



FATF REPORT

Ethnically or Racially Motivated Terrorism Financing

June 2021





The Financial Action Task Force (FATF) is an independent inter-governmental body that develops and promotes policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction. The FATF Recommendations are recognised as the global anti-money laundering (AML) and counter-terrorist financing (CFT) standard.

For more information about the FATF, please visit www.fatf-gafi.org

This document and/or any map included herein are without prejudice to the status of or sovereignty over any territory, to the delimitation of international frontiers and boundaries and to the name of any territory, city or area.

Citing reference:

FATF (2021), *Ethnically or Racially Motivated Terrorism Financing*, FATF, Paris, France,
<https://www.fatf-gafi.org/publications/methodsandtrends/documents/ethnically-racially-motivated-terrorism-financing.html>

© 2021 FATF/OECD. All rights reserved.

No reproduction or translation of this publication may be made without prior written permission.

Applications for such permission, for all or part of this publication, should be made to the FATF Secretariat, 2 rue André Pascal 75775 Paris Cedex 16, France (fax: +33 1 44 30 61 37 or e-mail: contact@fatf-gafi.org)

Photocredits coverphotos (left to right):

© Reise Reise, 2020 (Bulletholes in synagogue door, Halle from the terrorist attack on 9 October 2019)

© Henrik Lied/nrkbeta, 2011 (Government Quarter, Oslo after the terrorist attack on 22 July 2011)

© Luis Alejandro Apiolaza, 2019 ('Wall of Flowers' tribute to the victims of the Christchurch terrorist attack on 15 March 2019)

Table of Contents

Acronyms	2
Executive Summary	3
Chapter 1. INTRODUCTION	5
1.1. Definitions and Scope.....	5
1.2. Report Objectives.....	6
1.3. Methodology.....	6
Chapter 2. SOURCES OF FUNDING	8
2.1. Donations	8
2.2. Membership Fees.....	13
2.3. Commercial Activities	14
2.4. Criminal Activities.....	17
2.5. Abuse of Non-Profit Organizations (NPOs)	19
Chapter 3. MOVEMENT OF FUNDS	21
3.1. Financial Institutions.....	21
3.2. Money and Value Transfer Services	22
3.3. Cash	23
3.4. Virtual Assets	24
3.5. Financial Management.....	26
Chapter 4. USE OF FUNDS	27
4.1. Financing of Attacks	27
4.2. Propaganda, Recruitment and Networking	29
4.3. Real Estate Property.....	29
4.4. Training and Acquisition of Equipment.....	30
Chapter 5. CHALLENGES AND ISSUES FOR FURTHER CONSIDERATION	33
5.1. Different Legal Regimes for Combating Extreme Right Wing Terrorism	33
5.2. Few National Designations	34
5.3. Growing Transnational Links	35
5.4. Attacks are Primarily Carried out by Lone Actors	36
5.5. Public Private Partnerships and Information Sharing	36
5.6. Inclusion of ERW Groups in National Risk Assessment Process	36
5.7. Impact of COVID-19	37
Chapter 6. CONCLUSION	39
References	43

2 | ETHNICALLY OR RACIALLY MOTIVATED TERRORIST FINANCING

Acronyms

AML/CFT	Anti-money Laundering/Countering the Financing of Terrorism
AWD	Atomwaffen Division
B&H	Blood and Honour
B&H-DP	Blood and Honour-Portuguese Division
CT	Counterterrorism
CTED	United Nations Counter Terrorism Committee Executive Directorate
ČsVZ	Czechoslovak Soldiers in Reserve
DKK	Danish Kroner
DNFBP	Designated Non-Financial Business or Person
EC	European Commission
EoRMT	Ethnically or Racially Motivated Terrorism
EoRMTF	Ethnically or Racially Motivated Terrorism Financing
ERW	Extreme Right Wing
ERWT	Extreme Right Wing Terrorist
EUR	Euros
FATF	Financial Action Taskforce
FI	Financial Institution
GBP	British Pounds
IMF	International Monetary Fund
IMVE	Ideologically Motivated Violent Extremism
JEM	Joint Experts' Meeting
MSB	Money Service Business
MVTS	Money and Value Transfer Services
NRA	National Risk Assessment
NCRM	National Christian Resistance Movement
NPD	National Democratic Party
NPO	Non-Profit Organisation
NSF	National and Social Front
NZU	National Socialist Underground
RAC	Rock against Communism
STR	Suspicious Transaction Report
TF	Terrorist Financing
UNODC	United Nations Office on Drugs and Crime
USD	United States Dollars
VA	Virtual Assets
ZAR	South African Rand

Executive Summary

Ethnically or racially motivated terrorism (EoRMT) is a complex phenomenon that encompasses a wide range of actors. These range from individuals, that operate as lone actors or so called “lone wolves” to small and medium organisations, as well as transnational movements which span borders, and sometimes even continents.

This is the FATF’s first report on ethnically or racially motivated terrorism financing (EoRMTF). It builds on previous work conducted by other international organisations, including the United Nations, as well as work being done in the non-profit and academic sectors, and FATF’s existing expertise on terrorist financing (TF). This report brings together expertise from jurisdictions and institutions which have had experience in tackling EoRMTF with an aim to increase the understanding of TF risks related to extreme right wing actors more broadly among competent authorities, non-governmental bodies, the private sector, and the broader public. The findings in this report are based on inputs from around 30 jurisdictions across the FATF Global Network, as well as expertise from the private sector and international bodies partnered with the FATF.

This report finds that while extreme right wing terrorist (ERWT) attacks are mainly perpetrated by self-funded lone actors, extreme right wing (ERW) groups employ an array of fundraising techniques. These include donations (through both crowdfunding and private contributions), membership fees, commercial activities (including organisation of concerts, sales of merchandise and real estate ventures), and criminal activities. Notably, most of the funding for ERW groups appears to come from licit sources. ERW groups appear to be less concerned with concealing their transactions than in other forms of TF, many jurisdictions also reported that ERW actors are becoming increasingly operationally sophisticated in how they move their funds. Finally, funds appear to be used for varying activities, ranging from financing of attacks, to purchasing equipment, training, creating and dispersing propaganda, recruitment, networking, legal fees, and even purchasing and maintaining real estate assets.

This report highlights several challenges in tackling the financing of ERW-motivated groups and attacks. These include, but are not limited to, different legal regimes in place for combatting ERWT in different jurisdictions; few national designations of groups; growing transnational links between groups (and, in some instances, individuals who have perpetrated terrorist attacks); the fact that most ERW attacks are carried out by self-funded lone actors; and, the limited public-private partnerships in place for exchanging financial information.

Jurisdictions are encouraged to continue to develop their understanding of EoRMTF, especially through including this threat in their national risk assessments (NRAs), working with relevant public and private partners on threat detection, and exchanging best practices with relevant international partners to tackle the increasingly transnational characteristics of EoRMTF.

The COVID-19 lockdown restrictions on mass gatherings throughout 2020 and 2021 have significantly affected an important financial source for ERW groups, namely the organisation of ERW concerts and events.

4 | ETHNICALLY OR RACIALLY MOTIVATED TERRORIST FINANCING

At the same time, the COVID-19 crisis has provided a recruitment opportunity for violent extremist groups. This may mean that in the coming period ERW groups to seek for new methods of funding or to an increased use of already existing sources.

It is vital that jurisdictions maintain their focus on the evolving threat posed by EoRMTF in order to build on the work conducted by FATF and other bodies, and achieve meaningful progress in addressing the challenges identified in this report.

“COVID-19 lockdown restrictions had a dual effect: cancellation of funding events but also recruitment opportunities.”

Chapter 1. INTRODUCTION

Ethnically or racially motivated terrorism (EoRMT)¹ is a complex and growing phenomenon that encompasses a wide range of actors. These range from individuals, operating as lone actors or so called “lone wolves” to small and medium organisations, as well as transnational movements which span borders, and sometimes even continents.

The FATF under its German Presidency identified Ethnically or Racially Motivated Terrorism Financing (EoRMTF) as a priority area for the taskforce in June 2020 (FATF, 2020_[1]), and agreed to strengthen FATF’s understanding of the risks associated with this threat.

The objectives of the project have been to:

- raise awareness amongst the public about ethnically or racially motivated terrorism and its financing,
- draw attention of AML/CFT experts to the financing of ethnically or racially motivated terrorism,
- identify its common structural characteristics and patterns, if any, and
- where possible provide a set of good practices to competent authorities on how to counter this threat.

This report is the concluding deliverable of the project.

1.1. Definitions and Scope

The United Nations, other international organisations, individual FATF members, and various academic reports use different terms to identify this threat. These include “right-wing extremism”, “racially or ethnically motivated terrorism”, “far-right-terrorism”, “ideologically motivated violent extremism”, and “extreme right wing terrorism”. This report does not seek to define or re-define ² ethnically or racially motivated terrorism. However, for the sake of consistency, the report uses the term “extreme right wing” or “ERW” to refer to the various individuals and groups subscribing to ERW ideology (both violent and non-violent) and extreme-right wing terrorism (ERWT)³ to refer to terrorist activity motivated by ERW ideology.

ERW groups and actors can vary greatly in their activities – certainly not all those who proscribe to the ERW ideology will necessarily themselves be directly involved in violent

¹ This report relies on the UN CTED definition of ethnically or racially motivated terrorism (EoRMT) which is also referred to as extreme right-wing terrorism (ERWT). Therefore, these two terms are used interchangeably.

² See for example, the definition given in the UN CTED Trends Alert (UN CTED, 2020_[4])

³ See footnote 1.

6 | ETHNICALLY OR RACIALLY MOTIVATED TERRORIST FINANCING

action. This shapes the different financial behaviour among different ERW actors. Many entities which operate within the law exhibit overt and public financial behaviour (channelling their funds through financial institution (FIs)). Meanwhile, others who have come under greater scrutiny by law enforcement (whether through designation, proscription or other means) or been removed by financial services platforms (based on their terms of service) revert to more covert financial behaviour.

ERW groups also vary in size and structure - some involve only a few members united by joint interests or ideology, whilst others consist of dozens or even hundreds of followers with a strict chain of command, similar to organised criminal groups. This variety in members and structure significantly affects the fundraising capabilities of ERW groups, their expenditures and capacity to commit illicit activity.

1.2. Report Objectives

This report is intended to:

- Increase the understanding of TF risks related to ERW among competent authorities⁴, non-governmental bodies, the private sector, and the broader public.
- Outline the primary streams of revenue for ERW actors, by examining how ERW groups and individuals raise, move and use funds, as well as the international links between them.
- Highlight the leading trends and methods within EoRMTF, in particular the international and transnational aspects of EoRMTF.
- Increase awareness of the role that relevant financial institutions (FIs) and non-financial businesses can play in detecting suspicious activity and highlight the importance of public-private partnerships in CFT efforts tackling these risks.
- Examine key challenges in combatting EoRMTF, for both operational agencies and other relevant authorities, and non-governmental actors (including the non-profit sector and the private sector), and where possible expand on how those challenges can be overcome.

1.3. Methodology

Since the FATF mandate was expanded in 2001 to cover terrorist financing, this is the first time that the organisation has looked at the issue of financing of ethnically or racially motivated terrorism. Delegations from Germany and the United States have co-led this work. The project team for this work included representatives from 13 countries⁵, as well as representatives from the Egmont Group Secretariat, the European Commission (EC), EUROPOL, the International Monetary Fund (IMF), INTERPOL, the United Nations Office

⁴ In the context of this report, “competent authorities” refers to all public authorities’ responsibilities for combating terrorism and/or terrorist financing.

⁵ Argentina, Australia, Canada, China, France, Germany, Italy, Norway, Luxembourg, Russia, Sri Lanka, United Kingdom, and the United States of America.

on Drugs and Crime (UNODC) and the United Nations Counter Terrorism Committee Executive Directorate (CTED).

The methodology that the project team used to conduct research and develop this paper involved:

- A review of existing literature and open source material available on this topic⁶, in order to identify the key risks, trends and methods used in EoRMTF, as well as to outline the evolving threat landscape.
- A request to FATF and FSRB members to provide information on ERW-motivated terror attacks and groups in their jurisdictions, their modus operandi in financial activities, and any financial links identified between ERW actors in their jurisdictions and those abroad. Delegations also provided case studies on both ERW-motivated attacks and ERW groups, detailing the key characteristics of the case, as well as challenges and good practices identified throughout the detection and investigation of the threat. In total, the project team received inputs from 32 jurisdictions and entities. These included questionnaire responses from 31 jurisdictions⁷, and 37 case studies.
- A roundtable chaired by the co-leads at the Virtual Joint Experts' Meeting (JEM) in November 2020, featuring presentations by delegates from jurisdictions with experience in tackling EoRMTF and/or current or recent initiatives involving countering EoRMTF, as well as a presentation from the private sector.

⁶ This involved approximately 100 sources including academic texts, reports provided by international organisations, policy papers and news articles.

⁷ FATF (Australia, Belgium, Canada, Denmark, the Egmont Group Secretariat (observer), EUROPOL (observer), France, Germany, Greece, INTERPOL (observer), Israel, Italy, Japan, Luxembourg, Norway, Portugal, Saudi Arabia, South Africa, Spain, Switzerland, the United Kingdom, and the United States of America); EAG (Tajikistan); GIABA (Ghana, Senegal, Togo); MENAFATF (Somalia); MONEYVAL (Czech Republic, Guernsey, Poland, Ukraine).

Chapter 2. SOURCES OF FUNDING

The vast majority of ERW-motivated attacks in recent history have been perpetrated by self-funded individuals (so called lone-actor attacks), rarely involving complex organisation and weapons. Often lone-actor attacks are spontaneous and even involve tools already owned by the perpetrator (or in some cases easily accessible equipment like motor vehicles). As expenses for these attacks are low, and do not differ from normal transactions, there are often few or no red flags in the financial system and most useful financial information is only discovered through police investigations after an attack has taken place.

Meanwhile, ERW groups – while unique and operating in different contexts – have turned to a range of common sources to fund their activities. In general, these sources can be grouped into two categories:

- **Legal sources**, i.e. those that do not require the groups to commit offences to generate funds and rely on funds often coming from legitimate sources, such as crowdfunding or donations;
- **Illegal sources**, which require group members to violate the law to acquire the funds. This includes a range of predicate offences, e.g. robberies, fraud, or trade in prohibited goods.

2.1. Donations

2.1.1. Crowdfunding

Crowdfunding is the practice of soliciting contributions from a large number of people, especially from the online community, usually in smaller amounts, to support an idea or a project⁸. Crowdfunding has become particularly popular in the past decade and is often associated with social media networks and other methods of online communication. These days, crowdfunding continues to be on the rise, with dozens of specialised web sites offering various tools to gather funding from people.

Crowdfunding is an entirely legitimate way of obtaining funding from masses of donors, and the vast majority of crowdfunding activity is legitimate. However, terrorists have also widely used this as a fundraising model. The FATF publicly identified this risk in 2015 in relation to terrorist organisations controlling territory and their supporters (FATF, 2015^[2]). Since then, terrorist financing risks associated with crowdfunding continue to be on the FATF radar and draw attention of national authorities.

“Crowdfunding and online commerce allow ERW groups to collect funds in a perfectly legal way.”

⁸ www.merriam-webster.com/dictionary/crowdfunding

In their questionnaire responses, multiple delegations highlighted crowdfunding as one of the common methods for ERW groups to gather funding in an open manner. One of the factors underlying such prominence of crowdfunding is a generally high level of online activity of many ERW groups in social media, forums, gaming chatrooms and other internet platforms. Reliance on crowdfunding models also allows ERW groups to collect funds from across a larger audience that shares ERW ideology, going beyond the local community or country.

Box 2.1. Use of Crowdfunding Platforms by ERW Groups

Australia's FIU, AUSTRAC, has conducted discovery work on Bitchute, a video content platform which hosts ideologically motivated violent extremism (IMVE), **QAnon** and conspiracy content. This project identified 104 Far Right Wing and IMVE channels using the following funding methods:

- Payments via a Bitchute tips function which uses online money transfer services and virtual assets (VAs) (31 of 104 channels) as channels for the tips payments.
- Bitchute channels have hosted links to crowdsourcing and subscription-based funding channels including Patreon (49 of 104 channels) and Subscribestar (19 of 104 channels).
- Bitchute channels have hosted links to Dlive, a livestreaming service which has a payment function which allows users to tip a channel via VAs. Media reporting alleges many top earning channels on Dlive promote white supremacists and conspiracy themes and that entities in the top 100 channels earned between USD 150 000 and USD 550 000 in 2020.

Source: Australia

Similar to internationally designated terrorist organisations, ERW groups primarily use crowdfunding in two ways. Firstly, they take advantage of popular crowdfunding platforms to maximise outreach to supporters. However, as the major crowdfunding platforms have started to act against ERWT (mainly based on their terms of service), ERW groups and individuals have started to move toward specialised crowdfunding websites⁹.

Secondly, ERW groups solicit funding on their websites or social networks, including through private messengers with restricted access. The solicitation normally contains the identifiers of a financial instrument (bank account, e-wallet, etc.) controlled by the actor or his associates, so potential donors can easily transfer funds. This method, may receive further prominence with an increasing use of virtual assets (VA), as in many cases VAs enable the financier to maintain pseudonymity. For example, the financier may only need to publish the number of the VA wallet, without any further details disclosing his identity.

⁹ These include GoFundMe, Hatreon, GiveSendGo, MakerSupport, and WeSearchr.

Box 2.2. Use of Group's Websites to Solicit Donations

As noted in the 2020 European Union Terrorism Situation and Trend report, extremist groups in Europe mainly receive funds from their base of supporters. Right-wing extremists continued to use a mix of traditional and innovative methods to finance their activities, including collecting donations from supporters and sympathisers.

On its website **Nordfront, the Nordic Resistance Movement (Nordiska motståndsrörelsen)** has encouraged its followers to donate Bitcoins via various payment platforms.

Meanwhile, in Ireland, several high profile right-wing groups ask for online donations, partially in virtual assets.

Source: Europol

Although crowdfunding appears to be a common method for various terrorist groups to raise funds, there seems to be a notable difference in the messaging of the fundraising activity between ERWT and other terrorists like ISIL, Al-Qaeda and their affiliates.

Financiers and supporters of ISIL, Al-Qaeda and other terrorist groups often have to disguise the true intent of a crowdfunding campaign, to avoid drawing attention from the fundraising platform or public authorities. They do not publically acknowledge that the funds would ultimately be used by the terrorist group or its members, and declare allegedly a legitimate aim of the fundraising activity (e.g. support for people in need, or provision of assistance to refugees).

In turn, ERW groups often clearly declare that the funds will eventually be used by them, especially if the group is not designated as terrorist or officially banned, as they may feel less need to conceal their activities.

In this context, designating ERW actors as terrorist entities can be a powerful tool, preventing them from access to the international financial system and disrupting their public fundraising capabilities.

Box 2.3. Designation of Ideologically Motivated Violent Extremists as Means of Disrupting Fundraising Activities

In June 2019, Canada, for the first time, designated two IMVE groups as terrorist entities – **Blood and Honour** and **Combat 18**. Blood and Honour is an international neo-Nazi network whose ideology is derived from the National Socialist doctrine. Through their armed branch, Combat 18, the group has carried out violent actions, including murders and bombings.

Additionally, in February 2021, Canada designated several new IMVE groups as terrorist entities, including: a neo-fascist organization, **The Proud Boys**, and two neo-Nazi terror groups, **Atomwaffen Division** and **The Base**.

The listing of **Blood and Honour**, **Combat 18**, **the Proud Boys**, **Atomwaffen Division**, and **The Base** resulted in the removal of the groups' shared website, and Facebook and Instagram pages. As a result, the groups lost their ability to solicit donations and sell merchandise through these online platforms.

Further, the listings provided the clear means for online technology companies to remove online content associated with the groups, what also helps to disrupt their ability to raise funds online.

As a result of the listings, online revenue generating activities such as selling merchandise, crowdfunding, covert fundraising, membership fees, and accepting donations can now constitute terrorist financing. Furthermore, the addition of IMVE groups to the list of terrorist entities may lead to more Suspicious Transaction Reports related to the aforementioned groups being received by FINTRAC, which could allow FINTRAC to better develop IMVE indicators and produce more financial intelligence assessments on IMVE actors.

Source: Canada

2.1.2. *Private Donations*

Private donations are also one of the common methods for ERW groups to generate funds. Unlike crowdfunding, where the financier often does not have trusted relationships with the vast majority of donors, private donations are often based on the personal contact between the donors and the recipient. For some ERW groups, individuals willing to donate money first have to be vetted through communication via encrypted email with the group members.

Further, private donations for ERW groups are often collected in a covert manner. There are no public calls for funds and without any acknowledgement by the donors of providing funds to the group. This often makes it challenging for authorities to detect financial flow, compared to open crowdfunding calls. Some of the ERW groups only accept transfers from jurisdictions where they operate and instruct supporters to email them directly for payment details. This indicates the groups may deliberately prefer to receive less funding in order to conceal transactions and prevent disclosure.

Box 2.4. Covert Fundraising

The Scandinavian ERW group **Nordisk Styrke (Nordic Force, Nordic Strength)**¹⁰ only gives cryptocurrency addresses on their donations page. They also write that, in order to donate with other means (presumably cash or through bank transfers), interested parties have to contact a ProtonMail¹¹ in order to receive further information on how to proceed. The group has publicly discussed this approach as a part of operational security, as well as their aims to combat phishing and fraud attempts.

Source: Denmark

Box 2.5. Donations as a Primary Source of Funding

In response to the growing threat of right-wing terrorism, in August 2020 the Danish FIU carried out a target analysis of the domestic right-wing scene, focusing on three groups that represent different models of far right wing ideology. The first group is a large well-known Scandinavian neo-Nazi organisation, the second is the local branch of a Europe-scale far-right movement, and the third one is a smaller Scandinavian neo-Nazi organisation, established in 2019 with a potentially more violent scope.

The analysis highlighted that the first group's primary source of financing was donations from supporters. The group has publicised its bank account details, enabling a larger number of supporters to provide financial contributions.

The average amount of a single donation identified by the authorities was relatively low – around DKK 100 – 500 in a month (USD 16 – 80), with several donators providing regular monthly contributions. In one case, the authorities identified that a specific group also received around DKK 100 000 (USD 16 000) from several donors.

Source: Denmark

Some of the ERW actors appear to solicit donations internationally, including from individuals supporting different ERW ideologies. Although the collected material does not suggest that the ERW groups across the globe present a united front nor that any substantial global coordination exists between them, this is a dangerous trend highlighting the need for better international cooperation between competent authorities.

¹⁰ For more details, please see Annex B “List of ERW Actors Mentioned”.

¹¹ ProtonMail is an end-to-end encrypted email service.

Box 2.6. Project Rodenberry

The Australian FIU, AUSTRAC, conducted project Rodenberry, aimed at examining the threat and funding of far-right groups and individuals in Australia. The AUSTRAC used a range of data acquired from previous intelligence as well as open source information to identify key terms and then match them to financial data.

Throughout this study, AUSTRAC identified links between domestic actors and overseas far right wing groups, including hundreds of transactions between Australians and U.S.-based far right wing groups. Further work also identified ten Australians who sent funds to three recruiters from **the Misanthropic Division** and another ERW group.

Source: Australia

2.2. Membership Fees

Another common method of raising funds for ERW groups is collecting fees from members. Unlike crowdfunding and donations, both of which are forms of voluntary support, often provided by persons external to the group, fees are collected from members and are mandatory to pay. This is similar to the practices used by organised criminal groups, where lower-level criminals must regularly pay dues to higher-level criminals. Some ERW groups collect membership fees in cash or by using bank accounts held at local or regional FIs.

Box 2.7. Regular Membership Fees as EoRMTF

Národní a sociální fronta (NSF, National and Social Front), a neo-Nazi organisation, and **Českoslovenští vojáci v záloze (ČsVZ, Czechoslovak soldiers in reserve)** founded in 2018, a paramilitary anti-migrant anti-Muslim organisation founded in 2015, are the two leading ERW groups in the Czech Republic.

Both NSF and ČsVZ are using regular member fees as main source of financing. A vital source of funds for NSF is also distribution of propaganda during public and non-public events (concerts, lectures, seminars), as well as their e-shop. Notably, despite these efforts their total income remains relatively small.

Source: Czech Republic

This source of funds appears to be more common across sophisticated ERW groups, especially those having a more formal organisation. Reliance on membership fees also implies that members of the group must have their own sources of funding or be engaged into organised revenue generation activity of the group, in order to be able to provide regular contributions to the group's budget.

14 | ETHNICALLY OR RACIALLY MOTIVATED TERRORIST FINANCING

Reliance on membership fees by ERW groups appears to be a different practice from the financial strategies applied by other terrorist organisations such as ISIL, Al-Qaeda and their Affiliates. Many of such organisations have not collected membership fees, but instead, some of them pay salaries to their members. For example, ISIL has been known to pay to its fighters in the conflict zone.

2.3. Commercial Activities

Similar to other groups united by ideology, ERW groups do not declare profit generation as their main objective. However, some ERW groups have been engaged into various commercial activities, such as organising music festivals and concerts, football matches, martial arts events, selling various merchandise goods and real estate related deals. Apart from providing a steady income to the group, these activities also facilitate the promotion of the ERW ideology, creating the potential for future recruitment and building links between various ERW actors.

2.3.1. Concerts and Events

ERW groups regularly use organised public events for fundraising. This includes a range of different types of events, most common of which are music concerts and festivals, fight clubs and joint training activities. Apart from selling tickets to these events to sympathisers and supports, ERW groups also use them to distribute memorabilia, which enables them to collect extra funding from the participants.

Box 2.8. Concerts as a Source of Funding for ERW groups

German authorities estimate the domestic ERW scene to involve around 30 thousand individuals, with one third being violence-oriented. Concerts and music festivals (such as for example annual concerts in Themar, Thuringia) are assessed to be one of the primary funding sources for ERW groups. A large scale concert can – according to an exceptional event in Themar 2017 - involve up to 6 000 participants; with the average ticket price around EUR 30 in that year, such event could generate up to EUR 180 000 as the gross total for the involved far right wing groups.

Source: Germany

Far right wing inspired concerts in Belgium can bring together several dozens or even several hundred participants and also attract neo-Nazi audiences from abroad, including Germany, Hungary, the Netherlands, Sweden and the United Kingdom.

Source: Europol

For some of the ERW groups, music events are more than just a method of generating funds. Music concerts and festivals enables ERW groups to build up links between different actors, spread ERW ideology and recruit new members. Certain events have become a traditional place of gathering of ERW actors, providing them a regular venues to exchange ideas and facilitate contacts on the international scale.

Box 2.9. Blood and Honour and Regular Music Events

Since 2014 **Blood and Honour-Portuguese Division (B&H-DP)** has been organizing annual international musical events in the metropolitan area of Oporto. Over the years these events gathered hundreds of **B&H** militants and supporters coming from a number of countries, including Spain, France, Russia, Italy, UK, Switzerland, Belgium, Germany, Austria, Slovenia, Czech Republic, Hungary, Greece and Sweden, among others. Portuguese members of **B&H-DP** have also been attending other musical concerts promoted by the organisation elsewhere in Europe in the recent years. The last international neo-Nazi concert organized by **B&H-DP** took place on 2 November 2019 in the outskirts of Oporto and involved over than 200 Portuguese and foreign neo-Nazis that travelled from a significant number of European countries.

These events have proven to give wide opportunities to far right wing groups to foster the bonds of brotherhood and unity between activists from various countries. They also give the groups a unique chance to recruit new members by facilitating contacts with experienced activists and spread propaganda through music and merchandising.

The funds raised through these events could be used further to finance a number of other right wing activities.

Source: Portugal

Establishing trusted relationships with foreign actors may also give ERW groups additional capacity to circumvent domestic restrictions. For example, an ERW group banned in one country could use its relationships with groups in neighbouring countries, to arrange or attend a music event in another country, where this group has not been designated yet.

2.3.2. Sale of Merchandise

A number of delegations reported sale of merchandising to be an important source of income for ERW groups. This method of financing typically involve the sale of clothing, books or other goods with various ERW symbols (swastika, "14/88", etc.) or labelled with the group logo. Such memorabilia can be sold through specific shops owned by group members or at the thematic ERW concerts and festivals, which involves hundreds and thousands of participants.

Box 2.10. Fundraising Through Merchandise Sales

Founded in the United States in 2013, **the Atomwaffen Division (AWD)** is an international neo-Nazi terror group, which has since expanded to the United Kingdom (UK), Canada, Germany, and elsewhere. The group calls for acts of violence against racial, religious, and ethnic groups, and informants, police, and bureaucrats, to prompt the collapse of society. AWD has previously held training camps, also known as hate camps, where its members receive weapons and hand-to-hand combat training. In July 2019, the co-leader of AWD, a U.S. citizen, was banned from Canada by the Immigration and Refugee Board after it was determined that he was a member of an organization that has or will engage in terrorist activities.

AWD's resources and financing structure are primarily based online, as their founder Brandon Russell has relied on online money transfer services. AWD has sold merchandise online, including t-shirts and mugs emblazoned with AWD imagery made by the group's graphic designer, a Canadian who goes by the alias "Dark Foreigner." In 2018, the AWD sold t-shirt designs in order to support Samuel Woodward, an AWD member accused of killing teenager Blaze Bernstein in Orange County, California in January 2018. Russell has stated that he sold books on an online sales service to support the group.

Source: Canada

The rise of online commerce allows ERW groups to sell merchandise while distancing themselves from potential suspicion. ERW actors frequently use social media to communicate and to advertise ERW memorabilia, literature and music. Major social media platforms have started to ban groups and profiles linked to ERW movements, preventing them from advertising and selling merchandise. ERW actors have usually responded to this by opting for less well-known and thus less monitored alternatives, including fringe online forums and encrypted social messengers.

2.3.3. Real Estate

Real estate property is a central factor to fundraising activities of ERW groups. Renting real estate provides a steady influx of funds to ERW groups, while some other groups own restaurants and pubs, enabling them to raise funds through legitimate commercial activities. Owning real estate also gives ERW actors a legitimate registration address to create companies that can be further used for business purposes, for example to create small businesses selling merchandised goods. The groups can also benefit from long term profits from real estate, as its value increases over time.

Real estate is also a cornerstone of operational activities of ERW groups. Property owned by an ERW group is often used as a central hub for its members, giving them a convenient place to coordinate and share ideas. Commercial property like bars or clubs are also a perfect venue to recruit new members and share ERW ideology.

Box 2.11. Restaurant “Bistro Hollywood”

In 2011, a long-standing political activist from the Hesse-chapter of the **National Democratic Party (NPD-Hesse)**¹² purchased the restaurant “**Bistro Hollywood**” in the Lahn-Dill district (Hesse).

The property comprises several apartments and is used for various right-wing rock concerts (including ‘Oidoxie’ and ‘Kategorie C’) and meetings of the right-wing extremist scene. This includes both regional and supraregional actors. In addition, various party-political events of the **NPD-Hesse** took place in the restaurant which is also called ‘Teutonicus’ and has become a popular venue for right-wing extremists in recent years.

In November 2018, it became known that a criminal investigation into robbery by blackmail and violations of the Weapons Act had been opened against the activist and other suspects. The police searched the ‘Bistro Hollywood’, arrested several people and seized both weapons, ammunition and devotional objects. In the attic of ‘Teutonicus’, the investigators found a provisional firing stand.

At the beginning of 2018, the property was to be auctioned by the Wetzlar District Local Court by means of enforcement in order to pay off the NPD’s debts. However, due to a loan granted to the organisation by a member of the NPD, the forced auction did not take place.

Source: Germany

Depriving terrorists of owning or controlling real property is a powerful tool that could significantly limit their ability to generate revenue and disrupt operational activities. Authorities should target real estate property belonging to or controlled by ERWT groups in the course of each investigation to deter terrorist financing and disrupt related financial networks.

2.4. Criminal Activities

Previous FATF reports identified links between criminal activity and terrorist financing for many terrorist organisations. For example, there have been numerous cases identified of ISIL, Al-Qaeda and affiliates members engaging in kidnappings for ransom and extortions to generate funds (FATF, 2015^[2]). FATF reports have also identified the multi-million dollar profits of drug trafficking networks which have leaked into the funds of terrorist organisations (FATF, 2014^[3]).

¹² In accordance with the judgment of the Federal Constitutional Court of 17 January 2017 (file no. 2 BVB 1/13), the NPD advocates a concept aimed at abolishing the existing free democratic basic order. The NPD intends to replace the existing constitutional system with an authoritarian national state that adheres to the idea of an ethnically defined ‘people’s community’ (Volksgemeinschaft). Its political concept disrespects human dignity of all those who do not belong to the “Volksgemeinschaft” and is incompatible with the principle of democracy. The NPD is thus ‘verfassungsfeindlich’ - an anti-constitutional party.

ERW groups have also engaged in various criminal activities, although the most common offences committed appear to be different from those preferred by the internationally designated terrorist organisations. In general, ERW groups do not have the ability to generate funds stemming from the control of territory, such as extorting fees from population or business. Instead, some of the ERW groups have engaged in predicate offences traditional for organised criminality – robberies, frauds, drug trafficking, etc.

Box 2.12. Real Estate and Illegal Substance Cultivation as a Source of Income

In June 2019 the Guardia Civil and Mossos d'Esquadra initiated a joint investigation upon detecting the publication on the internet of a white supremacist manifesto. The text in the manifesto featured content similar to the writings published by perpetrators of ethnically or racially motivated terrorist attacks. In September 2020, two individuals linked to the aforementioned radical publication were arrested.

Both individuals managed Telegram channels from which their supremacist theories and the creation of isolated and self-sufficient "white communities" in rural settings were promoted and disseminated. The individuals were found to be preparing themselves for a "race war" by disseminating manuals on guerrillas or making weapons or explosives with ordinary materials. As a result of the ongoing investigations, in December 2020, two other individuals who were part of the project proposed by the detainees in September 2020 were arrested.

The individuals involved had intended to acquire land intended to use it for the illegal cultivation of marijuana, in order to proceed with its sale and obtain sufficient profits for the acquisition of weapons and explosive material for the commission of terrorist actions.

Source: Spain

Interactions between ERW groups and motorcycle gangs and football hooligans have been observed for years, indicating possible involvement of ERW groups, or at least some of its members, in crimes committed by them.

Building links with organised crime enables ERW groups to generate revenue. It also provides opportunities to get access to restricted or illicit goods, such as weapons or forged documents, which allows the groups to increase their criminal activities.

“Building links with organised crime enables ERW groups to generate revenue and provides opportunities for them to gain access to illicit goods.”

Box 2.13. Robberies as a Source of Funding for Extreme Right Wing Groups

In July 2018, the Munich Higher Regional Court found guilty and sentenced the last member of the **National Socialist Underground (NSU)** and four other co-defendants for murdering nine people and one police officer and carrying out three bomb attacks.

Before its disruption in 2011, the NSU consisted of three members, two of whom committed suicide after a bank robbery on 4 November 2011 in Eisenach (Thuringia). Overall in the period of 1998 – 2011, the NSU members committed 15 bank robberies, and a number of other robberies. The funds obtained in this way were used to finance living costs (rent, food, clothing etc.) and holidays of the members. A smaller portion of the funds was used to finance consequent robberies, e.g. to hire a camper van to travel, to procure weapons. The NSU also received material support from other the right-wing actors.

Source: Germany

2.5. Abuse of Non-Profit Organizations (NPOs)

As noted in the FATF Recommendations, NPOs play a vital role in the world economy and in many national economies and social systems.¹³ They also provide important charitable services to vulnerable populations, including those in and near conflict zones. FATF reports have identified cases in which terrorists and terrorist organisations exploit some NPOs to raise and move funds, provide logistical support, encourage terrorist recruitment, or otherwise support terrorist organisations and operations. As well, there have been cases where terrorists create sham charities or engage in fraudulent fundraising for these purposes. However, not all NPOs are inherently high risk for TF (and some may represent little or no TF risk at all). Jurisdictions should ensure they are accurately assessing which NPOs could face actual TF risk and applying targeted mitigation measures. Countries should not use the potential for TF risk to justify broad-based restrictive measures on legitimate NPO activity.

While examples of NPO abuse by ISIL and Al-Qaida have been identified, other terrorist groups have also sought to abuse NPOs, including ERW groups. For example, some jurisdictions have identified private foundations that are ideologically aligned with some ERW groups (but may not openly support violence). These foundations can provide indirect support to ERW recruitment by financing books or research that supports ERW ideology. In other instances, an NPO aligned with an ERW group (such as one having affiliated individuals in leadership positions in both groups) can offer legitimacy to the group by engaging in charitable activities (food drives or fundraising activity) among sympathetic populations. Additionally, some NPOs affiliated with ERW groups may offer paramilitary or survival training to identify ideologically aligned individuals and start their recruitment into a group.

¹³ www.fatf-gafi.org/publications/financialinclusionandnpoissues/

Box 2.14. Misuse of Non-Profit Organisations by ERW Groups

The **Suidlanders (“Southlanders”)** is a South African far right-wing, ethnonationalist, all-white, Christian Afrikaner survivalist group whose ideology is based on the prophecies of Boer Siener van Rensburg. They are registered as a Non-Profit Organisation (NPO) with three active directors and one organizational spokesperson. The group believes that a race war or general civil war, sometimes referred to as “Uhuru” or the “Night of the Long Knives”, is imminent in South Africa as a result of a so-called “white genocide” of farmers and believes that white South Africans are in mortal peril. They anticipate an eventual collapse of infrastructure, and advocate and plan for an evacuation of white South Africans from major cities in the event of a race war.

The **Suidlanders** are receiving donations from a variety of far-right and white Nationalists: the neo-confederate **League of the South, Identity Evropa** founder Nathan Damigo, and **American Vanguard**. They also received USD 40 000 on FreeStartr, the defunct alt-right Patreon alternative.

The **Suidlanders** conduct training in all aspects of civil defence throughout the year. The training includes logistics and operations, control of refugees, first aid, firearms training, and communication. They claim donations is spend on “vital necessities, medicine, radios and feminine and paediatric items”.

Source: South Africa

Chapter 3. MOVEMENT OF FUNDS

As most ERW-motivated attacks are conducted by individual actors, there is limited information on how they move funds. In general, individuals do not appear to work together to coordinate attacks or transfer money to each other. Since costs of these spontaneous attacks are relatively low, transactions made by the perpetrators rarely raise any red flags. Although individuals who commit so-called 'lone-wolf' attacks may be inspired by ERW groups and have been radicalised online, they may not have ever had direct contact with other members, let alone financed them.

There is limited information on how ERW groups move their funds. There is also limited information about ERW groups' money laundering activities, such as converting the proceeds of drug trafficking to gift cards¹⁴. This is partly because some ERW groups are not considered illegal and as such financial transactions associated with them or their members are not monitored. FIs and other reporting entities may nevertheless identify illicit activity of ERW groups, whether related to ML or predicate offences, through monitoring suspicious transactions and report its suspicion to the FIU. This will give competent authorities an important lead, which can be further used to initiate a criminal investigation against the group and reveal its financial infrastructure.

ERW groups are increasingly reaching across national borders to network, recruit and seek or move funding. The April 2020 UN CTED Trends and Alerts report indicates that some similarly minded ERW groups and individuals engage across national boundaries and have moved funds to show their support (UN CTED, 2020^[4]). In some instances, authorities noted that activities of different groups are not coordinated, but there have been mutual money transactions between them. For example, some sophisticated ERW groups that are believed to gain a certain amount of funds are assumed to provide funding to smaller ERW cells that are more focused on local activities.

3.1. Financial Institutions

ERW actors have notably been less reluctant to use regulated FIs to move funds compared to other perpetrators of terrorism, presumably due to fewer concerns about operational security. This is partly because many ERW groups and their high-profile activities (e.g. rallies and concerts) are not considered illegal. Those activities that are considered illegal are of low value and, therefore, less likely to be flagged as suspicious.

Leaders of some ERW groups also appear to be less concerned about disguising their day-to-day financial transactions. For example, in some countries FIs were able to identify transfers to and from ERW group leaders based on the analysis of financial links between

¹⁴ There is also limited information about ERW groups' money laundering activities, such as converting the proceeds of drug trafficking to gift cards. See, for example, www.splcenter.org/fighting-hate/intelligence-report/2018/blood-dishonour.

the groups. Others noted that sometimes individuals belonging to ERW groups have used bank accounts of their family members instead of their own to wire payments.

Box 3.1. Far-Right Terrorist Attacks and Moving Funds Through FIs

By selling fake university diplomas online, the Norwegian terrorist **Anders Behring Breivik** established a robust financial starting point for his terrorist operation from 2006 onwards.¹⁵ He used in-between companies in the Caribbean and the West Indies, and also established bank accounts in Baltic states and Norway. He had his mother open three bank accounts for money laundering purposes.

This income was crucial for Breivik as it enabled him to dedicate time to the operation without doing ordinary work, and it covered travel expenses, as well as purchasing of bomb ingredients, equipment and weapons for the 22 July 2011 attacks.

In 2009, Breivik also acquired ten credit cards as financial backup. He used these from April 2011, when his bank accounts were empty. From this time on Breivik's weak financial situation actually became a constraint, and he could no longer postpone the terrorist operation.

Source: Norway

Box 3.2. Far-Right Groups Moving Funds Through FIs

In Denmark, far-right groups normally have their banking information on their websites and conduct their transactions, including the movement of funds, through FIs. In the case of both alt-right and neo-Nazi groups, the movement of funds was being executed primarily through the formal banking sector until October 2020 when one of the biggest Nazi groups in Denmark (the Danish branch of **the Nordic Resistance Movement**) lost their bank account (based on the bank's terms of service) and thus switched to VAs.

A further reason that many such groups have used formal FIs is that they largely operated within the legal limits in Denmark, much like the organisations that formally fund them. There are some non-democratic violent organizations that operate in legal grey zones, but few STRs concerning them are received.

Source: Denmark

3.2. Money and Value Transfer Services

MVTS transfers have been a common technique for ISIL and Al-Qaeda foreign terrorist fighters to move funds to and from the conflict zone in Syria and Iraq. In the ERW context,

¹⁵ Oslo District Court (2012). Judgment 2012-08-24 TOSLO-2011-188627-24E

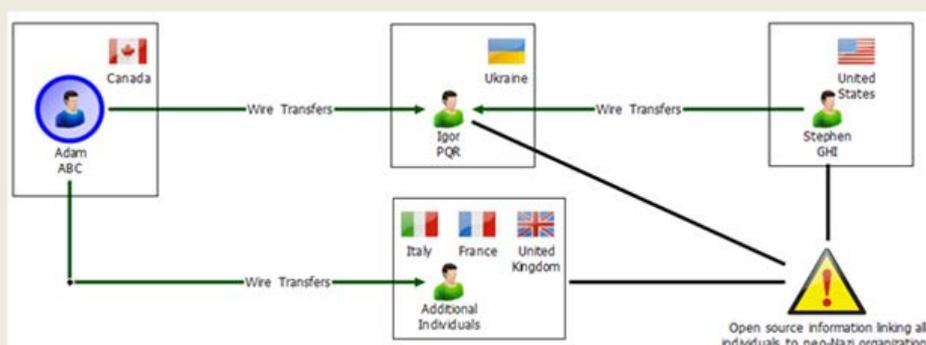
some countries noted a growing internationalization of ERW groups. Many of them took advantage of past and current regional tensions and conflicts, such as conflicts in Ukraine and the Western Balkans. However, other ERW actors are not directly linked to a particular conflict zone in the way that international terrorist groups are linked to the conflict in Syria and Iraq, meaning that there is a lesser flow of fighters and consequently money moving from supporters and families.

Nevertheless, as per *Box 3.3*, some authorities have noted that MVTs companies with cross-border operations can provide particularly valuable intelligence relating to investigations of ERW groups and individuals.

Box 3.3. Groups Moving Funds Using MVTs

In 2018, FINTRAC received suspicious transaction reports (STRs) from a reporting entity (money services business (MSB)) detailing wire transfers ordered by Adam ABC in Canada in 2015 and 2016. These included wire transfers ordered by Adam ABC to the benefit of an Igor PQR in Ukraine. Igor PQR had been identified to the reporting entity by law enforcement as suspected of involvement with a European neo-Nazi terrorist organization. The reporting entity also noted that a suspect leader of a Neo-Nazi organization in the United States, Stephen GHI, had also ordered wire transfers to the benefit of Igor PQR.

Subsequent analysis conducted by FINTRAC identified publicly available information linking further European-based beneficiaries of wire transfers ordered by Adam ABC to neo-Nazi organizations and the recruitment of individuals to fight with neo-Nazi organizations in Ukraine.



Source: Canada

3.3. Cash

ERW groups frequently make use of cash to transfer funds as a portion of their fundraising takes place in this manner. The majority of the responses received from the FATF Global Network suggests that cash is one of the most dominant methods for the transfer of funds for ERW group. Whether an ERW group raises funds via wire transfers or cash, the group typically withdraw a significant portion of the funds to be used as cash.

Where the use of cash have been identified, as discussed at further length in *Chapter 4*, it ranged from purchasing legal goods like promotion materials to illegal commodities including arms.

The main reason behind the use of cash is that it helps conceal groups' activities. Another incentive for ERW groups to use cash is that some of the mainstream FIs have begun to take action against them and limit their activities on their platforms. This forces the groups to seek alternative methods to collect and redistribute the funds, often resulting in an increased use of cash payments.

Box 3.4. ERW Groups Using Cash to Move Funds

In the period from January-November 2019 a domestic right wing group in South Africa, the **National Christian Resistance Movement (NCRM)**, also known as '**the Crusaders**' prepared and planned to carry out terrorist attacks in South Africa in order to destabilize the South African government.

In November 2019 the leader and three members of the group were arrested and later charged with terrorism and terror financing. The arrest followed a two-year extensive investigation into the **NCRM**. The alleged terrorist plot coordinated by the group was to target national key points, shopping malls and informal settlements. Following the leader's arrest, and subsequent searches of premises linked to the accused, lead to the discovery of a possible explosives factory, electronic devices, documents, unlicensed firearms and ammunition, which were seized for further analysis and investigation.

The group's activities were largely self-financed, but the group also received donations from sympathisers. After the disruption of the group's planned attack it was established that cash was used to purchase the components to construct improvised explosive devices.

The full sum raised and used to prepare for the attacks is unknown due to the group's reliance on cash.

Source: South Africa

3.4. Virtual Assets

In the same way that social media networks have started blocking ERW groups from their platforms, financial services companies (Tom Keatinge, 2019^[5]) have also started to refuse to process payments on their websites linked to ERW groups for violating terms of service on hate speech. Without the ability to process credit card payments, some groups have moved to using VAs like Bitcoin to move funds (Schulberg, 2019^[6]). Some ERW groups have used so called "privacy coins", i.e. VAs that allow a user to maintain total anonymity when making blockchain transactions.

Box 3.5. Use of VAs within ERW Attacks and Groups

One far-right organisation in South Africa created their own stable coin that operates on a 1:1 ratio with the local currency (South African Rand (ZAR)).

The stable coin, managed by an application styled PayApp, enables the group to use digital money as cash. The transactional data lasts 24 hours and thereafter is untraceable.

Bank statement analysis conducted on the accounts of members of the right wing organisation identified specific transactional references used. The references are in English and or Afrikaans, and include military reference to military ranks, which is indicative of the fact that the group had or has a formal military structure and chain of command.

The Organisation raised funds up to ZAR 268 000 (EUR 14 720). ERW actors in South Africa are known to receive financial support from individuals in foreign jurisdictions like the USA, UAE, Australia and Switzerland.

Source: South Africa

There has been plenty of interest in VAs from different ERW groups and individuals looking for anonymity, especially after being removed from mainstream payment platforms. ERW actors that feel more security-conscious and desire a greater level of secrecy, often choose VAs. However, notably there is limited information on the volume of funds being transferred in this way.

Box 3.6. Transferring Funds via Bitcoin

Financial investigation into the terror attack perpetrated by the **Christchurch mosque shooter** in New Zealand on 15 March 2019 found that he had made multiple donations to ERW entities overseas, including **Generation Identitaire** in France and **Martin Sellner** in Austria¹⁶, referencing ‘gift’ and ‘keep up the good work’, as well as that he made use of VAs to transfer funds. He was found to be engaged with ‘like-minded’ individuals via social media, chatrooms and forums. This case involves spontaneous cooperation after the fact from FIUs of the countries involved.

Source: New Zealand

¹⁶ This case involves spontaneous cooperation from the FIUs of the countries involved following the attack.

3.5. Financial Management

There have been varying impressions of how professionalised ERW groups are in their financial behaviour and management of funds. Compared to larger terrorist organizations like Al-Qaeda or ISIL, ERW groups generally have a less centralised financial system for management and movement of funds. In some cases, investigators were able to capitalise on ERW groups being less security conscious of financial activity, as the actors had left a larger financial footprint. This has involved an increased use of the formal financial system as well as referencing ERM symbolism in transactions.

At the same time, there seems to be an emerging trend of professionalization across the ERW community. For example, some ERW groups structure their transactions to avoid reporting thresholds, which would suggest that groups are becoming more skilled at disguising their financial activities. In some cases, authorities noted possibility of placement and layering stages of money laundering. **In general, the more attention from competent authorities ERW groups feel, the more likely they try to conceal of their actions, including financial operations.**

Box 3.7. Examples of ERW groups concealing financial transactions.

Investigations have found that the German far-right scene is largely cash-based. However, the large amounts of money earned through commercial fundraising activities like concerts have in the past been transferred using offshore companies in order to conceal financial flows.

Source: Germany

The biggest far right wing group in Belgium, “**Schild & Vrienden**” (“Shield and Friends”) originally started off as a student society with limited resources. Following significant media attention and outreach in which they tripled their resources through Bitcoin and donations via an online money transfer service, they also began to use a front company to move their funds. It appears that this move, however, was not to conceal their actions from authorities.

Source: Belgium

STRs received by FINTRAC relating to suspected far right wing financial activity show that leaders of these groups, are often operating a small business (e.g., transportation) yet their account activity shows transactions not in line with that profile (e.g., bank finding no evidence of business related purchases during the review period of a suspicious account).

Source: Canada

Chapter 4. USE OF FUNDS

ERW groups, as well as lone actors, use their funds for different purposes. On the one hand, they use their funds to purchase weapons and other items that are suitable for an attack. Often, they also use financial resources for propaganda, recruiting and networking. In addition groups use their funds for training purposes as well as for legal fees and penalties.

The acquisition of real estate for training purposes is becoming increasingly important. Investment in real estate and businesses (such as in catering) would also appear a potential way of ensuring sustained flows of income in order to consolidate structures in the long term¹⁷.

4.1. Financing of Attacks

There have been several ERW-motivated terror attacks in the last years, which generally followed the typical “lone actor” scenario with perpetrators using own sources to finance terrorist activity. In general, the amounts spent to conduct an attack were small and paid in cash, as the attacks did not involve a sophisticated planning or preparation. In many cases, the main expenditure for the attacker was the procurement of arms or explosives. In countries where individuals are allowed to possess firearms, often the weapon used in these attacks was bought legally either by the attacker or one of his associates. In countries with a stricter arms control regime, ERWT attackers procured arms through specialised online platforms on the Dark Web or encrypted messaging apps like Telegram.

¹⁷ German National Risk Assessment (2019), Page 45.

Box 4.1. Material for Attacks

A Regional Organised Crime Unit operation targeted a Gloucestershire resident who had sought to procure a firearm and ammunition. Subsequent triage of the suspects' devices identified that they held ERW views, and that the procurement of the weapon was assessed to have been for the purposes of a lone actor attack.

The subject was subsequently found guilty of two counts of attempting to possess a Glock 17 pistol and five rounds of 9mm ammunition with intent to endanger life. The funds were used to purchase a firearm and ammunition via Tor for GBP 1 000 (EUR 1 130).

This case highlighted the risk posed by isolated lone actors who have not come to the attention of any professional agencies, and have the technical capability to procure the relevant materials. In the absence of the interception of the firearm in question, the subject had prompted no other police interest.

Source: United Kingdom

ERW actors also used their access to online material to obtain instructions for assembling improvised weapons. In one case, the perpetrator used 3D printing and online tutorials to create components to reactivate a defective weapon.

Box 4.2. Buying and Building Equipment

On 9 October 2019 an attack against a synagogue in Halle (Saale) took place. Two people (who had not attended the synagogue service) were killed.

The attacker is a person with right-wing extremist, anti-Semitic and xenophobic views. His goal was to kill as many people of the Jewish faith or with an immigrant background as possible and, by filming the attack himself on his smartphone and making the footage available online, to encourage potential copycat attacks.

Weapons that were found and the weapons used for the crime were mainly made by the suspect himself. One firearm which was not used had been obtained illegally online by the suspect. The relevant financial transactions have been identified by the German authorities.

Funds were used by the offender to buy materials in hardware stores or on eBay to produce weapons through a 3-D printer. The bank statements analysis of the attacker's account indicated that there were no regular income or official unemployment compensations. Several irregular cash deposits up to an amount of EUR 500 have been identified. The provenance is unknown. The total amount of funds used to carry out the attack is unknown, too. During the attack a rental car was rented, paid and used by the attacker himself.

Source: Germany

4.2. Propaganda, Recruitment and Networking

Unlike individual actors, ERW groups have a more complex structure of expenditures. Similar to international terrorist groups, they spend money for propaganda, recruitment of new members and building links between members. However, a large portion of the funds raised by ERW groups is spent on their day-by-day activities and organising events. Finance also plays an important role in the promotion of ERW ideology, including creating propaganda, organising marches and events, maintaining websites that support and promote ERW views.

Funding enables ERW groups to build their organisation and reach a certain degree of publicity, which allows the groups to reach a wider audience. ERW groups also use available funding to increase manpower and develop skills. For example, some of the groups provide specialised trainings to its membership, including in shooting and martial arts.

Music and concerts play a key role in providing coherence to and propagating neo-Nazi groups. The Oi! and 'Rock against Communism' (RAC) music genres have been reported as one of the main unifying elements for ERW group in some regions (Europol, 2020^[7]). With their aggressiveness, they constitute one of the vectors of expression of neo-Nazi or skinhead groups and pose as an 'underground' culture. ERW groups connect with each other while visiting international events, e.g. marches, commemorations, concerts or martial arts tournaments. In addition they try to circumvent bans in one country by organising or attending meetings or concerts in other countries. Therefore funds are also needed for travelling to those events.

Box 4.3. Assessment by the Danish FIU

Neo-Nazi groups in Denmark predominantly use their funds for two main activities: activism (making flyers, posters, etc.) and digital infrastructure (creating podcasts, buying IT equipment, etc.). Meanwhile, alt-right groups in Denmark have been found to use their funds primarily for activism and to travel to participate in international gatherings and meetings.

Source: Denmark

4.3. Real Estate Property

In recent years, ERW groups have increasingly invested funds in the purchase of real estate. Often these properties are in structurally weak areas in which ERW actors often appear as the only interested parties. This real estate property then becomes a central hub for the group, giving it a convenient and secure venue for internal meetings. ERW groups also use real estate property to increase their operational capacity and spread its ideas. For example, they are used for right-wing concerts, parties, martial arts events and training courses (physical and survival training). In case when an ERW group does not own any real estate, it often turns to its sympathisers, who could provide a cost effective and secure location for mass gatherings¹⁸.

¹⁸ Project CRAAFT, Financing Right-Wing Extermism and Terrorism, Research Briefing No. 5, p. 3.

Some groups use the properties to open own businesses like restaurants and pubs, acting as small companies selling merchandise and as a place where people meet. In addition a possible anchoring of right-wing extremist property owners in rural areas creates the risk that they will succeed in introducing right-wing extremist ideological elements into the majority society through socialisation and acceptance.

Box 4.4. Real Estate Property

U.S. authorities have identified financial activity indicating that some racially-motivated violent extremist groups may be seeking to purchase property so they can facilitate paramilitary-style training, to include learning how to make improvised explosive devices, for members or other like-minded individuals.

“**The Base**” is a racially-motivated violent extremist group that seeks to incite civil unrest that will lead to the creation of a white ethno-state.¹⁹

In January 2020, a criminal complaint was filed charging three alleged members of The Base with firearms and alien-related charges. In December 2020, one defendant, William Garfield Bilbrough IV, was sentenced to five years in prison, followed by three years of supervised release, after Bilbrough pleaded guilty to conspiring to transport an alien, specifically, a fellow member of The Base. According to his plea agreement, Bilbrough was a member of The Base, a racially motivated violent extremist group. Since 2018, The Base has built a coalition of white supremacist members within the United States and abroad through, among other things, online chat rooms, in-person meetings, propaganda, and military-style training. Bilbrough participated in a regional training camp conducted by members of The Base in Georgia from 2 August through 4 August 2019, including participating in tactical training and firearms drills. Later that month, Bilbrough attended another Base training camp in a different state.

According to press reporting, an individual alleged to be a leader of the Base purchased secluded real property in a rural portion of Washington State, on behalf of The Base with the intention to use that property for paramilitary training¹.

Source: the United States

1. www.spokesman.com/stories/2020/jan/23/report-leader-of-neo-nazi-terrorist-group-owns-land/

4.4. Training and Acquisition of Equipment

Tactical training is an important expenditure for many ERW groups. Members of ERW groups take part in training camps in remote areas of countryside, where they attend lectures, self-defence classes, and practice in the use of weapons. Although it is hard to calculate the exact amount of funds spent by the groups on training, it appears to be a

¹⁹ On February 3, 2021, Canada listed The Base as a terrorist entity under its *Criminal Code*. See (Public Safety Canada, 2021^[8])

priority area for many of the groups. Such trainings increase the operational capability of ERW groups and builds trust between the members. Funding is used both for the implementation of these training courses and for the equipment. Authorities reported cases where the subjects had bought “Combat” type knives to use at such training camps (see Box 4.5).

Box 4.5. Training Camps

The subjects had been part of **National Action**, which was proscribed as a terrorist organisation in December 2016 by the then Home Secretary, as have its subsequent aliases. On the whole they were young, well-educated men from middle class families and generally from predominantly white communities. There were also a number of more aggressive less well educated men who were seen more as followers than leaders.

The subjects took part in training camps in remote areas of countryside where they camped out and took part in lectures, self-defence classes, and the use of weapons. Many of the subjects had bought “Combat” type knives to use at these training camps. In addition to the weapons, survival equipment and media there were also almost always purchases of sports training equipment such as weight training clothing and equipment as well as food supplements such as protein whey and creatine.

Source: the United Kingdom

Box 4.6. Purchasing Equipment

The French FIU (X) received a suspicious transaction report (STR) concerning an individual (A) after his arrest for “terrorist conspiracy” was reported in the media. The reporting entity indicated that individual (A) purchased a firearm and identified credit card payments to different armouries.

FIU (X) mapped individual’s (A) financial environment through national bank account register checks and direct access to databases managed by other public national authorities (tax information and law enforcement data in particular).

FIU (X) analysed the financial background of individual (A). In doing so, FIU (X) identified credit card payments to three different armouries for a total of EUR 1 226, a EUR 420 bank cheque for a rifle purchase, and a EUR 211.74 cheque to another armoury. It also allowed the FIU to build the financial resources picture of individual (A) (including their wages, various wire transfers and cheques from individuals or entities, cash deposits). Moreover FIU (X) identified different participations to internet money pots opened to the benefit of ERW organisations. Individual (A) also set up an online money pot in order to finance the translation of a nationalist book.

Thanks to a direct and continuous dialogue with the Judicial authorities, FIU (X) disseminated financial environment intelligence concerning this individual (A) to the Prosecutor in charge of the case on the basis that he had been arrested and indicted for “terrorist conspiracy” together with other individuals.

Source: The Egmont Group

Chapter 5. CHALLENGES AND ISSUES FOR FURTHER CONSIDERATION

5.1. Different Legal Regimes for Combating Extreme Right Wing Terrorism

One challenge in countering EoRMTF is that not all countries classify violent activity by ERW individuals or groups as terrorism. For example, while some jurisdictions will classify ERW-affiliated groups and individuals as a criminal gang and primarily pursue non-terrorism-related criminal charges, other jurisdictions may view these groups as a terrorist or other national security threat and charge terrorism-or national security-related offenses. When it comes to identifying and disrupting financial activity, investigating and charging terrorist financing may not be available in criminal or gang prosecutions, or in hate crime investigations.

Further, countries may have separate criminal authorities to prosecute crimes motivated by racial or ethnic bias. This can impact which agencies (law enforcement or security or intelligence services) and legal authorities are used for investigation and prosecution of the underlying violent activity and its financing.

An additional challenge in identifying and combating EoRMTF is that jurisdictions around the world differ in their treatment of racist, xenophobic, or related extremist speech (sometimes referred to as “hate speech”). In some jurisdictions, groups or individuals that disseminate written or electronic content promoting the hatred or certain racial, ethnic, or political groups are not considered illegal so long as they do not advocate for or facilitate violence against a specific individual or other target. In other jurisdictions, government authorities can take civil or criminal measures against individuals or groups that seek to incite violence without actually engaging in violent conduct.

Given that the dissemination of extremist content is not restricted by national borders, ERW groups or individuals may seek to produce and disseminate materials in jurisdictions with greater protections for hate speech that are then transmitted around the world. Using this incoherence between legal regimes, ERW groups get additional opportunities for fundraising, for example by organising events or selling memorabilia in a country where their actions are not considered illegal. This can make it challenging for other jurisdictions to use their own legal authorities to target the producers of such content.

Box 5.1. Ban of Associations to Protect Constitutional Order

Associations in Germany whose purposes or activities are contrary to criminal law or which are contrary to the constitutional order or the concept of international understanding may be banned under the Association Act. Bans of associations are thus a preventive measure to protect the constitutional order. The legal form of the association is irrelevant. Due to additional legal requirements, a separate law exists for banning political parties that are in contravention of the constitutional order.

The Federal Minister of the Interior, Building and Community is responsible for banning associations if they are active in more than one federal state (Land). If an association operates in only one Land, the relevant Land is responsible for banning the association. The association concerned may bring legal action against its ban before the Federal Administrative Court.

As a legal consequence of a ban, the association concerned is dissolved and its assets are confiscated. The continuation of the association, the formation of successor or substitute organisations and the use of the banned association's symbols are criminal offences.

Since 2016, five right-wing extremist associations have been banned at federal level: **Altermedia Deutschland** (January 2016), **Weisse Wölfe Terrorcrew** (March 2016), **Combat 18 Deutschland** (January 2020), **Nordadler** (June 2020) and **Sturm-/Wolfsbrigade 44** (December 2020).

Source: Germany

5.2. Few National Designations

Counterterrorism designations and accompanying restrictive measures, such as financial sanctions or travel restrictions, have played an integral role in CFT efforts. Under the FATF Standards and national implementing laws, the designation of an individual or group for being a terrorist or providing support to a terrorist group is accompanied by a freezing of assets owned or controlled by the designated person or entity, as well as prohibitions on engaging in transactions with the designated person or entity.

While these measures have an important disruptive effect on terrorist financing, their impact goes well beyond CFT. Public designations expose and isolate these individuals and organizations, deters would-be supporters, and forces these groups to expend time and resources to find new sources of revenue and channels for moving these funds. They can also assist FIs, DNFBPs, and others in improving their own detection of terrorist groups and identifying previously unknown subjects in a terrorist support network.

In addition, designations can assist or complement law enforcement actions against terrorist groups. For example, in many jurisdictions, judicial authorities can pursue criminal charges against individuals or entities that wilfully provide financial or other material support to designated terrorists and terrorist organizations. They have played a

fundamental role in the fight against global terrorist groups such as ISIL, Al-Qaida, and their affiliates, as well as regional terrorist threats, such as Boko Haram, Al-Shabaab, and Jemayah Islamiyah.

However, there is no UN or other international designation regime for targeting ERW groups, and only a few jurisdictions have designated ERW individuals or groups domestically. The reasons for this are varied: in some instances, ERW groups may not meet the criteria for designation if they do not meet the necessary threshold of (potential) terrorist activity or lack an identifiable command and control structure, and instead operate as loose networks of affiliated individuals. In other instances, national designation authorities may be primarily focused on more established foreign terrorist threats, and are not effectively coordinating with security services or other law enforcement authorities who are targeting ERW groups, especially if the ERW groups are largely domestic.

Additionally, if a jurisdiction perceives the ERW threat as primarily coming from radicalized individuals who self-fund their attacks, they may not see the utility of using designations to disrupt the limited amount of financial activity associated with these attacks. Finally, some jurisdictions may face legal constraints that prohibit them from restricting non-violent activity associated with hate speech or extremist rhetoric, or face domestic political challenges in taking action against violent extremist groups that may be affiliated with political parties.

Box 5.2. Designation v. Proscription

Groups or individuals can be designated under one of the UK's financial sanction regimes as a **designated entity**. Designated entities subject to an asset freeze can also be subject to further prohibitions (e.g. restrictions on access to financial services and markets or be subject to other restrictive measures such as travel bans). The Home Secretary can also **proscribe** an organisation if they believe that it is concerned in terrorism as defined by the Terrorism Act 2000. Proscribing an organisation makes them liable for additional offences under the Act, these offences include membership, expression of support for and wearing clothing or displaying an articles of a proscribed organisations in public. Proscribed organisations in the UK can also be considered for designation under the UK financial sanction regimes.

Source: the United Kingdom

5.3. Growing Transnational Links

As noted by the UN CTED, while right-wing extremism is not a recent phenomenon, the growing transnational links has been of particular concern. Similar to their jihadist counterparts, many of these groups have used the internet and social media to share propaganda and recruit ideologically-aligned supporters from around the world. They also may be looking to forge financial links and possibly collaborate in paramilitary or other specialized training.

Similar to their jihadi counterparts, some of these individuals and groups have travelled to conflict zones to network, recruit, and acquire combat experience. Some individuals

have travelled to Syria and Iraq to join groups fighting ISIL (in some instances, specifically to protect Christian minorities). And there are numerous reports of right-wing extremist-affiliated individuals traveling to join the conflict in Ukraine.

While many of these transnational links are focused on sharing propaganda based on ideology, there has only been limited reporting related to transnational fundraising activity. However, as these groups continue to interact, they may seek stronger cross-border financial ties.

This trend has posed a challenge for law enforcement or security services which are used to combating ERWT as a domestic threat with few transnational links. For example, existing transnational channels for CT or CFT cooperation between security services, law enforcement, and FIUs that are typically used to combat ISIL, Al-Qaeda, or other recognized terrorist threats do not currently share information or take joint action against ERW-related threats.

5.4. Attacks are Primarily Carried out by Lone Actors

Despite a growing internationalisation of ERW groups, many of the attacks that are motivated by ERW ideology are carried out by individuals who are not directly affiliated with members of a terrorist or violent organization. In many cases, these individuals may be inspired by propaganda or the ideology of an ERW group or network. These attacks are also relatively simple and low-cost, relying on firearms, explosives, or other material that is purchased by individuals using their own savings or personal loans. They typically do not rely on an extensive network of individuals or entities that provide operational support to an attack and leave a financial trail.

Authorities may see these attacks as having fewer opportunities for financial disruption and place less importance on the financial investigation associated with these attacks. Additionally, these types of self-funded attacks by “lone actors” can be challenging for FIs and DNFBPs to identify relevant financial activity prior to an attack.

5.5. Public Private Partnerships and Information Sharing

In recent years, many jurisdictions have created or expanded public-private partnerships focused on combating terrorist financing and money laundering. For terrorist financing, there has been a focus on ISIL, Al-Qaeda, Al-Shabaab, and other transnational terrorist threats. The work done on identifying ERW-related financing has been more limited.

Seeking to leverage the existing relationships and work in these fora could have a real impact on efforts to counter EoRMTF. Some jurisdictions have found public-private information sharing forums useful for sharing threat specific information on particular groups or individuals, which could be applied to ERW groups or networks. Additionally, certain contextual indicators developed to identify possible activity by other violent actors (e.g. ISIL-inspired attacks) may be useful for financial institutions in identifying similar patterns of behavior.

5.6. Inclusion of ERW Groups in National Risk Assessment Process

As noted by the FATF's *Terrorist Financing Risk Assessment Guidance* (FATF, 2019^[8]), identifying, assessing and understanding terrorist financing risk in a particular jurisdiction is an essential part of dismantling and disrupting terrorist networks. This allows law enforcement, the FIU, and other competent authorities to effectively use their

legal authorities to combat financial networks supporting these groups, and assists FIs and DNFBPs in better identifying and report suspicious transactions associated with ERW groups.

With ERW groups, not all jurisdictions in the FATF Global Network may face terrorist financing risk associated with these groups.²⁰ However, those jurisdictions that do identify violent activity or financial support associated with ERW individuals and groups should consider including risk information in their national risk assessment process. So far 6 out of 27 FATF members who have completed a National Risk Assessment (NRA) have covered EoRMTF²¹. For example, both Germany and the U.K. have included ERW groups and their financing in their NRAs²², while other countries have also provided threat and risk information through other public reports, such as national terrorism threat reports²³. Given the rising threat from these groups and growing evidence of cross-border links, this is an area for national AML/CFT authorities to focus on as they update their understanding of terrorist financing risk.

Box 5.3. Excerpt from UK National Risk Assessment

“The UK’s NRA finds that far-right extremists and terrorists likely utilise both traditional methods to fund their activities, such as the sale of merchandise, and innovative means, for example using emerging live streaming platforms to solicit donations via cryptoassets. Online donations of this kind are likely the principal source of external funding. However, most far-right extremist and terrorist activity is highly likely self-funded via legitimate means. Disruption by industry and law enforcement has highly likely motivated far-right extremists to utilise emerging and less regulated platforms, notably those associated with online gaming, to monetise their activism. While lack of funding probably limits extremists’ ability to organise and promote their activities, it is unlikely a barrier to successful extremist activism owing to the low costs associated with online activism. The prevalence of online-focused activism and low associated costs will highly likely mean activity will remain self-funded and supplemented by donations from supporters.”

Source: the United Kingdom

5.7. Impact of COVID-19

The FATF has produced several reports and assessments (FATF, n.d.^[9]) describing the impact of COVID-19 on money laundering and terrorist financing activity. Specific to ERW financing, the COVID-19 lockdown restrictions on mass gatherings have affected the

²⁰ For example, all the case examples in this report came from jurisdictions located in North America and Europe, as well as Australia, New Zealand, and South Africa.

²¹ Source: FATF NRA Library (2021)

²² For example, the U.K.’s latest NRA (HM Treasury / Home Office, 2020^[10]), Germany’s NRA (Federal Ministry of Finance, 2020^[11]).

²³ See, for example, Norway’s Threat Assessment (PST, 2019^[12])

possibilities for organising ERW concerts and events, thus blocking an important financial source. This may push ERW groups to seek for new methods of financings or to an increased use of already existing sources. This may include organising larger online campaigns to sell ERW merchandise products, attempts to anonymise donors to secure additional funding or further engagement with organised crime.

However, the economic and social impact of COVID-19 may also serve as a recruiting opportunity for these groups. As individuals in many jurisdictions who were already somewhat marginalized and in low-wage positions suffer financial losses, they may look to blame their misfortune on ethnic or racial minorities. Additionally, one consequence of the business closures and lockdowns mandated by many governments has been increasing use of social media for personal contact and news. ERW groups may use this to contact and “groom” more disillusioned and isolated individuals²⁴.

²⁴ UN CTED has published an updated Trends Alert on response of ERW groups to COVID-19 (UN CTED, 2020^[14])

Chapter 6. CONCLUSION

Successful disruption of ERW groups and individuals, and their violent activities, requires an understanding of how they are financed. This report provides an outline of key ways in which ERW actors raise, move and use funds, as well as practical examples of this.

With detailed information on their financial activities and any vulnerabilities that can be exploited, law enforcement, FIUs, securities services, and other competent authorities are able to more effectively employ targeted measures to combat these groups. This information further helps FIs and DNFBCs identify and report suspicious financial activity linked to these groups.

It is important that competent authorities work closely with relevant financial and non-financial institutions that play a vital role in detecting EoRMTF activity. While this report (among other national and international assessments) has greatly improved the FATF Global Network's understanding of EoRMTF, it also highlights opportunities for further work going forward. Additional work is needed to better counter racially and ethnically motivated terrorism within the AML-CFT community.

Members of the FATF Global Network are encouraged to build on this work by:

- **Considering EoRMTF in their TF NRAs, in order to deepen the understanding of this threat among AML-CFT professionals.** Countries should identify and assess their EoRMTF by involving relevant experts and data in the risk assessment process, and should put in place mitigation mechanisms and allocate resources in line with any identified TF risks. Given that this report, among others, finds that the threat of EoRMTF has a growing transnational dimension when conducting NRAs countries should also take into account the increasingly transnational nature of the phenomenon and therefore look beyond national boundaries, to analyze regional and global trends of raising and moving funds by such groups.
- **Building private-public partnerships to improve detection of EoRMTF activity.** Countries should consider how they can promote public-private collaboration and information exchange, to effectively detect and address EoRMTF. Given the importance of both financial and sector-related expertise (on ERW actors), it is important to consider how this collaboration can include a broad range of actors including FIs, digital technology companies, and the non-profit sector.
- **Cooperating with other jurisdictions to share best practices and address the increasingly transnational nature of EoRMTF.** Countries should consider how they can increase co-operation with foreign counterparts to strengthen measures to identify and combat EoRMTF. This could involve more proactive engagement with foreign counterparts and appointing contact points responsible for international EoRMTF-related inquiries. It may also involve organizing regular bilateral or multilateral dialogues, or participation in multilateral co-ordination mechanisms.

Annex A. Groups and Actors Mentioned in the Report

Table.1. ERW Groups and Actors Mentioned in the Report

Please note: This table is **not** a definitive list of ERW actors, but merely a list of ERW groups and individuals put forth in the case studies in this report.

Anders Behring Breivik is the Norwegian terrorist and right-wing extremist who committed the terrorist attacks on 22 July 2011 on the island of Utoya and in the city of Oslo.

Altermedia Deutschland was leading right-wing extremist internet portal in Germany, which was engaged in the systematic dissemination of right-wing extremist and National Socialist ideology, and was banned in Germany in January 2016.

American Vanguard (also Vanguard America) is a white supremacist, neo-Nazi, neo-fascist organization in America founded in 2015. Members of the group were present at the Unite the Right rally in Charlottesville, Virginia, in August 2017. James Alex Fields, the individual responsible for killing a counter protester and injuring 19 others in a vehicle-ramming attack at the Rally, was seen marching with the group.

The Atomwaffen Division (also known as the National Socialist Order) is an ERW neo-Nazi terrorist network. Formed in 2015 in the United States, the Atomwaffen Division has since expanded into the United Kingdom, Canada, Germany, Italy, and other European countries. The group was designated as a terrorist organization by Canadian authorities on February 3, 2021.

The Base are a neo-Nazi, white supremacist paramilitary group and training network, formed in 2018 and active in the United States, Canada, Australia, South Africa, and Europe. It advocates the formation of white ethno states, a goal they see as achievable via terrorism and the violent overthrow of existing governments. The group aims to connect committed extremists with terroristic skills to produce real-world violence. It organizes "race war preppers" and operates "hate camps", or training camps. The Base has links to the Atomwaffen Division and the Feuerkrieg Division. It was designated a terrorist entity by Canada on February 3, 2021.

Blood and Honour is right-wing extremist group and a neo-Nazi music promotion network founded in the United Kingdom in 1987. It is composed of White Nationalists and has links to Combat 18. It is banned in several countries, including Germany, Spain, Russia, and Canada. In 2019, Canada placed Blood & Honour on its list of designated terrorist groups.

Blood and Honour-Portuguese Division (B&H-DP) is the Portuguese arm of Blood and Honour.

Brenton Harrison Tarrant (referred to as the Christchurch mosque shooter) is the Australian who perpetrated the Christchurch terrorist attack in March 2019, killing 51 people and injuring 40. Tarrant has been linked to other ERW actors, including Generation Identity.

Combat 18 (also C18 or 318) is a neo-Nazi terrorist organization that was founded in 1992 in the United Kingdom, with ties to movements in Canada and the United States. Since its founding, the group has spread to other countries such as Germany.

Combat 18 Deutschland is the German offshoot of the Combat 18 organization. On 23 January 2020, the German Federal Ministry of the Interior, Building and Community announced and enforced an order banning "Combat 18 Deutschland". The order states that "Combat 18 Deutschland" is directed against the constitutional order and that its goals and activities are contrary to criminal laws and against the idea of understanding among nations.

Českoslovenští vojáci v záloze (ČsVZ, Czechoslovak soldiers in reserve), is a paramilitary anti-migrant, anti-Muslim organisation originally founded on 2015 as informal and non-registered group of former military and security servicemen.

Generation Identitaire is a nationalist far-right political movement in France. The group was banned in France in March 2021 for incitement to discrimination, hatred and violence.

League of the South, (also Identity Evropa), rebranded as **American Identity Movement** in March 2019, was an American neo-Nazi and white supremacist extremist organization established in March 2016. Leaders and members of Identity Evropa, have praised Nazi Germany and have openly pushed for what they described as the "Nazification of America". Identity Evropa has allied itself with the broader white nationalist alt-right and identitarian movements and the group particularly targeted college campuses by distributing slogans on fliers, posters, and stickers. In November 2020, the group's leader announced the group had disbanded, and therefore ceased all operations.

The Misanthropic Division is a world-wide neo-Nazi network, which emerged in Ukraine in 2014.

Národní a sociální fronta (NSF, National and Social Front) was founded on 2018 as a new neo-Nazi organization in Czechia.

National Christian Resistance Movement (NCRM) (also 'the Crusaders') is an ERW group in South Africa. In December 2020 two of their members were convicted and sentenced to 8 years on terrorism charges.

National Democratic Party (NPD) is a far-right and Neo-Nazi political party in Germany. In a 2016 hearing, the German courts openly acknowledged that NPD is unconstitutional based on its manifesto and ideology, citing "links to neo-Nazism" and that "anti-semitism was a structural element of the party ideology" in its reasoning. The Court also indirectly suggested that state grants or other financial contributions should not be given to such parties to further their unconstitutional cause.

National Socialist Underground (NSU) was a far-right German neo-Nazi terrorist group which was uncovered in November 2011. Unlike other terror groups, the NSU had not claimed responsibility for their actions, however numerous crimes have been attributed to them. In 2018 their sole surviving member was sentenced to life in prison.

Nordadler (also Northern Eagles) was a German neo-Nazi group whose 30 members professed allegiance to Adolf Hitler and aimed to revive the National Socialist ideology. The group was banned by the German Federal Ministry of the Interior, Building and Community in June 2020.

Nordfront i.e. the Nordic Resistance Movement (Nordiska motståndsrörelsen) is a Pan-Nordic neo-Nazi movement founded in 2016. It was established in Sweden, Norway, Finland, and Denmark, and also has members in Iceland. The NRM has been described as a terrorist organization due to their aim of abolishing democracy along with their paramilitary activities, weapons caches and connections to proscribed terrorist organisations. The group was banned in Finland in 2019.

Nordisk Styrka (Nordic Force, Nordic Strength) is an ERW neo-Nazi paramilitary group in the Nordic region with members in Norway and Sweden. It was founded in August 2019 by members of the Nordic Resistance Movement after an internal split within the group.

The Proud Boys are a far-right, neo-fascist, and exclusively male organization that promotes and engages in political violence in the United States and Canada, and has been designated as a terrorist organization in Canada.

QAnon is a far-right wing network which purports the conspiracy theory of the existence of a deep state plot being exposed online by an anonymous leader named Q.

Schild & Vrienden (“Shield and Friends”) is a Belgian far right-wing youth movement ‘Schild en Vrienden’ being investigated for anti-Semitic, anti-Muslim, and xenophobic content posted on secret Facebook groups.

Sturmbrigade 44 (also Wolfsbrigade 44) was a German neo-Nazi organization founded in 2016 named after a "special unit" under the leadership of SS officer Oskar Dirlewanger in the 1940s. The group was banned by the German Federal Ministry of the Interior, Building and Community in December 2020.

Suidlanders (English: Southlanders) is a South African ERW ethnonationalist Afrikaner survivalist group that believes that a race war or general civil war, sometimes referred to as "Uhuru" or the "Night of the Long Knives," is coming in South Africa as a result of a “white genocide”.

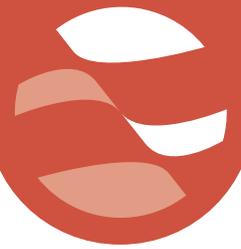
System Resistance Network (SRN) is a neo-Nazi group in the United Kingdom, formerly known as Vanguard Britannia, the British chapter of American alt-right, neo-Nazi group Vanguard America. Former members of the SRN are suspected to have been involved in the creation of the Sonnenkrieg Division, an offshoot of the American neo-Nazi terrorist organization the Atomwaffen Division.

Weisse Wölfe Terrorcrew (White Wolves Terror Crew) was a right-wing extremist group in Germany and had members across Germany, including neo-Nazis and former members of the skinhead scene. They were banned by the German Federal Ministry of the Interior in March 2016 because the association was directed against the constitutional order and that its goals and activities were contrary to criminal laws.

References

- Europol (2020), *European Union Terrorism Situation and Trend Report (TE-SAT) 2020*, [7]
<http://www.europol.europa.eu/activities-services/main-reports/european-union-terrorism-situation-and-trend-report-te-sat-2020>.
- FATF (2020), *Priorities for the Financial Action Task Force Under the German Presidency*, [1]
<http://www.fatf-gafi.org/media/fatf/documents/German-Presidency-Priorities.pdf>.
- FATF (2019), *Terrorist Financing Risk Assessment Guidance*, [8]
<https://www.fatf-gafi.org/media/fatf/documents/reports/Terrorist-Financing-Risk-Assessment-Guidance.pdf>.
- FATF (2015), *Financing of the Terrorist Organisation ISIL*, [2]
<http://www.fatf-gafi.org/media/fatf/documents/reports/Financing-of-the-terrorist-organisation-ISIL.pdf>.
- FATF (2014), *Financial Flows Linked to the Production and Trafficking of Afghan Opiates*, [3]
<http://www.fatf-gafi.org/media/fatf/documents/reports/Financial-flows-linked-to-production-and-trafficking-of-afghan-opiates.pdf>.
- FATF (n.d.), *FATF Focus on COVID-19*, [9]
<http://www.fatf-gafi.org/publications/covid-19/covid-19.html>.
- Federal Ministry of Finance (2020), *First National Risk Assessment*, [12]
https://www.bundesfinanzministerium.de/Content/EN/Standardartikel/Press_Room/Publications/Brochures/2020-02-13-first-national-risk-assessment_2018-2019.html.
- HM Treasury / Home Office (2020), *National risk assessment of money laundering and terrorist financing 2020*, [11]
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/945411/NRA_2020_v1.2_FOR_PUBLICATION.pdf.
- PST (2019), *Threat Assessment 2019*, [13]
<https://www.pst.no/globalassets/artikler/trusselvurderinger/annual-threat-assesment-2019-single-pages.pdf>.
- Public Safety Canada (2021), *Government of Canada lists 13 new groups as terrorist entities and completes review of seven others*, [10]
<https://www.canada.ca/en/public-safety-canada/news/2021/02/government-of-canada-lists-13-new-groups-as-terrorist-entities-and-completes-review-of-seven-others.html>.
- Schulberg, J. (2019), “Renegade Shareholders Have A Plan To Force Mastercard To Monitor Neo-Nazis”, *Huffpost*, [6]
https://www.huffingtonpost.co.uk/entry/mastercard-neo-nazis-shareholder-campaign_uk_5d121670e4b0aa375f5370ca.
- Tom Keatinge, F. (2019), “Fundraising for Right-Wing Extremist Movements”, *The Rusi Journal* [5]
 164:2, pp. 10-23, <http://dx.doi.org/10.1080/03071847.2019.1621479>.
- UN CTED (2020), “Member States Concerned by the Growing and Increasingly Transnational Threat of Extreme Right-Wing Terrorism”, *CTED Trends Alert* April 2020, [4]
https://www.un.org/securitycouncil/ctc/sites/www.un.org.securitycouncil.ctc/files/files/documents/2021/Jan/cted_trends_alert_extreme_right-wing_terrorism.pdf.

UN CTED (2020), “Member States Concerned by the Growing and Increasingly Transnational Threat of Extreme Right-Wing Terrorism”, *CTED Trend Alert July 2020*, [14]
https://www.un.org/securitycouncil/ctc/sites/www.un.org.securitycouncil.ctc/files/files/documents/2021/Jan/cted_trends_alert_extreme_right-wing_terrorism_july.pdf.



www.fatf-gafi.org

June 2021

Ethnically or Racially Motivated Terrorism Financing

Ethnically or racially motivated terrorism (EoRMT) is a complex phenomenon that encompasses a wide range of actors, ranging from individuals operating as lone actors or so called “lone wolves” to small and medium organisations, as well as transnational movements which span borders, and sometimes even continents.

The aim of the report is to increase the understanding of TF risks related to extreme right wing actors. The findings in this report are based on inputs from around 30 jurisdictions across the FATF Global Network, as well as expertise from the private sector and international bodies partnered with the FATF.

