

Financial activities linked to persons from Sweden and Denmark who joined terrorist groups in Syria and Iraq during the period 2013 - 2016

Report commissioned by Finansinspektionen

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Summary

This report presents the results of a study of Swedish individuals suspected to have travelled or attempted to travel to the conflict area in Syria and Iraq to support the activities of terrorist groups during the period 2013-2016. The aim of the study is to highlight the financial footprints and signals these foreign terrorist fighters leave behind and based on this knowledge determine the conditions in place to identify such activities in the future. The study was commissioned by Finansinspektionen with the goal of contributing to better insight and knowledge among anti-crime authorities, supervisory authorities and national operators subject to the anti-money laundering legislation with regard to foreign terrorist fighters.

Key conclusions:

- Travel patterns have changed significantly, for example compared to 2014, and it is also more difficult to identify financial signals from such travel. This places greater demands on government authority cooperation and other information gathering activities, such as social media signatures.
- Current behavioural patterns primarily feature innovative fund-raising activities and utilisation of government subsidy systems.
- Greater opportunities to disrupt these “environments” via alternative measures such as the “Al Capone method” are becoming more important, since anti-money laundering legislation can be difficult to apply.
- There are no possibilities for effective insight into foundations and associations, which makes it very difficult for authorities to identify if and to what extent these organisations are being used to support terrorists and foreign fighters.

Recommendations

- Create conditions for a national, holistic approach to financial support for terrorism and foreign terrorist fighters that is applied by all concerned authorities.
- Expand and improve the effectiveness of information-sharing between authorities regarding suspected individuals and activities in order to create conditions for investigating payment of subsidies, student loans, etc.
- Strive to achieve more effective supervision of fundraising activities in Sweden that result in the transfer of funds to conflict areas. This applies in particular to activities arranged or transactions conducted by associations and foundations.
- Improve knowledge about terrorist groups' use of social media and informal remittance methods. Greater insight and awareness is also needed surrounding the risk of financial transactions to transfer funds from abroad to radical Islamic activities (radicalisation, recruitment, travel and planning of attacks) in Sweden.
- Improve the possibilities for strategic assessment of potential courses of events beyond relevant, individual events in order to ensure that there is a general status overview as support for proactive measures.
- Improve the cooperation between government authorities in Sweden and Denmark with regard to cross-border criminal activities and terrorism financing, particularly within the Öresund Sound region.

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Introduction

Aim and objective

This report presents the results of a study of Swedish individuals suspected to have travelled or attempted to travel to the conflict area in Syria and Iraq during the period 2013-2016 to support the activities of terrorist groups. The aim of the study is to highlight the financial footprints and signals these foreign terrorist fighters (FTFs) leave behind and based on this knowledge determine the conditions in place to identify such activities in the future. The study was commissioned by Finansinspektionen with the goal of contributing to better insight and knowledge at anti-crime authorities, supervisory authorities and national operators subject to the anti-money laundering legislation about the problems related to FTFs.

The study was conducted by the Center for Asymmetric Threat Studies (CATS) at the Swedish Defence University with analysis support from the Swedish Defence Research Agency (FOI).

The high frequency of travel in recent years between Europe and the area of conflict in Syria and Iraq is one of the primary reasons underlying the growing threat from radicalisation and terrorism. The importance of counteracting this development is emphasised in the revised Swedish strategy to prevent terrorism that was introduced in August 2015.¹ However, this type of travel is not synonymous with the financing of terrorism, although some FTFs who joined the Islamic State (IS) or other terrorist groups may have wanted to bring financial means and thus create a better platform for themselves within the organisation in terms of status and equipment for participating in the group's activities. Regardless of the extent of the role the financial aspect plays in terrorism-related activities, the

¹ Prevent, preempt and protect – the Swedish counter-terrorism strategy, Government Communication 2014/15:146, 27 August 2015

trail of such transactions and activities in the financial system offers a possibility for the Swedish system to identify, investigate and disrupt such activities.

This study also gathered information about Danish FTFs and similar issues during the same period. The presentation of the Danish situation in this respect serves primarily two purposes: to identify similarities and differences between the two countries and to identify characteristics of the Danish context that may appear in Sweden.

This study is the second report within the framework of the assignment commissioned by Finansinspektionen. The first study aimed to shed light on how terrorism is financed from an international perspective and describe the national regimes applied by other countries to identify and counteract such financing. The results of the first study were presented in December 2015 and included in the information about Sweden used in the ongoing investigation by the Financial Action Task Force (FATF).^{2, 3}

Method

The conditions for carrying out this study were highly dependent on the extremely valuable contributions made by anti-crime authorities, supervisory authorities and other national organisations. However, the results of the study are based on a number of different sources that in turn are based on information, experiences and contact networks established during the first study on this topic.

The empirical data that was gathered has been processed and qualitatively analysed based on the activities and events of financial significance relevant for identifying financial signals potentially related to suspected FTFs. The trends and tendencies

² Normark & Ranstorp, "Understanding Terrorist Finance: Modus Operandi and National CTF-regimes", Center for Asymmetric Threat Studies, Swedish Defence University, December 2015.

³ <http://www.fatf-gafi.org/countries/#Sweden>

with regard to behavioural patterns have been subject to particularly thorough consideration since the aim of the study was to serve as a basis for increasing awareness about types of behaviour that may be of importance in the future.

The general empirical data includes a review of the literature and information from open sources that were relevant for the study. This includes information from public documents that are linked to suspected FTFs, such as preliminary inquiry reports, judgements and fiscal re-examination decisions. Information was also gathered through discussions and interviews with the following national organisations during the period September 2016 – January 2017:

- Centrala studiestödsnämnden (CSN)
- Swedish Economic Crime Authority
- Finansinspektionen
- Social Insurance Office
- Larmtjänst
- Swedish Police, Finance Intelligence Unit and National Operations Department
- Swedish Tax Agency
- Swedish Security Service

The following organisations contributed to the study from Denmark:

- Center for Terror Analysis (CTA)
- Danmarks Radio and investigative journalists at Politiken and Jyllandsposten

The FTF issue in general

The civil war and the ongoing conflict in Syria has claimed half a million lives. They have also created the worst humanitarian catastrophe since the Second World War, and several million people have sought refuge in Europe and neighbouring

countries.⁴ The underlying causes of the war are multi-faceted and complex and include local and regional players. More than 1,000 local and armed opposition groups are fighting Assad.⁵ There are also a large number of jihadi groups in Syria fighting amongst themselves and against Syria's regime and its allies. The war in Syria primarily created conditions for the coalescence of the jihadi groups, which resulted in the Caliphate's declaration of the Islamic State in June 2014.⁶ This led to a rapid stream of FTFs pouring into IS between the period 2012-2017. The European Commission estimates that more than 7,700 individuals travelled from Europe with the primary goal of joining IS.⁷

Since 2012, a very large number of Swedish citizens have joined extremist Sunni terrorist groups in Syria and Iraq. According to the Swedish Security Service, approximately 300 people have travelled to Syria and Iraq since 2012 to join the Islamic State and Jabhat Fatah al-Sham (JFS - previously Jabhat al-Nusra), which are both classified by the UN as terrorist organisations.⁸

Most of the first-time FTFs went during the period 2013-2014 when IS coalesced its international network to generate support for the creation of the Caliphate in June 2014. Since the autumn of 2015, the number of trips to IS-controlled areas has decreased. According to the Swedish Security Service, 250 Swedish citizens had travelled to the area up to November 2014, and only an additional 30 had travelled there one year later.⁹ According to the National Centre for Terrorist Threat Assessment, this decrease is a direct result of two factors: the military losses

⁴ Human Rights Watch, "Syria", *World Report 2017* (Human Rights Watch, 2017).
<https://www.hrw.org/world-report/2017/country-chapters/syria>

⁵ Charles Lister, *The Syrian Jihad – Al-Qaeda, the Islamic State and the Evolution of an Insurgency* (Hurst, 2015).

⁶ William McCants, *The ISIS Apocalypse* (St Martin's Press, 2015).

⁷ The reference to the figure is EC DG Home Affairs and its anti-terrorist unit, which stated this figure at a meeting of EU RAN CoE in November 2016.

⁸ Swedish Security Service, "Hot och hotbild" <http://www.sakerhetspolisen.se/kontraterrorism/hot-och-hotbild.html>

⁹ Swedish Security Service, "Halvering av förstagångsresenärer" (2016-06-29).

suffered by the IS and the tightening of border controls into the conflict zone thus making it more difficult to travel to Syria and Iraq.¹⁰

According to the Swedish Security Service, most of the individuals who join IS are “young men between the ages of 18 and 30, born in Sweden with at least one parent born abroad and who have no or low income”.¹¹ Women have also been recruited and recruitment numbers increased in 2014/2015 at the same time as minors were taken to IS-controlled areas.¹² FTFs have also given birth to children in Syria and Iraq, and these children do not have identity documents. In the autumn of 2016, information was circulated that approximately 40 Swedish children below the age of ten were with the IS, but this number is a low estimate since significantly more children were born there.¹³ There is a risk that many of these children have seen legal executions or been abused.¹⁴

IS is carrying out recruiting activities on a broad front, often targeting young men who do not have any particular goals for the future. Fighting for the IS may appear to be a career path when other alternatives are limited.¹⁵ A large number of these men have long criminal backgrounds with convictions for both minor and more serious crimes. By using a combination of psychological and ideological factors, IS recruiters successfully target psychologically vulnerable youth. Inducements are also used, for example apartments, cars, wages, the promise of adventure,

¹⁰ National Centre for Terrorist Threat Assessment, “Helårsbedömning: Bedömning av terrorhotet mot Sverige 2017”
http://www.sakerhetspolisen.se/download/18.1beef5fc14cb83963e73383/1484663040490/NCT_Helarsbedomning_2017.pdf

¹¹ Ibid.

¹² Evin Ismail, *Ung och Extrem: Om Våldsbejakande Islamistisk Extremism* (MUCF, 2016).
http://www.mucf.se/sites/default/files/publikationer_uploads/ung-och-extrem-islamistisk.pdf
http://www.mucf.se/sites/default/files/publikationer_uploads/ung-och-extrem-islamistisk.pdf

¹³ “Minst 40 svenska barn hos IS”, *SR*, 2 February 2016.

¹⁴ Nadim Houry, “Children of the Caliphate”, *Foreign Affairs*, 22 November 2016.

¹⁵ Niklas Orrenius, “Att strida för IS kan i Vivalla framstå som en karriärväg bland andra”, *Dagens Nyheter*, 29 May 2016.

weaponry training and the possibility of marrying a woman of their choice.¹⁶ Identity aspects, masculinity and feminine ideals are also important factors.¹⁷ Women hold traditional gender-based roles, but also other roles outside the home, for example recruiting other women to IS, logistics, propaganda, care and specialised police units.¹⁸ IS has increasingly concentrated its recruitment to social media and is targeting younger and younger school-age children and youth in Sweden.¹⁹

However, there is no one single profile for the type of person that IS recruits. This profile is instead described as a “kaleidoscope” of different forces at an individual level and encompasses social, political, ideological and identity factors that interact with one another. The actual catalyst behind the radicalisation is often group dynamics, charismatic leadership and the role of social media.²⁰ Recruitment often occurs via previous social circles and at “garage mosques” with a Salafi-Takfiri focus.²¹ There are examples of situations where these “garage mosques” are run by individuals who have previous leadership and other experiences from al-Qaeda.²² Individuals often travel to the conflict area in clusters of close relations and family as well as with friends.²³

Authorities report that travel to the conflict area in Syria has followed different patterns. During the years 2013-2015, FTFs were mainly young men with long criminal backgrounds. Young girls and women also travelled after the call of the

¹⁶ Kassem Hamade, “IS lockbeten för unga i Sverige”, *Kvällsposten*, 21 July 2016.

¹⁷ Evin Ismail (2016), *op.cit.*

¹⁸ Haras Rafiq and Nikita Malik, “*Caliphates: Women and the Appeal of Islamic State*,” (Quilliam Foundation, 2015); “Escaped Islamic State Wives In Hiding In Turkey”, *SKY News*, 20 April 2015.

¹⁹ Interview with social services staff in north-west Gothenburg, 13 January 2017.

²⁰ Magnus Ranstorp, “Root Causes of Extremism”, RAN CoE Issue Paper, (2016).

²¹ Takfiri is an anti-democratic and violent offshoot within the Salafi movement. For more information about Salafi/Takfiri: Shiraz Maher, *Salafi-Jihadism: The History of an Idea* (Hurst & Company, 2016).

²² Magnus Sandelin, *Svenska IS-Krigare: Från Al-Qaida Till Jihadi Cool* (Fri Tanke, 2016).

²³ Per Gudmundson, “The Swedish Foreign Fighter Contingent in Syria”, *CTC Sentinel*, 24 September 2013.

Caliphate in the summer of 2014 to participate in the formulation of the IS as a state.²⁴ In 2015, families also travelled to IS-controlled areas. FTFs come primarily from Stockholm, Gothenburg, Malmö and Örebro, but there have also been FTFs from other cities in the country.²⁵

There is evidence that FTFs often flew direct to Istanbul or the charter destinations around Antalya and then continued on to pre-determined safehouses around Gazientep and other places along the border between Turkey and Syria. The recruits were then guided across the border into Syria by IS facilitators to short interviews and training camps or IS-controlled cities. Recruiting manuals such as *Hijrah to the Islamic State* (2015) provide practical advice on preparations and travel arrangements, as well as what to bring and how to behave once in Turkey and about to enter Syria. As part of the IS recruitment process, new arrivals fill out an extensive IS questionnaire to provide personal details and answer follow-up questions about who recommended they join IS.²⁶ Male recruits are then sent to training camps, where they are screened and assigned to either the battlefield or other tasks based on their ability and talent.

The Swedish Security Service estimates that approximately 150 FTFs have returned to Sweden. Affiliations with terrorist organisations, combat experience and the trauma experienced by these FTFs from having carried out and witnessed violence first-hand means that most of them are capable of carrying out a terrorist attack. Of those that have returned, a few are judged to constitute an elevated threat. There are indications that returning FTFs gain a higher status in their surroundings and become jihadi role models for a wider network. Security services tend to focus less on women than on men, which further broadens and complicates the overview of

²⁴ Niklas Orrenius, "I Vivalla vet nästan alla någon som anslutit sig till IS", *Fokus*, 28 May 2016.

²⁵ Magnus Ranstorp, Linus Gustafsson & Peder Hyllengren, "From the Welfare State to the Caliphate", *Foreign Policy*, February 2015).

²⁶ Brian Dodwell, Daniel Milton & Don Ressler, "The Caliphate's Global Workforce: An Inside Look at the Islamic State's Foreign Fighter Paper Trail" (West Point Combating Terrorism Center, (April 2016).

potential threats. The potential role of returning women in extremist environments should not be underestimated since they often provide support and take on a very active operational role.

The 300 identified Swedish FTFs are part of a wider radical Islamic environment in Sweden from which new individuals are recruited and developed through ideological submersion. The environment can be described as a patchwork quilt consisting of core ideologies that spread the Takfiri-jihadi message. Encompassing this is also the Dawah movement, which uses more legitimate means to attract young adults to a Salafi (or Takfiri-Salafi) interpretation of religion. For example, this movement raises money to support violent extremism but hides this purpose by pretending that the funds will be used for other purposes. Locally, some recruiters are also talent scouts, and there are structures consisting of criminal and Islamic extremists that interact and work together in various ways. Since many FTFs have a criminal background, there is a risk that they also belong to the same criminal groups and networks as many of the individuals in the extreme Islamic environment, who also have criminal backgrounds. Experiences and criminal behaviour are exchanged in these circles on a continual basis.

The importance of working on a broad front at both a national level and through international collaboration to identify and prevent FTFs from travelling to support terrorism cannot be emphasised enough. Identifying financial activities among FTFs could potentially be beneficial for authorities in their mapping of terrorist suspects' behaviour and movement patterns, activities and social circles. This opens the door to potentially identifying other individuals in the suspect's extremist network who the anti-crime authorities may not have been able to identify otherwise. Authorities would thus be able to identify violent extremists and terrorism methods as well as how both change over time. Even if very few people are actually charged with the financing of terrorism, it is possible to use the FTFs' financial transactions to build a

knowledge base, identify networks and, where possible, disrupt the financing of terrorism and involved participants by charging them with financial crimes.

National authorities have focused more on FTFs in recent years with the aim of disrupting extremist environments in Sweden. Since 2015, six groups have been created at the Swedish Tax Agency under the auspices of “Project Snowball”, which aims to review hundreds of people who it has been determined in 60–70% of the cases have unreported income.²⁷ In December 2016, the Swedish Tax Agency completed 150 investigations and in 70% of the cases had made tax decisions totalling SEK 12 million.²⁸ Of these decisions, 30 were for investigations in Gothenburg, 25 in Region Skåne 25, and 10 each in Örebro and Gävle.²⁹

The Swedish Security Service has increased its focus on terrorism financing by, for example, making organisational changes and cooperating with the Financial Intelligence Unit of the Swedish Police, which has received more funding in recent years. The Border Police, in cooperation with Swedish Customs and other authorities, has also focused on the outflow of cash with a focus on terrorism financing and money laundering.³⁰

FTFs and their financial indicators

A majority of the world’s countries have established a Financial Intelligence Unit (FIU) with the aim of receiving, analysing and reporting suspected financial transactions on a national level. The national FIUs thus fulfil an important function and act as an interface between proprietorships subject to the anti-money laundering legislation and supervision/anti-crime authorities. A large portion of the

²⁷ Daniel Ohlsson, “Skatteverkets Terrorjakt”, *Expressen*, 2 December 2016.

²⁸ Etezaz Yousuf, “Krävs på miljonbelopp efter terrorfinansiering”, *Göteborgsposten*, 13 December 2016.

²⁹ Ibid.

³⁰ <https://www.tullverket.se/nyheter/nyheter/over51miljonerkronorharbeslagtagits.5.226de36015804b8cf353434.html>

reports written about financial indicators and “red flags” have been prepared by the FIUs of other countries, for example AUSTRAC in Australia, FINCENT in the USA and FINTRAC in Canada, with the aim of supporting proprietorships’ efforts to identify and counteract money-laundering and the financing of terrorism. Multi-lateral cooperation and supervisory bodies (Egmont Group, FATF, etc.) have also written similar reports. Only a small number of these reports focus on the risks related to and indicators of terrorism financing. Indicators identifying FTFs are also limited in these reports.

The reports from this international context have been used in this study to provide a starting point for specific behaviour that may be of interest to consider from a national perspective: the extent to which financial activities of Swedish FTFs agree with this behaviour and the manner in which they deviate.

Indicators that many of these reports highlight as being linked to FTFs include applications for different types of loans (micro loans, SMS loans, student loans), applications for credit cards that can be used for cash withdrawal, cash withdrawals in areas bordering the conflict area (Turkey, Lebanon, Jordan, etc.), fund-raising that consists of smaller amounts from many different accounts, unusually high account activity, purchase of tickets to travel to border zones or trips that pass through the border zone, purchase of pre-paid SIM cards or pre-paid subscriptions for mobile telephones, purchase of outdoor equipment, rental and leasing of specific vehicle models.^{31 32}

Financial indicators and the importance of using financial intelligence to identify FTFs have also been highlighted in a report published by the International Center

³¹ AUSTRAC “Methodologies Brief 01 – Building a profile: Financial characteristics associated with known Foreign Terrorist Fighters and supporters”, December 2015
<http://www.austrac.gov.au/building-profile-financial-characteristics-associated-known-fff-fts#key-indicators>

³² FINTRAC, “Common indicators” <http://www.fintrac-canafe.gc.ca/msb-esm/reports-declarations/suspicious-douteuses/com-eng.asp>

for Counter Terrorism (ICCT).³³ This report is one of the few publications that specifically highlights financial aspects related to FTFs and the importance of cooperation between financial firms and government authorities.

³³ Keating Tom, "Identifying foreign terrorist fighters; The Role of Public-Private Partnership, Information Sharing and Financial Intelligence", RUSI, 2015. https://www.icct.nl/wp-content/uploads/2015/07/OP-FININT_web_low-res.pdf

Swedish FTFs and financial activities

This section describes the observations made when processing the empirical evidence with regard to financial activities that can be linked to persons suspected of or attempting to travel to conflict areas with the goal of joining terrorist organisations. These observations are based primarily on information obtained from national authorities affected by this issue. This section contains a description of the extent to which the Swedish cases agree with the established perspectives of FTF indicators and activities as well as a description of aspects in which the Swedish cases are deviant.

The nature of the financial activities linked to FTFs has changed over time. In most cases, the information that is available relates to the FTF phenomenon that almost literally exploded during the early days of the Islamic State's territory expansion in Iraq and Syria in 2013 and 2014. Since the autumn of 2015, the number of FTFs travelling from Sweden to terrorist organisations in Syria and Iraq has declined.

Another aspect that makes it difficult for the study to provide a clear and concrete depiction of behaviour among the FTFs that results in a financial trail is that different Swedish authorities give different, and sometimes contradictory, reports of the occurrence of such behaviour.

However, what is clear from the information that was gathered for this study is that the individuals who travelled to the conflict area with the suspected intention of joining terrorist organisations during the past year are leaving behind significantly fewer financial footprints before and during their travels than what was the case in 2013-2014.

One plausible explanation for this is that FTFs have become more aware of the trail that their actions leave behind in the financial system as well as the fact it has

become a priority topic at the national level to be able to identify and counteract FTFs.

It is also important to distinguish between two types of financing: funds used for actual trips and personal needs and funds that are intended to be transferred to the organisation. While relatively small amounts of money are needed to finance an FTF's trip, there appear to be financial activities that are channelled to IS-related activities under the cover of humanitarian fundraising organisations. There are key individuals who act as central financial hubs and decision-makers regarding the distribution of funds and whether the funds should go to individual FTFs or humanitarian projects.

The change in FTF behaviour can also be explained by the fact that a large percentage of the FTFs who have travelled to the conflict area in the past two years may have strived to create reasonable conditions for being able to return to Sweden. This may be why fewer FTFs are taking risks such as signing up for micro loans, leased cars and other obligations that could be a major burden if they return to Sweden.

Another general observation is that there does not seem to be a clear "Swedish profile" to their behaviour. FTFs finance their activities using a wide number of different activities, not only between individuals but also over time.

That said, however, there are still a number of observations that are worth highlighting as representative behaviour among FTFs. This behaviour may leave a financial trail that can be tracked by supervisory authorities and financial institutions. Many of the observations fall well in line with the picture of FTFs that the authorities have already established, while others can be said to be more country-specific.

Individuals with relatively scarce resources

From the broad group of Swedish FTFs identified by concerned authorities during the period in question, it is clear that the FTFs have limited financial resources in the form of savings and employment. The authorities estimate that approximately 70 per cent of these individuals are considered to have “orderly finances”, but their income is often low and their future prospects limited.

Between 40 and 45 per cent of the identified Swedish FTFs received some form of income from employment, with the greatest representation within this group by converts and women. There are cases of falsified control information and fictitious employment among the FTFs, as well as individuals who have received financial support from family and close relatives.

Only a few individuals have a clear link to companies, which in turn means that the scope of VAT fraud within this group of individuals is relatively limited. This is particularly apparent when comparing this type of behaviour in Sweden with that of Danish FTFs, a topic that will be developed in more detail in the closer analysis of Danish FTFs in Chapter 3. The section about crime below, however, lists several examples of Swedish cases of VAT fraud that can be linked to FTFs. In the cases where FTFs were identified as having company commitments, the links were to companies in the mobile telephone industry, the construction industry, cleaning companies and, in a few isolated cases, assistance companies. The Swedish Tax Agency makes the assessment that some form of company commitments occurred in approximately every fifth case that the agency investigated.

It is also apparent that FTFs act as fronts to support fraud and benefits crimes at home in Sweden. Arrangements for the sale of identity documents and front-men occur among both criminal and extremist circles, which makes criminal investigations even more complicated.

A few authorities also state that they observed differences in the behaviour within the group of FTFs with regard to how they used their bank accounts and bank transactions depending on their ethnicity. The use of informal transaction systems is more common among ethnic groups that utilize clan structures.³⁴

The Swedish National Economic Crimes Bureau has identified eight cases between 2013 and 2016 where the suspects or the people in their immediate surroundings have had links to a radicalised environment. The Bureau also estimates that economic crime connected to terrorism in some cases is small-scale (e.g. SMS loans) and in other cases organised and large-scale. In both cases, it was highly opportunistic and changed over time.

The Bureau also notes that there are direct links between the radicalised environment and serious, organised crime, in part through personal contacts and in part by copying criminal activities. VAT-related criminal activities have become more refined during the period in question as the individuals perpetrating the crime have become more knowledgeable about the authorities' control and working methods.

Exploitation of the state benefits system

One feature that is unique to the Swedish FTF profile is that almost all of the 300 individuals have received some form of state benefits. The most common benefits were those from the Swedish Social Insurance Agency, such as housing benefits, child benefits, maintenance allowances and parental allowances. There were also occurrences of other forms of state benefits, such as social insurance benefits, but to less of a degree.

³⁴ Per Brinkemo, *Mellan Klan och Stat* (Timbro, 2014).

The reason that social insurance benefits occur with lower frequency among FTFs is said to be that the social services apply stricter conditions, which makes it more difficult to receive the benefits. State benefits normally do not provide amounts at the individual level per month that are of such a level that they can be used as a primary source for subsistence. The exploitation by this group of individuals of state benefits should not be viewed as a source of income that is highly linked to this category of people or to the FTF phenomenon, but rather should be viewed against the background that state benefits in general are a recurring feature at the national level.

To be entitled to state benefits normally requires that the person is registered and living in Sweden. People who spend more than six months abroad are not entitled to benefits. For this reason, people who have travelled to the conflict area in Syria and Iraq have had people in Sweden who handled their mail and other tasks required to maintain an appearance of being in the country.

Another benefits-related construction that probably is relatively common is that people who are physically located in Sweden receive the benefits and then send them to the FTFs in the conflict area. One major problem is the delay between the discovery that individuals have travelled abroad and their subsequent de-registration from the Swedish social system. Even if the individuals are found to be responsible for paying back improper pay-outs, the chances are small of regaining these funds since the individuals have left the country.

There are also a few individual cases of FTFs taking advantage of assistance benefits, sometimes on improper grounds, by establishing assistance companies or acting as a resource for care of the user. One FTF was found guilty of participating in an assistance fraud case that went on for a number of years. In this case, an individual was entitled to assistance, but the money was used to support a number of people.

Upon closer investigation, however, the authorities discovered that the individual was not as sick as purported, and thus should not have been entitled to assistance. The FTF participated in the fraud by falsely claiming to be in the employ of the sick individual, although such work never occurred. It was not determined how much money the FTF earned from the fraudulent arrangement, but the employment lasted 10 months.

Of the 140 investigations completed by the Swedish Tax Agency, three to four cases were identified, primarily in the Malmö region, where assistance companies were used to send money abroad.

Fundraising activities

Calls via social media to donate money to jihadi combatants in Syria and Iraq is a recurring phenomenon that we highlighted in a previous study of the modus operandi for terrorism financing.³⁵ How common this type of fund-raising is among individuals and associations in Sweden is not known. However, there are people in Sweden who arrange the transfer of money to the areas in Syria where FTFs are located. Examples of the methods used for donations from Sweden to Syria are described in more detail on page 27.

It is also important to emphasise that money sent from the conflict area in Syria and Iraq to financial contact persons in Sweden in turn facilitate and finance recruits for the warring factions in Syria. Authorities say that the scope of such fund-raising activities is greatly underestimated due to the large number of unreported cases. Under the Swedish Tax Agency's Project Snowball, unreported income has been

³⁵ M. Normark & M. Ranstorp, Understanding Terrorism Financing: Modus Operandi and National CTF-regimes, Swedish Defence University, December 2015, p. 21.

identified in individuals' accounts in almost all of the cases that involved FTFs who travelled to Syria.³⁶

Among the FTFs from Sweden, roughly ten have conducted some form of systematic fund raising from other people prior to their trip. The amounts are normally transferred in relatively small sums ranging from several hundred krona to several thousand krona, but there are often a large number of transfers over a limited period of time. In other cases, a few transfers were made for significantly larger amounts over a short period of time.

The total amount of money that the FTFs raised prior to their departure has thus ranged anywhere from a few hundred thousand krona up to one million krona. The money is often transferred to foreign accounts that the Swedish Tax Agency and other authorities cannot follow. In some cases, travel agencies were used to transfer cash in order to minimize the risks associated with account transfers.

Fundraising can be a risk factor for the FTFs since it requires interaction with other people around the time of the trip. It is therefore more likely that such activities will be conducted by persons who are already part of a wider network of Salafi followers or claim to be raising money for other purposes, for example within the framework of aid and charity organisations.

It is also very difficult to distinguish between transactions that are intended for humanitarian purposes and those that are intended for terrorism activities. In one case, FTFs travelling to Syria raised funds through Facebook to purchase ambulances, which then were transported to unidentified recipients. The person that initiated the fundraising then joined the IS.

³⁶ For example, see Daniel Olsson, "Skatteverkets Terrorjakt", *Expressen*, 2 December 2016.

Loans

The application of FTFs shortly before their departure for loans from many credit institutions, and for which there is clearly no intention to repay the loans, is a phenomenon that was associated with travel to Syria and Iraq during the early years of the fighting in these countries.

However, views on how common it is for FTFs to apply for loans before their departure differ between Swedish authorities. The Swedish Tax Agency says that only a limited percentage (approximately 10%) of the FTFs that were investigated borrowed money from credit institutions.

The Swedish Police make the assessment that more than half of the identified FTFs borrowed money from credit institutions before their departure. In most cases, the loans are applied for from smaller credit institutions and in particular for SMS loans, where smaller amounts can be borrowed in a very short period of time. Fees for these types of loans are often very high, and the repayment period is short, but for FTFs, who have no intention of paying back the loan, these types of loans offer a good opportunity to quickly generate financial assets, since the risk of being denied due to insufficient creditworthiness is lower than for other types of loans.

The market for this type of micro loan has shown strong growth over a short period of time, and there is therefore a large number of credit institutions that offer micro loans for amounts between SEK 10,000 and SEK 50,000 (and in some cases up to SEK 75,000). Several of the FTFs who took advantage of this opportunity have sent applications for micro loans to several credit institutions at the same time. In one case, the FTF received loans from eight different credit institutions in a relatively short period of time, none of which have been repaid. The lenders have varied, from banks to foreign exchange offices. This also includes companies which have a different main business but ancillary activities related to credit and the issuing of loans.

Established banks have developed over the years extensive preparedness for identifying attempts to apply for loans for illegal purposes. Even if smaller lending institutions have been used to generate financial resources, this was sometimes discovered after a large number of micro loans were transferred to the same bank account over a short period of time. Authorities have reported that individuals were encouraged to attempt to borrow upwards of SEK 500,000 through credit fraud, of which a few attempts were successful. In other cases, FTFs applied for hundreds of small loans within a matter of weeks.

FTFs have also applied for student loans through CSN.³⁷ Authorities differ in their assessment of the occurrence of student loans among FTFs. The Swedish Police estimate that a significant portion of these individuals have taken out student loans. Other authorities, including CSN, have very limited insight into the extent to which FTFs receive student loans. The Swedish Police say that it appears to be more lucrative for these individuals to apply for student loans to study abroad.

In this context, loans for studies abroad are particularly advantageous since there is a greater possibility to receive the majority of the student loan paid in advance. It is also difficult for CSN to stop advance payments, since it is hard in practice to prove that the student does not intend to complete the studies referred to in the application. This also applies in cases where there is information about the person being in the conflict area but where this person continues to assert that the studies will be completed. However, CSN is able to stop payment of student loans in the presence of sufficiently strong indicators that a person will not be completing the studies, and in particular in cases where it is obvious that the person is not participating in ongoing studies.

³⁷ "Finanspolisens årsrapport 2015", Swedish Police
https://polisen.se/Global/www%20och%20Intrapolis/Arsredovisningar/01%20Polisen%20nationellt/Fipos%20årsrapport/Finanspolisens_arsrapport_2015_webb.pdf

Other activities (material purchases, leased cars, tickets, etc.)

The purchase of equipment prior to departure for Syria and Iraq is a typical activity identified as a common occurrence among FTFs. This is also identified among Swedish FTFs. In April 2016, a person was arrested at Arlanda Airport on the suspicion of having initiated travel to Syria via Turkey with the aim of joining a terrorist organisation. The man had packed in his luggage equipment such as a holster, a jacket, gloves, knee protectors, elbow protectors and a protective vest. Similar finds in other cases indicate that FTFs make material preparations before or during their travel to the conflict area.

The problem from a financial intelligence perspective is that these FTFs most likely acquire this type of equipment in a manner that is difficult to monitor, for example by avoiding credit card payments or by purchasing the equipment second-hand. According to the authorities that are able to identify and investigate financial transactions, the financial trail from the purchase of outdoor, hunting and wildlife stores has not been identified among Swedish FTFs.

Another indicator that is highlighted in international circles is that FTFs rent or lease a car that they then can drive down to Syria to be used as support for the activities of the terrorist organisation or sold in the area. There are only a few cases in Sweden where this behaviour is suspected to have happened. According to Larmtjänst, 5-10 cars of the model Nissan Navarra and Nissan KingCab (also Toyota Hilux) were rented by persons in Sweden where it was later proven that the people used fictitious or incorrect home addresses. One Nissan Navarra was found in Istanbul; the other cars have not been found.

In general, the number of Nissan Navarras that have disappeared increased between 2015 and June 2016. These models have proven to be particularly

attractive for IS since they are well suited for the local terrain and can be equipped with heavy weaponry systems on the flatbed. They are also often observed in propaganda material from IS in Syria and Iraq.

Swedish authorities also have observed that FTFs are significantly more cautious about using bank cards for payment, probably due to the increased awareness of how easily these transactions can be traced. They display greater caution in their payments particularly immediately prior to and following their departure.

However, they generally use bank or credit cards to pay for their tickets. The destinations stated when the tickets are booked in most cases are different than the intended final destination. The aim of stating a different destination when booking the trip aims to mislead authorities and travel companies about the actual purpose of the trip. It is therefore common for FTFs not to follow their itinerary in its entirety, but rather quite simply change their direction at a location where there are more favourable conditions for continuing on to Syria and Iraq.

There are bank transactions from the group of radical Islam supporters in Sweden to bank accounts in Turkey, which potentially could be related to the financing of terrorism activities in the region. It is not usual for Swedish authorities to observe Swedish FTFs making cash withdrawals in the areas bordering on the conflict zone. This may mean that FTFs are withdrawing cash before their trip begins or during the trip. The financial assets that FTFs have at the time of travel are probably transported across the border into Syria and Iraq as cash. This is also yet another step to reduce the signals left behind from FTF activities, where the importance of hiding one's position close to the conflict area is most likely a top priority. Another central factor behind the greater use of cash in this context is that the international banking system is more or less non-functional in the area of conflict.

Large outflows of cash intended for terrorism financing, among other activities, were identified during joint control operations between Swedish Customs, the Swedish Enforcement Authority and the Swedish Police as part of Operation Chimera in October 2016, which targeted controls of outflows and inflows of cash.³⁸

Many FTFs also obtain a protected identity, which makes it more difficult for authorities to track information. Furthermore, it is also important to note that the way FTFs manage money and the extent to which the banking system is used varies within the group. Differences between individuals in this respect can sometimes be due to differences in ethnicity and cultural traditions. It is therefore not possible to view FTFs as a homogeneous group when it comes to financial transactions and behaviour.

There are also observations of involuntary financing of IS from the FTFs' families and relatives, who are contacted by IS under the premise that their sons and daughters are in trouble and need money. The FTFs themselves also sometimes contact family members to ask for money to come home, but then never do.

Criminal activities associated with FTFs

According to information from the Swedish Police, more than half of the identified FTFs have a criminal record. The crimes committed by the FTFs in the cases reviewed within the framework of this study vary. Since this study is focusing on the financial activities associated with FTFs, financial crime has been of most interest to this study, but other types of crime have been identified as well, such as:

³⁸ "Över 600.000 kr avsedda för terrorgrupper beslagtagna", SVT, 17 November 2016.
<http://www.svt.se/nyheter/inrikes/over-600-000-kr-avsedda-for-terrorgrupper-beslagtagna>

- Theft
- Assault and battery
- Drug offence
- Weapon offence
- Attempted aggravated arson
- Intercourse with a child
- Vacating of youth service
- Violation of the Knife Act
- Unlawful driving
- Unlawful threat
- Use of documents
- Attempted robbery
- Receipt of stolen goods
- Obstructing the course of justice
- Kidnapping

There are also instances of crime that in general can be considered to be more unusual, but within the framework of this study are less surprising, such as terrorist offences, planning for terrorist offences, complicity in terrorist offences and conspiracy to commit terrorist offences. Additional crimes that are more financial in character are also observed and are presented in more detail below.

Crime that generated financial resources

It is difficult to draw a clear line separating crimes that have generated financial resources from those that have not. Many types of crime generate financial resources to varying degrees and extents. This delineation in practice is even more difficult when it comes to the financing of FTFs. It is extremely difficult, even for justice administrators, to prove which activities can be linked to the financing of FTFs. Given this background, this study has primarily reviewed crimes with financial characteristics, the intention of which was to obtain financial resources. It has not been possible to identify how these resources have then been used to finance FTFs.

A number of types of crime were observed that can be considered to be financial in nature. These are:

- Unpaid loans
- Tax offences
- Loan debt
- Credit card debt
- Benefits offences
- Fraud
- Bankruptcy
- Bookkeeping offences

The reviewed cases contain a wide range of crimes and modus operandi. All of the financial cases will not be described in detail, but some of them may be worth highlighting to provide a more nuanced view.

The first entails the purchase and sale of mobile telephones, with the aim of withholding taxes and VAT. Several companies were used, and some of them were represented by or involved FTFs. The criminal activity was extensive and resulted in tens of millions of krona being withheld from the state. The arrangement revolved around the purchase of mobile telephones from Latvia. By establishing fictitious companies, using middlemen and moving money between different companies, it has been possible to withhold tax and incoming VAT. Approximately ten companies were involved in total and were used to varying extents and for different purposes. Two of the companies were represented by or involved FTFs.

The first company (X) was bought by one FTF and has another FTF as its CEO. The former was found guilty by the district court as the authorised signatory for having disregarded the company's bookkeeping obligation by omitting flows of money into the company's accounts and entering into loans that were not repaid. The latter is currently undergoing trial and has previously been identified as being active in jihadist groups. For example, in his application to be the CEO of the company in question, he listed a C/O address at a known jihadist. In its ruling against the former

individual, the Swedish Tax Agency describes the company as “fictitious” and that it was used for carousel fraud or other fraudulent activities.

The company (X) was also used as a “missing trader”, the purpose of which was to provide a VAT number to enable VAT-free sales in Sweden, and for issuing invoices to Swedish buyers with VAT tax. The company has not submitted a VAT return, which means that the purchases were not taxed.

One FTF was involved in the second company (Y). This individual was also previously charged with attempted terrorist offences. Inaccurate information was reported in company (Y) that resulted in the withholding of SEK 25 million in tax. According to the district court, the individual facilitated aggravated tax evasion of up to SEK 12 million. The individual participated in the issuance of falsified invoices from a number of fictitious companies with the aim of not paying VAT tax to the Swedish Tax Agency.

The Latvian company on paper has sold electronic products to fictitious companies, but these were not the actual buyers – company (Y) was the buyer. Company (Y) then requested deductions for incoming VAT on invoices even though there were no sales subject to VAT between company (Y) and fictitious companies. In this way, company (Y) has been able to purchase goods below cost, which improved possibilities for maximizing profit while at the same time having the right to deduct VAT.

According to the Swedish National Economic Crimes Bureau, there have been three cases in the past four-five years of withheld VAT on the trade of mobile telephones. These cases entailed serious accounting fraud, serious tax offences or serious misconduct toward creditors depending on the individual circumstances. In one of the cases, VAT totalling approximately SEK 16 million was withheld. However, it is important to emphasise that the Swedish National Economic Crimes Bureau has not

been able to determine with certainty that the funds are going to terrorist operations, even if there are strong suspicions of this since the suspected individuals were involved in extremist environments and made transfers to Dubai, Egypt, Morocco and Turkey.

In another case of *suspected* fraud, terrorist Mohamed Aziz Belkaid, who participated in the Paris (2015) and Brussels (2016) attacks, was elected to the Board of Directors of two companies in the construction industry, which were depleted of their assets and entered into bankruptcy six months after he travelled to the IS in Syria.³⁹ Belkaid was even on the Boards of five other Swedish limited liability companies that entered into bankruptcy.⁴⁰ The case is still being investigated as a suspected link to terrorist financing.

The criminal act in relation to the travel period

It has been difficult to establish the exact dates for when the FTFs were travelling, but based on a number of case studies it is possible to draw some conclusions about the relationship between when the criminal act was committed and the date of travel to Syria and Iraq. The material shows that there is a discrepancy between crimes with financial characteristics and other criminal activities. In terms of the latter, they did not occur close to the date of departure, but rather more randomly and a long time before the trip.

One pattern that has been identified with regard to financial crime is that very little time passed between the crime and the date of travel. This is particularly clear in the previously described cases, where different types of loans were paid to individuals who shortly thereafter travelled to the conflict area. As mentioned before, it is naturally not a crime to request a loan, but when a loan application is submitted close to the date of departure and thereafter is not paid back, the

³⁹ "IS Terrorist satt i styrelse för Västeråsföretag", *Gefle Dagblad*, 22 March 2016.

⁴⁰ Ibid.

behaviour can be considered of criminal intent. As a whole, this creates a picture of a number of individuals who have applied for loans from various credit institutions with the aim of financing their trip to and stay in Syria and Iraq.

Donation channels from Sweden to Syria – a concrete example

In the previous study of modus operandi for terrorism financing, several different methods were identified that Islamic terrorist groups use to finance their operations, such as the phenomenon of crowd funding on social media and the informal remittance system, hawala.⁴¹ During the authors' work on the previous study, it became apparent that Swedish authorities have limited insight into these methods.

In order to improve the knowledge within this area, a case is described below that includes both social media and informal remittance systems. The case is a concrete and relevant example of how the activities may unfold. It highlights how easy it is to come into contact with individuals in Sweden who represent such activities, the ease with which money can be transferred and how difficult it is for national authorities to trace these transactions. As previously mentioned, it is often difficult in these contexts to prove what the money has been ultimately used for, but it is not possible to rule out that the methods are used to finance FTFs or support terrorist groups. The following description is a summary of the case and highlights the most central components. It should be pointed out that no funds were transferred in this case.

In this example, the process of asking for donations to FTFs in Syria and Iraq is initiated via Facebook by an FTF in northern Syria (A). Initial contact is established with A through a telephone number that is provided in A's Facebook post. A instructs the potential donor that further communication will occur through the

⁴¹ Normark & Ranstorp, 2015. *Understanding Terrorist Finance. Modus Operandi and National CTF-regimes.*

WhatsApp app. Over WhatsApp, A explains that there is an “office” in Sweden where the transaction can be completed. A is presented as having an established relationship with the “office”. Circumstances in the dialogue with A indicate that the “office” in Sweden uses the informal remittance system, hawala, to transfer money to A in northern Syria.

A then gives the name of two individuals who can complete the transaction, but due to technical and geographical considerations, the transaction cannot be completed. According to one of the individuals at the Swedish “office” (B), there are several “offices” in a city in southern Sweden that can transfer the money. However, according to B, it is important to state when making the transfer that the money is being transferred to family members and not to support FTFs in Syria.

Following instructions from A in Syria and continued discussions with Swedish representatives for offices in southern Sweden, the potential donor comes into contact with eight different individuals who say they can handle transfers to northern Syria.

The transfer methods the donor is referred to through these contacts are direct transfers to bank accounts in major Swedish banks, Swish transfers and face-to-face meetings to hand over cash.

A in Syria also refers to transfers via Western Union to a person in Antakya, Turkey, close to the border to Syria, as an alternative method for making a donation. It becomes apparent that this transfer method is the one that A usually refers to in conversations with potential donors in other countries.

There are numerous and relatively easy options for making transfers from Sweden to combatants in Syria, and some are extremely difficult for authorities to identify. The combination of communication through social media, mobile telephone applications and transfers using methods that do not leave behind a trail in the

banking system make it easy, fast and relatively risk-free for individuals in Sweden to donate money to combatant groups in Syria.

As mentioned above, hawala is an informal remittance system that is used in the Muslim regions of the world. The system is based on networks and mutual trust between members who are completely independent of the international banking system. This means that hawala can operate more or less outside the view of government authorities. According to the U.S. Department of the Treasury, a number of terrorist attacks have been financed through this system.⁴² There is also information that the Abaoud network, which planned and contributed to the carrying out of the Paris attacks in November 2015, received financial support from IS through hawala and Western Union transfers.⁴³

There are indications in the dialogue between the involved individuals in the case being discussed here that this case is not unique within these social groups. There is cause to suspect that transactions from Sweden to actors represented by individual A in northern Syria have occurred before. It should also be emphasised that calls for donations to the conflict area in Syria and Iraq are a relatively common occurrence on social media and that they only constitute one particular example of the network that individual A in northern Syria knows in Sweden. However, it is not possible to prove that all involved individuals in this case have been fully aware that the transaction would support combatant groups in Syria. Individuals who handle fully legal transactions to the area may be being taken advantage of by people who have an illegal objective for the transaction.

⁴² US Department of Treasury. *Resource Center. Hawala and alternative remittance systems* <https://www.treasury.gov/resource-center/terrorist-illicit-finance/Pages/Hawala-and-Alternatives.aspx>

⁴³ Nesser et.al, "Jihadi Terrorism in Europe: The IS-Effect", *Perspectives on terrorism*, Vol 10, No 6, 2016. <http://www.terrorismanalysts.com/pt/index.php/pot/article/view/553/1097>

Danish FTFs

Denmark has been the object of an extensive and complex terrorist threat for several years. One of the primary reasons behind this threat is the controversial Muhammed caricatures that were published in the Jyllandsposten (JP) newspaper in 2005. According to Politiets Efterretningstjeneste (PET), the terrorist threat became even stronger after JP republished the pictures in 2008 and again during the period 2010-2012, when several serious terrorist attacks targeting the newspaper office were averted.⁴⁴

David Headley, who planned the Mumbai attack in 2008 and then acted on behalf of the Pakistani extremist group, Harkat-ul-Jihad-al-Islami (HuJI), in the attack against the JP office, the four Swedes who planned the terrorist attack against Politikens Hus in December 2010 and the Lars Doukajev case in 2010 are several of the more than ten planned attacks that have been averted in Denmark since 2005.⁴⁵ In February 2015, Omar Hussein attacked both Kruttunnen, where Lars Vilks held lectures, and later the Jewish synagogue in Copenhagen.⁴⁶

In November 2012, PET turned its focus to the Danish citizens who travelled to Syria to join the jihadi groups fighting the Assad regime.⁴⁷ Attention was drawn to the already existing terrorist network in Denmark by the ruling against Said Mansour in 2007 for encouraging terrorism and again in 2014 for encouraging terrorism on social media. Mansour's international network was prominent in the extremist Salafi movement.

Shiraz Tariq was a prominent leader and in 2009 he founded the extremist platform, "Kaldet til Islam". Shiraz Tariq and several members of "Kaldet til Islam" travelled to

⁴⁴ PET/CTA, "Tegningesagens fortsatte betydning for terrortruslen mod Danmark", 8 January 2013.

⁴⁵ For a more detailed discussion, please see Morten Skjoldager, *Syv År For PET* (People's Press, 2016).

⁴⁶ Niklas Orrenius, *Skotten i Köpenhamn* (Albert Bonniers förlag, 2016).

⁴⁷ PET/CTA, "Foreign fighters – og truslen mod Danmark", 19 November 2012.

Syria to join jihadi groups that then formed the Islamic State. There, Tariq became emir for the Danish contingency and published a video in which he called for others to join the fight and threatened to kill the former Prime Minister and NATO's Secretary General Anders Fogh Rasmussen, cartoonist Kurt Westergaard and politician Naser Khader, among others.⁴⁸

In April 2016, the Center for Terror Analyse (CTA) announced that more than 135 Danish citizens had gone to Syria to join the Islamic State and other jihadi groups such as Jabhat Fatah al-Sham.⁴⁹ Most of these were Sunni Muslims under the age of 30, even if approximately 10 per cent were women.⁵⁰ Approximately 62 have returned.⁵¹ An analysis of 77 Syria FTFs shows that 15 per cent are converts and the majority were relatively well educated, for example as engineers. Many of the Danish FTFs have a criminal past.⁵²

Interviews with Danish FTFs show that the motivation for joining IS is primarily the pull factors such as participation in the formation of a state, revenge and pride rather than push factors such as social marginalisation and social exclusion.⁵³ In contrast is a report from Ankestyrelsen about 20 individuals who travelled to Syria. The report finds that the majority (three-fourths) had extensive social, family and emotional problems that resulted in social isolation and isolation from the Danish society.⁵⁴

⁴⁸ Morten Skjoldager and Jakob Sheikh, "Edderkoppen i det salafistiske miljø er blevet emir for danske krigere i Syrien", *Politiken*, 30 August 2013.

⁴⁹ PET/CTA, "Vurdering af terrortruslen mod Danmark", 28 April 2016.

⁵⁰ Ibid.

⁵¹ "Alle danske pas skal tjekkes grundigt efter rejser ud af EU", *Information*, 6 December 2016.

⁵² Jakob Sheikh, "Syrienskrigere er storbydanskere med kriminel fortid", *Politiken*, 15 September 2016

⁵³ Jakob Sheikh, "I Just Said It. The State": Examining the Motivations for Danish Foreign Fighting in Syria", *Perspectives on Terrorism*, Vol.10, Issue 6 (December 2016).

<http://www.terrorismanalysts.com/pt/index.php/pot/article/view/557>

⁵⁴ Jens Anton Bjørnager och Maja Hagedorn Hansen, "Rapport: Syrien-krigere er ofte socialt belastede", Berlingske, 15 July 2015.

Forms of financing

The financing of Danish Syrian FTFs has taken on different forms over time, including remittance services, fundraising channels, VAT fraud, SMS loans, benefits offences and various types of identity theft. The Center for Terror Analysis (CTA) points out that different types of financing coincide from a timing perspective with specific travel patterns. During the period from 2012 until early 2014, Danish FTFs took short trips to Turkey/Syria that coincided with the Turkish visa period. During this period, these FTFs were largely self-financed through minor criminal activities.

After 2014, the financing of Danish FTFs became more organised. FTFs were responsible for financing the purchase of their own weapons once arriving in the conflict area, and they had to raise money through various types of fraud that was then split between the FTF and IS. Their financing began to focus more on fundraising for a specific purpose. Authorities also noted more frequent misuse of various state benefit programs and VAT fraud. During the autumn of 2015, travel to IS-controlled areas decreased and the nature of the financing changed in that fundraising became more hidden and careful in order to minimise discovery.

According to Politikers journalist and author Jakob Sheikh, several channels were established for transferring money between jihadists in Denmark and the IS in Syria/Iraq. According to his sources, fundraising and the transfer of financial means constitute *jihad bi-al-mal* – financial jihad. In one innovative financing method, an intermediary contacted the families of Danish FTFs and said the FTF was in trouble and needed financial help. The families were informed that if they refused to send money, the FTF would be punished.

A number of families of Danish FTFs have been pressured or blackmailed into providing information about their sons and daughters in Syria/Iraq.⁵⁵ Danish FTFs in Syria transferred money via Western Union or Moneygram to the border areas between Turkey and Syria. In the cases reviewed by Jakob Sheikh, Danish FTFs most often sent transfers of USD 1,000 via Western Union to southern Turkey, which was then transferred to a goldsmith in the IS-controlled village of al-Bab. The recipient then withdrew the amount after providing an ID number.⁵⁶

Another financing method is to raise money under the guise of humanitarian purposes, when in fact the activities include both legal and illegal objectives, thus masking that parts of the funds are channelled to the Islamic State or Jabhat Fateh al-Sham. One of these suspected channels was the fundraising that was closely associated with a number of members of the extremist group, "Kaldet til Islam".

In 2015, PET also warned that terrorist financing was a growing problem in that they noted suspected collection of amounts between DKK 10,000-50,000 for various purposes.⁵⁷ In one example, a fundraising organisation, *De Humanitære Hjerter*, which sold pins and stickers with a logo that looked much like the flag of the Islamic State, was suspected of ties to terrorist groups. Charges were dropped in May 2016 since it could not be proven that there was a concrete link to the terrorist organisation.

In another case, the parents of a kidnapped Danish journalist paid a large ransom to the Islamic State. Twenty-six-year-old Daniel Rye Ottosen was kidnapped by the IS in Syria in 2013 and held captive for 13 months together with James Foley and other Western hostages, all of whom were regularly tortured. His parents paid a ransom

⁵⁵ "Familier til Syrienskrigere bliver truet, afpresset og afkrævet penge", TV2, 17 March 2016. <http://nyheder.tv2.dk/samfund/2016-03-17-familier-til-syrienskrigere-bliver-truet-afpresset-og-afkraevet-penge>

⁵⁶ Jakob Sheikh, *Danmarks børn i hellig krig* (Lindhardt and Ringhof, 2015).

⁵⁷ "PET-frygt: Dansk nødhjælp går til terror", *Berlingske*,

of more than EUR 2 million to the IS to free him in June 2014.⁵⁸ Danish FTFs returning to Denmark have also improperly used state benefits.

During the autumn of 2014, Danish authorities found 28 cases of suspected benefits offences among 50 returning FTFs. In May 2015, the number of cases had increased to 32 and concerned a total of DKK 378,000 during the FTFs' stays in Syria.⁵⁹ In December 2016, PET had reported 36 cases to the Danish Agency for Labour Market and Recruitment with claims for repayment in 29 cases totalling DKK 672,000.⁶⁰

One of the most common forms of financing used by Danish FTFs is VAT fraud. During the autumn of 2016, *DR* and *Politiken* joined forces to conduct a detailed review of 77 concrete cases of Danish FTFs and found that 16 were members of Boards of Directors in 40 different companies that had entered bankruptcy or were subject to fraud.⁶¹

One of the most well-covered cases was Abdessamad Fateh (a.k.a. Abu Hamza), who is the only Danish person officially listed on the UN Security Council's list of suspected terrorists (the so-called 1267 Committee list) since September 2014. Abu Hamza was a well-known and popular preacher in the Salafi Grimhøj mosque in Aarhus. In 2010, Abu Hamza helped establish a subgroup called the Muslim Youth Center (Muslimsk Ungdoms Center, MUC) that consisted of a core of 20 devout extremists who focused on da'wa activities in the area and had between 50-100 members.

In the autumn of 2014, Abu Hamza travelled to IS-controlled areas. One month before he left he was named to the Board of the Danish transport firm, Q Transport, which specialised in the import of chicken from Germany and cheese from the

⁵⁸ Puk Damsgård's *The ISIS Hostage: One Man's True Story of 13 Months in Captivity*

⁵⁹ "Syrienkrigere har fået 378.000 kroner i velfærdssydelse", *DR*, 18 May 2015.

⁶⁰ "36 danske syrienkrigere knaldet: Dræber på kontanthjælp", *Ekstrabladet*, 22 December 2016.

⁶¹ "16 danske syrienkrigere er også direktører", *DR*, 15 September 2016.

Netherlands. During Abu Hamza's stay in Syria, the company ran up a debt of DKK 3 million in VAT fraud and an additional DKK 6 million to private companies.⁶² Abu Hamza's passport and bank ID (NemID) were used by other people in Denmark while he was in Syria.

Abu Hamza's VAT fraud was not an isolated case, but rather part of a larger network of shell companies that were established for the same illegal purpose. Most of these companies traded in provisions (chicken, soda, candy, and cheese) that were imported from other countries using advanced VAT fraud arrangements. Together with Abu Hamza, five other "Board members" participated in the scheme and together swindled at least DKK 39 million, of which DKK 6 million was unpaid VAT to the Danish tax agency, Skat.⁶³

Two of the Board members were living in Denmark, but later travelled to Syria to join the Islamic State. The other three Board members were Spanish citizens from Melilla, a Spanish enclave in Morocco, and had connections with IS. The scheme consisted of establishing a trading company in Denmark, which then was transferred to Spanish citizens who controlled bank transactions through BankID. A trial is currently ongoing in Spain against the three individuals from Melilla, who are charged with terrorist offences.

⁶² Jakob Sheikh, Portræt: Selv i døden opildner Abu Hamza sine følgere, 25 January 2016.

⁶³ Bo Elkjær "Terrormistænkte kan have snydt for 39 millioner kroner", 25 January 2016.
<https://www.dr.dk/nyheder/penge/terrormistænkte-kan-have-snydt-39-millioner-kroner>

Conclusions about Danish financing

The Center for Terror Analysis (CTA) in Denmark emphasises that the financing of Danish FTFs follows practical aspects and changing needs, such as visa periods in Turkey, possibilities for travelling in and out of IS-controlled areas and the establishment of the Islamic State. This shows that the financing has been heavily influenced by specific courses of events in the conflict areas over time and organised fundraising campaigns in Denmark (including extortion of taxes on small companies), different company constructions and fraud schemes.

Several recurring aspects that distinguish the Danish cases of FTF financing are the large-scale company networks, credit fraud and VAT fraud that have occurred regularly over a long period of time and generated large amounts. In addition, this complicated web of company networks could be linked to a terror cell in Spanish Melilla that from a distance controlled financial transactions and fraud through NemID. The problem also seems to have been enhanced by the fact that Danish financial institutions and anti-crime authorities neither appeared to be aware of nor took action against Abu Hamze, the only Danish person on the UN's terror/sanction list. It is not clear if the authorities let the fraudulent activities continue because of a need for intelligence in conjunction with the Danish-Spanish terrorist connections or if they quite simply did not know they were happening.

These large-scale and complicated fraudulent schemes demonstrate a weakness in the increasingly digital society in Denmark, where fraud is facilitated through the ease of establishing a company online in only five minutes with the help of NemID. More than 29,000 trade companies are established every year according to the Danish Business Authority.⁶⁴ The lack of a requirement for a face-to-face meeting with authorities combined with the possibility of conducting business entirely

⁶⁴ Kristian Sloth and Mads Rafte Hein, "Momseksperter: Gør det sværere at oprette et firma", *DR*, 31 May 2016

online, has created an environment that fosters various identity frauds, front-men arrangements and other types of financial fraud.

It is possible to be eligible for a VAT refund from the Danish tax authorities, and it is also possible to obtain credit lines for purchases that are used in advanced arrangement of varying extents.⁶⁵ Extensive trade in personal data is reported when using identities to create businesses that only intend to commit credit and VAT fraud.

Another aspect related to VAT fraud is the Öresund Sound problem, i.e. two regions in close proximity to one another that have different financial systems and supervisory authorities and where the exchange of financial information is limited between countries due to reasons of confidentiality. This weakness has been exploited through fraudulent VAT transactions between Sweden and Denmark, primarily in the food industry. One prominent example of this is the taxation of high-sugar items in Denmark. Companies buy and store candy in Sweden (where there is no "sugar tax") and then repackage it to be sold illegally in Denmark.⁶⁶

In conclusion, fundraising activities and their links to terrorist financing are a widespread problem for Danish supervisory and anti-crime authorities. Even if fundraising activities are registered and controlled by the Danish Fundraising Board and other authorities, it seems that there are serious deficiencies in the Danish authorities' handling and coordination of money laundering and terrorist financing. It has been reported that Denmark's FATF evaluation with contain extensive criticisms on, for example, the risk assessment methods of government authorities,

⁶⁵ "Momssvindler vokser", *DR*, 13 January 2016.

⁶⁶ Mathias Sommer, "Meget svindel kommer fra Sverige", *DR*, 12 January 2016.

deficient coordination, an under-dimensioned money laundering secretariat and insufficient oversight of the financial sector.⁶⁷

Conclusions

A change in behavioural patterns

Swedish citizens travelling to the conflict area in Syria and Iraq have dramatically changed their behavioural patterns during the period 2013-2016. This change has been driven by several factors on the international arena as well as the national arena, which together influence the individuals who sympathize with and have a desire to support terrorist groups in the area. The situation for those who are fighting for the Islamic State has deteriorated due to military set-backs, the loss of central territorial strongholds and reduced financial assets, which changed the conditions for establishing a functional Caliphate in accordance with the organisation's objectives.

These difficulties have also meant that the perception of life in and the fight for the Caliphate is no longer as attractive for northern Europeans. Countries that are fighting these terrorist organisations have also enhanced their efforts to stop individuals who are trying to join groups such as IS and JFS. It has become riskier to travel to areas of conflict, and there is a high probability of being arrested before even reaching the destination. The border between Turkey and Syria is now monitored much more closely, making it difficult to enter into Syria. Anti-crime authorities have begun to find tools and methods of working at a national level to counteract radicalisation and FTFs by both revising their strategies and developing coordination at the central and local level.

⁶⁷ "Danmark står til klø for indsats mod hvidvask", TV2, 20 January 2017; Jesper Høberg, "FATF: Lækket rapportudkast om terrorfinansiering og hvidvask: Stram op, Danmark!", *Jyllandsposten*, 20 January 2017.

These changes will not stop individuals in Sweden from trying to join terrorist organisations in the future, but they have resulted in a fewer number of FTFs over time. Individuals who intend to become FTFs today must also plan their trip knowing that it is much more difficult now than it was between 2013 and the autumn of 2014 to successfully travel all the way through Europe to the conflict area. It is entirely possible that future travel patterns to support terrorist groups may change; FTFs may start to travel to other terrorist organisations in the area or other regions instead of the IS in Syria and Iraq.

What is clear from the results of this study is that FTFs have changed their behaviour in a manner that makes it significantly more difficult for national actors to identify these individuals before and after their trip. This applies in particular to the financial trail they leave behind. Behavioural patterns have probably changed as individuals have become more aware about their financial trail and thus have made an effort to reduce these signals. It is even probable that this is the result of the fact that fewer of the FTFs who travel for this purpose leave Sweden with the intention of staying in the conflict area forever. The option of being able to return to Sweden most likely creates a restraint, i.e. not taking on loans and risking a heavy burden upon return.

However, we are able to state that the global overview of the signals FTFs leave behind in financial systems (indicators) largely agree with the behaviour Swedish FTFs have shown during the period 2013-2014, including extensive loans and financial crimes close to their date of departure. We have also been able to identify national nuances in this behaviour that reflect the differences in national conditions for increasing their financial assets.

Swedish behavioural pattern

From a Swedish perspective, it is clear that FTF activities in the future will be associated with benefits-related income and different types of fundraising activities. This clearly differs from our neighbour, Denmark, and is probably due to the fact that the participants' behavioural patterns are influenced by national conditions (where weaknesses in the national systems are exploited). In Denmark, this is apparent in the ease of establishing companies that can be used for extensive credit and VAT fraud. In Sweden, the terms for receiving government benefits are relatively more generous.

FTFs also exploit trends in society in general that enable them to conduct business for illegal purposes. This includes, for example, technological development that simplifies financial transactions and the use of apps to establish channels of communications that are difficult for anti-crime authorities to track. These developments have made it easier to conduct fundraising activities among people with common interests.

The benefits issue

As previously mentioned in this report, there is a high occurrence of government benefits among FTFs. Many of these benefits have probably been obtained on valid grounds and can go quite far to financing a trip to the conflict area. To the extent the FTF receives benefits before taking measures to support terrorist groups or preparing a trip to the areas where terrorist groups are in control, there is little the authorities can do. It can also be very difficult to take counteractive measures in this respect, even if there is intelligence about individuals planning a trip or having started a trip.

However, it is very important in all of the cases where there is information indicating that Swedish individuals support activities directly linked to terror organisations such as IS and JFS, on location in the area of conflict or in another way, to investigate whether the person in question is receiving government benefits. In order to create conditions that facilitate such an investigation, it is important to provide authorities responsible for this type of benefit with clear information about the individuals who are identified in these contexts and distribute this information quickly through established, formal procedures.

The same challenge is present with regard to the payment of student loans. Today, CSN has extremely limited insight into the extent to which student loans are paid to individuals who travelled to the area of conflict to support terrorist groups. This is particularly worrisome based on the fact that such loans are attractive for this group of individuals. The assessment of whether to make an advance payment for foreign studies is particularly critical in this context. For this reason, information about suspected FTFs should also be given to CSN. In contrast, Denmark has not observed the same problem with student loans since the system there is to divide the student loan into several payments.

Fundraising activities

Fundraising to support terrorism occurs in many different ways and with many different objectives. In this study, we have focused on the raising of financial funds to support FTFs. All FTFs must make financial arrangements to finance their trip and any equipment that may be needed once they arrive. FTFs may also raise money in order to be able to raise their status within the organisation after arriving in the conflict area by bringing their own financial means.

The conditions for raising money from a large group of individuals at a global level has probably never been simpler or faster than what it is today. The technological

advancements in social media and the number of available message applications for computers and mobile telephones make it possible to market and promote financial donations to a very wide audience while using a hidden identity. The transition from initial contact via open systems such as Facebook and Twitter to exchanging instructions about questionable transactions is easily done through applications such as Surespot, Kik, Snapchat, Telegram, WhatsApp, etc.

This means that the conditions for identifying suspected fundraising activities and the individuals behind these activities are limited to tracing activities in bank accounts and transactions within the banking system. This is why the reporting of suspected transactions that banks and other business proprietors provide the financial intelligence function at the police is very important. Unfortunately, it is difficult to identify patterns in the transactions that could indicate such fundraising activities and be of help to the financial institutions. In the cases this study was able to investigate, the transaction pattern can be many deposits of small amounts from several other accounts, but it is also possible for there to be a few deposits of large amounts over a short period of time and variations in-between.

The identification of patterns becomes significantly more problematic when the transactions are not handled through established financial systems. There are indications that cash handling in these contexts is becoming more common. There is also information that indicates the use of informal payment services such as hawala for transactions connected to terrorism. The empirical evidence behind the indicators and information, however, is relatively vague, but sufficient for Swedish authorities to create a better understanding of these transaction methods with the aim of finding tools and measures to handle them.

There have been strong suspicions among authorities that terrorists are exploiting fundraising activities. This study has not found any information indicating that foundations and associations have been exploited for the benefit of FTFs. However,

it is clear that the authorities' insight into foundations and associations is extremely limited, which means that the lack of information should not be interpreted as an indication that such links do not exist in practice.

The supervisory authorities of fundraising activities, such as the County Administrative Boards, do not currently have the possibility of monitoring whether financial means that are sent abroad are to some extent supporting terrorism. To find out which funds are distributed to whom outside of the EU requires advanced intelligence and local knowledge at the supervisory authorities of the areas that are controlled by various armed groups. This would also require more effective supervision and better traceability in the actual reporting, primarily in the dissolution rate of associations' fundraising activities and foundations, their accounting and exact to which operations in practice these are sent abroad and distributed on location. The large number of participants makes this a real challenge, since there are more than 8,000 foundations in Stockholm.

Fewer and weaker indicators require greater cooperation

During the work on this study, it became clear that more Swedish authorities are earmarking more resources for identifying, processing and counteracting the financing of terrorism. Many of the authorities the study worked with have established special functions that are tasked with gathering and processing information on this topic. In light of the problems that authorities are facing regarding proof of participation in or support of terrorist groups in the conflict area, it is very important to find alternative measures for disrupting these activities and participants in extremist environments that contribute to the decision of FTFs to travel. The Swedish Tax Agency's application of the "Al Capone method" is one example of how an authority can benefit from existing mandates and tools to charge suspected individuals by investigating to what extent they declare their income and pay the right tax.

However, it is also clear that there is major potential for using the authorities' resources and capacity to raise the aggregate capacity of the nation to handle the financing of terrorism.

Downpipes without gutters

Authorities have good insight into individual matters based on their own mandate, function and activities. However, there is no systematic processing and sharing of information that supports a more nuanced overview of the participants, methods, patterns and development trends based on all of the authorities' information and perspectives. This means there are many different perceptions among concerned authorities about how terrorism is financed, by whom and to what extent. There are many different organisations at the national level that need to identify and handle this issue. A clearer cooperation structure and cooperation processes between the large number of affected authorities are required to increase the national capacity.

However, there are new initiatives and conditions for taking concrete measures to improve cooperation. On 15 August 2016, a new act entered into force that enables authorities to share confidential information in order to prevent, obstruct or identify serious organised or systematic crime. This act applies to the following authorities: Arbetsförmedlingen, Swedish Economic Crime Authority, Swedish Social Insurance Agency, Swedish Prison and Probation Service, Swedish Enforcement Authority, Swedish Coast Guard, Swedish Migration Agency, Swedish Police Authority, Swedish Tax Agency, Swedish Security Service and Swedish Customs.⁶⁸

⁶⁸ Information Obligation for Cooperation Against Some Organised Crime Act (2016:774), SFS 2016:774, 2016-06-22 and Ordinance 2016:775 with the same name.

In addition, five authorities have received an assignment from the Government to develop and strengthen the cooperation to more effectively counteract the financing of terrorism.⁶⁹ The result of the work of these five authorities, which was headed by the Swedish Security Service, was presented in October 2016.⁷⁰ The document states that each authority has taken measures to strengthen its operations to counteract the financing of terrorism.

With regard to the core assignment from the Government regarding measures to work more efficiently through more in-depth and strengthened cooperation, it is much more difficult to identify concrete suggestions, although the Swedish Security Service and the Financial Intelligence Unit present the foundation and objectives for establishing “a formal cooperation”. How “formal cooperation” will function and the resources and measures that will be required, however, are not included in the document.

Furthermore, it states that the Swedish Police Authority and the Swedish Security Service must create a forum under the leadership of the Financial Intelligence Unit that aims to establish regular meetings with business proprietors to inform them about indicators and signs of the financing of terrorism in order to support the businesses in their capacity to identify such activities. In general, the report refers for the five authorities’ work with existing cooperation forums and the inquiry that proposed a new structure to replace existing coordinating bodies to counteract money laundering and the financing of terrorism.⁷¹

⁶⁹ <http://www.regeringen.se/regeringsuppdrag/2016/05/uppdrag-att-utveckla-och-starka-samverkan-for-att-arbeta-effektivare-mot-finansiering-av-terrorism/>

⁷⁰ “Uppdrag att utveckla och stärka samverkan för att arbeta effektivare mot finansiering av terrorism (Ju2016/03577/PO)”, Ref. 2016-10539-6, October 2016.

⁷¹ “Ytterligare åtgärder mot penningtvätt och finansiering av terrorism – fjärde penningtvättsdirektivet – samordning – ny penningtvättslag”, SOU2016:8, January 2016.

Recommendations

- Create conditions for a national, approach to financial support for terrorism and foreign terrorist fighters that is applied by all concerned authorities
- Expand and improve the effectiveness of information-sharing between authorities regarding suspected individuals and activities in order to create conditions for investigating the payment of benefits, student loans, etc.
- Strive to achieve more effective supervision of fundraising activities in Sweden that result in the transfer of funds to conflict areas. This applies in particular to activities arranged or transactions conducted by associations and foundations.
- Improve knowledge about terrorist groups' use of social media and informal remittance methods. Greater insight and awareness is also needed surrounding the risk of financial transactions to transfer funds from abroad to radical Islamic activities (radicalisation, recruitment, travel and planning of attacks) in Sweden.
- Improved the possibilities for strategic assessment of potential courses of events beyond relevant, individual events in order to ensure that there is a general status overview that provides support for proactive measures.
- Improve the cooperation between government authorities in Sweden and Denmark with regard to cross-border criminal activities and terrorism financing, particularly within the Öresund Sound region.

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