Combating Financing of Terrorism: Emerging International Law

Nabiebu Miebaka and Joseph Abang Odok*

ABSTRACT

Abstract— The rise of international terrorism has underscored the critical need to combat terrorist financing, an essential element for the sustainability of global terrorist networks. This research examines the evolving framework of international law addressing the financing of terrorism, with a focus on the creation of new norms that may constitute customary international law. By analyzing key international instruments such as the International Convention for the Suppression of the Financing of Terrorism and the Financial Action Task Force's (FATF) Special Recommendations, the paper explores how global cooperation and regulatory frameworks have developed to curtail terrorist financing. The research highlights the effectiveness of measures like know-your-customer (KYC) processes, suspicious transaction reporting (STR), and financial sanctions. It also critiques gaps in the existing legal regime, such as the under-regulation of alternative remittance systems and cryptocurrency use. Through a doctrinal methodology, this paper assesses whether international initiatives have successfully created binding global norms to suppress terrorist financing and considers the role of global bodies like the FATF in enforcing these standards.

Keywords: Terrorist Financing; International Law; FATF; Customary International Law.

1 Faulty of Law, University of Calabar, Nigeria

2* Department of Philosophy, University of Calabar, Nigeria.

INTRODUCTION

The lack of unanimity in a comprehensive understanding of international terrorism makes it significantly harder to delimit associated offences, such as financing the act of terrorism. There is no doubt that for carrying out terrorist activities, especially on a global scale, financial resources are required. It is, therefore, essential to deny the terrorist organisations access to funds and all kinds of support services to weaken their institutional infrastructure and their ability to conduct violent operations. But given the diverse and complex nature of financial systems across the world including reliance on the alternative remittance systems like 'Hawala', the transactions in the darknet, the administrative and law enforcement mechanisms are unlikely to always succeed in identifying if an ongoing banking transaction is intended to finance a particular terrorist act. However, at the strategic level, implementation of the International Convention for the Suppression of the Financing of Terrorism, the Financial Action Task Force's Special Recommendations on Terrorist Financing and Security Council resolutions and other recommendations relating to counter-terrorism have helped in diminishing the availability of funds to terrorist organizations through formal banking channels. (Ibrahim, 2019). Even if some organisations still manage to avail funds through laundering or abuse of other mechanisms such as Charity etc. establishment of due diligence and KYC processes along with effective implementation of reporting mechanisms like Suspicious Transaction Reports (STRs) etc., help the enforcement agencies collect admissible evidence to combat terrorism. All these measures have helped create a global administrative law norm. The objective of this research is to examine whether the international legal initiatives in this field have created a new customary international law against terrorist financing.

By successfully creating a global awareness and consequential universal acceptance to combat financing of terrorism, the international community has laid the foundation for a new global norm against terrorist financing, which has the appeal, force and impact to genuinely establish new customary international law rules. Over the years, a large number of international, regional, national and inter-governmental regulatory and cooperative measures have been adopted against terrorist financing, thereby further consolidating the sufficiently universal norms, which are increasingly being perceived to be the neo-international customary law with binding obligations for stricter implementation. The FATF spearheads the movement and has been acting as the incubator for these universal norms, with concomitant power to name and shame the non-compliant States, through the innocuous peer-review process. World, being a perception-driven society, any adverse report by the FATF is perceived as a sanction on the delinquent country, which in fact appears to be more impactful than the UN sanctions. As Ben Saul observes, "the clearest area of new international anti-terrorism law 'concerns norms against terrorist financing. While anti-financing norms emanate from disparate sources of varying normative quality, the combination of such sources in their totality is sufficiently universal and rule-like" (Saul, 2009, p.32).

The FATF identifies problematic States and starts constructive engagement with them. If it fails to see any improvement, it can resort to other counter measures against the delinquent States, including urging all the countries to consider increased regulatory and reporting requirements regarding their dealings with those delinquent States and also consider the additional risks posed by financial dealings with them, which can adversely impact their image and credibility in the business and financial communities (Nyarks, 2006; Nyarks, 2012). Normally, these measures work, as FATF enjoys a lot of influence; most of the largest economies of the world are its members, whose political commitments can have ripple effects across the global economy. "FATF standards have become conditions of doing business with non-members and there is thus a powerful commercial incentive for nonmembers to conform" (Alexander 2001, p. 11). This obviously raises the most valid query: Is there a new International Law against financing of terrorism? Three developments at the international level have set the tone for shifting the focus to combating financing of terrorism, the often-ignored area in the field of international crimes. The first was the adoption of the *International Convention for the Suppression of the Financing of Terrorism* 1999 by the UN General Assembly consensually by the Member States. Secondly, post-9/11, the Security Council decided to take charge to ensure international peace and security and adopted the epoch-making, quasi-legal Resolution 1373 (2001), which required all States, including the States that had not ratified it, to criminalise and prevent terrorist financing through their domestic legal systems, thereby universalising the *Terrorist Financing Convention.* Thirdly, the Security Council adopted stricter measures like introducing institutional and structured forms of financial sanctions regimes against Al-Qaeda, the Taliban and their worldwide associates by adopting Resolution 1267 (1999), which were extended and modified in subsequent resolutions (Messmer & 2011).

This work deals with international instruments adopted by States in order to deal with the issue of financing international terrorism and their drafting histories, reservations of States to several provisions, notable implementing legislations and regulatory measures taken by several States, loopholes in existing framework, and recommendations for a more robust regime.

INTERNATIONAL INSTRUMENTS

One of the foremost concerns while negotiating and drafting this Convention was whether to retain the status of the act of financing terrorism an associated offence or to categorize it as an independent offence (Letho, 2009; Nyarks, 2022). States largely agreed that the act must be made an independent offence. The effect of this is that the offence of financing an act of terrorism is punishable even when the said act of terrorism hasn't actualized. While establishing it as an independent offence, a step in the right direction, one of the pertinent lacunae as observed by the Cuban delegation was the exclusion of certain financers, such as legal entities and States themselves. While the FATF recommendations are broader and include steps that States should take

to curb financing by legal entities, these recommendations are not binding obligations upon Member States like the Convention or a UN SC Resolution. Therefore, in order to tackle the problem more holistically, there is a need to appropriately implement domestic legislations to criminalize funding irrespective of the entity involved in the act. Apart from this, issues such as alternative remittance schemes, wire transfers, and the involvement of non-profit organizations as a channel for such financing activities have not been addressed by the Financing Convention or by the UNSC Resolutions.

Financing Convention

The Financing Convention was one of the first attempts to comprehensively address the issue of financing of terrorism by a dedicated international instrument; it is the first of the universal terrorism-related Conventions and Protocols designed to prevent terrorism. Initiated by France in the 1998 G-8 meeting, this concern was regarded as a priority for the international community (Chumba, 2016; Udoh & Umotong, 2013; Udo & Udoh, 2022). Broadly, the obligations laid out in the Convention require States to criminalise financing of terrorism as an independent offence in domestic criminal legislations. Recognising that international co-operation is paramount to tackle such complicated issues, the Convention lays down an elaborate mechanism ensuring that States co-operate with each other, through measures such as mutual legal assistance, extradition, etc. States are also obligated to establish a mechanism for regulating and monitoring the role of financial institutions, including for the reporting of evidence of such offences.

This agreement had twin objectives. Instead of requiring a State to have laws punishing a particular violent act after it had taken place, the Financing Convention required criminalization of the non-violent logistical preparation and support that make significant terrorist groups and terrorist operations possible. Moreover, its article 2.3 eliminated any ambiguity by expressly declaring that funds need not be used to carry out a prohibited violent act for their provision or collection to be punishable." from criminalising the financing of terrorism, the Convention allowed forfeiture of the funds provided or collected for terrorist purposes, and for administrative measures to discourage such financing (Udoh, 2013; Udoh, 2014). The act of financing, as defined in the Convention, requires that for an offence to be committed, it should either be with the intention that the funds would be used for the purpose of financing terrorist acts, or with the knowledge thereof. The offence is defined broadly in Article 2 of the Convention, using words such as "providing or collecting" and "directly or indirectly". Therefore, only when such funds are provided or collected unlawfully and with the knowledge or intention of its use in prohibited terrorist acts, the offence of financing actualised. Article 2(1)(b) of the Convention defines terrorism:

> Any act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to

> intimidate a population, or to compel a Government or an international organization to do or to abstain from doing any act (Tofangsaz, 2020, p. 33).

The second source of delimiting what constitutes a terrorist act for the purpose of this Convention is the annexure to the Treaty which lists nine international treaties which require the criminalisation of certain acts as terrorist acts States that are not parties to any of the listed treaties may exclude the application of those onto themselves, and if any State ceases to be a party to any of the treaties mentioned in the list later, they can exclude such application (Okide, 2019; Okide¸ 2021).

A pertinent observation in the scheme of the Convention is that the definition of the offence is narrow in so far as it limits itself to the direct financing of terrorist acts through the limited understanding of "funds", as opposed to the Security Council Resolution which criminalises, in a broader fashion, financial support to terrorists and terrorist organisations, both in terms of actual funds as well as material assistances. It is significant to note here that the funds used may not have illicit origins. They may have entered the formal financial sector through legitimate means, but it is their ultimate utilisation for the intended purpose of financing terrorism that is considered relevant (Talmon, 2005).

No extradition request can be denied on grounds that the offence is fiscal or political. The offenses covered by the Convention, are, therefore, *deemed* extraditable offences. The Convention can act as a legal basis for granting extradition by a requested State that has not concluded an extradition treaty with the requesting State. The principle of *aut dedere aut judicare* has been established under the Convention, obligating each State party that has information regarding an alleged offender within their territory to initiate investigation against him, and notify to other States that have jurisdiction over the case of their intention to either prosecute the individual or to extradite him to another State that can exercise jurisdiction over them (Bassiouni & Wise, 2023).

The FATF recommendations, which provide an elaborate preventive framework, and act as the "international standard for [rules to prevent] money laundering" are not legally binding. The Convention does, however, lay down a general duty to require financial institutions and intermediaries to have such systems in place that allow them to keep track of all transactions, and to report unusual or suspicious activity (Klein, 2009). In order to fulfill this obligation, States may adopt domestic legislation relying on the Recommendations by FATF, including that financial institutions verify the identity of each account holder and observe due diligence. The States are also obligated to maintain secure channels of communication between financial agencies and intelligence units for the rapid and efficient relay of information.

While some States have opted for a comprehensive legislation covering all the laws in a unified manner, others have incorporated these laws within their existing legal framework. One of the measures adopted by several developed countries in assisting

financial institutions conduct their due diligence is the maintenance of a list of individuals and institutions suspected of engaging in terrorism (Okide, 2020; Okide¸ 2023). This not only helps the financial institutions and intermediaries in identifying persons and institutions while tracking transactions and keeping a check of their account holders, but also eases the burden of proof in a trial while proving knowledge of transacting for financing terrorism. Such systems of presuming knowledge have been implemented in New Zealand, the United States, Canada, and the United Kingdom.

The Convention includes three main obligations for States parties:

1. They must establish the offence of financing of terrorist acts in their criminal legislation
2. They must engage in wide-ranging co-operation with other States parties and provide them with legal assistance in matters covered by the Convention
3. They must enact certain requirements concerning the role of financial institutions in the detection and reporting of evidence of financing of terrorist acts.

Summary of the Financing Convention

Article	Contents
4	Criminalize the financing of terrorism (FT) as defined in Article 2 and 3
5	Establish liability (criminal/civil/administrative) of corporations for FT
6	Exclude excuses for FT based on political, philosophical, etc., considerations
7	Establish jurisdiction over FT offences
8	Establish power of State to identify, detect, freeze, or seize assets used in committing FT offences
9,17,19	Establish procedure for detention of persons suspected of FT (including notification to other jurisdictions)
10	Implement principle of "prosecute or extradite"
11	Implement provisions on extradition
12-15	Implement provisions on mutual co-operation and extradition
16	Implement provisions on transfer of detainees and prisoners.

18	Take FT prevention measures, including
18 1 (a)	Prohibiting illegal encouragement, instigation, organization, or engaging in FT offences.
18 1 (b)	Requiring FIs to utilize the most efficient measures available for customer identification, paying special attention to, and reporting suspicious transactions, and, considering regulations on unidentified account holders and beneficiaries; on documentation for opening accounts for legal entities; on suspicious transaction reporting; and on record retention.
18. 2 (a) & (b)	Consider Supervision measures, including, for example, licensing of all money transmission agencies; and Feasible measures to detect or monitor cross-border transportation of cash.
18. 3 (a)	Establish channels for exchange of info. regarding transportation of cash
18. 3 (b)	Establish procedures for co-operating with other parties for enquiries on (i) persons and (ii) funds suspected of FT involvement.
18. 4	Consider exchanging such information through the Interpol.

Criminalization of Financing of Terrorist Acts

As per Article 2 of the Financing Convention, "Any person commits an offence within the meaning of this Convention if that person by any means, directly or indirectly, unlawfully and wilfully, provides or collects funds with the intention that they should be used or in the knowledge that they are to be used in full or in part, in order to carry out a terrorist act which constitutes an offence within the scope of and as defined in the Convention" (Flechtner¸ 1988, 32). The Convention requires States Parties to criminalise the offences of the financing of terrorist acts (as set out in the Convention) and taking into account the serious nature of the offence to provide for appropriate penalties for these offences in the national legislations.

As far as the mental element in the offence of terrorist financing is concerned, the Convention refers to two aspects namely that the act must be done 'wilfully' and that the perpetrator must have had "either the intention that the funds would be used to finance terrorist acts, or the knowledge that the funds would be used for such purposes". In this second aspect, the Convention requires two elements i.e. 'intent' and 'knowledge'. The definition of the offence of terrorist financing as given in the Convention contains two main material elements:

(A) Financing - Financing is defined very broadly as providing or collecting funds - if a person "by any means directly or indirectly, unlawfully and wilfully, provides or collects funds ---"

(B) Terrorist Acts - The terrorist acts are taken from two sources. The first source is the list of nine international treaties, between 1970 and 1997, that require the parties to establish various terrorism offences in their domestic legislations. A State party can exclude a treaty from the list (Annexed to the Convention), provided the State is not a party to it and this exclusion remains effective till the State becomes a party to the treaty. The second source is a "self-contained" definition of terrorist acts given in the Convention, which defines terrorist acts as:

> "Any […] act intended to cause death or serious bodily injury to a civilian, or to any other person not taking an active part in the hostilities in a situation of armed conflict, when the purpose of such act, by its nature or context, is to intimidate a population, or to compel a Government or an international organization to do or to abstain from doing any act" (Young, 2006, p.53).

Other Salient Features

Funds need not be actually used to commit the defined offences.

1. Participating as an accomplice in the commission of an offence, and organizing or directing the commission of the offence are criminalized like the offence itself.
2. Offence by a "group of persons acting with a common purpose is also an offence, provided the contribution is international, and (i) it is made with the aim of furthering the criminal activity or criminal purpose of the group, where such activity or purpose involves the commission of an offence under the Convention; or (ii) it is made in the knowledge of the intention of the group to commit an offence under the Convention."
3. Convention excludes an offence, "committed in a single State, the offender is a national of that State and is present in its territory, and no other State has a basis under the Convention to exercise jurisdiction over the alleged offender".
4. Legal entities are also liable for the offences, which can be criminal, civil or administrative.
5. Offence not to be excused by political, philosophical, ideological, racial, ethnic, religious, or other considerations of similar nature.
6. No counter-terrorism strategy can succeed, if the sources of terrorist funding are not dried up. Hence, there is a growing international interest in criminalising all aspects of financing of terrorism.

Jurisdiction

The Convention recognizes the principle of *Au Dedere Au Judicare* – Extradite or Prosecute. While a State party may assume jurisdiction in certain circumstances, it must assume jurisdiction in the following circumstances, when the offence is committed:

1. in the territory
2. on board a vessel flying its flag or
3. an aircraft registered under its laws and
4. when it is committed by one of its nationals

International Cooperation

The hallmark of this Convention is the detailed provisions on mutual legal assistance and extradition.

i) Mutual Legal Assistance

The Convention puts some conditions on the States parties relating to offences under this Convention namely that the requests for legal assistance may not be refused on the grounds of bank secrecy, and that these offences should not be considered as fiscal or political offences for purposes of extradition or mutual legal assistance (Edet, et al., 2024). This is a very important provision as in cases of financial investigation, most States refuse to cooperate on the ground of banking secrecy or on the ground that the offence is a fiscal offence.

ii) Extradition

In order to ensure that the extradition process is not embroiled in procedural formalities, the Convention contains detailed provisions relating to extradition. "These are:

1. The offences set out in this Convention are deemed to be extraditable offences in any extradition treaty existing between any States parties before the coming into force of the Convention, and the parties undertake to include these offences in any such treaty to be concluded between them in the future.
2. When a State Party requires an extradition treaty for effecting extradition, in the absence of an extradition treaty with the requesting State, it may still consider this Convention as a legal basis for granting extradition for any offence set out under the Convention.
3. States parties that do not require a treaty, are required to recognize the offences under the Convention as extraditable.
4. To avoid denial of extradition on the grounds that the offence has not been committed in the territory of the requesting State, the offences are to be treated as committed, to the extent it is essential, both in the territory of the State in which they occurred and also in the territory of the State that has established jurisdiction under Article 7, paragraphs 1 and 2 of the Convention (Gondek, 2005).

5. In the event of any incompatibility in the provisions between the existing extradition treaties/arrangements between States Parties, and the Convention, the provisions in the former are deemed to have been modified, as if the incompatibilities did not exist."

Preventive Measures

The Convention contains a few provisions to prevent financing of terrorism, some of which are based on the recommendations of the FATF. It is obligatory on the States Parties to ensure that the financial institutions and other financial intermediaries take necessary measures to identify their customers, including the beneficiaries of accounts, to identify unusual or suspicious transactions, to report suspicious transactions and to preserve records. Article 18 of the Convention requires the State Parties to cooperate in preventing the offences set out in the Convention by taking all possible measures including making provisions in their national laws to prevent and counter preparations for offences, both within or outside their territories. Further, the States are required to extend cooperation, as early as possible, in sharing information with other States in a secured manner through their FIUs and other competent agencies.

THE FATF SPECIAL RECOMMENDATIONS ON TERRORIST FINANCING

The administrative measures are reflected in the nine Special Recommendations of the FATF, as mentioned below. The first five Special Recommendations (SRs) are similar in content to the provisions of the Financing Convention and SCR 1373. The next three cover new areas. The last one, the SR IX, relates to Cash Couriers (Bures, 2017). These Special Recommendations are:

SR I: Ratification and Implementation of UN instruments.

SR II: Criminalising the financing of terrorism and associated money laundering.

SR III: Freezing and confiscating terrorist assets.

SR IV: Reporting Suspicious transactions related to terrorism.

SR V: International co-operation.

SR VI: Imposing AML requirements on alternative remittance systems

SR VII: Strengthening customer identification measures in wire transfers

SR VIII: Ensuring that non-profit entities cannot be used to finance terrorism SR IX: Having measures to detect physical cross-border transportation of currency and bearer negotiable instruments

Administrative Cash Seizure

SR IX was recommended by the FATF. As per this recommendation, countries should have measures in place, including legally empowering the competent authorities to stop

or restrain currency or bearer negotiable instruments that are suspected to be related to terrorist financing or money laundering, or that are falsely declared or disclosed (Zolkaflil, et al., 2015; Owa, et al., 2024). They should put in place a declaration system or other disclosure obligation to detect the physical cross-border transportation of currency and bearer negotiable instruments, and take appropriate legal action including its confiscation.

Most countries have legislations making it mandatory for people to declare cash at the international borders when it exceeds a specified amount and Customs authorities are given powers to seize undisclosed cash or proceeds of smuggling. But as explained, terrorism can be financed by money from both legitimate and illegitimate sources. If someone gives a true declaration of money and the same is from legitimate sources (but may be intended for terrorist acts), such currencies cannot be seized by the Customs authorities as per existing laws in some countries. In order to give more teeth to the law enforcement authorities and to tackle both legitimate and illegitimate money related to terrorism or other specified illegal activities, some countries have considered giving special administrative powers to the police and Customs officials to detain and seize money. Some countries like the UK have enacted special legislations and procedures for seizure of cash both at the international borders and within the country, by the police, if the cash is suspected to be of illicit origin or related to terrorism. Nigerian Customs officials are empowered to seize and confiscate currencies at the international borders if the same are illegally smuggled into or out of the country.

Financial Intelligence Units (FIUs)

In any work relating to collection of financial intelligence or investigation of financial crimes, it is essential to have access to the financial system, which is traditionally governed by secrecy due to commercial considerations. An effective preventive strategy requires prior information about the sources of funding and the modus operandi of the criminals, particularly the terrorists. Organised terrorism requires huge funding and global networking and most of the funds pass through the financial systems. In order to prevent terrorist attacks and to detect the source and channels of financing terrorist acts, a need was felt to devise a mechanism of disclosure of suspicious transactions by the financial institutions to a centralised agency.

This led to the establishment of FIUs in the early 1990s. These are central agencies that receive STRs from FIs and other persons and entities, analyse them and disseminate the intelligence to concerned domestic law-enforcement agencies and to foreign FIUs, if necessary, for taking appropriate action against money laundering. An FIU may also receive information/intelligence from foreign FIUs, on request, as per the arrangement. The FIUs have formed an international association in 1995, called the Egmont Group (McNaughton, 2023). The FIU.NET is an automated computer network for the FIUs to exchange information in a secured manner. In 2003, the FATF also adopted a revised set of recommendations on combating money laundering, stressing

on the importance of the FIUs in the anti-money laundering/combating the financing of terrorism (AML/CFT) framework. In view of the increasing terrorist attacks, the scope of activities of FIUs has been expanded to include work relating to the financing of terrorism. The range of reporting entities has also been expanded to include 'non-financial trade and professions, such as casinos, company service providers, legal and accounting professionals' etc (McNaughton, 2023). The IMF and the World Bank have been providing technical assistance to States in setting up and strengthening of FIUs to effectively address the AML/CFT issues. Considering the growing usefulness of the FIUs, a number of international conventions have encouraged the State Parties to establish FIUs namely the Financing Convention, 'the UN Convention Against Translational Organised Crime (2001)', and the 'UN Convention Against Corruption (2003)'.

Transaction Reports

Although the obligation is to report suspicious transactions or activities, there is no universal definition and different countries adopt different definitions of suspicion as a dynamic concept that keeps changing with changing risk parameters and modus operandi. Decisions regarding suspicious transactions are made by staff of the reporting institutions on the basis of their skills, experience, and knowledge, rather than on the basis of a fixed set of rules. This leads to the increase in the filing of a large number of STRs, many of which are found to be not useful, thereby putting a strain on the limited resources of the FIUs to properly analyse them in time for initiating timely action by the competent law enforcement authority.

Many jurisdictions require reporting of cash-transactions above a specified threshold. Such Cash Transaction Reports (CTRs) yield good intelligence to reach an offender or as evidence of utilisation during the money trail (Pasco¸ 2012). In the US and Australia cash transactions above $ 10,000, and AU$10,000 respectively are reported through CTRs. Some jurisdictions permit the FIUs to block suspicious transactions for a temporary period. In Italy, the FIU can suspend a transaction on being requested by the Bureau of Anti-mafia Investigation or the Finance Police. Some FIUs even have the power to block transactions at the request of a foreign FIU. In Barbados the FIU may freeze a bank account up to a period of five days, if a request to that effect is received from a local law-enforcement authority or a foreign FIU, which of course is subject to appeal.

Freezing Assets of Terrorists and Terrorist Organizations

UNSCR 1373 (2001) makes it mandatory for States "to freeze without delay funds and other financial assets of persons who commit, or attempt to commit terrorist acts or participate in or facilitate the commission of terrorist acts" (Chimimba, 2017, p. 32). This obligation is akin to the provision in the Financing Convention, which urges the States

"to take measures for the freezing of funds used or allocated for the purpose of committing a terrorist act." It includes entities owned or controlled directly or indirectly by such persons. The Financing Convention is broader in scope than the SCR 1373. While the Resolution requires only the freezing of assets of terrorists and those who support them, the Financing Convention requires the States parties "to take measures for the identification, detection, freezing, and confiscation of funds used or allocated for the purpose of committing the terrorist acts" (Chimimba, 2017, p. 32). The Security Council, acting under Chapter VII, adopted UNSCRs 1267 (1999) and 1333 (2000), deciding that the Member States would freeze the assets of the Taliban and of Usama bin Laden, respectively, and the assets of individuals and entities owned or controlled by them, as designated under these resolutions. Unlike Resolution 1373 (2001), these resolutions established an "autonomous" asset-freezing regime, so that from time to time, the Council could issue and modify the lists of persons and entities whose funds are to be frozen.

Initially, the Council had imposed limited air and financial embargoes, under UNSCR 1267 (1999), to force the Taliban to stop providing sanctuary and training to terrorists, including Usama bin Laden and, later, vide resolutions 1333 (2000) and 1390 (2002) it imposed arms embargo, travel ban and assets freeze on designated individuals and entities associated with the Taliban and Al-Qaida. On 17 June 2011, the Security Council vide resolutions 1988 (2011) and 1989 (2011), divided the regime into two, one committee for the Taliban and another for Al-Qaida. In 2015, resolution 2253 (2015), expanded the listing criteria to include those associated with Islamic State in Iraq and the Levant (ISIL, or Da'esh), apart from Al-Qaida. Under Resolution 1390 (2002), one consolidated list was issued and as on 16 July 2020, 261 individuals and 89 entities were included in it. The finding by the Council's Al-Qaida and Taliban Sanctions Committee regarding the participation of the entity "in the financing, planning, facilitating and preparation or perpetration of terrorist acts or in supporting terrorist acts" forms the basis for listing (Carisch, et al., 2017).

The 1267 Committee has issued Guidelines for the conduct of its work including the manner in which additions and deletions are made to the list of persons and entities whose assets are to be frozen (Dosman, 2004). The meetings of the Committee are held in closed session to discuss the proposals for listing received from the Member States. States have been advised 'to submit names as soon as they gather the supporting evidence of association with ISIL (Da'esh) and Al-Qaida'. Since the sanctions are intended to be preventive in nature, there is no necessity to have a criminal charge or conviction for listing. Both the Committee and the Ombudsperson have been empowered to receive delisting requests. An individual or entity wanting the removal of names must send a request to the government of residence or citizenship. If the government does not agree to delist, it may refer the case to the Committee and, later, to the Security Council. The names of the individuals and entities can be removed from the list by following the procedure established by the Committee.

The Ombudsperson

The Council vide its resolution 1904 dated 17 December 2009 created the Office of the Ombudsperson to the ISIL (Da'esh) and Al-Qaida Sanctions Committee. This is the only sanctions regime that provides an independent review procedure, thereby satisfying the due process requirement (Carisch, et al., 2017). The Ombudsperson conducts an independent and impartial review of requests from individuals and entities seeking to be removed from the sanctions List. In the ten years, the Ombudsperson has accepted 89 petitions for delisting; 75 per cent of the petitions have been granted[288]. Daniel Kipfer Fasciati, the current Ombudsperson, emphasizing the importance of providing due process in the implementation of counter-terrorism policies, said: "The Ombudsperson's position in the world of targeted sanctions is unique. It fulfils a much-needed role of balancing security and fairness, guaranteeing the rights of individuals and entities" (Prost, 2017, p.54).

FATF'S BASIC PRINCIPLES OF PREVENTION OF MONEY LAUNDERING

Traditionally, many of the criminals used different techniques to convert proceeds of crime, to disguise its illicit origin and to acquire assets. Over a period of time, the problem has assumed scary proportions and criminals have not only changed their techniques but also forged a global network to escape being caught by the law enforcement authorities. Money laundering is an old mechanism with a new name. It is now realized that without effective international and regional co-ordination, there is little prospect of successful action to deprive criminals of the proceeds of their crimes. Money laundering affects the economy of a country adversely and because of the growing alliance of the traditional money launderers with organized criminals, more particularly the terrorists, there is an urgent need for global efforts to combat it effectively. At the same time, since many of the developing countries have cash-based economies, care has to be taken to avoid excessive procedural formalities, as it may stifle the economy. Risk-based measures, consistent with the traditional economic practices must be developed. In the context of terrorism, it is seen that terrorists adopt various methods to receive money from people, move it from one place to another in the same country or even to many other countries in the guise of legitimate money or smuggle it to desired destinations to execute their actions. Financing of terrorism depends on the laundering techniques for success.

The FATF has recommended to criminalise money laundering on the basis of the Vienna and Palermo Conventions (Al-Zaqibh, 2013). In order to include the widest range of predicate offences, countries are advised to apply the crime of money laundering to all serious offences, for example by taking a threshold approach to all offences that carry a sentence of one year or more or which are punishable by a minimum penalty of six months or more. Any money laundering offence should at least include the criminal offences of murder, kidnapping, extortion, terrorism, drug-

trafficking, organized crime, corruption, fraud, smuggling, counterfeiting etc. The following are the basic principles of prevention of money laundering as contained in the FATF's Forty Recommendations:

1. Money laundering should be criminalised on the basis of the UN conventions (FATF Recommendations 1 and 2);
2. Appropriate measures should be put in place to confiscate the proceeds of crime (FATF Recommendation 3);
3. Banking secrecy laws must not conflict with or inhibit the effectiveness of the money laundering strategy (FATF Recommendation 4);
4. Administrative and regulatory obligations to develop systems and controls to guard against money laundering should be imposed on all financial institutions (FATF Recommendations 5-12, 15);
5. Obligations should be placed on all financial institutions. If they know or suspect, or have reasonable grounds to suspect that funds have been derived from criminal activity, they should report those suspicions promptly to the competent authorities (FATF Recommendations 16, 20 and 24-25);
6. The obligations for developing anti-money laundering systems, controls and reporting procedures should be applied to designated non-financial businesses and professions, recognizing, as appropriate, the concept of legal privilege (FATF Recommendations 16, 20 and 24-25);
7. Financial and non-financial sector businesses, their directors and employees, should be protected against breach of confidentiality if they report their suspicions in good faith (FATF Recommendations 14);
8. Appropriate, proportionate and dissuasive sanctions should be introduced for non-compliance with anti-money laundering or terrorist financing requirements (FATF Recommendations 17);
9. Countries should not approve the establishment or accept the continued operation of shell banks (FATF Recommendations 18);
10. Countries should consider implementing feasible measures to detect or monitor the physical cross-border transportation of cash and bearer-negotiable instruments and imposing a requirement on financial institutions and intermediaries to report all transactions above a certain amount (FATF Recommendations 19);
11. Appropriate measures should be taken to ensure that financial institutions give special attention to business relationships and transactions whose AML and anti-terrorist measures are inadequate (FATF Recommendations 21-22);
12. Countries should ensure that financial institutions, designated non-financial businesses and professions are subject to adequate regulation and supervision and that criminals are prevented from owning and controlling financial institutions (FATF Recommendations 23-25);
13. Appropriate law enforcement mechanisms should be put in place to process, investigate and prosecute suspected reports of money laundering and a FIU should be

established as the national receiving centre for information on money laundering and terrorist financing (FATF Recommendations 26-32);
14. Countries should ensure that the transparency of legal persons and structures can be accessed on a timely basis (FATF Recommendations 33 and 34);
15. Countries should rapidly, constructively and effectively provide the widest possible range of mutual legal assistance in relation to money laundering and terrorist financing investigations, prosecutions and related proceedings, and provide the widest range of international co-operation to their foreign counterparts (FATF Recommendations 36-40).

UN Designated List

The whereabouts of many individuals and entities designated by the UN are still not known and the UN list suffers from many deficiencies:

- Insufficient identifiers of designated persons or entities
- No date of birth
- No Parental Details
- No Address
- Confusion due to too many aliases – in Portugal one name corresponded to 50 identical names in the database of a banking institution
- Transliteration of names from Arabic to English – same name can be spelt differently - for example Asbat al-Ansar could be spelled with an initial 'u' or 'e' depending on the transliteration.
- Difficulty in entering data in national watch list
- Ineffective use for ensuring travel ban or problems being caused to genuine persons at border points
- Difficulty in asset tracing, freezing or forfeiture
- Difficulty in monitoring their activities
- Terrorist groups generally do not have a legal personality and normally do not have bank accounts or assets in their names. They hold assets or open accounts through nominees. Listing of such groups help in freezing assets of their leaders and others connected with it, by invoking the provision, "assets owned or controlled directly or indirectly by listed persons or on their behalf (Galchinsky, 2013). Although many lawsuits have been filed by the individuals and entities in various countries against the sanction, no court has invalidated a listing or set aside any order on the ground of violation of human rights. Some States have, however, expressed concern about the absence of provisions of 'due process of law'. Guidelines have been issued later allowing parties to petition for delisting through their governments, as discussed before (Galchinsky, 2013).

CIVIL FORFEITURE OF ASSETS

The Commonwealth Secretariat had prepared model laws on civil recovery of criminal assets and terrorist property, which was approved by the Law Ministers of the Commonwealth in their meeting in October, 2005 in Accra, Ghana (Adams, 2021). Most of the laws provide for conviction-based forfeiture, where forfeiture is based on criminal conviction. Recently, many States have adopted non-conviction based or civil recovery of criminal assets as an additional tool to combat financing of terrorism. Under this regime, proceedings are generally *In Rem,* applying civil rules of procedure, brought against property as opposed to a person. On the basis of evidence that are based on balance of probabilities, forfeiture can be ordered. Some of the countries that have adopted this regime are Australia, Canada, Ireland, South Africa, the UK and the USA ((Adams, 2021).

TERROR FUNDING: CASE STUDIES

Investigations of past cases have revealed that not much funds are actually required for carrying out terrorist attacks. It is very difficult to detect possession and transfer of funds relating to a particular terrorist attack by existing financial system monitoring mechanisms. Although, FIUs regularly receive STRs from banks and financial institutions, the financing of an actual attack may be done using regular non-suspicious transfer of funds, which escape being identified as suspicious, unless specific intelligence is received to that effect. According to the UK Report of the Official Account of the Bombings in London on 7 July 2005, "those transport attacks cost less than £8,000. Even though the group leader, Mohammed Kahn, had been to Pakistan and was believed to have trained in terrorist camps there, the operation was selffinanced. Kahn provided most of the funding, using funds from overdrawn bank accounts, credit cards and a defaulted personal loan" (Howells, 2009, p. 86).

As per the US 9/11 Commission Report, the cost of attacks ranged 'between US$ 400,000 and US $500,000, financed directly by Al-Qaida', but the source of the money used for the attacks could not be ascertained during the investigation. For this mission, the terrorists had adopted different types of money transfer techniques: Khalid Sheik Mohammed, the Al-Qaida leader, had paid about US $10,000 in cash to each of the participants after their visits to Pakistan; Members of the Hamburg Cell including its leader Mohammed Atta were paid about US$ 5,000 each, after their visits to Afghanistan, towards their return journey to Germany and other expenses; Cash and Traveller's Checks purchased in the UAE and Saudi Arabia were encashed in the US; and cash withdrawals were made in the US from the ATMs and VISA, drawing money a bank account in the UAE (Leuprecht, et al., 2018, p. 43). As per this report, the hijackers escaped suspicion as they had used their bank accounts in the US, opened in their own names, using passports and other valid identification documents. While the hijackers were not experts on the U.S. financial system, nothing they did would have led the banks to suspect criminal behaviour, let alone a terrorist plot to commit mass murder.

As regards the train bombings of 11 March 2004 in Madrid, the 2004 Report of the Investigative Commission of the Government of Spain estimated the cost to be around € 50,000. Al-Qaida's action was a reaction to the presence of Spanish troops in Iraq. The report mentioned that "Because most of the funds were generated by fraud, drug dealing and thefts, preparations for the attacks would not have been revealed by administrative controls of the type recommended by the FATF for financial institutions and designated non-financial businesses and professions" (Quilligan¸ 2013, p. 75). The fact that more than €50,000 and drugs worth €1.5 million were found in the house, where the bombers blew themselves up when cornered, proves the nexus between terrorists and drug traffickers (Quilligan¸ 2013, p. 4). As per the FATF publication, 'Terrorist Financing', "The disruption of specific attacks through the interdiction of specific transactions appears highly challenging. Recent attacks demonstrate that they can be orchestrated at low cost using legitimate funds and often without suspicious financial behaviour. -----Nevertheless, when funds available to terrorists are constrained, their overall capabilities decline, limiting their reach and effect.

CONCLUSION

It is absolutely essential to deny the terrorist organisations access to funds to weaken their ability to carry out terrorist acts. However, because of the diverse and complex nature of financial systems, varying degree of regulatory frameworks, continuing use of alternative remittance systems like 'Hawala', and the transactions undertaken in darknet using cryptocurrencies, etc. the law enforcement agencies find the task quite daunting. But committed to combat financing of terrorism, the international community has taken many measures in the past two decades. The International Convention for the Suppression of the Financing of Terrorism, the FATF's Special Recommendations on Terrorist Financing and Security Council resolutions and related recommendations/initiatives by other organisations have helped in diminishing the availability of funds to terrorist organizations through formal banking channels. Establishment of due diligence and KYC processes along with effective implementation of reporting mechanisms like STRs etc., have helped the enforcement agencies collect admissible evidence to combat terrorism, including against charities, which are often used to channelise funds to the terrorists.

The Financing Convention was one of the first instruments to comprehensively address the issue of financing of terrorism with a design to prevent terrorism. Some of the provisions to prevent financing of terrorism are based on recommendations of the FATF, which require the States parties to ensure that the 'financial institutions and other financial intermediaries take measures to identify their customers, including the beneficiaries of accounts, to pay special attention to unusual or suspicious transactions, to report suspicious transactions and to preserve records'. Apart from criminalising the financing of terrorism, the Convention provides for 'forfeiture of the funds provided or collected for terrorist purposes'. The Convention lays down an elaborate mechanism for

international co-operation, through mutual legal assistance, extradition, etc. The offences covered by the Convention, are, deemed extraditable offences, under the principle of *aut dedere aut judicare* and, hence, no extradition request can be denied on grounds that the offence is fiscal or political.

Post-9/11, SCR 1373 (2001)required all States to criminalise and prevent terrorist financing through their domestic legal systems, thereby universalising the Terrorist Financing Convention. It also introduced financial sanctions regimes against Al-Qaeda, the Taliban and their worldwide associates by adopting Resolution 1267 (1999), which were subsequently modified (Saul¸ 2012). In spite all these measures in the field of CFT, terrorist organisations continue to adopt newer modus operandi to generate funds, transfer it to different countries and use it for carrying out their criminal activities. While assessing the impact of Resolutions 2199 (2015) and 2462 (2019) on the financing of terrorism, the Analytical Support and Sanctions Monitoring Team of the UN, pursuant to resolutions 1526 (2004) and 2253 (2015) concerning ISIL (Da'esh), Al-Qaida and the Taliban and associated individuals and entities, had reported that "ISIL is assessed to retain financial reserves totalling between $50 million and $300 million and to be able to direct funds both within the core conflict zone and globally to affiliates in its network. ISIL reportedly retains access to cash hidden in Iraq, the Syrian Arab Republic and nearby countries or stored with trusted associates. Its financial reserves are also invested in businesses in Iraq, the Syrian Arab Republic and elsewhere". (McDowell, 2017, p. 42).

Military action against ISIL and the seizure of its territorial holdings, no doubt, impacted its ability to generate funds in Iraq and the Syrian Arab Republic. The group is reported to be resorting to smuggling, extortion and kidnapping for ransom for funding its activities. FIUs have reportedly located transactions in which FTFs or their family members have received funds from abroad. These funds are received in their personal/business accounts maintained in banks in the countries in their neighbourhood, withdrawn later and remitted to the conflict zone using cash courier/money service business providers. What is worrying is that the terrorists are also using the dark web and attempting to raise funds using crypto or virtual currencies. Mobile payment platforms are also being used to access financial services in some countries.

Since the States Parties to the Financing Convention had rightly agreed to keep financing of terrorism an independent offence, the offence of financing an act of terrorism becomes punishable even when the said act of terrorism had not taken place. However, the definition of the offence in the Convention is narrow compared to the Security Council Resolution. While the Resolution criminalises, in a broader fashion, financial support to terrorists and terrorist organisations, both in terms of actual funds as well as material assistances, the Convention limits itself to the direct financing of terrorist acts through the limited understanding of "funds". However, the scope of the Financing Convention is broader than that of the UNSCR 1373. Under the Resolution,

States are required to only freeze assets of terrorists and those who support them (Naheed¸ 2020). On the other hand, the Convention requires criminalization of various activities such as identification, detection, freezing, and confiscation of funds used or allocated for the purpose of committing the terrorist acts.

Under the Security Council's asset-freezing regime, implemented through UNSCRs 1267 (1999) and 1333 (2000), the Council periodically issues, modifies and maintains lists of persons and entities whose funds are to be frozen. Issued under Chapter VII, these resolutions require the members of the UN to freeze the assets of the Taliban and of Usama bin Laden and the assets of individuals and entities owned or controlled by them, as designated under each of the resolutions (Godinho, 2010). In view of the largescale criticism against this opaque sanction regime, which caused a lot of hardship to many entities, the UN set up the office of Ombudsperson to balance security with fairness, while guaranteeing the rights of individuals and entities.

Apart from issuing a set of nine SRs on terrorist financing, FATF has been playing a lead role in coordinating the efforts at the domestic and international level to combat terrorist financing. It has also been pro-actively monitoring the implementation of its recommendations by adopting a methodology of cooperative compliance through mutual evaluation process. Although terrorist financing is not legally defined in these nine Special Recommendations, these are based on the Financing Convention, thereby complimenting the efforts of the UN by encouraging ratification of international treaties. "The FATF has had a powerful influence on both norm creation and norm enforcement in the area of global terrorist financing" (Michelle Gallant, 2010, p. 26). In June 2019, the FATF issued an 'Interpretive Note to Recommendation 15 on New Technologies to prevent the misuse of virtual assets for money laundering and terrorist financing', recommending measures for the regulation and oversight of virtual assets and virtual asset service providers.

Departing from the formal international law-making processes, FATF adopted a *sui generis,* novel and more practical form of global norm-making. It satisfies the need for a global administrative law, which is practical, universal, effective and has the backing of the economically powerful countries. The world is divided into compliant and noncompliant groups and the later are literally treated as untouchables by those who believe in rule of law, transparency and a crime-free society. Apart from the FATF, there are some other groups such as the Group of 8, the Asia-Pacific Economic Cooperation (APEC), the World Bank, the IMF, the Commonwealth and even private sector players like the Wolfsberg Group of Banks and the Basel Committee on Banking Supervision, etc. that are working against terrorist financing outside the arenas of hard law making.

Apart from the measures taken by the UN, and the FATF, over the years, a large number of regulatory and cooperative measures have been adopted by the international, regional, national and inter-governmental bodies against terror financing. These measures have helped create a global administrative law norm and have laid the

foundation for a new global norm against terror financing that has the appeal, force and impact to genuinely establish new customary international law rules with binding obligations for stricter implementation.

REFERENCES

Adams, M. (2021). *Ghana's Relations with The Commonwealth of Nations Under the Fourth Republic* (Doctoral dissertation, University of Ghana).

Alexander, K. (2001). The international anti-money-laundering regime: the role of the financial action task force. *Journal of Money Laundering Control*, *4*(3), 231-248.

Al-Zaqibh, A. A. M. (2013). International laws on money laundering. *International Journal of Social Science and Humanity*, *3*(1), 43.

Bassiouni, M. C., & Wise, E. M. (2023). *Aut dedere aut judicare: the duty to extradite or prosecute in international law*. Brill.

Bures, O. (2017). Ten years of EU's fight against terrorist financing: A critical assessment. In *EU Counter-Terrorism and Intelligence* (pp. 27-52). Routledge.

Carisch, E., Rickard-Martin, L., Meister, S. R., Carisch, E., Rickard-Martin, L., & Meister, S. R. (2017). The Spread of Terrorism: Libya I, Sudan I, Afghanistan/Taliban, Al Qaeda and ISIL, Lebanon. *The Evolution of UN Sanctions: From a Tool of Warfare to a Tool of Peace, Security and Human Rights*, 225-282.

Carisch, E., Rickard-Martin, L., Meister, S. R., Carisch, E., Rickard-Martin, L., & Meister, S. R. (2017). The Spread of Terrorism: Libya I, Sudan I, Afghanistan/Taliban, Al Qaeda and ISIL, Lebanon. *The Evolution of UN Sanctions: From a Tool of Warfare to a Tool of Peace, Security and Human Rights*, 225-282.

Chimimba, T. P. (2017). United Nations Security Council Resolution 1373 (2001) as a Tool for Criminal Law Enforcement. In *The Pursuit of a Brave New World in International Law* (pp. 359-394). Brill Nijhoff.

Chumba, C. (2016). *Security-based diplomacy influencing transnational terrorism management between Kenya and Somalia* (Doctoral dissertation, MMUST).

Dosman, E. A. (2004). For the Record: Designating Listed Entities for the Purposes of Terrorist Financing Offences at Canadian Law. *U. Toronto Fac. L. Rev.*, *62*, 1.

Edet, J. E., Ugbe, R. O., Nabiebu, M., Alobo, E. E., & Ijiomah, A. O. (2024). From Sovereign Immunity to Constitutional Immunity in Nigeria: Reappraising the Gains and Pitfalls. *Migration Letters*, *21*(S2), 615-625.

Flechtner, H. M. (1988). Remedies Under the New International Sales Convention: The Perspective from Article 2 of the UCC. *JL & Com.*, *8*, 53.

Galchinsky, M. (2013). Quaint and Obsolete: The 'War on Terror' and the Right to Legal Personality. *International Studies Perspectives*, *14*(3), 255-268.

Godfrey, T. U., Uwa, K. L., & Akpan, A. (2024). Personality Traits and Academic Performance of Students in Akwa Ibom State University, Nigeria. *International Journal of Business and Management Review*, *12*(1), 21-37.

Godinho, J. (2010). When worlds collide: Enforcing United Nations Security Council asset freezes in the EU legal order. *European Law Journal*, *16*(1), 67-93.

Gondek, M. (2005). Extraterritorial application of the European Convention on Human Rights: territorial focus in the age of globalization?. *Netherlands International Law Review*, *52*(3), 349-387.

Howells, K. (2009). Could 7/7 Have Been Prevented?: Review of the Intelligence on the London Terrorist Attacks on 7 July 2005.

Ibrahim, S. A. (2019). *The Use of Cryptocurrency in Terrorism-Financing and Money Laundering: Case Study of Pakistan* (Doctoral dissertation, Quaid-i-Azam University).

Klein, P. (2009). International Convention for the Suppression of the Financing of Terrorism. *United Nations Audiovisual Library of International Law*, 1-5.

Letho, M. (2009). *Indirect responsibility for terrorist acts: redefinition of the concept of terrorism beyond violent acts* (Vol. 10). Brill.

Leuprecht, C., Cockfield, A., Simpson, P., & Haseeb, M. (2018). Tracking transnational terrorist resourcing nodes and networks. *Fla. St. UL Rev.*, *46*, 289.

McDowell, D. (2017). *Brother, can you spare a billion?: the United States, the IMF, and the international lender of last resort*. Oxford University Press.

McNaughton, K. J. (2023). The variability and clustering of Financial Intelligence Units (FIUs)–A comparative analysis of national models of FIUs in selected western and eastern (post-Soviet) countries. *Journal of Economic Criminology*, *2*, 100036.

Messmer, W. B., & Yordán, C. L. (2011). A partnership to counter international terrorism: The un security council and the un member states. *Studies in Conflict & Terrorism*, *34*(11), 843-861.

Michelle Gallant, M. (2010). Promise and perils: the making of global money laundering, terrorist finance norms. *Journal of Money Laundering Control*, *13*(3), 175-183.

Naheed, I. (2020). A Critical Analysis of the UN Instruments against Terrorist Financing. *Europolity-Continuity and Change in European Governance*, *14*(2), 217-234.

Nyarks, A. (2006). Varieties of Anaang language. *Unpublished Master's Thesis. University of Uyo*.

Nyarks, A. (2012). English Mirror. *Use of English and Communication Skills. Uyo: Noble Publishers & Associates*.

Nyarks, A., & Campus, O. A. (2022). The Linguistic Evaluation of Anaang Syllable Structures. *International Journal of Formal Education*, *1*(8), 1-15.

Nyarks, D. A. (2022, August). Affixation: A linguistic strategy for language development, a case study of Anaang language. In " *ONLINE-CONFERENCES*" *PLATFORM* (pp. 140-149).

Okide, U. (2020). An Analysis of Authorsâ€™ Viewpoints on Interfemale Hostility in Selected Igbo Novels. *Kenneth Dike Journal of African Studies (KDJAS)*, *1*(1).

Okide, U. (2021). Perspectives on Cultural and National Development as Reflected in Two Igbo Poems. *Lagos Notes and Records*, *27*(1), 96-113.

Okide, U. J. (2019). Inter-Female Hostility as a Cultural Behavior in Freud's Theory of Aggression. *Culture, Precepts, and Social Change in Southeastern Nigeria: Understanding the Igbo*, *113*.

Okide, U. J. (2021). Perception and Artistic Presentation of the Phenomenon of Death among Igbo Poets. *Sapientia*, *3*(2), 245-263.

Okide, U. J. (2022). CHILD ABUSE IN THE IGBO FAMILY: AN ANALYSIS OF OSUAGWUâ€™ S NWA NGWII PUO EZE. *Nigerian Journal of African Studies (NJAS)*, *4*(1).

Okide, U. J. (2023). Cultural Views of Wealth in Traditional and Contemporary Igbo Society: Perspectives from Maduekweâ€™ s â€ œEgo na-ekwuâ€. *Nigerian Journal of African Studies (NJAS)*, *5*(2).

Owa, O. E., Miebaka, N., Odey, S. A., Ugbe, R. O., & Alobo, E. E. (2024). Impact of the 2014 Pension Reform Act on Workers' Commitment, Retention and Attitude to Retirement in Cross River State, Nigeria. *Ianna Journal of Interdisciplinary Studies*, *6*(2), 293-301.

Pasco, G. A. (2012). *Criminal financial investigations: the use of forensic accounting techniques and indirect methods of proof*. CRC Press.

Prost, K. (2017). Security Council sanctions and fair process. In *Research handbook on UN sanctions and international law* (pp. 213-235). Edward Elgar Publishing.

Quilligan, M. (2013). *Understanding Shadows: The Corrupt Use of Intelligence*. SCB Distributors.

Saul, B. (2009). The emerging international law of terrorism. *Indian Yearbook of International Law and Policy*, 163-192.

Saul, B. (2012). Terrorism and international criminal law: questions of (in) coherence and (il) legitimacy. In *International Criminal Justice* (pp. 190-230). Edward Elgar Publishing.

Talmon, S. (2005). The Security Council as world legislature. *American Journal of International Law*, *99*(1), 175-193.

Tofangsaz, H. (2020). *Suppression of terrorist financing: over-criminalization through international law*. Rowman & Littlefield.

Udo, I. L., & Udoh, M. (2023). Moral Education and Corruption in Nigeria: A Reflection on Plato's Counsel on Education. *IILARD Journal of Humanities and Social Policy*, *9*(1), 1-12.

Udoh, M. O. S. E. S. (2013). Challenges and Prospects for Developing Scientific And Technological Attitude In Africa. *African Journal of Culture, Philosophy and Society: Aworom Annang*, *3*(1), 7-15.

Udoh, M. O. S. E. S. (2013). The Place of Mythological Metaphysics in Social Control. *Journal of Complementary Reflection: Studies of Asouzu*, *3*(1), 45-53.

Udoh, M. O. S. E. S. (2014). Socialization and Society: The Family System as a Basic Unit.

Udoh, M., & Umotong, I. (2013). Environment Sustainability and Renewablity. *Elements of History and Philosophy of Science*.

Uloma, O. V., Mbonu, C. N., Onuorah, A. C., Mbarah, G. O., Anyacho, E. O., Orji, M. B., ... & Eucharia, O. E. (2019). *Culture, Precepts, and Social Change in Southeastern Nigeria: Understanding the Igbo*. Rowman & Littlefield.

Young, R. (2006). Defining terrorism: The evolution of terrorism as a legal concept in international law and its influence on definitions in domestic legislation. *BC Int'l & Comp. L. Rev.*, *29*, 23.

Zolkaflil, S., Omar, N., Abdullah, W. N. H., & Nazri, S. N. F. S. M. (2015). A review on compliance rating: FATF special recommendation IX cross border declaration or disclosure. *Procedia Economics and Finance*, *31*, 535-550.