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Lone-Actor and Small Cell Terrorist Attacks

A New Front in Counter-Terrorist Finance?

Tom Keatinge and Florence Keen



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Contents

Acknowledgements	v
Executive Summary	vii
Introduction	1
I. Methodology	7
II. Results	9
III. Conclusion	17
Appendix: Lone-Actor Terrorist Plots in Australia, France and Great Britain	19
About the Authors	27

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Executive Summary

‘The smallest action you do in their heartland is better and more enduring to us than what you would [do] if you were with us. If one of you hoped to reach the Islamic State, we wish we were in your place to punish the Crusaders day and night’.

*Abu Muhammad Al-Adnani, former Official Spokesperson and Senior Leader of Daesh, speaking in May 2016.*¹

EFFORTS TO DISRUPT the funding of Daesh (also known as the Islamic State in Iraq and Syria, or ISIS) have taken up a significant amount of the time and resources of policymakers, law enforcement and the military. These efforts have also involved mobilising the private sector, particularly banks, oil companies and antiquities dealers. However, little attention has been paid to understanding and addressing the financing associated with the plots (whether successful, failed or disrupted) of lone actors and small cells that have acted beyond Daesh-controlled territory.

This paper seeks to provide insight into the financing connected with a sample of 63 lone-actor and small cell terrorist plots in Great Britain and France since 2000,² including those that are religiously inspired, right wing, nationalist, and single issue. The aim is to inform thinking and raise awareness among those charged with tackling this threat. The report also draws on a similar study by Australia’s financial intelligence unit, AUSTRAC, thereby providing an overview of lone-actor and small cell terrorist finance from the perspective of three countries, each with individual and distinct experiences.

What is clear from both studies is that the simplicity and spontaneity of these attacks, particularly those attempted by a lone assailant as opposed to a dyad or triad, means that assailants are often able to make use of their own funding resources, offering limited opportunities for traditional counter-terrorist financing (CTF) approaches to reveal financial indications of plans prior to their execution. Despite this challenge, the research conducted for this paper has highlighted a number of key themes that it is hoped can contribute to the approaches taken by law enforcement and security authorities as they adapt their CTF response to the evolving threat posed by such terrorists:

- While there has been an undoubted need to focus on disrupting the significant financing accrued by Daesh over the past two years, a comprehensive CTF strategy should not lose sight of the fact that lone actors and small cells operating at home present a considerably

1. Maher Chmaytelli et al., ‘Islamic State Calls for Attacks on the West during Ramadan in Audio Message’, *Reuters*, 22 May 2016.
2. We have used ‘Great Britain’ rather than ‘UK’ throughout since the research does not cover Northern Ireland.

more immediate threat to citizens than Daesh, given that the latter mainly operates in Iraq and Syria.

- Although it has traditionally been the case in many countries that terrorist financing has been addressed separately from broader financial crime, the increasing intersection of lone actors and small cells with low-level criminality suggests that this separation needs to be reconsidered. Investigations need to at least acknowledge this emerging connection and create dedicated inter-agency links to combat it.
- Attacks undertaken with knives have certainly resulted in casualties; however, the use of firearms (particularly automatic weapons) has resulted in casualties on a far greater scale. As such, increased focus should be placed on identifying and disrupting financial flows related to the trade in illicit firearms.
- Information about the financial tools employed by lone actors and small cells must be more widely disseminated to raise awareness among those agencies and actors – in both the public and private sectors – who are less familiar with terrorist financing techniques. These might include certain types of retailer, payday lenders and student loan companies, as well as online payment systems that may increasingly be the target of terrorist-related fraud. Closer monitoring of the welfare system is also advised, in light of cases identified where benefits were used to fund terrorist plots.
- The financial patterns of lone actors and small cell operators are often indistinguishable from legitimate financial behaviour, and proactive identification of these individuals through financial reporting remains challenging. National financial intelligence units must therefore act as a critical bridge between national security and law enforcement agencies (that identify subjects of interest via non-financial means) and the private sector, to allow financial institutions to conduct more targeted monitoring.

Ultimately, financial intelligence alone will not defeat terrorism. Lone actors and small cells provide a particularly challenging form of threat for the security authorities, and Daesh appears increasingly intent on directing or inspiring homegrown plots. However, this does not mean that the efforts of the authorities should ignore the possibility that finance can, in some circumstances, play a disruptive role, particularly when plots are more sophisticated and require greater financial resources. This paper is therefore intended to encourage a better understanding of the financing methods of lone actors and small cells in order to contribute to more effective, cross-agency and public–private sector partnership-based responses.

Introduction

WHEN WEIGHING UP the different approaches to tackling terrorism, authorities often adopt the policy of ‘follow the money’. This is because starving a group of its financial resources is perceived as a cornerstone of any operation aimed at disrupting and ultimately destroying a terrorist organisation. However, research into the financing of lone-actor (sometimes referred to as ‘lone-wolf’) and small cell terrorism remains sparse, despite the fact that it was identified by the Financial Action Task Force (FATF) as an emerging terrorist finance risk in October 2015.¹ In its most recent EU Terrorism Situation and Trend Report (TESAT), Europol emphasises that lone attacks remain a favoured tactic by Daesh and Al-Qa’ida, particularly when their supporters are unable to fight with them abroad.² Europol also highlighted that right-wing attacks remain a clear and rising threat, a reaction to the continuing arrival of irregular migrants into the EU. While the monetary requirements of lone actors and small cells are substantively less than the more recognisable and organised terrorist plots, they must still access finance to support their daily living expenses, and ultimately execute their plots.

Attacks throughout 2016 – in Orlando in the US, Magnanville and Nice in France, and Würzburg and Berlin in Germany – highlight the scale of the threat. Although Daesh claimed responsibility for these attacks, limited evidence exists directly linking the group with the planning, support or execution of these attacks.³

This paper begins with the assumption that all terrorist activity, whether large or small, must include some financial element. While intelligence and security services have, in general, engaged extensively with the study of terrorist financing, there has been limited academic investigation into the financial footprints of lone actors and small cells due to the inherent limitations of using open source intelligence as an evidence base.⁴ This paper has therefore examined cases of lone-actor and small cell terrorism drawn from RUSI’s Countering Lone-Actor Terrorism (CLAT) project, which includes both successful and disrupted plots from 1 January 2000 to 31 December 2014. It then builds upon the existing data using open source information drawn from the Global Terrorism Database and media reports to collect additional cases up to 30 April 2016. Data were also used from a similar study undertaken by Australia’s financial intelligence unit, AUSTRAC, that identified six additional cases within the same period.

Finally, this research was supplemented by interviews with relevant personnel in law enforcement and intelligence communities who have first-hand experience in terrorist finance and lone-

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1. FATF, ‘Emerging Terrorist Finance Risks’, October 2015.
 2. Europol, *European Union Terrorism Situation and Trend Report, 2016* (The Hague: European Police Office, 2016).
 3. Europol, ‘Lone-Actor Attacks – Recent Developments’, 20 July 2016.
 4. A rare example can be found in Emilie Oftedal, *The Financing of Jihadi Terrorist Cells in Europe* (Kjeller, Norway: Norwegian Defence Research Establishment, January 2015).

actor terrorism, including the UK's National Terrorist Financial Investigation Unit, the Crown Prosecution Service and the Metropolitan Police, as well as AUSTRAC.

The threat landscape is constantly shifting, and while lone-actor and small cell attacks are not a new phenomenon, evidence would suggest that they are becoming more commonplace.⁵ By enhancing the understanding of this activity through the scrutiny of the financial behaviour behind these plots, it is hoped that this paper will contribute another layer to this growing and important body of research.

Counter-Terrorist Financing

Having been substantially overlooked by the international community prior to 9/11, despite the introduction in 1999 by the UN of the International Convention on the Suppression of the Financing of Terrorism,⁶ Counter-Terrorist Financing (CTF) was pushed to the top of the global agenda after the Al-Qa'ida attacks on New York and Washington DC. Following these attacks, it became apparent that the hijackers had navigated their way undetected through the financial system, their actions providing no signals, at the time, that would flag them up as terrorists. Soon after, the US government publicly proclaimed that the fight against Al-Qa'ida financing was as critical as the fight against the jihadis themselves.⁷ The international community responded, with FATF introducing its 'Special Recommendations' related to CTF in October 2001, demanding the criminalisation of terrorist financing, the application of asset-freezing measures, greater monitoring of potential abuse through charities, cash couriers and wire transfers, and the ratification and implementation of relevant UN conventions and resolutions. In the following years, FATF has sought to strengthen overall CTF standards and implementation across global jurisdictions.

The necessity for coordinated, worldwide action has intensified in the current geopolitical climate. Daesh, which holds territory in Northern Iraq and Syria, has received the largest portion of publicity. The subsequent spike in terrorist activity perpetrated by the group has been significant, and it continues to claim responsibility for indiscriminate attacks close to its territory and further afield. Whether the attacks are in Baghdad, Beirut or Paris, it appears that no region or community is immune, and disrupting Daesh's financial model has become a global priority. Just three days after the Paris attacks, in November 2015, leaders at the G20 summit made clear their commitment to cutting off funding relating to all forms of terrorism, and to increased information sharing between nations.⁸ This was reiterated by global finance ministers at the UN in December 2015, as they voted unanimously for Security Council Resolution 2253, which expanded the sanctions framework against Al-Qa'ida to include Daesh.⁹ Yet these calls to

5. Clare Ellis et al., 'Countering Lone-Actor Terrorism Series No. 4', *RUSI Occasional Papers* (February 2016), p. 7.
6. UN, 'International Convention for the Suppression of the Financing of Terrorism', December 1999.
7. John Roth et al., 'National Commission on Terrorist Attacks Upon the United States: Monograph on Terrorist Financing', 2004.
8. *Deutsche Welle*, 'G20 Leaders Pledge to Cut off Financing to Curb IS Terrorism', 17 November 2015.
9. UN, 'Unanimously Adopting Resolution 2253 (2015), Security Council Expands Sanctions Framework to Include Islamic State in Iraq and Levant', SC/12168, press release,

cut off funding ignore the more valuable and proven power that financial intelligence can bring to the identification and disruption of terrorists planning attacks at home.

There has been no shortage of analysis on how best to choke Daesh's finances, from preventing funding from flowing to and from Daesh-controlled territory, to targeting their oil fields and winning back territory militarily. These initiatives have been coordinated by the Counter Daesh Finance Group, co-led by the US, Italy and Saudi Arabia.¹⁰ Within Daesh-controlled territory, there are signs that these strategies may be working.¹¹ Of course, a quantitative measure of Daesh's overall balance sheet is extremely difficult to obtain, a fact highlighted in a recent interview with Adam Szubin, Acting Under Secretary for Terrorism and Financial Intelligence at the US Department of the Treasury, who said that '[i]t's proven to be a pretty hard intelligence question to be able to measure [Daesh's] overall accounting'.¹² Despite this challenge, he nevertheless emphasised that Daesh has suffered significant financial constraint, reflected in a widely circulated memo suggesting that fighters in the Syrian city of Raqqa had seen their pay slashed by 50%. There are also reports that the group has stopped paying death benefits to the families of its personnel. Finally, he describes how Daesh has increased taxes and extended them to even the poorest members of society. These indicators add to a growing picture that Daesh's revenue stream within its shrinking territory is slowly but surely being depleted.

The Lone-Actor and Small Cell Threat

As noted above, while this progress against Daesh in Iraq and Syria is to be welcomed, a CTF strategy designed purely around disrupting activity abroad risks being short-sighted by failing to acknowledge that, for the West, the most imminent threat is from attacks that are conducted domestically by lone actors or small cells. These plots are cheap and extremely quick to plan and implement, yet the results can often be as deadly as schemes that are more expensive and elaborate. The 2013 murder of Fusilier Lee Rigby in London demonstrated this clearly: his attackers first ran him down with a car before attacking him with kitchen knives and a cleaver. The objectives – death and publicity – were achieved, despite the lack of complexity in the planning and the execution.

Daesh understands the potency of this strategy in an era of smartphones and social media. It does not take much to capture and disseminate footage of these attacks worldwide, instilling fear into the target audience with brutal efficiency. Middle East analyst Hassan Hassan has observed that Daesh mobilises sympathisers as active conscripts in its military campaign. Al-

17 December 2015, <<http://www.un.org/press/en/2015/sc12168.doc.htm>>, accessed 5 December 2016.

10. US State Department, 'Establishment of the Counter-ISIL Finance Group in Rome, Italy', press release, 20 March 2015, <<http://www.state.gov/r/pa/prs/ps/2015/03/239592.htm>>, accessed 5 December 2016.

11. Tom Keatinge, 'Disrupting Daesh Finance is About More Than Oil', *RUSI Commentary*, 24 February 2016.

12. Paul Cruickshank and Nicole Magney, 'A View from the CT Foxhole: Adam Szubin, Acting Under Secretary for Terrorism and Financial Intelligence, U.S. Dept. of Treasury', *CTC Sentinel* (Vol. 9, No. 8), August 2016.

Qa'ida, on the other hand, views its supporters as part of a long-term effort to build legitimacy. He predicts that lone-actor attacks will continue to form a central plank of Daesh's foreign strategy, and are thus likely to increase as they inspire followers to participate in global jihad.¹³

The notion that all terrorists are hardened, well-trained militants in battle-torn regions does not correspond with the increasingly unpredictable threat faced at home from people who may not previously have been on the radars of the police or intelligence services. Therefore, while Europe must remain vigilant over terrorists returning from foreign conflicts, individuals who often have never left their country of birth can also pose a serious risk. The critical point here is that lone actors fit no single profile or demographic. They may be inspired by religion or ideology, or have personal grievances or even mental health problems.¹⁴ This is why authorities are often taken by surprise by these kinds of attacks, and why they present such an immense challenge to detect and disrupt.

There is a growing body of research on lone-actor and small cell terrorism.¹⁵ However, the financial methodologies behind these plots are consistently under-reported and therefore under-analysed. This is perhaps because the funding and resources required for these attacks are minimal. Therefore, the detection of suspicious transactions by the financial services industry following traditional CTF responses is unlikely (without the direction of specific intelligence from national security or law enforcement agencies). In many cases, this will require amended legislation and the introduction of enhanced information sharing that balances data protection and privacy risk requirements.¹⁶

This paper argues that without thorough scrutiny and analysis of the financing methods of lone actors and small cells, policymakers and law enforcement agencies risk creating a gap in their understanding of the threat posed by these actors. This paper seeks to address this gap by analysing the financing methods behind lone-actor and small cell plots in Great Britain and France from 1 January 2000 to 30 April 2016, as well as drawing on a study conducted by AUSTRAC, in order to ascertain what trends can be identified.

The inclusion of data and experiences from Australia reflects the fact that the threat of lone-actor and small cell terrorism in Australia, much like France and Great Britain, is increasing. In

13. Hassan Hassan, 'Isis Rallies Lone Wolves to the Jihadi Cause', *Financial Times*, 14 June 2016.

14. For a detailed analysis of the overlap between lone-actor terrorism and mental health, see Raffaello Pantucci et al., 'Countering Lone-Actor Terrorism, Policy Paper 1: Personal Characteristics of Lone-Actor Terrorism', *RUSI Occasional Papers* (December 2015). Their findings show that in 35% of lone-actor cases reference is made to a mental health disorder.

15. For a comprehensive understanding of the literature thus far, see Raffaello Pantucci et al., 'Countering Lone Actor Terrorism, Literature Review', *RUSI Occasional Papers* (December 2015).

16. For further discussion on information sharing, financial crime and data protection see Ines Sofia de Oliveira et al., 'Building Trust and Taking Risks in the Global Fight to Tackle Financial Crime', *RUSI Occasional Papers* (October 2016); and Ines Sofia de Oliveira, 'Challenges to Information Sharing', *RUSI Occasional Papers* (July 2016).

September 2014, Australia's terrorism public alert level was raised from 'Medium' to 'High',¹⁷ the first time the level had been raised since 9/11. This was due to the fact that the international forces driving extremist ideology and capabilities are becoming more sophisticated, with extremist narratives resonating with small sections of the Australian public.

Moreover, 110 Australians are currently in Syria and Iraq to train, fight or to support militant groups, such as Daesh. A further 40 are known to have returned to Australia.¹⁸ Given the increasing threat that this poses, continued monitoring of international trends will remain important for Australian authorities to detect and deter new methods of terrorist financing.

17. On 26 November 2015, the new national terrorism threat advisory system was launched. The previous rating of 'High' is now labelled 'Probable'.

18. Evidence provided by AUSTRAC.

I. Methodology

Defining ‘Lone-Actor’ Terrorism

WHILE THERE IS no single accepted definition of lone-actor terrorism, this report seeks to remain consistent, where possible, with the working definition established in RUSI’s CLAT series:

The threat or use of violence by a single perpetrator (or small cell),¹ not acting out of purely personal-material reasons, with the aim of influencing a wider audience, and who acts without any direct support in the planning, preparation and execution of the attack, and whose decision to act is not directed by any group or other individuals (although possibly inspired by others).²

This working definition was subsequently broken down into the following inclusion criteria:

- Violence, or the threat of violence, must be planned or carried out.
- The perpetrator(s) must be an individual, dyad or triad.
- The perpetrator(s) must act without any direct support in the planning, preparation and execution of the attack.
- The perpetrator’s decision to act must not be directed by any group or other individuals.
- The motivation cannot be purely personal-material gain.
- The target of the attack extends beyond those victims who are immediately impacted by the attack.³

To be included in the database, there needed to be evidence to indicate that each of the six criteria had been met. If there was any doubt, then the authors used their judgement to decide whether the case should be included or not.

Data Collection

The CLAT database captured both successful and disrupted instances of lone-actor terrorism across 30 countries (EU member states plus Norway and Switzerland) between 1 January 2000 and 31 December 2014, primarily collecting data from the Global Terrorism Database to establish whether incidents met the criteria for inclusion.⁴ Open source research and input from country

1. Isolated cells of up to three members constituted a small cell, which again did not appear to be part of the broader threat picture, but were in fact remote cells manufacturing terrorist attacks without clear direction.
2. Edwin Bakker and Jeanine de Roy van Zuijdewijn, ‘Countering Lone Actor Terrorism, Definitional Workshop’, *RUSI Occasional Papers* (December 2015).
3. Bakker and de Roy van Zuijdewijn, ‘Countering Lone Actor Terrorism, Analysis Paper’, p. 2.
4. For information on more than 150,000 terrorist attacks, see University of Maryland, ‘Global Terrorism Database’ <<https://www.start.umd.edu/gtd/>>, accessed 5 December 2016.

experts then validated the cases. A limitation of the database is that variations in the reporting of incidents across Europe meant that some cases would unavoidably have been missed.

To narrow the scope of this study, the authors of this paper investigated incidents in France and Great Britain, which represented half of the total cases in the original CLAT database. It then supplements these with additional cases that occurred after the CLAT database's cut-off point of December 2014, bringing the period covered up to April 2016.⁵ This paper chose to limit the number of cases investigated as a starting point, in order to ascertain if further research would be useful. This initial study could, however, be built upon in the future by including the entire CLAT database and cases since then.

There were two plots that were included in the analysis where there was some ambiguity as to whether criterion three (above) had been met: the failed drive-by shootings in Shepherd's Bush, London, in 2014 (see Appendix: GB39); and the cluster of five attacks in France in January 2015, of which the assault on satirical magazine *Charlie Hebdo* proved the most fatal (see Appendix: F12). In both cases, links to abroad were cited, implying there *may* have been outside direction. In the absence of a definitive answer, both are included because of the interesting financial information contained within them. This brought the total number of incidents studied to 63, of which 20 were in France and 43 in Great Britain.

This paper then draws on a study undertaken by AUSTRAC, whose assessment followed the same methodological approach and yielded six cases in total.⁶ Finally, we conducted interviews with relevant personnel in the law enforcement and intelligence community who have first-hand experience with lone-actor and small cell terrorism – some of whom had worked on some of the cases collected. The purpose of this was to strengthen the overall analysis by ensuring that all possible financial methodologies and responses were considered. The interviews were semi-structured, so that the conversation was guided to some extent; however, the participants were free to bring new concepts and unique experiences to the discussion.⁷

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5. While there have been notable attacks in France and Great Britain that appear to fit the lone-actor trend after this date, we analysed cases only up until April 2016. Our rationale was that investigations into these more recent events are still active, meaning that key details are not yet publicly available; therefore, the lone-actor credentials could not be sufficiently verified.
 6. AUSTRAC provided two additional cases of lone-actor terrorism: the arrest of Tamim Khaja in New South Wales on 17 May 2016; and the arrest of an unnamed juvenile in New South Wales on 15 June 2016. However, because they fell outside of the time period, they were not included as part of the final analysis.
 7. For a more detailed view of our interview methodology, see John Carruthers, 'A Rationale for the Use of Semi-structured Interviews', *Journal of Educational Administration* (Vol. 28, No. 1, December 1990).

II. Results

WHAT WAS CLEAR from the initial results was that the media reporting in all three countries for the majority of cases contained little or no information about the financing of the plots. For example, of the 63 incidents drawn from France and Great Britain, only 12 reports refer to the financing of the plot (19%). Two primary reasons for this were surmised: first, given the nature of the plots, which often required few financial resources, there was simply nothing financial to report on. Second, media reporting of terrorist activity tended to focus on the more ‘headline-worthy’ elements, particularly when attacks resulted in deaths. If there was financial information, it was alluded to briefly, but not explored in any great detail.

Notwithstanding the limited references, some overall themes started to emerge: the need for a more detailed understanding of the finance related to firearms trafficking; the difference in financial activity between lone actors and small cells; the emergence of new terrorist financing sources and self-funding schemes; the links between low-level criminality and lone-actor and small cell terrorism; and the need for more creative and collaborative approaches to the topic.

Weapon of Choice

A clear trend that materialised through the analysis of France and Great Britain was that when the choice of weapon was less sophisticated and/or more accessible, financial information was far harder to discern. Less sophisticated weapons include knives (or similar), vehicles and incendiary activity (most commonly arson). Twenty-one (about 33%) of the incidents examined involved these methods (or a combination thereof) and, of those, only one, the murder of Lee Rigby, mentioned financial activity, referencing the purchase of knives by Michael Adebolajo the day before the attack (see Appendix: GB26).¹ There was no additional information on the price of the knives, or where Adebolajo obtained the funds, but it is unlikely to have involved more than £20–30. The reason for this is clear: less sophisticated or easily accessible weapons do not typically require external sources of funding, given that most people either already have the personal funds to purchase them, or have access to the tools, such as the use of a vehicle.

This lack of sophistication accords with the portrayal of lone-actor plots as being often motivated by a spontaneous decision to commit an act of terror. The case of Bertrand ‘Bilal’ Nzohabonayo, a 20-year-old Islamic convert in Joué-lès-Tours, exemplifies this (see Appendix: F9).² Despite being previously known to authorities for petty crime, he had not appeared on any French intelligence or terror watch list when he attacked police officers with a knife outside a police station in December 2014. The foiled knife attack by the 19-year-old Brusthom Ziamani

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1. *BBC News*, ‘Woolwich: How Did Michael Adebolajo Become a Killer?’, 19 December 2013.
 2. Rory Mulholland, ‘French Knife Attacker Bertrand Nzohabonayo Was Islamic Convert’, *The Telegraph*, 21 December 2014.

in August 2014 in London revealed a similar story (see Appendix: GB37).³ In these cases, there is no indication that a specific purchase was made for the attacks, demonstrating the acute problem law enforcement faces in such cases when trying to identify related financial indicators.

Plots that mentioned homemade explosives similarly yielded limited financial information: of the 29 (46%) identified, only four made reference to 'purchasing' materials required to make the explosives, and even then the amounts were insignificant. This helps explain why the financial activity of lone actors so often goes undetected, as even amateur bomb-making requires only small amounts of funding.

When firearms were the weapon of choice, the media coverage of the financial element was also far from comprehensive. Of the 14 plots (22%) that used, or planned on using, firearms, only four referenced the purchase of weapons. From the data, it was apparent that proportionally firearms related to far more plots in France, referenced in 40% of French plots, compared with just 14% in Great Britain, underlining the widely held belief that such weapons are more easily accessible in continental Europe than in Great Britain. Tackling the illegal trafficking of firearms was prioritised in the European Agenda for Security, published less than three weeks after the November 2015 attacks in Paris, where automatic weapons were used to devastating effect.⁴ Developing a greater understanding of both the formal banking and cash-based financial flows connected with the illicit trade in firearms in Europe will be crucial to identifying and disrupting those involved in the trafficking of these key terrorism ingredients.

By contrast, the weapons used in Australia's three successful attacks have been unsophisticated, inexpensive and relatively easy to obtain. Ahmad Numan Haider used a knife in his attack on two police officers in Victoria (see Appendix: A1).⁵ The make and model of the knife has not been made public and there are conflicting reports about the number and type of knives used.

The sawn-off shotgun Man Haron Monis used in the fatal Sydney siege in December 2014 is believed to have been imported to Australia in the late 1950s (see Appendix: A2). The gun was not registered, should have been surrendered in Australia's buyback scheme in 1996 and is thought to have been purchased for a low cost on the 'grey market'.⁶ Australia's grey market comprises an estimated 250,000 unregistered guns owned by individuals for recreational purposes. It is considered cheaper than, and distinct from, the much smaller criminal 'black market'.

3. Peter Walker, 'Teenager Jailed for 22 Years for Plotting to Copy Lee Rigby Beheading', *The Guardian*, 20 March 2015.

4. European Commission, 'Commission Takes Action to Combat Terrorism and Illegal Trafficking of Firearms and Explosives', press release, 2 December 2014, <http://europa.eu/rapid/press-release_IP-15-6218_en.htm>, accessed 5 December 2016.

5. Melissa Davey, 'Police Call for Calm after Melbourne Shooting', *The Guardian*, 23 September 2014.

6. Paul Bibby, 'Lindt Café Siege Inquest: Gun Used by Man Monis Part of Australia's "Grey Market"', *Sunday Morning Herald*, 17 August 2015.

Small Cells

When attacks were committed by small cells (either dyads or triads) there was noticeably more information pertaining to the perpetrators' financial methods. Sixteen (25%) of the incidents in the France and Great Britain sample were classified as 'small cell', and within these, nine (of the small cell cases) contained financial information, equivalent to 75% of all studied cases where financial information was available. This is consistent with the fact that, within our sample, when more than one attacker was involved there was a greater level of complexity to the plot. Having an accomplice gives rise to greater discussion and planning, and execution of the plot is less likely to be spontaneous.

Despite this, the amounts of money required, and the related financial activity, were often still below a threshold that might reasonably flag their behaviour as being connected with terrorism (without specific intelligence being shared with the financial sector). The plot resulting in the cluster of attacks in France in January 2015 (the most notorious being the *Charlie Hebdo* attack) supports this point (see Appendix: F12): one of the Kouachi brothers, who committed the attack that killed twelve people, was reported to have received \$20,000 of financial support from AQAP (the Al-Qa'ida affiliate in the Arabian Peninsula).⁷ Between them, it was calculated that the weapons amassed had a street value of up to €25,000, which included three AK-47 Kalashnikovs, Soviet-made Tokarev pistols, a Skorpion submachine gun and a rocket launcher.⁸

This case reinforces how problematic it can be for authorities and financial institutions to identify terrorist finance. Despite the significant funding that would have been needed to purchase such an array of weaponry, the group's financial activity still went undetected by the financial sector. Anti-money laundering systems such as transaction monitoring and 'know your customer' checks are tailored to pick up suspicious entities or activity in the financial system. However, they are not well-suited to spotting possible terrorist-related activity unless the authorities are able to provide guidance and insight as to precisely what banks' systems should be seeking. Indeed, it may well have been the case that the funds were provided via the informal financial sector using a money service business, where transaction monitoring is generally less intrusive and oversight less effective. Where terrorists are able to interact with the financial system, the techniques they employ are often unlikely to trigger a typical warning sign, emphasising the value of the intelligence insight financial intelligence units and other law enforcement agencies can provide in assisting financial institutions to monitor their data for information that may in turn assist the authorities.

Funding From Legitimate Sources

The challenge of identifying self-funding from legitimate sources is an acknowledged vulnerability for law enforcement when tackling foreign terrorist fighters. FATF has stated that

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7. Michael B Kelley, 'Al Qaeda In Yemen Has Claimed Responsibility for The Paris Terror Attacks,' *Reuters*, 14 January 2015.
 8. Harriet Alexander, 'How Did the Paris Terrorists Get Hold of Their Weapons?', *The Telegraph*, 17 January 2015.

Box 1: The Australian Response

In 2014, the Australian government broadened the scope of the country's counterterrorism operations to include criminal intelligence, financial intelligence and revenue agencies, as well as expanding law enforcement and border agency involvement. This introduced enhanced collection and discovery methodologies beyond traditional national security approaches. It became apparent that the intelligence and collection capabilities of revenue, criminal and financial intelligence agencies could be harnessed to help identify entities at higher risk of radicalisation or issue-motivated violence.

The result is that forms of collection that were previously outside the scope of national security agencies can now be undertaken lawfully by the additional members of the counterterrorism community, as authorised under their enabling legislation. For example, rather than focus only on gun licence holders, records of those denied firearm licences or those who had them revoked could be considered. Bulk suspicious matter reports, filed with AUSTRAC by the reporting sector, could be analysed for high-risk geographic regions or cohorts.¹ Other data could include familial information, possibly from social services, taxation and law enforcement agencies; or unusual ammunition purchases and gun magazine subscriptions. This diverse data could be collected using existing policing or criminal intelligence holdings or via a wider range of legislation that permits coercive powers or subpoenas for information.

At the same time, Australian authorities have implemented a number of creative and collaborative strategies that may also be applicable in other jurisdictions, and are worthy of consideration. These strategies are reportedly proving to be effective at detecting and disrupting both individuals likely to commit onshore acts of extremism, as well as their supporters and financiers. For example, the National Disruption Group (NDG) brings together twenty federal and state/territory agencies to coordinate counterterrorism disruption operations. Its membership includes representation from national security, law enforcement and non-law enforcement agencies such as education, community and social services organisations. By extending its reach to this diverse range of agencies, the NDG has reportedly proved itself effective in disrupting terrorist activity through financial channels such as tax evasion and fraud. In addition to disruption, the NDG identifies suitable individuals for diversion activities, including participation in countering violent extremism programmes. Australian authorities are also running a creative detection project that develops key risk indicators for violent extremism to assist with identifying individuals who are likely to commit acts of onshore violent extremism.

Additionally, the Australian Criminal Intelligence Commission works closely with its national security and law enforcement partners to identify links between Australian extremists and serious and organised crime. In some instances, serious and organised crime controls the markets that extremists and indeed their supporters use, including firearms and encrypted communications. There is evidence that serious and organised criminals have fought with or supplied material to support terrorist organisations. Understanding the nature of this terror-crime nexus can prove critical in the early detection of extremism.

1. 'Suspicious matter reports' is the Australian term for suspicious activity reports, or suspicious transaction reports, as they are known elsewhere.

there are many parallels between the way foreign terrorist fighters and small terrorist cells accrue finance.⁹ Individuals have been found to use funds from legitimate sources, including their own employment income, social welfare and bank loans to travel to conflict zones. This method of funding was apparent within the research of plots in France and Great Britain, with five plots identified whose foundations lay in self-funding through the use of loans (from family and banks, as well as student loans). In the case of the Glasgow airport plot in June 2007 (see Appendix: GB7), the jury was told that one member of the triad, Bilal Abdullah, had considered loans, savings products and credit cards as a means of bankrolling the plan.¹⁰ Between them, the attackers were able to purchase five different cars – key to the execution of the plot, which involved using car bombs and crashing into Glasgow airport.¹¹ This aligns with the previous finding that the more sophisticated a plot, the more money it is likely to need, and it is also evidence of the variety of strategies that terrorists will seek to use to fund attacks.

The example of Mohammed Rehman and Sana Ahmed Khan, the British husband and wife whose 7/7 attacks tenth anniversary bomb plot was disrupted in May 2015, also demonstrates the potential of loan funding; Khan was said to have funded Rehman's preparations, which totalled around £14,000, by taking out payday loans, as well as by drawing from her own salary as a teaching assistant (see Appendix: GB41).¹² While it is near impossible for loan and credit agencies to determine what customers will ultimately spend their money on, it is clear that limited awareness exists in this community as to the extent to which their products might be employed for terrorist financing purposes.

From the Australian sample, funding from legitimate sources seems likely to remain the main source of terrorism financing here, much in the same way that Australian foreign terrorist fighters fund their planning and travel to conflict zones. AUSTRAC's research found that multiple cash withdrawals were often made by suspects in the months preceding an attack, although there was no identifiable trend in withdrawal location or amount. Moreover, while some individuals made suspicious online purchases, as well as structured cash deposits and withdrawals prior to the attack, it was not a common feature.

History of Low-Level Crime

Another theme that emerged in many of the cases in France and Great Britain was evidence of links to low-level and petty criminality prior to terrorist activity. As was pointed out in a recent report by the International Centre for the Study of Radicalisation and Political Violence (ICSR),¹³ the nexus between crime and terrorism is not a new phenomenon. However, it has evolved in recent years as a result of the convergence of criminal and terrorist environments,

9. FATF, 'Emerging Terrorist Finance Risks', October 2015.

10. *The Independent*, "'Glasgow Plotter Asked for Loan,'" Court Told', 14 October 2008.

11. *The Herald*, 'Glasgow Airport Terror Attack: Timeline of the Plot', 16 December 2008.

12. Tom Whitehead and David Barrett, 'Middle Class Daughter of Magistrate Who Turned to Suicide Bomb Plotter', *The Telegraph*, 20 December 2015; Owen Bowcott, 'Couple Found Guilty of 7/7 Anniversary London Bomb Plot', *The Guardian*, 29 December 2015.

13. Rajan Basra et al., 'Criminal Pasts, Terrorist Futures: European Jihadists and the New Crime–Terror Nexus', ICSR, 2016.

in which individuals often move fluidly between these two sub-sections of society. In Europe, ICSR observed the overlap between criminals and terrorists who were often being drawn from the same section of society, such as ghettos in prisons, and what they term as growing Muslim 'underclasses' in European cities, many with a history of violence, and ultimately using their criminal skills for terrorist objectives. Indeed, jihadists have not only legitimised the use of petty crime to fund terrorism, but have encouraged it as an ideologically correct way of enacting jihad.

What remains unclear is the extent to which the proceeds of this criminality are used to finance the plots. For example, in the case of Tarik Hassane and Suhaib Majeed (the would-be drive-by shooters in Shepherd's Bush) a PayPal fraud scheme was revealed in court (see Appendix: GB39).¹⁴ This was, however, small-scale, and there was no indication that any of this money was linked to the plot itself. There had also been suspicion that money was sent from abroad, however the laptops of the convicted were so heavily encrypted that this information can neither be confirmed nor validated.¹⁵ This case demonstrates how sophisticated digital technologies can complicate terrorist investigations – a problem which is likely to grow as encryption software continues to proliferate.

Opportunities to Respond: Considering Creative and Collaborative Strategies

Generally absent in the sample from France and Great Britain was evidence of lone actors and small cells financing their activities through traditional tools associated with terrorist finance, such as receiving money from abroad, from donors or via charities. The same can be said for AUSTRAC's study, which indicates that in addition to traditional strategies to combat terrorist finance a more innovative strategy could be explored which incorporates agencies not ordinarily associated with CTF.

Key to enhancing the financial sector's response to this evolving threat will be the greater sharing of information by law enforcement and national security agencies to help improve the quality and timeliness of suspicious transaction reporting, the detection of which is unlikely in these cases without specific intelligence leads. This could include providing financial institutions with greater access to specific national security data, such as through the sharing of suspect lists to assist with more targeted private sector investigations and reporting.

Expanding the scope of mandatory suspicious activity reporting to cover certain retail sectors responsible for the sale of high-risk goods and services could also be considered. For example, the obligation could apply to those involved in the sale of firearms and other weapons, telecommunications equipment, fertilisers and related chemical products or the hire of vehicles. Precedent for this approach exists, for example in the US, where industry is required to report the sale of precursor chemicals suitable for the production of illicit drugs or the manufacture

14. Emily Pennink, "'Drive-by Jihad' Plotters Tarik Hassane and Suhaib Majeedi Jailed for Life', *The Independent*, 23 April 2016.

15. Private interview conducted by the authors.

of explosives.¹⁶ In most US schemes, this is done directly from the wholesaler or retailer to a policing agency. Another option could be to use existing FIU infrastructure, reporting portals and analytical power to collect and process this purchase data or suspicious activity reporting from selected industries to seek to identify relevant profiles or indicators. Furthermore, with UK benefit and welfare payments increasingly featuring as a source of financing, greater awareness of this risk and monitoring of the system should be considered. Indeed, it was discovered that Mohamed Abrini, who was allegedly involved in the Brussels airport bombings as the 'man in the hat', had been passed £3,000 cash in July 2015 from the account of Belgian national, Anouar Haddouchi, who had previously lived in the East Midlands and was still receiving benefits from there, despite having left to fight in Syria in 2014.¹⁷

Given the constraints financial intelligence faces in early detection of radicalisation or self-funding activities, approaches such as those highlighted above are highly relevant in the face of the security challenges posed by the current lone-actor and small cell terrorism threat, highlighting the clear value of applying multi-faceted approaches to combating new forms of terrorist financing threat.

16. See, for example, Arizona Department of Public Safety, 'Reporting Precursor Chemicals', <<http://www.azdps.gov/information/Chemicals/Reporting/>>, accessed 5 December 2016.

17. Mark White, 'Pair Convicted After Giving Money to Brussels Bomb Suspect', *Sky News*, 6 December 2016.

III. Conclusion

What is clear from this report is that while lone-actor and small cell terrorism represents an ongoing threat, the ability to detect and prevent plots in their formative stages through financial intelligence challenges traditional CTF approaches for discovering, understanding, and responding to this form of extremism. It is therefore necessary to consider different or expanded approaches to identifying and monitoring for transactions outside those typically associated with terrorist financing. The simplicity and spontaneity of these attacks, particularly those attempted by lone actors, has meant that assailants are often able to make use of their own resources, reducing the possibility that their plans might be discovered prior to execution. As one official confirmed, lone actors accrue money simply to sustain their daily living costs and to ultimately commit an act of terror – and, unlike organised criminals, they may have little interest in material wealth or luxury lifestyles.¹ Given that the majority of such successful attacks end with the perpetrator’s death, it can be assumed that terrorists often expect to die as martyrs, which explains why they do not store up significant sums of money in their bank accounts. Finance becomes the means to their own end, making any obvious financial links to their plans challenging to distinguish.

Despite these challenges, this research has highlighted a number of key themes that it is hoped can contribute to the approaches taken by law enforcement and security authorities as they adapt their CTF response to the evolving threat posed by such terrorists:

- While there has been an undoubted need to focus on disrupting the significant financing accrued by Daesh over the past two years, a comprehensive CTF strategy should not lose sight of the fact that lone actors and small cells operating at home present a considerably more immediate threat to citizens than Daesh, given that the latter mainly operates in Iraq and Syria.
- Although it has traditionally been the case in many countries that terrorist financing has been addressed separately from broader financial crime, the increasing intersection of lone actors and small cells with low-level criminality suggests that this separation needs to be reconsidered. Investigations need to at least acknowledge this emerging connection and create dedicated inter-agency links to combat it.
- Attacks undertaken with knives have certainly resulted in casualties; however, the use of firearms (particularly automatic weapons) has resulted in casualties on a far greater scale. As such, increased focus should be placed on identifying and disrupting financial flows related to the trade in illicit firearms.
- Information about the financial tools employed by lone actors and small cells must be more widely disseminated to raise awareness among those agencies and actors – in both the public and private sectors – who are less familiar with terrorist financing techniques. These might include certain types of retailer, payday lenders, government

1. Private interview conducted by the authors.

benefit agencies and student loan companies, as well as online payment systems that may increasingly be the target of terrorist-related fraud.

- A broader set of disruption strategies should be considered, such as the imposition of financial control orders or the closer monitoring of the welfare system.
- The financial patterns of lone actors and small cell operators are often indistinguishable from legitimate financial behaviour, and proactive identification of these individuals through financial reporting remains challenging. National financial intelligence units must therefore act as a critical bridge between national security and law enforcement agencies (that identify subjects of interest via non-financial means) and the private sector, to allow financial institutions to conduct more targeted monitoring.

Ultimately, financial intelligence alone will not defeat terrorism. Lone actors and small cells provide a particularly challenging form of threat for the security authorities, and Daesh appears increasingly intent on directing or inspiring their activities. This does not, however, mean that the efforts of the authorities should ignore the possibility that finance can, in some circumstances, play a disruptive role, particularly when plots are more sophisticated, and require greater financial resources. The argument of this paper is therefore not that finance is the best tool for detecting and disrupting lone-actor and small cell terrorism; but merely that enriching our knowledge around the financial methodologies behind such plots is useful in building an overall picture about this evolving threat. This report is intended to encourage more creative thinking in seeking ways to better understand the financing methods of lone actors and small cells, in order to contribute to more effective, cross-agency and public–private sector, partnership-based, responses.

Appendix: Lone-Actor Terrorist Plots in Australia, France and Great Britain

Figure 1: Lone-Actor and Small Cell Terrorist Plots in Australia

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
A1	Single	Individual	Knife	No	Religiously Inspired	No	N/A
A2	Single	Individual	Multiple	No	Religiously Inspired	Yes	Knife believed to have been purchased for low cost
A3	Single	Dyad	Knife or similar	Yes	Religiously Inspired	No	N/A
A4	Single	Individual	Multiple	Yes	Unknown	No	N/A
A5	Single	Individual	Explosives	Yes	Unknown	Yes	Purchased materials that were used in attack from hardware store
A6	Single	Individual	Multiple	Yes	Unknown	No	N/A

Figure 2: Lone-Actor and Small Cell Terrorist Plots in France

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
F1	Single	Individual	Firearms	No	Other	No	N/A
F2	Single	Individual	Firearms	No	Left-Wing and Anarchist	No	N/A
F3	Single	Individual	Firearms	Yes	Right-Wing	No	N/A
F4	Multiple	Dyad	Firearms	No	Religiously Inspired	Yes	Funds used to purchase firearms and rent car
F5	Single	Individual	Firearms	No	Religiously Inspired	No	N/A
F6	Single	Individual	Explosives (Molotov cocktail)	No	Right-Wing	No	N/A
F7	Single	Individual	Knife or similar	No	Religiously Inspired	No	N/A
F8	Single	Individual	Knife or similar	No	Religiously Inspired	No	N/A
F9	Single	Individual	Knife	No	Religiously Inspired	Yes	Petty crime provided funds although no proven link that this was used to fund terror
F10	Single	Individual	Vehicle	No	Religiously Inspired	No	N/A

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
F11	Single	Individual	Vehicle	No	Other	No	N/A
F12	Multiple	Triad	Multiple	No	Religiously Inspired	Yes	Funds received from international donor
F13	Single	Individual	Knife or similar	No	Religiously Inspired	No	N/A
F14	Single	Individual	Firearms	No	Religiously Inspired	No	N/A
F15	Single	Individual	Multiple	No	Religiously Inspired	No	N/A
F16	Single	Individual	Firearms	No	Religiously Inspired	Yes	Purchased firearms
F17	Single	Individual	Vehicle	Yes	N/A	No	N/A
F18	Single	Individual	Vehicle	No	Right-Wing	No	N/A
F19	Single	Individual	Knife	Yes	Religiously Inspired	No	N/A
F20	Single	Individual	Knife	No	Religiously Inspired	No	N/A

Figure 3: Lone-Actor and Small Cell Terrorist Plots in Great Britain

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
GB1	Unknown	Individual	Multiple	Yes	Right-Wing	No	N/A
GB2	Multiple	Individual	Multiple	No	Right-Wing	No	N/A
GB3	Multiple	Individual	Multiple	No	Right-Wing	No	N/A
GB4	Unknown	Individual	Explosives	Yes	Right-Wing	No	N/A
GB5	Unknown	Individual	Multiple	Yes	Right-Wing	No	N/A
GB6	Multiple	Individual	Explosives	No	Left-Wing and Anarchist	No	N/A
GB7	Multiple	Dyad	Explosives	No	Religiously Inspired	Yes	Self-funded through bank loans and credit cards
GB8	Unknown	Individual	Multiple	Yes	Right-Wing	No	N/A
GB9	Unknown	Individual	Explosives	Yes	Right-Wing	No	N/A
GB10	Unknown	Individual	Explosives	Yes	Right-Wing	No	N/A
GB11	Single	Individual	Explosives	Yes	Religiously Inspired	No	N/A
GB12	Single	Individual	Explosives	No	Religiously Inspired	No	N/A

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
GB13	Single	Individual	Explosives	No	Religiously Inspired	No	N/A
GB14	Multiple	Individual	Explosives	Yes	Religiously Inspired	No	N/A
GB15	Unknown	Individual	Explosives	Yes	Religiously Inspired	No	N/A
GB16	Single	Triad	Incendiary	No	Religiously Inspired	No	N/A
GB17	Unknown	Individual	Explosives	Yes	Right-Wing	No	N/A
GB18	Single	Individual	Multiple	Yes	Religiously Inspired	No	N/A
GB19	Single	Dyad	Biological/ chemical	Yes	Right-Wing	Yes	Purchased chemicals
GB20	Single	Individual	Knife or similar	No	Religiously Inspired	No	N/A
GB21	Unknown	Dyad	Explosives	Yes	Religiously Inspired	No	N/A
GB22	Single	Individual	Explosives	No	Right-Wing	No	N/A
GB23	Unknown	Dyad	Explosives	Yes	Right-Wing	No	N/A
GB24	Unknown	Triad	Multiple	Yes	Right-Wing	No	N/A
GB25	Multiple	Individual	Multiple	Yes	Right-Wing	No	N/A
GB26	Single	Dyad	Multiple	No	Religiously Inspired	Yes	Purchased knives

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
GB27	Single	Individual	Multiple	No	Right-Wing	No	N/A
GB28	Single	Individual	Incendiary	Yes	Right-Wing	No	N/A
GB29	Single	Triad	Incendiary	No	Right-Wing	No	N/A
GB30	Single	Individual	Explosives	No	Other	No	N/A
GB31	Single	Dyad	Incendiary	No	Right-Wing	No	N/A
GB32	Unknown	Individual	Explosives	Yes	Right-Wing	No	N/A
GB33	Unknown	Dyad	Multiple	Yes	Religiously Inspired	Yes	Purchased chemicals
GB34	Single	Individual	Incendiary	No	Right-Wing	No	N/A
GB35	Unknown	Individual	Biological/ Chemical	Yes	Right-Wing	No	N/A
GB36	Unknown	Individual	Explosives	Yes	Right-Wing	Yes	Materials bought online through self- funding
GB37	Unknown	Individual	Knife or similar	Yes	Religiously Inspired	No	N/A
GB38	Unknown	Dyad	Explosives	Yes	No clear ideology expressed	No	N/A
GB39	Unknown	Dyad	Firearms	Yes	Religiously Inspired	Yes	PayPal fraud referenced but no proven link

Code	Single/ Multiple incident	Type	Weapon	Prevented?	Ideology	Finance mentioned?	Details
GB40	Unknown	Individual	Biological/ Chemical	Yes	Religiously Inspired	Yes	Purchased materials online
GB41	Unknown	Dyad	Multiple	Yes	Religiously Inspired	Yes	Self-funded by loan
GB42	Single	Individual	Knife or Similar	No	Religiously Inspired	No	N/A
GB43	Unknown	Dyad	Multiple	Yes	Religiously Inspired	No	N/A

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