

**STATEMENT FOR THE RECORD
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House Financial Services Committee
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**Joint Hearing Before
The Task Force to Investigate Terrorism Financing**

Terrorist Financing and Related Illicit Finance in Latin America
And

The Increased Activities of Hezbollah in the Area and the Response of Local Officials to These Challenges

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Introduction

Chairmen Fitzpatrick and Ranking Member Lynch, and Honorable Members of the Task Force to Investigate Terrorism Financing, I deeply appreciate the invitation to participate in this very important hearing on terrorism financing and the increased Hezbollah activities in Latin America. Let me start by thanking you for your service and for your unwavering support of federal law enforcement, our military and our intelligence services. However, just as important is your valuable support to security institutions in many of our neighboring countries in Latin America and the Caribbean. I have testified before many of you over the years and worked with outstanding members of your staff. I have the utmost respect for each of you and the tremendous contributions that you have made, and continue to make, in keeping America safe.

I spent 33 years in law enforcement serving in some of the toughest and most austere locations around the globe and retired from the US Drug Enforcement Administration (DEA) approximately seven and one-half years ago. I was very fortunate to have ascended through the ranks of the DEA where I ultimately served as the Acting Chief of Intelligence for approximately one year and as the Assistant Administrator and Chief of Operations for almost four years. In that assignment I had operational oversight responsibility for DEA's 227 domestic and 86 foreign offices and several Headquarters divisions, including the Special Operations Division.

With the support of a phenomenal team, I was responsible for leading the efforts to design and implement the DEA's significant expansion in Afghanistan, as well as for the Foreign-deployed Advisory and Support Teams (FAST) program and the agency's Drug Flow and Financial Attack Strategies. I was also responsible for leading the formative development of the Department of Justice multi-agency Organized Crime Drug Enforcement Task Force Fusion Center after being appointed by the Deputy Attorney General to serve as the Center's first Director. The Center supports both terrorism and drug trafficking investigative efforts by seven federal law enforcement agencies.

I served in DEA field assignments at various ranks on both the East and West Coasts, on our Southern and Northern borders, in the Midwest, in Washington, DC during three separated Headquarters tours, and also led joint tactical operations for several years with host-nation counterparts in the Andean Region and the northern-tiered countries of Central America. I also volunteered for an assignment with the Department of Defense Coalition Provisional Authority during the summer of 2003 to serve as the SES Chief of Staff for the Iraq Interim Ministry of Interior. I served in local and state law enforcement for almost twelve years prior to joining the DEA and enlisted in the US Marine Corps in 1971 where I served fourteen months deployed overseas, including limited duty in the Republic of Vietnam. Two days after retiring from the DEA in late 2008 I co-founded SGI Global, LLC and started work as a Managing Partner, a role that I continue to serve in to this day. SGI is currently supporting critically important security projects for our military and government agencies in Afghanistan, Central Asia, the Middle East, Africa, Mexico and Panama, as well as in various locations here at home.

From that, I believe you can conclude I am not a politician, a diplomat or an academic. I am a career law enforcement practitioner and it is in that context that I appear before you today to address, from purely my perspective, the threat posed by terrorism financing and increased Hezbollah activities in Latin America.

Perspective on Attacking Terrorist Finance in Latin America and the Caribbean: (Or Anywhere Else for that Matter)

I applaud our military for developing and implementing Counter Threat Finance (CTF) policy over the past few years and engaging in this very specialized area of intelligence. However, to successfully disrupt or defeat the threat, the information collected, analyzed and reported on must be “actioned.” Unless things change, the lead responsibility for this whole of government initiative falls to our Departments of Justice, Treasury and Homeland Security, but our military and Intelligence Community play an important role in contributing to this effort.

It is important to understand CTF investigations do not play out in high-tech intelligence centers where extremely talented analysts construct cases with the touch of buttons on a keyboard as they drill deep into supercomputers in search of incriminating data. To experience genuine success, CTF entails lots of old fashioned “gum shoe” detective work; frequent globe trotting to the most security challenged countries on the face of the earth; demanding and sometimes painful interagency collaboration, coordination and de-confliction; difficult investigative methods that include dangerous undercover operations, Title III wire/wireless taps, exhaustive surveillance, informant handling, and never ending witness interviews, to name just a few; finally, these investigations require a great deal of time – typically several years. For the sake of this hearing, I will focus on some things we can be doing to experience greater success.

I believe it is essential for federal law enforcement to prioritize the investigation of illicit finance in all transnational criminal organization and terrorism initiatives and to develop the unique intelligence and investigative methods required to disrupt and ultimately defeat threat finance. It is one thing to have agency policy requiring the financial aspect of every criminal investigation be addressed, but it’s something very different when agency heads demand it. This becomes even more important when considering that most transnational criminal and terrorist organizations do not possess organic money laundering capacity; they have to outsource that requirement. And these criminal and terror groups rely on many of the same shadow facilitators to move their agenda’s forward, including the same international money-laundering grids. That alone is a vulnerability that should be exploited far more aggressively than is currently being done. In today’s transnational drug trafficking and organized crime investigations, if you are merely following contraband, then you will most assuredly find contraband; if you are genuinely following the money, you will most often uncover facets of your investigation (e.g. terrorism) you never dreamed possible.

The single most productive method for identifying a terrorist or transnational criminal organization’s ability to launder contraband revenue is to identify and exploit how they communicate their business. Just as kingpins command and control every aspect of the transportation and distribution of drugs on a global level, so do those responsible for laundering their billions of dollars of illicitly derived funds. Money laundering consortia are likely to be even more dependent on communication devices and systems than terror and organized crime groups. Consequently, we need to transition from a “white collar crime” to an “organized crime” mentality as we pursue many of today’s illicit finance investigations, because money laundering is of paramount importance to criminal, terrorist and insurgent organizations.

In so doing, agents need to rely heavily on the long-standing investigative methods utilized by the FBI and DEA to attack organized crime and to work seamlessly with the Department of Treasury FinCEN and OFAC to tactically and strategically attack the shadowy, global financial networks that enable criminal and terror organizations to carry out their dirty business. Conducting net-worth assessments and other traditional means of examination are significant to any financial investigation and I do not want to diminish their importance in anyway. However, we should not hesitate to utilize judicially approved electronic intercept and other organized

crime investigative tools whenever and *wherever* possible in pursuit of the money laundering networks supporting these threats to our national security.

Let me address the importance of the *wherever* part of that last sentence. As DEA has increased its use of electronic surveillance over the past few decades, the agency and DOJ have concurrently worked to help their foreign counterparts transition from ‘intelligence only’ electronic surveillance to judicially approved models like U.S. federal law enforcement’s Title III (Omnibus Crime Control and Safe Streets Act of 1968) authority.

Thanks to decisions in a number of Federal District Courts over the last two decades that allow U.S. law enforcement to utilize evidence derived from judicially authorized electronic intercepts by law enforcement in other countries, the DEA and its foreign counterparts are regularly sharing evidence to attack the most sophisticated drug trafficking organizations ever investigated. It is exactly this type of activity that has resulted in the arrests, convictions and lengthy incarcerations of notorious transnational drug and arms traffickers such as Haji Bashir Noorzi, Haji Jouma Khan, Victor Bout, Haji Bajko, Monsur al Kasar and Chapo Guzman, to name just a few. This is one very powerful method for fighting organized crime and terrorism – and this is how we have to fight the illicit finance consortia supporting it.

However, a substantial challenge faced by law enforcement and the courts in many Latin American and Caribbean countries, and many other places around the world, is that they do not possess organized crime legislation and authorities required to identify, investigate, bring to justice and ultimately incarcerate powerful organized crime and terror leaders. Law enforcement in these places lack the ability to conduct undercover operations because of agent provocateur prohibitions; lack the authority to conduct judicially approved electronic interception of *any* communications; lack the authority to cooperate with other countries in the international delivery of seized contraband; and lack powerful conspiracy laws, extraterritorial jurisdiction and stiff sentencing guidelines to effectively counter the threats posed by sophisticated terror and criminal organizations. Many also lack the authority to conduct meaningful financial investigations. Consequently, it is almost impossible for our counterparts to bring the leadership ranks of these organizations to justice, because they have to be caught red handed with contraband, or directly involve themselves in some other related criminal activity. And these bad actors obviously didn’t ascend to leadership by being stupid.

One of the most important things we can do to enhance our ability to conduct high-level illicit finance investigations is to assist willing nations with the development of counter-organized crime legislation and the investigative and prosecutorial capacity of their judiciary and law enforcement, as well as their financial investigative capacity that is usually the responsibility of finance ministries. To experience success, capacity building must include the entire judicial spectrum: law enforcement, prosecutors, judges and prison officials. If not, it will most certainly fall apart like a house of cards. A comprehensive, fully vetted and totally dedicated counter-organized crime judicial model may be the best option in countries plagued with corruption. This will require funding, legislation and diplomacy on the part of the U.S. – and a great deal of hard work.

The Currency of Contraband and the Importance of Denying Revenue:

While I applaud our military and our Intelligence Community for developing and implementing Counter Threat Finance policy over the past few years, we seem to have forgotten that drugs and other types of contraband are routinely traded by terror and transnational criminal organizations for virtually every necessity required to stay in business, and in the fight. As an example, drugs are routinely traded for myriad weaponry; for communications systems; for the actual smuggling of contraband (payment in kind); for all types of vehicles, including large aircraft and maritime vessels; for safe houses and other Real Estate; for assassinations and other violent attacks; for counterfeit travel documents such as passports and visas; for services such as human trafficking – and yes, drugs are even traded for money-laundering services. Some money-launderers realize they can make far more profit from the sale of drugs than they could ever hope to make on a standard money-

laundering commission. They take payment in drugs and then outsource their distribution to affiliated indigenous organized crime groups. Mexico based drug trafficking organizations (DTO), in a successful attempt to feed their insatiable appetite for more profit, stopped accepting cash from Colombian traffickers in the early 1990s for smuggling Colombian DTO cocaine into the U.S. The Mexican DTOs demanded “payment in kind” for their services (a percentage of drugs from each load to be smuggled). The Mexican DTOs’ profits went through the roof and this transition allowed them to carve out new territories west of the Mississippi River for the first time in history. And it ultimately resulted in their dominance of drug trafficking in our Country today. ***We seem to have forgotten that drugs and other contraband are the oldest form of alternative currency.***

Shortly after 9-11 about 60 percent of our Department of Defense detection and monitoring (D&M) resources were moved from Southern Command’s (SOUTHCOM) area of responsibility to other parts of the world and most have never returned. Every four-star general and admiral who served as Combatant Commanders at SOUTCOM since 9-11 have testified about this concern, as well as the growing influence of Iran and Hezbollah in their theatre of responsibility. Joint Interagency Task Force-South in Key West, which is staffed by U.S. military and federal law enforcement personnel, tracks aircraft and maritime vessels suspected of transporting major drug shipments in the SOUTHCOM area of responsibility and the Task Force works hard to coordinate the interdiction of these smuggling operations. The aircraft “tracks”, denoted by red lines on maps between the Andean Region of South America and Venezuela, looks like a mass of spaghetti on any typical month. Most of these suspicious aircraft go absolutely untouched, because the U.S. government and our Latin American counterparts no longer possess the resources necessary to interdict them. Sadly, most all of those tracked flights represent airplane loads of cash. ***We seem to have forgotten that successful contraband interdiction ultimately denies revenue to transnational drug trafficking, criminal and terror organizations.***

Each of those aircraft also represent lost opportunities to build ever-stronger, multifaceted conspiracy investigations targeting sophisticated drug trafficking and money laundering organizations, just like the Ayman Joumaa case that I will address in the next section. Every time one of those wasted targets of opportunity drop off the radar we lose another critically important overt act in a complex conspiracy investigation – powerful evidence that will never be presented to a federal jury.

If we do not begin exerting as much brainpower and brawn toward interdicting drugs and other contraband, as we are on illicit finance, we will never experience any meaningful level of success against the most sophisticated drug trafficking, criminal and terrorist organizations we have ever faced. If you do not subscribe to that theory, ***then please consider the fact we lost over forty-seven thousand (47,000) Americans to drug overdose deaths in 2015*** and the numbers are no better this year. That equates to 129 fellow Americans lost each day in our Country – the highest losses in our Nation’s history. This situation is shameful.

Perspective on Hezbollah’s Involvement in Transnational Organized Crime:

History has repeatedly shown that when a terrorist organization loses funding from its state sponsor(s) it will inevitably turn to organized crime activity to generate revenue to keep the movement alive. Hezbollah is no different and its meteoric rise in the global cocaine trade has generated far more contraband revenue over the past 15 years than the ever-diminishing funds provided by Iran during that same period. This rise was most likely precipitated by Iran’s inability to match its previous funding levels due to the effect of stiff sanctions over the past several years. However, many experts believe the Iranian tap will again be turned to the Hezbollah “full-open” position as sanctions against that country are systematically lifted.

I testified before the Homeland Security Committee about four years ago concerning a Department of State report on Iranian influence in Latin America and the Caribbean. The findings documented in the report reflected that Iran’s influence was waning in the area because Iran was cash starved as a result of sanctions.

The report also stated there were no known Hezbollah cells operating in the Western Hemisphere. At the time, many experts believed Iran was providing no more than \$200 million dollars a year to Hezbollah.

I pointed out to the Committee the recent Patriot Act Section 311 findings against the Lebanese Canadian Bank as the result of a DEA investigation that clearly revealed Hezbollah was laundering as much as \$200 million dollars a month in cocaine revenue through the bank and some of its affiliate institutions. My hypothesis was that thanks to Hezbollah's (and Quds Force) increased involvement in global cocaine trafficking, the organization was not predominantly reliant on Iran for funding. I also pointed out that all cocaine trafficked by Hezbollah destined for its world markets emanates from the Andean Region of South America and passes through Venezuela and parts of the Caribbean. This activity alone required Hezbollah to significantly increase the numbers of its operatives throughout the region. Rest assured that today Hezbollah and Iran, just as they were four years ago, are thriving throughout the region.

Additionally, after 40 years in this business, I can assure you Hezbollah will not revert to ideology as their principal motivator for doing what they do if Iran starts pumping funding into the terrorist organization as they once did. Hezbollah's hierarchy and its lieutenants honed their criminal skills to a finely sharpened edge over the past 15 years and in the process they have developed a voracious attraction for the massive revenue generated by their involvement in worldwide cocaine trafficking. Just like the FARC, the Taliban and so many other terrorist and insurgent groups, Hezbollah will principally continue to use ideology as a very effective recruiting and indoctrination tool aimed at the young, disenfranchised masses needed to do its dirty work. But make no mistake; the executive secretariat now has a taste for drug money and there is no turning back.

Just 15 short years ago Hezbollah was involved in moving small, ten to twenty kilogram quantities of cocaine to Middle East markets from the Tri-Border region of South America, the remote criminal and terrorist "free-zone" where the borders of Paraguay, Argentina and Brazil come together. Today, the terrorist group is responsible for smuggling hundreds of tons of cocaine from the Andean Region of South America into Venezuela where they then ship the drugs to emerging European markets via West and North Africa. This phenomenon is not based on mere speculation by agencies that garner intelligence from second or third party sources; rather, it is based on evidence that can, and already has met the judicial test in federal courts here at home.

There is no better example of what started as DEA's Operation Titan, followed by successor initiatives, that precisely capture Hezbollah's involvement in the international drug trade, exposes the complexity of its transnational criminal and terrorist network and identifies many of the nefarious connections that make it all work. The evidence and intelligence gleaned during ongoing investigative efforts come from tested and trusted confidential sources, backed up by judicially approved electronic intercepts, extensive witness interviews, exhaustive surveillance, search warrants and other organized crime investigative methods.

Much of this investigative success story rests with the DEA's outstanding partners, Treasury's FinCEN and OFAC, and the unique authorities they possess. Their tactical and strategic use of sanctions and Patriot Act 311 actions during this investigation peeled back the complicated protective layers that exposed the financial vulnerabilities of Hezbollah and other terror and criminal networks so they could be fully exploited by DEA investigators. The raw power behind this effort was the outstanding collaboration between DEA, FinCEN and OFAC and DOJ prosecutors that involved a relentless and elaborate cycle of investigation, analysis, sanctions, indictments and arrests and seizures – all conducted with cunning coordination and de-confliction. Another team member that also deserves credit for the success of this operation were analysts from the Department of Defense. The "silent professionals" made important contributions.

This international conspiracy investigation, initiated by DEA in 2007, began to gain significant momentum after an OFAC Kingpin Act designation in January 2011 that identified Ayman Joumaa, a Lebanese Colombian,

and several members of his global illicit network as Specially Designated Narcotics Traffickers. The following month FinCEN announced Patriot Act Section 311 findings against the Beirut-based Lebanese Canadian Bank (LCB), the Prime Bank of Gambia and other affiliate financial institutions of the LCB for facilitating a Hezbollah cocaine money laundering scheme involving as much as \$200 million dollars per month. The LCB, which was sold just a few weeks after the 311 findings, was long known to be a Hezbollah influenced and preferred financial institution used for money laundering purposes. In December 2011 the US Attorney's Office for the Southern District of New York (SDNY) filed a \$450 million dollar civil complaint against the LCB. This action ultimately led the bank's new owners to reach a \$102 million dollar settlement agreement with the SDNY in June 2013.

By 2015 there were ten OFAC Kingpin Act designations against DTOs and money laundering organizations and over 180 designations against entities and individuals, as well as two Patriot Act Section 311 actions. Also worth mentioning were the endless stream of indictments, arrests and seizures of/from a host of characters who were members of financial institutions, transnational drug trafficking and organized criminal organizations, money laundering operations, more than 30 used car dealerships in the U.S., and designated terrorist organizations including the Hezbollah and the FARC; all of which spanned more than twenty-five countries on four Continents. Other Hezbollah connections were made as a result of the investigation that generated another 15 OFAC designation actions and one other 311 action against a Lebanese originated bank in Cyprus.

One of the exposed money-laundering schemes started with cocaine shipped by Hezbollah operatives from the Andean Region of South America to Venezuela, where it was then shipped to Europe and the Middle East via West and North Africa. This sophisticated supply chain is only made possible through Hezbollah's strong alliances with indigenous organized crime groups and the centuries old, nomadic Tuareg smugglers in North Africa, not to mention corrupt senior politicians and security officials in Venezuela and many other countries. The cocaine was (and continues to be) sold in Europe and the Middle East by Hezbollah for as much as \$200,000 dollars per kilogram. To put that in proper perspective, the US value for a kilogram of cocaine seldom exceeds \$40,000 dollars. The bulk cash from the enterprise was collected and amassed in West Africa where it was cached at safe sites.

The legitimate trade portion of the scheme was tied to over 30 US-based used automobile dealerships owned and operated by Lebanese Americans on the East Coast. The US dealerships acquired used automobiles here at home, shipped them to automobile lots in West Africa where they were sold for profit. The sales prices of the vehicles were inflated in the financial records and the cash proceeds were co-mingled with the cached drug proceeds and then transported in bulk to Hezbollah operated and controlled financial exchange houses in Lebanon. Some of the proceeds were then wired to the US dealerships to continue the money laundering cycle. By all counts the total number of suspect used automobile dealerships identified in the investigation is incredible, none of which existed before 9-11.

One lead in the investigation resulted in overhead imagery that showed an enormous vacant field in West Africa and corresponding imagery one year later showing the area filled with hundreds of used vehicles that had been shipped from the US. Evidence revealed that an average of \$180 million dollars in bulk cash per quarter was being transported from Togo to Ghana, West Africa where it was placed on commercial aircraft and flown directly to Beirut. The illicit revenue generated by this enterprise exceeded the annual GDP for several small West African countries.

One example of the bulk cash involved in this conspiracy involved approximately \$20 million dollars in U.S. currency that was seized after a Lebanese Colombian and close Hezbollah associate delivered the cash to an undercover DEA agent in Central America. Reportedly another \$16 million dollars in bulk cash was supposed to be delivered to the agent within 48 hours of the first delivery, but unfortunately that delivery was not completed.

Essential Points:

There are some very important points to be made about the events described above:

1. Those who believe Hezbollah is in some way primarily dependent upon Iran to supply them with funding are dangerously uninformed.
2. No terrorist or international drug trafficking organization has the ability to execute complex drug trafficking and money laundering operations involving multi-ton quantities of cocaine and bulk cash with just a handful of rogue operatives, or rogue cells for that matter. It takes scores of loyal Hezbollah soldiers to make it all work in this case and they are now operating throughout the Western Hemisphere, including right here at home. Congressman Peter King, then Chairman of the Homeland Security Committee during a hearing approximately four years ago, stated that government officials had briefed him that as many as 250 Hezbollah operatives were active in the US.
3. Iran's inability to match its past levels of funding over the last several years to its most important proxy has crystalized in the eyes of Hezbollah the strategic importance of Latin America, Mexico, our Southwest Border and the Caribbean, as well as Africa and Europe. It is Hezbollah's meteoric rise in the global drug trade that should be troubling us most. When it comes to generating contraband revenue, nothing comes close to the drug trade and it is undoubtedly contributing to the Hezbollah's global expansion.
4. Hezbollah has the undeniable ability to move multi-ton quantities of cocaine throughout the world, not to mention bulk cash that weighs thousands of pounds. Many analysts and other experts regrettably continue to woefully underestimate Hezbollah's level of sophistication, both organizationally and operationally, and to ask a very important question: What else could they be moving?
5. The principal leader of any terrorist, drug trafficking, or criminal organization must ensure absolute harmony and loyalty within their ranks. It is all about obedience, commitment and allegiance and it is stringently managed with the use of corruption, intimidation and brutal violence, the long-standing hallmarks of organized crime. To believe Hezbollah's highest level of leadership is not directly complicit in, and sanctioning the organization's global criminal and terrorist operations indicates a total lack of understanding for how the real underworld operates and thrives.
6. We can no longer allow Hezbollah to go unchecked. We need a whole of government approach to fight what former DHS Secretary Michael Chertoff and FBI Director Robert Mueller described as the most sophisticated and dangerous foreign terrorist organization in the world and we need to get serious about doing it as quickly as possible.

Unconventional Consequences:

Hezbollah profits in many ways by growing their transnational criminal footprint:

1. It increases their presence in the Western Hemisphere, in Africa and in Europe and is helping the group establish an even greater repertoire of calculated alliances with other transnational criminal and terrorist organizations.
2. As they increasingly engage themselves in this type of activity, the terrorist organization's operatives are, in essence, hiding behind criminality – all the while developing an ever-increasing capacity to strike terror when the time is right.
3. Drug distribution to Western markets is an important part of their Jihad against the West – it kills infidels, tears at the moral fabric of the West, costs hundreds of billions of dollars a year in lost earnings and in medical treatment, education and law enforcement costs, and further destabilizes already weak governments throughout regions of Latin America, Mexico, the Caribbean and Africa, which facilitates Hezbollah's ability to operate with impunity. A senior Hezbollah spiritual leader issued a religious edict,

or fatwa, in the early 1980s that justified selling drugs to Western infidels, which laid the foundation for the group's involvement and expansion in the global drug trade.

4. The global drug trade generates hundreds of millions of dollars each year in contraband revenue for Hezbollah ***and it provides a never-ending source of funding for their war chest.*** Hezbollah uses cocaine, other drugs and other contraband as an alternative form of currency. And they have used drugs as payment for information and to successfully corrupt Israeli Defense Force personnel, as well as soldiers in other militaries.
5. Hezbollah becomes even more relevant to Iran and their long-standing partner, the IRGC Quds Force, as they grow their global footprint and their global reach.
6. Finally, and most importantly, it allows Hezbollah and the Quds Force to reconnoiter (at will) potential future battlefields and to establish the rat-lines necessary to sustain imminent, prolonged asymmetric conflict in many parts of the world, including areas very close to home.

What We Can Do To Help Counter The Threat:

There are three things the U.S. government can do to help counter the threat posed by sophisticated criminal and terrorist organizations that will not require a great deal of funding:

1. We need interlocking counter-terrorism and counter-narcotics policies, strategies and initiatives, and singular funding streams. As the bad guys grow closer together – the good guys are drifting farther apart, and much of this is caused by the way we develop and fund competing national security interests.
2. We need defense in depth strategies and we cannot continue with our obsession for developing strategies and plans to guard the one-yard line (our borders). Shortly after 9-11 many of our Department of Defense detection and monitoring resources were moved from Southern Command's area of responsibility and most have never returned. We need more federal law enforcement personnel deployed to security challenged areas around the world to expand their human source networks and to work shoulder-to-shoulder with host nation counterparts in furtherance of bi-lateral criminal investigations. Further, as already mentioned, we need to help foreign counterparts build the capacity they need to help themselves and us counter 21st Century asymmetric threats.
3. We must revitalize interest in pursuing the traditional threats: drugs, arms and human trafficking, and money laundering and counterfeiting. Most importantly, we need to implement aggressive counter-corruption safeguards and initiatives, because our judicial system is under attack. A renewed focus on these threats will naturally lead agents and officers headlong into terrorist organizations and their operatives, which is exactly what is happening with the DEA on a regular basis.

Summary:

Many federal court documents have been unsealed over the past five years, including the 73-page civil complaint (amended) against the Lebanese Canadian Bank (et al.) (LCB) that was filed by the US Attorney's Office for the Southern District of New York, and they are a must-read. The documents should serve as an eye-opener, because they paint a very troubling picture of Hezbollah's increasing global reach – all facilitated by its involvement in drug trafficking, money-laundering and other transnational criminal operations in the Western Hemisphere, Africa, Europe and the Middle East.

Sophisticated international terrorist organizations like Hezbollah do not issue identification cards, seldom wear uniforms and most often operate in the shadows while conducting highly sophisticated transnational criminal schemes to generate the revenue required to keep their movements alive. These activities also permit Hezbollah to develop and nurture valuable associations with other terrorist, insurgent and transnational criminal organizations, as well as human and weapons trafficking groups, local indigenous organized crime groups and money laundering networks. If we do not move more aggressively to keep Hezbollah in check, the numbers of

their illicit associations and the complexity of their operations will continue to grow. They will continue to evolve and become ever more dangerous.

It is extremely dangerous to perceive Hezbollah as anything other than a terrorist and criminal organization masquerading as a political party. Israeli security experts have long viewed Hezbollah as Iran's fleet of aircraft carriers – possessing the ability to hit Western interests virtually anywhere in the world, including right here at home. It would benefit us to adopt this viewpoint as quickly as possible.

Finally, no two nations will ever agree on a common list of terrorist organizations or terror suspects, but regularly reach mutual consensus on drug trafficking and organized crime targets. One of the most important and cost effective things we can do to protect ourselves here at home is to help willing nations develop and mature their ability to conduct terror and organized crime investigations and prosecutions. Investigating illicit finance is an important part of that practice, as well as the sharing of valuable evidence. In the end, exposing many terrorist leaders for who they really are – predatory international drug traffickers who target society's weak – sends a powerful message to those who were indoctrinated or charmed into believing they were freedom fighters.