contact for Hezbollah’s FRD. He maintained communication with suspected Hezbollah operatives around the world, including in Venezuela, Germany, Lebanon, and Saudi Arabia.⁶⁶

In February 2015, a Hezbollah support network and its businesses in Nigeria were sanctioned by the Treasury Department. Members of the Nigeria cell included Mustapha Fawaz, a known member of the IJO; his brother Fouzi Fawaz, a Hezbollah FRD official; and Abdallah Tahini, a permanent representative of Hezbollah’s FRD in Abuja, Nigeria.⁶⁷

Four months later, the Treasury sanctioned Adham Tabaja, a Hezbollah member and majority owner of the Lebanon-based real estate and construction firm, Al-Inmaa Group for Tourism Works, which maintains direct ties to senior Hezbollah organizational elements, including the terrorists group’s operational component, the Islamic Jihad.⁶⁸ With the assistance of Kassem Hejeij, a Lebanese businessman tied to Hezbollah, and Husayn Ali Faour, a known member of the IJO, their overseas terrorism unit, they exploited the firm’s Iraqi subsidiaries to fund Hezbollah.

In November 2015, the Department of Treasury blacklisted three different Hezbollah procurement agents and their companies for obtaining various electronic equipment, unmanned aerial vehicles (UAVs), and accessories from the United States, Europe, Asia, and the Middle East for Hezbollah, and material for improvised explosive devices (IEDs) meant for the Houthis in Yemen. Included in this set of designations were Adel Mohamad Cherri, Fadi Hussein Serhan, and Ali Zeaiter. Zeaiter was previously designated in 2014 for using the China-based subsidiary of Stars Group Holding, Stars International Ltd., to acquire components for Hezbollah’s UAVs and other projects.⁶⁹

The U.S. Department of Treasury’s relentless and successful campaign of targeting Hezbollah’s global criminal networks and procurement operations seems to be striking a nerve with Hezbollah. Speaking in July 2015, Hezbollah Secretary-General Nasrallah felt the need to push back against recent U.S. designations of Lebanese businessmen and companies exposed for their criminal business ties and for operating for or on behalf of Hezbollah. Keeping the illicit nature of these activities secret is important for Hezbollah, as the group struggles to maintain public support against the backdrop of its support for the Assad regime next door in Syria. “We don’t have projects for profit,” Nasrallah insisted. “We don’t deal or conduct business with companies. We don’t have employees in Lebanese companies.” Nasrallah complained that “America targets businessmen, companies, corporations, and tradesmen in Lebanon and tries to negatively affect them and destroy them,” but insisted such actions “only hurt the Lebanese people and not Hezbollah. They work to destroy this country and the economy.” Nasrallah openly conceded Hezbollah gets significant support from Tehran, and took a swipe at the United States at the same

time: “We get our money from Iran and we publicly and proudly say that. We don’t have WikiLeaks. We don’t need to hide.”⁷⁰

But in fact, Hezbollah goes to great lengths to hide its criminal activities, both to preserve operational security and to shield itself from the political backlash it could incur if its less altruistic activities were exposed.

Hezbollah’s Organized Criminal Facilitators

Beyond the group’s useful idiots and more formal henchmen, Hezbollah also leverages the specialized skills of well-placed facilitators for a wide array of purposes. At the low end of the spectrum, idiots and henchmen leverage their relationship for small, personal gain. But on the high end, “super-facilitators” open doors that enable Hezbollah to engage in multimillion-dollar criminal enterprises.

Transnational criminal organizations (TCOs) pose a variety of threats, all of which are made possible by facilitators who sit at the crossroads of the licit and illicit worlds. These are the bankers, attorneys, brokers, and more who provide services to legitimate and criminal customers alike, hiding the criminal enterprise—money laundering, smuggling—behind the veneer of their otherwise legitimate business activities. At one end of the spectrum, criminals employ otherwise legitimate professionals as cover for their illicit activities, while at the other extreme they rely on “specialists” whose unique skill sets are subsumed into criminal networks.⁷¹ In the case of Hezbollah, the group itself, as well as some of its most prominent supporters who are also involved in criminal activities, leverages connections with facilitators of all shapes and sizes to execute operations.

Consider an example along the Lebanese-Israeli border. In August 2012, 8 residents of Nazareth and Ghajar (a small town straddling the “Blue Line” demarcating Israel’s northern border with Lebanon) were charged in an Israeli district court in connection with a June 2012 attempt to smuggle 20 kilograms of explosives into Israel. Israeli authorities foiled the plot, which included enough C4 to wage “a wave of serious attacks in Israel.”⁷² Israeli authorities said the explosives crossed the border with the help of a Ghajar resident, a criminal facilitator who was not only known to authorities primarily as a narcotics smuggler, but also for his ties to Hezbollah. The explosives were then passed along in a series of exchanges between smugglers who Shin Bet believed were smuggling drugs, not explosives.⁷³ The case is not exceptional, as Hezbollah has long been known to trade drugs to Israeli drug smugglers (both Jewish and Arab) in return for intelligence on Israeli army positions and more.⁷⁴

But Hezbollah will work with criminals in other contexts and in other regions as well. In November 2014, Brazilian police reports revealed that Hezbollah helped a Brazilian prison gang, the First Capital Command (PCC), obtain weapons in exchange for the protection of prisoners of Lebanese origin detained in Brazil.⁷⁵ The same reports indicated that Lebanese traffickers tied to Hezbollah reportedly helped sell C4 explosives that the PCC allegedly stole in Paraguay.⁷⁶

In June 2005, Ecuadorian police broke up a cocaine-smuggling operation run by members of the Lebanese diaspora community who were involved in Hezbollah fundraising

activities.⁷⁷ From a Middle Eastern restaurant in northern Quito, Rady Zaiter ran a drug ring that brought in \$1 million per shipment of cocaine smuggled to Europe and Asia. An internal police report confirmed that the operation was connected with Hezbollah, which reportedly received upwards of 70 percent of the ring's profits. Zaiter was arrested in Colombia, and six others were arrested in Ecuador for involvement in his network.⁷⁸ The operation reportedly also recruited airport officials to get their merchandise past airport security checkpoints.⁷⁹

In April 2009, 17 people were arrested in the Dutch Caribbean island of Curacao for their involvement in a "Hezbollah-linked drug ring."⁸⁰ The suspects included locals, as well as individuals from Lebanon, Cuba, Venezuela, and Colombia. According to the Dutch prosecution service, the network shipped vast amounts of cocaine from the Caribbean to the Netherlands, Belgium, Spain, and Jordan. More were shipped from Venezuela to West Africa, and from there onward to the Netherlands, Lebanon, and Spain. Profits were invested in real estate in Colombia, Venezuela, and Lebanon. Prosecutors asserted, "The organization has international contacts with other criminal networks that financially supported Hezbollah in the Middle East. Large sums of money flooded into Lebanon, from where orders were placed for weapons that were to have been delivered from South America."⁸¹

Hezbollah has also sought to leverage support from Lebanese diaspora communities in Europe. According to a 1992 report to the U.S. Senate Committee on Foreign Relations, in the 1980s and early 1990s, Hezbollah leveraged the business acumen and connections of sympathetic Lebanese businessmen in Europe to build a "web of import-export companies in Western Europe as part of its dormant network," with the purpose of inserting "large quantities of explosive and related equipment into target countries."⁸² In October 2009, German authorities arrested two Hezbollah members with ties to Nasrallah and other senior Hezbollah officials. According to the report, the two had trained in Hezbollah camps, but were not arrested for terrorist or militant activities, rather for cocaine trafficking on behalf of the group. The arrests followed a pitched investigation that began in May 2008, when customs agents at Frankfurt Airport seized €8.7 million in cash and another half million euros during a subsequent investigation at the suspect's apartment. To their surprise, investigators found traces of cocaine on the bills, along with the fingerprint of an infamous Dutch drug kingpin.⁸³

In the Philippines, a Hezbollah network planning attacks in Asia and trying to infiltrate operatives into Israel plugged into a criminal document forgery network to procure false passports for its operatives. In 1999, two senior Hezbollah operatives, Pandu Yudhawinata and Abu al-Ful, traveled to Zamboanga City, Mindanao, to procure false passports, only to find that their usual contact was out of the country.⁸⁴ In his absence they turned to Talib Tanjil, another of Pandu's sources for false documents, who agreed to provide the necessary passports.⁸⁵ Like Pandu's usual contact, Tanjil, too, was more of a collaborator than a member of the Hezbollah network, though he was sympathetic to its mission.⁸⁶

In one case typical of Hezbollah's modus operandi, Hezbollah supporters in the United States paid a ground services coordinator at Chicago's O'Hare International Airport to smuggle bulk cash and other packages (e.g., a cellular jammer, night vision goggles, and rifle scopes) onto airplanes, circumventing security inspections. Although he was fully aware where the packages were going, Riad Skaff was not a Hezbollah operative himself, just a well-placed facilitator. Prosecutors noted Skaff's conduct was "in essence that of a mercenary facilitating the smuggling of large amounts of cash and dangerous defense items for a fee."

So long as the facilitators can provide the service in question, Hezbollah operatives do not tend to have any qualms about working with them. Consider the U.S. case dubbed *Operation Phone Flash*, in which a Hezbollah procurement agent based out of Europe with extensive import-export businesses around the world attempted to procure small arms and antiaircraft missiles from individuals he believed were affiliated with the Philadelphia mafia (they were actually FBI informants and undercover agents).⁸⁷

But the area where Hezbollah has relied most heavily on the services of criminal facilitators—some of whom are also affiliated with the terrorist group but are primarily illicit businessmen, some of whom are linked to the group only by virtue of the services they provide Hezbollah as a client—is drug trafficking. The UNODC estimates the international narcotics market to be a \$435 billion a year industry. Hezbollah has had a finger in the business since at least the mid-1990s, when U.S. officials testified that "Hezbollah activities, which include narcotics and smuggling as well as terrorism, are supported in the tri-border area."⁸⁸ Fifteen years later, in March 2010, Anthony Placido, chief intelligence officer at the U.S. Drug Enforcement Administration (DEA), echoed the sentiment when he told the U.S. Congress: "Drug trafficking organizations based in the tri-border area have ties to radical Islamic organizations such as Hezbollah."⁸⁹ By 2011, the U.S. Department of State's Bureau of International Narcotics and Law Enforcement reported, "Lebanese citizens with links to [criminal and drug trafficking] organizations are a major presence among international drug trafficking and money laundering organizations in South America, and are tied into the highest levels of Colombian traffickers moving cocaine throughout the world."⁹⁰

There is, however, no one model for Lebanese criminals involved in drugs and tied to Hezbollah. In the words of one investigator, "Some belong to families tied to Hezbollah, some just pay money to Hezbollah because it represents 'the cause' [of resistance against Israel and the West]. Some of what we see is Hezbollah actively involved in drugs [as a group], some is [sic] just Lebanese Shia involved in drugs who happen to be sympathetic to Hezbollah" and support the group but are neither members of nor directed by Hezbollah.⁹¹ Wherever they fall on the Hezbollah spectrum, all of these characters interface extensively with criminal facilitation networks to carry out their business, the majority of whom are not themselves affiliated with the group beyond their working relationship.

One of the most significant takedowns to date was dubbed *Operation Titan*, a two-year investigation of a cocaine smuggling and money laundering operation in Colombia run by a Hezbollah figure named Chekry Harb, who used the alias, "Taliban." The case began

when agents overheard Harb talking to cartel members on wiretaps targeting a Medellín, Colombia, cartel called La Oficina de Envigado. By June 2007, an undercover DEA agent met Harb in Bogotá and learned details about Harb's smuggling routes, including one that involved shipping cocaine to Jordan's Aqaba port and then smuggling it overland to Syria. At one point, Harb bragged to the undercover agent that he could get 950 kilos of drugs into Lebanon within hours, prompting the agent to casually suggest he must have Hezbollah connections in order to operate so freely there. According to the agent, Harb just smiled and nodded.⁹²

In time, the undercover agent got close enough to the cartel to serve as one of its money launderers. The agent laundered some \$20 million, enabling the DEA to follow the money and map out much of the cartel's operations. But before Harb could identify his Hezbollah contacts to the DEA undercover agent, the operation broke down, reportedly due to CIA interference.⁹³

Over the course of the operation, Colombian and U.S. agents arrested more than 130 suspects, seized \$23 million, deployed 370 wiretaps, and monitored 700,000 conversations. Harb's network reportedly paid Hezbollah 12 percent of its narco-income. "The profits from the sales of drugs went to finance Hezbollah," Gladys Sanchez, lead investigator for the special prosecutor's office in Bogotá, commented after the October 2008 arrests. Among those reportedly cooperating in this narcotics and money laundering enterprise were members of the Northern Valley Cartel, right-wing paramilitary groups, and the Revolutionary Armed Forces of Colombia (FARC).⁹⁴ Despite the collapse of the intelligence operation, Harb was ultimately convicted on drug trafficking and money laundering charges and placed, along with several of his associates, on the U.S. Treasury Department's list of Specially Designated Narcotics Traffickers.⁹⁵

"Mark my words," warned Michael Braun, the former head of the DEA's Special Operations Division, in congressional testimony in the summer of 2009, "As we speak here today, operatives from al-Qaeda, Hezbollah, and, Hamas—perhaps others—are rubbing shoulders with Latin American and Mexican drug cartels, including the FARC, in West African countries and other places on the [African] Continent."⁹⁶ Together, these illicit actors have become what Braun describes as "hybrid terrorist organizations," groups that he described, from firsthand experience, as "meaner and uglier than anything law enforcement or militaries have ever faced."⁹⁷ And they have developed mutually beneficial relationships of convenience. In Africa, Braun testified, "they are frequenting the same seedy bars and sleazy brothels, and they are lodging in the same seamy hotels. And they are 'talking business.' They are sharing lessons learned, sharing critically important contacts and operational means and methods."⁹⁸

A dramatic exposé of the full scope of both the African drug problem and Hezbollah's role in it appeared in January 2011, when the Treasury Department blacklisted Lebanese narcotics trafficker Ayman Joumaa along with an additional 9 individuals and 19 businesses involved in his drug trafficking and money laundering enterprise. With criminal associates and front companies in Colombia, Panama, Lebanon, Benin, and the DRC, Joumaa's organization was truly transnational. But while his drug ties to South America and his

terrorist ties to Lebanon were unsurprising, the African narco-terrorism link—and its direct connection to the United States—was a wake-up call. An extensive DEA investigation revealed that Joumaa laundered as much as \$200 million a month from the sale of cocaine in Europe and the Middle East through operations located in Lebanon, West Africa, Panama, and Colombia, through money exchange houses, bulk cash smuggling, and other schemes.⁹⁹

Another prominent Hezbollah operative involved in laundering drug money through Africa is Oussama Salhab, according to U.S. officials. Court documents citing evidence collected during DEA investigations identify Salhab as “a Hizballah operative who, among other things, controls a network of money couriers who have transported millions of dollars in cash from West Africa to Lebanon.” A close associate of his, Maroun Saade—who belongs to the Free Patriotic Movement, a Lebanese Christian group allied with Hezbollah—ran another major drug trafficking organization tied to Hezbollah in Africa. Along with several other defendants, Saade was indicted in February 2011, on narco-terrorism and other charges related to his alleged agreement to sell cocaine to people he believed were affiliated with the Taliban and to transport and distribute Taliban-owned heroin in West Africa.¹⁰⁰ In several instances, Saade reportedly bribed officials to close investigations into narcotics trafficking or to obtain the release of money couriers working for Salhab who were arrested by Togolese authorities for smuggling bulk currency across the border. In one case in July 2010, Salhab himself was arrested along with one of his couriers, and Saade paid the bribes for their release. In another case, Saade bribed officials to close a narcotics investigation into the activities of Imad Zbib, described in U.S. court documents as “a prominent Hezbollah representative in Togo.” According to U.S. officials, Zbib is a close associate of Salhab and has transported loads of two to three metric tons of cocaine from South America to Togo, concealing the hauls in used cars purchased through lots he owns and transporting the drugs to Europe for sale.¹⁰¹

People like Ayman Joumaa and Oussama Salhab appear to have been in the right place at the right time. As demand for narcotics increased in Europe and the Middle East, South American cartels started looking for new routes to these growing markets. One route went to Europe through West Africa, and another through Syria and Lebanon. The Middle East route benefited from Hezbollah’s ties to Iran and Venezuela. According to Lebanon’s drug enforcement chief, Colonel Adel Mashmoushi, one way drugs were sent to Lebanon was on board the weekly Iran Air flight from Venezuela to Damascus and then overland by trucks to Lebanon. Confirming this route, U.S. officials stressed that “such an operation would be impossible without Hezbollah’s involvement.”¹⁰²

Thanks to its support networks on both sides of the Atlantic, Hezbollah has a natural advantage vis-à-vis Latin American drug kingpins looking to transport their product to or through Africa. The only Spanish-speaking country on the African continent is Equatorial Guinea, and even the Portuguese dialect spoken in Angola differs from that spoken in Brazil. Long active as cargo aggregators, Lebanese merchants—including those with ties to Hezbollah—are well-placed to use their existing logistical machinery to facilitate the

movement of other products. From a trafficking perspective, it matters little whether the products being moved are frozen chickens, cigarettes, gasoline, or drugs.¹⁰³

Similarly, Hezbollah plugs in to purely criminal networks to launder the proceeds of its narcotics smuggling, moving beyond the close-knit sectarian and familial bonds that tend to define the group's own networks. Consider some of the money launderers engaged by Joumaa, himself a Lebanese Sunni Muslim, to process the proceeds of the drug sales he coordinated with Hezbollah. Luis Santiago Calle Quiros (Spanish-Peruvian dual national) and his Spanish wife, Maria Paloma Rodriguez Badillo, collected cash proceeds from narcotics sales (including Joumaa's) at their Madrid office.¹⁰⁴

These two, along with several others in Madrid, operated as a cell of a larger money laundering network run by Colombian money launderer Isaac Perez Guberek Ravinovicz. Designated a narcotics kingpin for his narcotics money laundering, the Guberek network laundered hundreds of millions of dollars in drug money, including from the Joumaa drug trafficking organization. Announcing Guberek's kingpin designation and federal indictment, the U.S. government revealed that the actions were part of its "campaign to target narcotics networks, including [those] run by Joumaa whose global narcotics enterprises have stretched from South America to Africa and have benefited terrorist groups such as Hezbollah." For Joumaa and his Hezbollah partners, these were strictly business relationships into which they would enter regardless of ideology. The Guberek network offered excellent money laundering services, so neither Joumaa nor his Hezbollah partners were concerned that Guberek was Jewish, or that his son, Henry Guberek Grimberg, was a dual Colombian-Israeli national living in Israel. (Nor does it appear to have bothered the Gubereks that their client worked with Hezbollah, a terrorist group pledged to Israel's destruction.)¹⁰⁵

Conclusion

Today, Hezbollah criminal enterprises—some formal, some informal—span the globe from drug-running and organized crime in the Balkans, to procuring false passports in Southwest Asia, to trafficking in stolen goods and trade-based money laundering in South America, and operating corporate front organizations and extorting financial support in Africa. U.S. officials believe "a substantial portion" of revenue raised by Middle Eastern terrorist groups in general comes from the \$20 to \$30 million brought in annually by the illicit scam industry in the United States alone.¹⁰⁶ Little, if any, of this is believed to be directed in any top-down form of command and control by Hezbollah leaders. But often, if one follows the loose threads of a Hezbollah-linked criminal investigation, connections emerge with at least one person with formal, often high-level Hezbollah connections, including people with Hezbollah military training or people serving somewhere in the diaspora as the local representative of senior Hezbollah officials like Secretary-General Nasrallah. Occasionally, a case will reveal the involvement of a senior Hezbollah leadership figure as well. In 2009, the U.S. Immigration and Customs Enforcement agency revealed a series of Hezbollah criminal schemes in the United States which ranged from

stolen laptops, passports, and gaming consoles to selling stolen and counterfeit currency, procuring weapons, and a wide range of other types of material support, pointing to the wide range and scale of Hezbollah's criminal activities.¹⁰⁷ In those cases, senior Hezbollah officials from both the organization's public and covert branches played hands-on roles in the planning and execution of many of the criminal schemes.¹⁰⁸ According to U.S. investigators, following the loose threads in several recent cases led straight back to a Hezbollah representative in Iran, Abdallah Safieddine. That should not surprise, given that a United Nations criminal investigator found that Safieddine—a cousin and close associate of Nasrallah himself—is “considered one of the Hezbollah's top moneymen.” His brother, Sayyed Hashem Safieddine, is a senior Hezbollah official sometimes mentioned as a possible successor to Nasrallah.¹⁰⁹

Recently, Hezbollah's criminal activity has turned away from the petty crime of sympathizers. Today, Hezbollah seeks to leverage the services of organized criminal networks to facilitate its own entry into large-scale organized criminal enterprise. From narcotics to international used car sales, and from money laundering to procurement front companies, U.S. law enforcement now sees multiple cases where the Hezbollah-affiliated criminal operators are themselves acting as “super-facilitators” for a tremendously wide range of crimes and clients.

Consider again the case of Ayman Joumaa and the Lebanese Canadian Bank (LCB). In January 2011, Joumaa was designated a drug kingpin for “laundering as much as \$200 million per month” through LCB and other channels tied to Hezbollah.¹¹⁰ The following month, the U.S. Treasury designated LCB a primary money laundering or terror financing concern under Section 311 of the USA PATRIOT Act, effectively shutting down the bank. But several months later, in December 2011, the Southern District of New York unsealed a \$483 million civil forfeiture action against LCB, which read like a cross between a criminal indictment and a suspense thriller. Since then, investigators around the world have followed the threads of the LCB case from the United States to Europe, Australia, Africa, and South America, arresting not only garden-variety drug traffickers and money launderers but key “super-facilitators” with ties to senior Hezbollah figures as well.¹¹¹ For example, one of the senior Hezbollah officials implicated in the LCB case: Abdallah Safieddine.¹¹²

Investigators have pursued so many Hezbollah-related cases that the group can no longer pretend to ignore them, and the press has taken notice. “The U.S. government is intensifying efforts to stop the flow of money to the terror group Hezbollah as officials work more closely with their European counterparts to stymie the organization's international network,” the *Wall Street Journal* reported in December 2015. Citing the case of an American suspected money launderer in Colombia with ties to Hezbollah, and cases of suspects arrested in Lithuania, France, and the United States, the *Journal* cited U.S. officials describing how “Hezbollah uses a variety of means to make, move, and hide cash,” aided by “super-facilitators—moneymen who help various criminal enterprises disguise the sources of their funding.”¹¹³

The challenge Hezbollah poses has become global in nature. In this brief review we have discussed criminal operations in five continents; North and South America, Africa, Europe, and Asia. They include terrorist operations in Cyprus, the Philippines, and along the Lebanese-Israeli border; money laundering in the TBA, North Carolina, Belgium, Sierra Leone, and plenty more; trafficking of drugs and other contraband in Canada, Colombia, Germany, and Africa, to name a few; and waging war in Syria on behalf of the brutal Assad regime. The lesson to be learned here is that the Hezbollah threat has evolved and is no longer limited in scope to politics in the Middle East or their mission to wipe Israel from existence. It is a threat that must be recognized everywhere it is manifest, and challenged on a global scale. Hezbollah can no longer be seen as an Iranian proxy and terrorist organization alone; it is now a powerful military force, a globally lethal terrorist organization, and a complex criminal and money laundering network. To effectively thwart Hezbollah's anti-American and anti-Western operations will require a much more accurate understanding of how Hezbollah has evolved over the three decades since its establishment.

As the White House strategy to combat transnational organized crime warns, illicit networks of all kinds—drug traffickers, weapons dealers, terrorist groups, and more—share key “convergence points”—in particular people, places, or organizations that launder their money.¹¹⁴ In the case of Hezbollah, super-facilitators—some with ties to the group, some just criminal middlemen—are attractive convergence points for their ability to quickly and efficiently move and launder massive illicit money flows. But they are also Hezbollah's Achilles' heel, exposing a group presenting itself as a noble “resistance” for the criminal enterprise it has become. This presents Hezbollah both with a grassroots legitimacy problem at home and exposes the group to law enforcement scrutiny around the world.

Notes

¹ Former FBI official, interview by author, Washington DC, February 23, 2011.

² Menelaos Hadjicostis, “Cyprus Court Convicts Hezbollah Member,” *Associated Press*, March 21, 2013, available at <<http://www.timesofisrael.com/cyprus-convicts-hezbollah-member-in-terror-plot/>>.

³ Matthew Levitt, “Hezbollah: Party of Fraud,” *Foreign Affairs*, July 27, 2011, available at <<https://www.foreignaffairs.com/articles/2011-07-27/hezbollah-party-fraud>>.

⁴ Sebastian Rotella, “Jungle Hub for World's Outlaws,” *Los Angeles Times*, August 24, 1998, available at <<http://articles.latimes.com/1998/aug/24/news/mn-16046>>; U.S. Department of State, “Country Reports on Terrorism 2009,” *Office of the Coordinator for Counterterrorism*, August 5, 2010, available at <<http://www.state.gov/documents/organization/141114.pdf>>.

⁵ Universal Strategy Group Inc., *Directed study of Lebanese Hezbollah* (Nashville, TN: Universal Strategy Group, October 2010), 54.

⁶ Marcelo Martinez Burgos and Alberto Nisman, “Argentina Investigations Unit of the Office of the Attorney General, Office of Criminal Investigations: AMIA Case,” October 25, 2006, 311, available at <http://albertonisman.org/wp-content/uploads/2015/03/2006-Nisman-indict-AMIA-full-ENG_.pdf>.

⁷ Buenos Aires, Argentina Judicial Branch, AMIA Indictment, Office of the National Federal Court No. 17, Criminal and Correctional Matters No. 9, Case No. 1156, March 5, 2003, 153.

⁸ Universal Strategy Group Inc., *Directed study of Lebanese Hezbollah*.

⁹ U.S. Department of State, “Country Reports on Terrorism 2009.”

¹⁰ U.S. Department of Treasury Press Center, “Treasury Targets Hizballah Fundraising Network in the Triple Frontier of Argentina, Brazil, and Paraguay,” press release, December 6, 2006, available at <<https://www.treasury.gov/press-center/press-releases/Pages/hp190.aspx>>.

¹¹ U.S. Department of Treasury Press Center, “Treasury Designates Islamic Extremist, Two Companies

Supporting Hizballah in Tri-Border Area,” press release, June 10, 2004, available at <<https://www.treasury.gov/press-center/press-releases/Pages/js1720.aspx>>.

¹² Flemming Quist, “Is Africa Under Attack?” *United Nations Office on Drugs and Crime*, available at <<http://www.un.org/en/events/tenstories/08/westafrica.shtml>>.

¹³ Directorate of Intelligence, “The Lebanese in sub-Saharan Africa,” *Central Intelligence Agency*, January 1988, approved for release in June 1999; for more information, see Matthew Levitt, *Hezbollah: The Global Footprint of Lebanon’s Party of God* (Washington, DC: Georgetown University Press, 2013), 246-276.

¹⁴ “For a Few Dollar\$ More: How al Qaeda Moved into the Diamond Trade,” *Global Witness*, press release, April 17, 2003, available at <<https://www.globalwitness.org/en/archive/few-dollar-more-how-al-qaeda-moved-diamond-trade/>>.

¹⁵ Lansana Gberie, “War and Peace in Sierra Leone: Diamonds, Corruption and the Lebanese Connection,” Occasional Paper #6, *Partnership Africa Canada*, November 2002, available at <http://www.pacweb.org/Documents/diamonds_KP/6_War-Peace_sierraleone_Eng-Nov2002.pdf>.

¹⁶ The Associated Press, “Hezbollah Extorting Funds from West Africa’s Diamond Trade,” *Haaretz* (Tel Aviv), June 30, 2004, available at <<http://www.haaretz.com/hezbollah-extorting-funds-from-west-africa-s-diamond-trade-1.127125>>.

¹⁷ *United States of America v. Mohamad Youssef Hammoud and Chawki Youssef Hammoud*, “Appendix: Summary of Cigarette Purchases, after Allocation of Unidentified Wholesale Account Purchases,” June 10, 2002; Kenneth Bell, “Hizballah Fundraising in the American Heartland,” Policy #700, *The Washington Institute*, January 15, 2003, available at <<http://www.washingtoninstitute.org/policy-analysis/view/hizballah-fundraising-in-the-american-heartland>>.

¹⁸ *United States of America v. Mohamad Youssef Hammoud and Chawki Youssef Hammoud*, United States District Court for the Western District of North Carolina, Charlotte Division, Docket No. 300-CR-147, June 2002.

¹⁹ David Kaplan, “Homegrown Terrorists: How a Hezbollah Cell Made Millions in Sleepy Charlotte, N.C.,” *U.S. News and World Report*, March 10, 2003, 30.

²⁰ *United States of America v. Mohamad Youssef Hammoud and Chawki Youssef Hammoud*, June 10, 2002, 1457.

²¹ *United States of America v. Mohamad Youssef Hammoud and Chawki Youssef Hammoud*, May 29, 2002, 599.

²² *Ibid.*, 552-53.

²³ David Kaplan, “Homegrown Terrorists,” 30.

²⁴ Robert Fromme and Rick Schwein, “Operation Smokescreen: A Successful Interagency Collaboration,” *FBI Law Enforcement Bulletin* 76, no. 12 (December 2007): 20-25.

²⁵ U.S. Department of Justice, United States Attorney’s Office, Central District of California, “Operation Bell Bottoms Targets Counterfeiting, Drug Operation in Los Angeles–Area Clothing Stores,” press release, November 6, 2007.

²⁶ Statement of John C. Stedman, “Counterfeit Goods: Easy Cash for Criminals and Terrorists,” hearing before the Committee on Homeland Security and Governmental Affairs, U.S. Senate, May 25, 2005.

²⁷ *Ibid.*

²⁸ U.S. Department of Treasury Press Center, “Treasury Designates Islamic Extremist.”

²⁹ *Ibid.*

³⁰ Marc Perelman, “U.S. Hand Seen in Paraguay’s Pursuit of Terrorism Suspect,” *Forward*, January 17, 2003, available at <<http://forward.com/news/9127/us-hand-seen-in-paraguay-s-pursuit-of-terrorism/>>.

³¹ Buenos Aires, Argentina Judicial Branch, AMIA Indictment, Office of the National Federal Court No. 17, Criminal and Correctional Matters No. 9, Case No. 1156, March 5, 2003, 156.

³² U.S. Department of Treasury Press Center, “Treasury Designates Islamic Extremist.”

³³ *Ibid.*

³⁴ *Ibid.*

³⁵ Buenos Aires, Argentina Judicial Branch, AMIA Indictment, Office of the National Federal Court No. 17, Criminal and Correctional Matters No. 9, Case No. 1156, March 5, 2003, 154.

³⁶ *United States of America v. Bassam Gharib Makki*, United States District Court, Southern District of Florida, Miami Division, CR 98-334-01, February 12, 1999, Affidavit of FBI Agent James Bernazzani Jr., 5.

³⁷ U.S. Department of Treasury Press Center, “Treasury Targets Hizballah Fundraising Network.”

³⁸ Buenos Aires, Argentina Judicial Branch, AMIA Indictment, Office of the National Federal Court No. 17, Criminal and Correctional Matters No. 9, Case No. 1156, March 5, 2003, 190; Burgos and Nisman, “Argentina Investigations Unit,” 239.

³⁹ *Ibid.*, 314–15; Buenos Aires, Argentina Judicial Branch, AMIA Indictment, Office of the National Federal Court No. 17, Criminal and Correctional Matters No. 9, Case No. 1156, March 5, 2003, 154–55, 232.

⁴⁰ Larry Rohter, “South America Region under Watch for Signs of Terrorists,” *New York Times*, December 15, 2002, available at <<http://www.nytimes.com/2002/12/15/world/south-america-region-under-watch-for-signs-of-terrorists.html?pagewanted=all>>; “Hizbullah Gets Hit with the Conviction of a Collector,” *ABC Color*

(Paraguay), September 30, 2007; "Drop a Course Link in the Drug Trade to the East," *ABC Color* (Paraguay), May 6, 2006.

⁴¹ "Hizballah Captive in Brazil Participated in 1994 Argentine Attack," *Estadão* (Brazil), October 24, 2008.

⁴² U.S. Department of Treasury Press Center, "Treasury Targets Hizballah Fundraising Network."

⁴³ *Ibid.*

⁴⁴ U.S. Department of Treasury Press Center, "Treasury Targets Hizballah Network in Africa," press release, May 27, 2009, available at <<https://www.treasury.gov/press-center/press-releases/Pages/tg149.aspx>>.

⁴⁵ U.S. intelligence official, interview by author, Washington, DC, July 2003.

⁴⁶ U.S. Department of Treasury Press Center, "Treasury Targets Hizballah Network in Africa."

⁴⁷ *Ibid.*

⁴⁸ "Coin in the Congo: The Moral Bankruptcy of the World Bank's Industrial Logging Model," *Greenpeace*, April 11, 2007, 34, available at <http://www.greenpeace.org.uk/files/pdfs/forests/carving_congo_3.pdf>.

⁴⁹ U.S. Department of Treasury Press Center, "Treasury Targets Hizballah Financial Network," press release, December 9, 2010, available at <<https://www.treasury.gov/press-center/press-releases/Pages/tg997.aspx>>.

⁵⁰ *Ibid.*

⁵¹ Bill Gladstone, "Ex-official: Hezbollah Network of Operatives Active in Canada," *Jewish Telegraphic Agency*, April 9, 1997, available at <<http://www.jta.org/1997/04/10/archive/ex-official-hezbollah-network-of-operatives-active-in-canada-2>>.

⁵² Matthew Levitt, "Hizballah's Canadian Procurement Network," in *Terror in the Peaceable Kingdom: Understanding and Addressing Violent Extremism in Canada*, ed. Daveed Gartenstein-Ross and Senator Linda Frum (Washington, DC: FDD Press, 2012).

⁵³ State of Ohio v. Ali Abdul Nasrallah, Court of Appeals of Ohio, Sixth District, Lucas County, No. L-99-1194, September 1, 2000; Michael D. Sallah, "Terror Links Sought in Credit Card Scam," *The Blade* (Toledo, OH), December 15, 2002, available at <<http://www.toledoblade.com/World/2002/12/15/Terror-links-sought-in-credit-card-scam.html>>.

⁵⁴ United States of America v. Elias Mohamad Akhdar, Government's Written Proffer; United States of America v. Elias Mohamad Akhdar et al., Indictment.

⁵⁵ PoliceOne Critical Alert, "Terrorism-Related Arrests in Va., Mich; One Officer Shot," *Policeone.com*, February 4, 2003, available at <<http://www.policeone.com/terrorism/articles/59229-Terrorism-Related-Arrests-in-Va-Mich-One-Officer-Shot>>.

⁵⁶ Jim Irwin, "Cigarette Smugglers Fed Money to Hezbollah," *Associated Press*, February 5, 2003, available at <<http://abcnews.go.com/US/story?id=96402>>.

⁵⁷ United States of America v. Hassan Moussa Makki, Government's Written Proffer in Support of Its Request for Detention Pending Trial, Criminal No. 03-80079, United States District Court, Eastern District of Michigan, Southern Division, April 4, 2003; United States of America v. Elias Mohamad Akhdar et al., Indictment.

⁵⁸ David Shepardson, "Dearborn Resident Pleads Guilty to Terror Charges," *Detroit News*, September 19, 2003, available at <<http://www.detnews.com/2003/metro/0309/19/a02-275736.htm>>.

⁵⁹ United States of America v. Hassan Moussa Makki, Government's Written Proffer in Support of Its Request for Detention Pending Trial, Criminal No. 03-80079, United States District Court, Eastern District of Michigan, Southern Division, April 4, 2003; United States of America v. Elias Mohamad Akhdar et al., Indictment.

⁶⁰ Former FBI official, phone interview by author, September 25, 2009.

⁶¹ United States of America v. Imad Mohamad-Musbah Hammoud et al., Indictment; former FBI official, phone interview by author, September 25, 2009; see also United States of America v. Tarek Makki, Plea Agreement, Criminal No. 03-80617, Eastern District of Michigan, Southern Division, October 5, 2005.

⁶² United States of America v. Imad Mohamad-Musbah Hammoud et al., Indictment.

⁶³ Former FBI official, email interview by author, April 29, 2010.

⁶⁴ United States of America v. Imad Mohamad-Musbah Hammoud et al., Indictment.

⁶⁵ Roi Kais, "Hezbollah Funding Terror with Fake Medicine," *YnetNews*, September 10, 2012, available at <<http://www.ynetnews.com/articles/0,7340,L-4279293,00.html>>.

⁶⁶ U.S. Department of Treasury Press Center, "Treasury Targets Major Money Laundering Network Linked to Drug Trafficker Ayman Joumaa and a Key Hezbollah Supporter in South America," press release, June 27, 2012, available at <<https://www.treasury.gov/press-center/press-releases/Pages/tg1624.aspx>>.

⁶⁷ U.S. Department of Treasury Press Center, "Treasury Targets Hizballah Financial Network."

⁶⁸ U.S. Department of Treasury Press Center, "Treasury Sanctions Procurement Agents of Hizballah Front Company Based In Lebanon with Subsidiaries In The UAE And China," press release, July 10, 2014, available at <<https://www.treasury.gov/press-center/press-releases/Pages/jl2562.aspx>>.

⁶⁹ U.S. Department of Treasury Press Center, "Treasury Sanctions Hizballah Procurement Agents and

Their Companies,” press release, November 5, 2015, available at <<https://www.treasury.gov/press-center/press-releases/Pages/jl0255.aspx>>.

⁷⁰ “Sayyed Nasrallah: Before and After Nuclear Deal, U.S. Remains the Great Satan,” *Al Manar*, July 25, 2015, available at <<http://english.alarabiya.net/en/News/middle-east/2015/07/25/Hezbollah-U-S-remains-great-Satan-after-nuke-deal.html>>.

⁷¹ U.S. Strategy to Combat Transnational Organized Crime, Addressing Converging Threats to National Security, *White House*, July 2011, available at <https://www.whitehouse.gov/sites/default/files/Strategy_to_Combat_Transnational_Organized_Crime_July_2011.pdf>.

⁷² Quoting ISA official.

⁷³ Yaakov Katz, Yaakon Lappin, and Ben Hartman, “Shin Bet nabs explosive-smuggling Israeli Arabs,” *Jerusalem Post*, August, 9, 2012, available at <<http://www.jpost.com/Defense/Shin-Bet-nabs-explosive-smuggling-Israeli-Arabs>>.

⁷⁴ Levitt, *Hezbollah*, Chapter 8.

⁷⁵ “Hezbollah has ties to Brazil’s Largest Criminal Gang; Group also Found Active in Peru,” *Fox News Latino*, November 11, 2014, available at <<http://latino.foxnews.com/latino/news/2014/11/11/hezbollah-has-ties-to-brazil-largest-criminal-gang-group-also-found-active-in/>>.

⁷⁶ *Ibid.*

⁷⁷ “Ecuador Arrests: Suspects arrested in connection with drug smuggling to raise funds for Hezbollah,” *Associated Press*, June 21, 2005, available at <<http://www.aparchive.com/metadata/Ecuador-Arrests/9ef863bc50d869875ef0e894d8def7a4?query=nigeria¤t=6&orderBy=Relevance&hits=9&referrer=search&search=%2Fsearch%3Fquery%3Dnigeria%26allFilters%3DArrests%3ASubject%2CCrime%3ASubject%2CSmuggling%3ASubject&allFilters=Arrests%3ASubject%2CCrime%3ASubject%2CSmuggling%3ASubject&productType=IncludedProducts&page=1&b=def7a4>>.

⁷⁸ “Hezbollah drugs ring” broken up,” *BBC News*, June 22, 2005, available at <<http://news.bbc.co.uk/2/hi/americas/4117960.stm>>.

⁷⁹ “Ecuador Arrests: Suspects arrested in connection with drug smuggling to raise funds for Hezbollah.”

⁸⁰ Associated Press, “17 arrested on Curacao for involvement in Hezbollah-linked drug ring,” *The Guardian*, April 29, 2009, available at <<http://www.theguardian.com/world/2009/apr/29/curacao-caribbean-drug-ring-hezbollah>>.

⁸¹ “Police crackdown on Curacao drugs ring with ties to Hezbollah,” *Agence-France Presse*, April 29, 2009, available at <https://now.mmedia.me/lb/en/archive/police_crackdown_on_curacao_drugs_ring_with_ties_to_hezbollah>.

⁸² U.S. Senator John Kerry and U.S. Senator Hank Brown, “The BCCI Affair,” a report to the *Committee on Foreign Relations United States Senate*, 102nd Congress, 2nd session, December 1992, 445.

⁸³ “Hezbollah will profit from the Cocaine Trade in Europe,” *Der Spiegel*, January 9, 2010, available at <<http://www.haaretz.com/news/report-hezbollah-funded-by-drug-trade-in-europe-1.261091>>.

⁸⁴ Philippine intelligence report, “TIR on Pandu Yudhawinata,” 9, cited in Levitt, *Hezbollah*, 132.

⁸⁵ Philippine intelligence report, “TIR on Pandu Yudhawinata,” 9-10, cited in Levitt, *Hezbollah*, 132.

⁸⁶ Levitt, *Hezbollah*, 132.

⁸⁷ Levitt, *Hezbollah*, 336-337.

⁸⁸ Statement of Philip Wilcox, Jr., “International Terrorism in Latin America,” testimony before the Committee on International Relations, U.S. House of Representatives, September 28, 1995.

⁸⁹ Statement of Anthony Placido, “Transnational Drug Enterprises (Part II): Threats to Global Stability and U.S. Policy Responses,” before the Subcommittee on National Security and Foreign Affairs Committee on Oversight and Government Reform, U.S. House of Representatives, March 3, 2010.

⁹⁰ Bureau of International Narcotics and Law Enforcement, “2011 International Narcotics Control Strategy Report,” *U.S. Department of State*, available at <<http://www.state.gov/j/inl/rls/nrcrpt/2011/>>.

⁹¹ DEA Agents, interview by author, Washington, D.C., June 18, 2010.

⁹² Jo Becker, “Beirut Bank Seen as a Hub of Hezbollah’s Financing,” *New York Times*, December 13, 2011, available at <<http://www.nytimes.com/2011/12/14/world/middleeast/beirut-bank-seen-as-a-hub-of-hezbollahs-financing.html>>.

⁹³ *Ibid.*

⁹⁴ Chris Kraul and Sebastian Rotella, “Drug Probe Finds Hezbollah Link,” *Los Angeles Times*, October 22, 2008, available at <<http://articles.latimes.com/2008/oct/22/world/fg-cocainering22>>.

⁹⁵ U.S. Department of Treasury Press Center, “Treasury Designates Medellin Drug Lord Tied to Oficina de Envigado Organized Crime Group,” press release, July 9, 2009, available at <<https://www.treasury.gov/press-center/press-releases/Pages/tg201.aspx>>.

⁹⁶ Prepared statement of Michael A. Braun, “Confronting Drug Trafficking in West Africa,” hearing before the Subcommittee on African Affairs of the Committee on Foreign Relations of the U.S. Senate, June 23, 2009.

⁹⁷ Michael Braun, “Drug Trafficking and Middle Eastern Terrorism Groups: A Growing Nexus?” Policy

#1392, *The Washington Institute*, July 25, 2008.

⁹⁸ Prepared statement of Michael A. Braun, "Confronting Drug Trafficking in West Africa."

⁹⁹ *United States of America v. Lebanese Canadian Bank SAL et al.*, Verified Complaint, 11 CIV 9186, United States District Court, Southern District of New York, December 15, 2011.

¹⁰⁰ *Ibid.*; *United States v. Maroun Saade et al.*, Indictment, 11 Cr. 111 (NRB), United States District Court, Southern District of New York, February 8, 2011.

¹⁰¹ *United States of America v. Lebanese Canadian Bank SAL et al.*, Verified Complaint, 11 CIV 9186, United States District Court, Southern District of New York, December 15, 2011.

¹⁰² Becker, "Beirut Bank Seen as a Hub of Hezbollah's Financing."

¹⁰³ West Africa expert, interview by author, Washington, D.C., November 28, 2011.

¹⁰⁴ U.S. Department of Treasury Press Center, "Treasury Targets Spanish Cell of Guberek Money Laundering Network," press release, October 29, 2013, available at <<https://www.treasury.gov/press-center/press-releases/Pages/jl2193.aspx>>.

¹⁰⁵ U.S. Department of Treasury Press Center, "Treasury Targets Major Money Laundering Network Operating Out of Colombia," press release, July 9, 2013, available at <<https://www.treasury.gov/press-center/press-releases/Pages/jl2002.aspx>>.

¹⁰⁶ John Mintz and Douglas Farah, "Small Scams Probed for Terror Ties: Muslim-Arab Stores Monitored as Part of post-Sept. 11 Inquiry," *Washington Post*, August 12, 2002, available at <<http://www.washingtonpost.com/wp-dyn/articles/A6565-2002Aug11.html>>.

¹⁰⁷ U.S. Immigration and Customs Enforcement, "Indictment charges 4 with conspiracy to support Hezbollah," press release, November 24, 2009, available at <<https://www.fbi.gov/philadelphia/press-releases/2009/ph112409.htm>>.

¹⁰⁸ Levitt, *Hezbollah*, 337-342.

¹⁰⁹ Michael Isikoff, "Bank Accused of Laundering Drug Money for Hezbollah," *NBC News*, February 10, 2011, available at <http://www.nbcnews.com/id/41512092/ns/world_news-mideast_n_africa/t/bank-accused-laundering-drug-money-hezbollah/#.VnxjC_krLIU>.

¹¹⁰ U.S. Department of Treasury Press Center, "Treasury Targets Major Lebanese-Based Drug Trafficking and Money Laundering Network," press release, January 26, 2011, available at <<https://www.treasury.gov/press-center/press-releases/Pages/tg1035.aspx>>.

¹¹¹ Statement of David Asher, "A Dangerous Nexus: Terrorism, Crime and Corruption," testimony before the House Committee on Financial Services, Task Force to Investigate Terrorism Financing, U.S. House of Representatives, May 21, 2015.

¹¹² Isikoff, "Bank Accused of Laundering Drug Money for Hezbollah."

¹¹³ Devin Barrett, "U.S. Intensifies Bid to Defund Hezbollah," *Wall Street Journal*, December 16, 2015, available at <<http://www.wsj.com/articles/u-s-intensifies-bid-to-defund-hezbollah-1450312498>>.

¹¹⁴ U.S. Strategy to Combat Transnational Organized Crime, Addressing the Threats to National Security, *White House*, July 2011