

LOGIC MODELS AND PUBLIC POLICY: ML/TF AND THE TRM

Logic models and public policy: Canadian money laundering/terrorist financing (ML/TF) and the
Terrorist Resourcing Model (TRM)

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Abstract

The Canadian approach to counter-terrorist financing is largely premised on the money laundering model (ML/TF). This approach provides coverage of most aspects of terrorist financing but is lacking in areas not expressly financial in nature. An alternative approach is John Schmidt's Terrorist Resourcing Model (TRM) that takes a broader view of terrorist resourcing writ large. In order to determine whether there are gaps in the current approach that could be covered by adopting a TRM perspective, a theory of change and program logic model for a TRM-based counter-terrorist resourcing is developed and compared to both a 2010 ML/TF logic model and a derived logic model for Canada's counter-terrorism strategy complemented by recent legislation. The comparison demonstrates that the TRM does indeed have a broader operational coverage than the ML/TF model, but that these gaps are accounted for in the overarching Canadian counter-terrorism strategy. The use of logic models provided: a tool to convert TRM from a perspective into a program outline; a suitable method to compare objectives and strategies of two competing policy approaches; a means to identify differences and gaps in different policies; and, an example of the utility of theories of change and logic models in policy development, evaluation and comparison.

Keywords: theory of change, logic model, money laundering/terrorist financing, terrorist resourcing model

LOGIC MODELS AND PUBLIC POLICY: ML/TF AND THE TRM

Logic models and public policy: Canadian money laundering/terrorist financing (ML/TF) and the Terrorist Resourcing Model (TRM)

The real and perceived threat of terrorism in Canada, emanating from Canada or affecting Canadian interests and values abroad has been given impetus from myriad terrorist activities, such as: the ongoing conflict against ISIS in Iraq and Syria; the terrorist attacks in Belgium and Paris; the execution of John Ridsel in the Philippines; ten young Quebec Muslims were detained in May 2015 for allegedly trying to join jihadist groups in Syria; that, according to CSIS Director Michael Coulombe in March 2016, about 180 Canadians have left Canada to take part in terrorism (Bell, 2016); and the October 2014 murders of Corporal Nathan Cirillo and Warrant Officer Patrice Vincent and shooting on Parliament Hill. Canadian national counter-terrorism efforts seek to limit threats within Canada, international threats emanating from Canada, and terrorist activities affecting regional and international security. An element that permits the continuation of activities incited, sponsored or conducted by terrorist organizations is their financial, materiel and moral support. A concerted international and national effort to combat terrorist resourcing is pursued along the same lines as money laundering, given the understanding that terrorists need to move their funds through a process similar to laundering money. Critiques of the efficacy of this approach (House of Commons, *Terrorist Financing in Canada ...*, June 2015; Senate, *Follow the Money...*, March 2013) and of its conceptual representativeness (Wittig, 2011; Vittori, 2011; Acharya, 2009) have led to propositions of other models. One of these is John Schmidt's Terrorist Resourcing Model (TRM) (Government of Canada, *Air India ...*, 2010). The TRM is a visually linear, but intrinsically non-linear system of resourcing stages designed to explain what is being resourced, by who, and how. TRM can be used to identify nodes at which counter-terrorist activities could be conducted.

The purpose of this paper is to determine whether a TRM-based counter-resourcing program would provide a more comprehensive coverage of the resourcing issue than the current Money laundering / Terrorist Financing (ML/TF) approach. This will be achieved by inferring a theory of change and program logic model for the TRM, comparing it to both a logic model contained in an evaluation of the anti-ML/TF regime conducted by Capra International for the Department of Finance in 2010 (Capra International Inc., December 2010) and a derived logic model of the 2013 Canadian Counter-Terrorism Strategy (Government of Canada, *Building ...*) augmented with more recent government legislation. The comparison will highlight the convergences and divergences between the TRM and ML/TF models and illuminate whether there are gaps in the current approach that could be covered by adopting a TRM perspective as the basis for a counter-terrorist resourcing strategy or if those gaps are covered by the overarching Canadian counter-terrorism strategy.

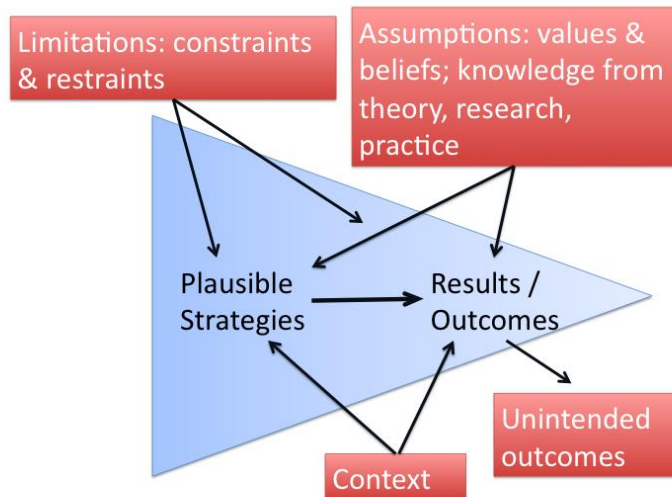
The paper is divided into four sections. The first section details the design of the logic model that will be used in both the TRM and ML/TF cases. The second section situates the TRM model in typologies of terrorist organization support operations, locates Canada in a typology of counter-terrorist practice types, provides an overview of TRM, develops a TRM theory of change and program logic model, and tests the quality of the model. The third section presents a ML/TF logic model and derives a Canadian counter-terrorism logic model from government sources and locates ML/TF within it. The final section compares the three models and draws conclusions about similarities, differences and counter-terrorist resourcing gaps.

Logic model design

Logic models are useful tools for policy analysis, development and evaluation. They permit a visual representation of a problem, potential interventions and policy objectives. They serve to operationalize a complex chain of activities repeated over time, explain the linkages between those activities, highlight the transitions between them and provide contextual conditions. (Yin (2014); Knowlton & Phillips (2013); Frechtling (2007); Funnell & Rogers (2011); Centre of Excellence for Evaluation, Treasury Board Secretariat). Treasury Board Secretariat (Lexicon) defines a logic model as: “A depiction of the causal or logical relationships between activities inputs, outputs and the outcomes of a given policy, program or initiative.” A logic model should be based on a theory of change (ToC) that establishes measurable outcomes and plausible strategies to achieve them. The outcomes and strategies are based on fundamental assumptions of behaviour and structures derived from theory, research and practice. Theories of change outline “the mechanisms of change, as well as the assumptions, risks and context that support or hinder the theory from being manifested as observed outcomes.” (Treasury Board of Canada Secretariat (2012). Theory-Based Approaches to Evaluation: Concepts and Practices. P 2)

A theory of change (Fig. 1) is composed of plausible desired results (outcome) and strategies (activities). Importantly, the strategies can be unpacked to identify the underlying assumptions, which themselves are based on values, theory, research and practice (Knowlton and Phillips, 2013, p. 22). Theories of change are evaluated based on the relationship between strategies and results and, in particular, on their assumptions, plausibility and stakeholder involvement (Knowlton and Phillips, p. 59).

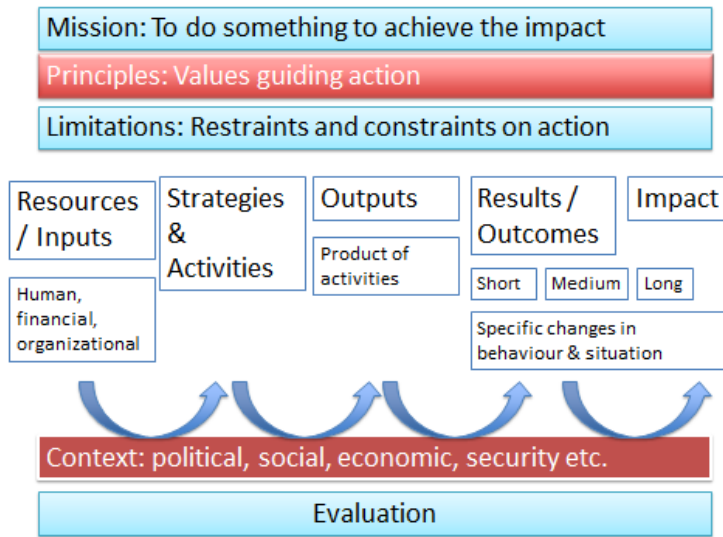
Figure 1. Theory of Change



Theories of change and program logic models can be further detailed by providing information on context (Fretchling, 2007) and unintended outcomes (Funnell and Rogers, 2011), and limitations (restraints and constraints on program objectives). Context includes an analysis of political, security, economic, social, legal, geographic and information domains.

Program logic models (fig. 2) are constructed by analyzing the mission and principles, context and limitations, objectives, impact and outcomes (and unintended outcomes), outputs, strategies and activities, inputs or resources, and how to assess the various components of the system and the system itself (Knowlton and Phillips, p. 36; Funnell and Rogers, 2011; Fretchling, 2007; Treasury Board of Canada Secretariat, *Theory-Based Approaches ...*, 2012; NASPAA COPRA, 2016)

Figure 2. Program Logic Model



Logic model quality can be tested by analyzing the environmental context surrounding the program and with the “FIT” and “SMART” tests (Knowlton and Phillips, pp. 53-60) described below.

The TRM model and current Canadian ML/TF models will be developed using these formats and quality testing techniques.

TRM-based theory of change (ToC) and program logic model

This section situates the TRM model in terrorist resourcing literature, provides an overview of TRM, locates Canada in a typology of counter-terrorist practice types and develops a TRM-based theory of change and program logic model. It then tests the quality of the model using the FIT and SMART analysis method.

Terrorist resourcing – more than money

The TRM resides within a family of resourcing models that conceptualize resourcing and its elements in a manner that is much broader than ML/TF. In *Terrorist Financing and Resourcing* (2011), Jodi Vittori depicts how terrorist organizations acquire assets and analyzes “the effect of their resourcing strategies on their capabilities and their target selection” (p. 1). She breaks down resources in three asset types: “(1) money or other readily liquid assets; (2) tangible goods, such as life’s necessities and the items needed to conduct attacks; and (3) intangible goods such as operational space, security, intelligence, and some level of training and expertise” (p. 1). She describes terrorist organizations have varying levels of autonomy (control

over one's resources) and capability, and she uses those criteria to develop a terrorism resourcing typology that comprises seven categories of terrorist organizations: lone wolf; state sponsored; franchise; bundled support; state sponsoring; shell state; and transnational corporation (p. 7). Each of these categories resources itself in a different way, and has different levels of autonomy – “the freedom to determine the timing, target selection, and weapons for operations” (p. 4) – and capability – the quantity and quality of resources at their disposal, “measured in terms of the level of violence achieved by a terrorist organization in the pursuit of its goals” (p.6). The categories move from solely state funded with low autonomy but high capability, to lone wolf with high autonomy but low capability. All the categories except lone wolf have varying degrees of funding, materiel, service and ideational support requirements from external sources to resource their organizations.

Timothy Wittig (2011) argues that terrorist activities generally represented as financing need to be understood in terms of how terrorist organizations “access and interact with particular – and often legitimate – political-economic communities” (p.2). This is relevant for the Canadian case because open-source research has revealed that people have legally provided funding for legitimate charities and non-profit organizations that have in turn supported organizations that support terrorist organizations (Public Safety Canada, *Research into How Resources ...*, 2016). Wittig also argues that the financing, or resourcing, of terrorist entities involves not only raising and spending money, “but also the capacity to move and store resources until they can be spent (p. 9). This movement process needs to be understood in terms of value flow, so that terrorist financing is “much more accurately represented as relating not to the movement of expenditure of *money*, but rather the exchange of *value*, in all its forms (p. 45). Furthermore, this exchange of value often occurs within the economic systems of the terrorist organizations, rather than the Western one. A money-focussed approach, as compared to a value transfer approach, would miss all the non-monetary resources acquired and moved by terrorist organizations, nor would it be able to follow the money through its many permutations as it is converted into exchange goods, transferred, converted in funds etc.

The point here is not that money is irrelevant to terrorist financing, but simply that the activities commonly represented as terrorist finance actually concern the exchange of value, which may, but also might not, be monetary. In this way, terrorist finance is, semantically, a misnomer in that it actually revolves about the exchange of *value* rather than money. Value comes in many forms, including various types of both material value (for example, cash, non-cash monetary instruments, value-added commodities, and raw materials) and non-material value (for example, services, profit- or route-sharing agreements, and even simply feelings of contributing to a case, and so on). (Wittig, 2011, p. 47)

The relevant conclusion drawn from Wittig is that terrorist resourcing must consider more than just purely monetary aspects and approach resourcing from the perspective of the movement of value. This is precisely how the TRM approaches the issue.

The Terrorist Resourcing Model (TRM)

John Schmidt publically introduced his Terrorist resourcing Model (TRM) in 2007 as a representative from the Government of Canada Integrated Terrorism Assessment Centre (ITAC) before the Commission of Inquiry into the Investigation of the Bombing of the Air India Flight

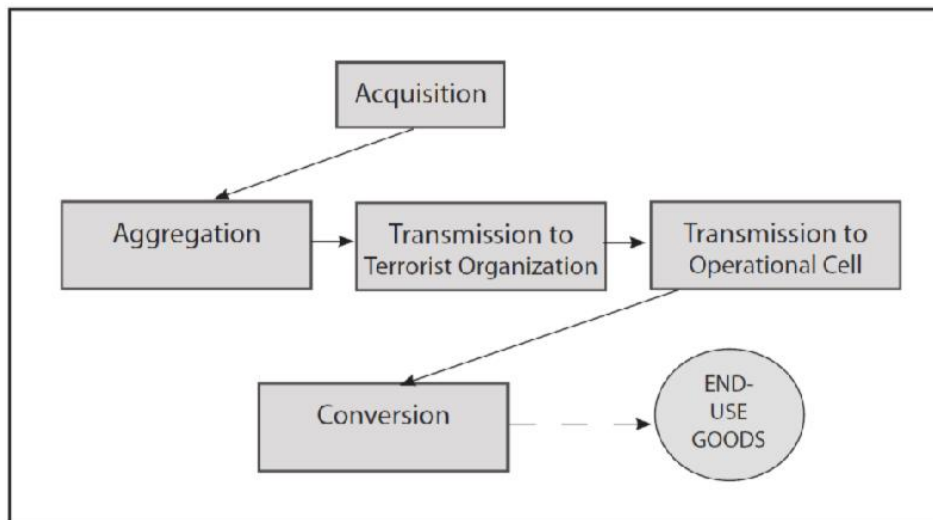
182 (Government of Canada, *Air India* ..., 2010). Schmidt named his model TRM rather than the “Terrorist Financing Model” because, he argued, terrorist financing does not necessarily involve money; it can consist of an exchange of goods and, even if money is used, it may not reach the operating cell if it is exchanged for goods beforehand (p. 52). In his testimony, he highlighted the similarities and differences between money laundering and terrorist financing (TF), but argued that the dissimilarities meant that there was a requirement for a different model: “money laundering and TF do “intersect” on many occasions and share many of the same techniques, but ... TF is not the same as money laundering. As a result, the money laundering model does not effectively represent the TF process” (p. 56).

The Schmidt model has five stages, but “the stages need not always occur in the same order and may not be present in every case” (p.52). The model provides a conceptual grounding for the understanding of the supply chain movement of resources from point of acquisition to the execution of a terrorist act. Notwithstanding its non-linear nature in practice, the stages are presented in a linear fashion (fig. 3) as follows (Commission of Inquiry Volume 5, 2010): Stage 1 is the acquisition of free or stolen funds, exchange goods (goods with monetary value such as jewels, real estate or stocks) and end-use goods (such as Vittori’s tangible goods, - life’s necessities and the items needed to conduct attacks). “Acquisition activities are fundraising activities” (p. 52) or “consist of the direct contribution or receipt of goods or services – for example, weapons, vehicles, explosives or food” (p. 52). A free service is also an acquisition. This notion of free service conceptually permits the inclusion of volunteers as a form of acquisition, but of a human kind instead of monetary or goods (Public Safety Canada, *Research into How Resources* ..., 2016). Stage 2 is the aggregation of resources, which often occurs concurrently with acquisition: “This stage consists of pooling resources, either in a few financial institutions (for money) or in a few physical locations (for goods). In some cases, the aggregation stage is bypassed completely” (p. 52). Stage 3 is the transmission of resources to a terrorist organization. This may occur in several steps and often involves at least one international movement of the funds or goods. Stage 4 is the transmission to a terrorist or operational cell, also understood as allocation or disaggregation of resources:

The terrorist organization allocates funds or goods to the appropriate cell in charge of a given activity. In the model, “activity” means much more than attacks, and includes matters such as direct support, propaganda, intelligence gathering, recruitment and radicalization. If funds are allocated rather than converted into goods, this will be the last stage of the process. (p. 52)

A terrorist or operational cell can be as small as one person. The cell’s activities include terrorist acts but also activities that facilitate further acquisition such as recruitment and professional services. Stage 5 is the conversion of funds or goods into end-use goods or services and can occur at any time in the model. “End-use” refers to being used to carry out any of the terrorist organization’s activities, which may include, but is not limited to, a terrorist act.

Figure 3. The terrorist resourcing model (TRM)



TRM Model. Source: Government of Canada (2010). *Air India*....

Since conversion can occur at any time, and some stages may be skipped, Schmidt acknowledged that there exist possible variations in the sequencing of the stages in the TRM process, such as: Stage 1,3,5,4; Stage 1,5,4; or simply Stage 1 alone.

The Schmidt model rightly claims to be non-linear but it is graphically presented in a linear construct. A study on terrorist resourcing in Canada (Public Safety Canada, *Research into How Resources ...*, 2016) concluded that a more appropriate representation of the model is as a system of events that either feed back onto themselves or lead to acts of terrorism.

A TRM counter-terrorist resourcing strategy would expand beyond the strictly financial aspects and, like Vittori and Wittig, approach resourcing as an exchange of value conducted by illegitimate and legitimate socio-economic actors using Western and non-Western financial systems. The goals are to prevent resourcing from occurring by dissuading and deterring, and to stop it when it occurs by detecting, tracking, intercepting and blocking. More specifically, its outcomes would be aligned with the TRM stages: to inhibit (with regulations), to dissuade (with persuasion), to deter (with threat), to detect, to track, to intercept and to block acquisition, pooling, transmissions and conversion. Additional to these outcomes is to successfully prosecute, which also supports the deterrence outcome. Strategies to achieve those outcomes would include interventions such as:

surveillance and control measures related to acquisition, aggregation and transmission of funds and high value goods, as FINTRAC is currently mandated to monitor; surveillance and community/policing initiatives such as Countering Violent Extremism (CVE) directed at countering the acquisition of human services; and surveillance and control measures related to end use goods such as explosives or their components and weapons. (Public Safety Canada, *Research into How Resources ...*, 2016)

These outcomes and strategies are included in the TRM-based theory of change and program logic model.

Counter-terrorist strategies and national context – the Canadian way

Counter-terrorist strategies can employ a multitude of active and passive methods designed to achieve everything from the destruction of the terrorist organization to its disruption or neutralization (unable to continue effective operations). Richard Chasdi (2010) provides a counter-terror practice classification that is useful to determine the goal of counter-terror operations and the manner in which those goals are to be achieved. Chasdi identifies five goal-type counter-terror categories or “strategems”: disruption; cooption; destruction; pre-emption; and repression. He complements this typology with passive or active types. For example, passive disruption practices would include legal and political-administrative efforts related to prevention, protection, information collection and defensive measures (p. 41). He introduces modality or nature of counter-terror practices, which can be positive (carrot) or negative (the stick), and six types of counter-terror responses: political, economic, military, police, judicial and legislative. Chasdi’s typology culminates in a three tier description of counter-terror practices that he uses in his subsequent research: modality-type; goal-type, and counter-terror response-type (p. 90). Counter-terror strategies in Canada using Chasdi’s typology are as follows:

Disruption – passive: legal and political-administrative efforts related to prevention, protection, information collection and defensive measures (p. 41).

Disruption – active: use of military or police forces to “reduce the effect ... of ...terrorist assaults or prevent assaults from happening in the first place” (p. 41).

Pre-emption – passive: intelligence gathering, border security and the use of rhetoric or persuasive techniques to counter the violent extremist narrative.

Understanding the Canadian context provides insights into the development of a theory of change and logic model. Apart from understanding the social, political and economic factors inciting and defusing terrorism, context also provides information on assumptions related to principles of action stemming from values and beliefs, and limitations on action caused by those beliefs and national institutional rules and structures.

From the Canadian context we can also derive the ethical principles upon which a Canadian counter-terrorist program is based: tolerance (avoid making Muslims or minority groups feel targeted, ostracized or threatened as a group); limited (avoid overstating the threat and overreacting to the threat (Gomis, 2016; Forcese & Roach (2015))); respect rule of law (work within legal limits); and respect for human rights (work within the Charter).

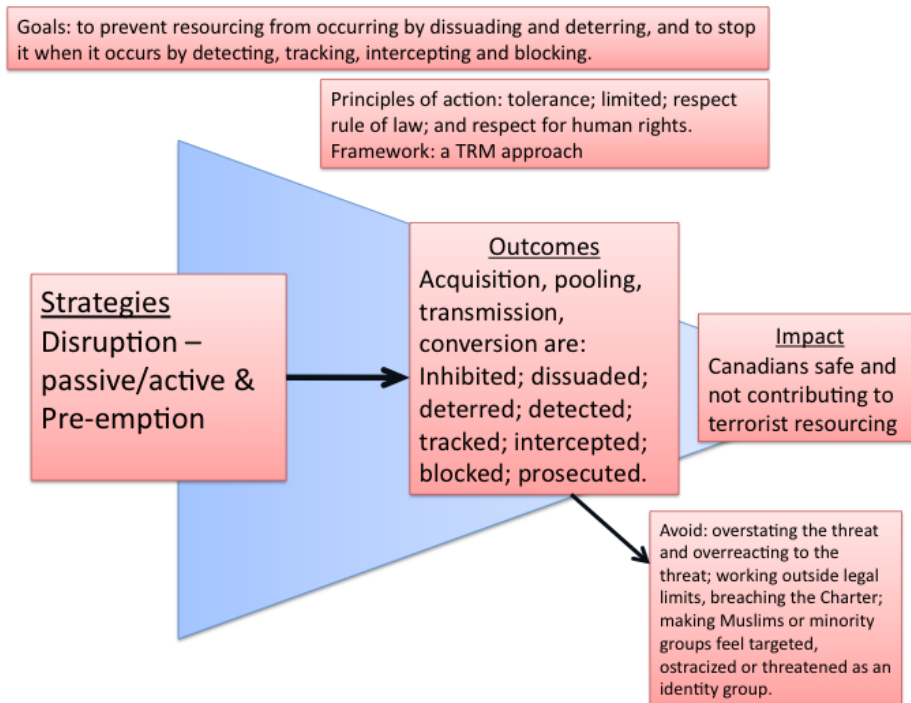
The Canadian context also provides a number of limitations on counter-terrorist practices that are already included in the strategies above. There are restraints (cannot do) on policing, intelligence gathering and sharing, use of force and control of telecommunications, and constraints (must do) on following due legal process and observing charter rights (Bill C-51 provisions excepted).

Having now identified Canadian goals, principles, limitations, outcomes, strategies and practices, the next step is to build a theory of change and program logic model.

A TRM-based counter-terrorist resourcing theory of change for domestic counter-terrorism in Canada

Piecing together the various elements of the theory of change into one model results in figure 4.

Figure 4. A TRM-based theory of change



Knowlton and Phillips (2013) recommend “toggling” between outcomes and strategies to improve theories of change during their development. Toggling, or “iterative cycles of inquiry” (p. 25) is merely thinking through the plausible strategies identified and whether they could lead to the desired outcomes, and whether strategies have been missed or need to be rearticulated. In the case of the TRM-based domestic counter-terrorism theory of change, reviewing the strategies and outcomes remind us of at least three important points: first, based on liberal constitutional values observed in an analysis of the Canadian context, that we have consciously limited operational ways and means by not selecting active pre-emption strategies or strategies designed to destroy, repress or co-opt terrorist groups; second, that the theory of change for resourcing is broader in scope than financing; third, despite a broader scope, it does not include all strategies and outcomes that are relevant to countering terrorism.

During the “toggling” exercise, the TRM-based theory of change is tested by asking the following questions (Knowlton & Phillips, 2013, p. 25): “Are the results focussed and narrow enough to discern optimum strategies?” ... and ... “Is the connection between the strategies named and the results desired as strong and direct as needed to be effective with the population

of interest?” The theory of change outcomes are certainly narrow enough to permit the identification of plausible strategies, perhaps even too much so for the bird’s eye view that the theory of change is required to provide. The strategies – passive and active disruption, and passive pre-emption – are the toolbox that counter-terrorist operations are limited to within a Canadian context. Table 1 presents an initial overview of the plausible connection between TRM stages, outcomes and strategies. The table was generated by thinking of the types of activities within those strategies and whether those activities could “contribute” (TBS, Theory-Based Approaches to Evaluation, p. 4) to the specified effect on the target activity and audience. The “population of interest” has, up to this point, not been specified other than being generically Canadian. An unwanted outcome is making Muslims or minority groups feel targeted, ostracized or threatened as a group. Although particular activities within the strategies could be targeting specific groups, such as countering the violent rhetoric produced by extremists acting in the name of Islam, or educating Somali communities about the possible deviation of their fundraising returns to a terrorist organization, maintaining the universal principles of tolerance and non-attribution (i.e. the individual’s fault not the group’s) requires outcomes that are pan-Canadian. This approach would also provide some coverage over lone wolf terrorists who are self-converts and not part of any wider community.

Table 1. TRM stages, outcomes and strategies

Stage	Inhibit	Dissuade	Deter	Detect	Track	Intercept	Block	Prosecute
Acquisition (free or stolen)	PD, PE	PD, PE	PD, AD	PD	PD	PD,AD	PD, AD	PD,AD,PE
Pooling	PD	PD	PD	PD	PD	PD,AD	PD, AD	PD,AD
Transmission to a TO	PD	PD	PD	PD	PD	PD,AD	PD, AD	PD,AD,PE
Transmission to a cell	PD	PD	PD, AD	PD	PD	PD,AD	PD, AD	PD,AD,PE
Conversion	PD	PD	PD, AD	PD	PD	PD,AD	PD, AD	PD,AD,PE

*PD= passive disruption (legal and political-administrative measures); AD=active disruption (use of police forces); PE= passive pre-emption (intelligence gathering, border security and the use of rhetoric/counter-narratives)

Another important aspect of the theory of change review is that it highlights that the theory of change can be considered linear but only in the sense that the effective implementation of the strategies will lead to the desired outcomes as a block. The TRM outcomes are stacked vertically with no differentiation between short, intermediate and long term outcomes. Moreover, stages within the TRM model can be skipped and conversion to end-use goods and services can occur at any time. There is, however, linearity within the model in that prevention of one stage will prevent the other stages from occurring, such as an interruption of pooling would prevent transmission and conversion. There is also the possibility for short term outcomes to reflect the implementation of strategies that will lead to the counter-resourcing outcomes. Short term outcomes would then be procedural and regulatory implementation objectives, or foundational, as compared to substantive counter-resourcing ones.

A TRM-based counter-terrorist resourcing program logic model for domestic counter-terrorism in Canada

The various elements from the theory of change are integrated into the program logic model at Annex A, with the strategies broken down into activities and their outputs, and the resources identified to conduct those activities. The quality of the program logic model can be tested using the FIT and SMART protocol (Knowlton & Phillips). FIT primarily tests the activities and output. In terms of frequency, the program itself is not repeated but most of the activities – those designed to produce substantive outcomes – will be repeated routinely in some cases (e.g. intelligence and financial information gathering) and others will be repeated upon requirement (e.g. intercepting resourcing transmission and prosecuting). The program intensity or depth depends on the multi-level whole of government approach and the participation of the vulnerable and financial and business communities. Intensity is produced by the level of effort of the various departments and the information gathered and submitted by the multitude of providers. The target of this program needs to be pan-Canadian but certain activities do need to be tailored for and directed at the communities most likely to knowingly or unknowingly provide resources to terrorist organizations or to contain elements who inspire violent extremism. Activities, in general, need to be executed with enough frequency and volume to generate a change in behaviour – to prevent unknowing support for terrorism and to dissuade and deter knowing support – and to detect, intercept, block and prosecute those who carry out resourcing.

SMART can be applied to the program overall and to program elements (Knowlton and Phillips, p. 53-54). Activities are specific and clearly connected to the outcomes, and outputs are specific and clearly linked to activities. The outputs are measurable, but the outcomes are somewhat more complicated to measure because successful inhibiting, dissuasion and deterrence are impossible to attribute directly to the counter-terrorism activities. By emphasizing contribution instead of causality, however, the logic model skirts the issue of directly linking activity and effect. The SMART test does identify the requirement to develop indicators of success, however, and three that have been selected here are: the rate of terrorism in Canada equals the average since 1970 of 2.4 (Global Terrorism Database, 2016); the number of cases uncovered, revealing the efficacy of the detection process and our ability to know the resourcing situation; and the number of prosecutions, indicating the efficacy of the interagency collaboration and intelligence and information sharing. The indicators were added to the logic model at Annex A.

Continuing with the SMART quality review, the program is action-oriented and the content is feasible, with the caveat that Canadian terrorist resourcing and terrorism – lone wolf in particular – is very unlikely to be eliminated in its entirety. Linear program logic models generally indicate a program time duration. The TRM-based model is internally recursive, with activities and outcomes recurring as cases arise. A timeframe could be added to the achievement of the foundational outcomes, and this could arbitrarily but plausible be estimated to be one year. In reality, most of these outcomes have been achieved by federal, provincial and municipal departments and agencies.

This section has posited a TRM-based theory of change and program logic model. The model will also be used to compare it with the Canadian money-laundering / terrorist financing model and the counter-terrorism strategy to identify convergences and divergences between the

two and to ultimately comment on the value of the terrorist resourcing model for developing a counter-resourcing strategy.

Canadian ML/TF and Counter-terrorism program logic models

This section presents Canada's anti-money laundering and anti-terrorist financing regime and provides a logic diagram developed in 2010 for the Department of Finance by Capra International Inc. as part of a 10-year evaluation of the regime. It constructs a program logic model based on Canada's 2013 counter-terrorism strategy and notes more recent legislation that reinforces that strategy. The program logic models will be compared in the subsequent section.

A logic model for the Canadian money laundering / terrorist financing (ML/TF) regime

The genesis of the Canadian approach to ML/TF owes its objectives and strategies to numerous United Nations Security Council Resolutions (UNSCR) and initiatives of the inter-governmental Financial Action Task Force (FATF) and the Egmont Group of Financial Intelligence Units. In particular, UNSCR 1373 (2001) required all UN members to prevent and suppress the financing of terrorist acts, criminalize willful funding, suppress the recruitment of terrorist groups and deny safe haven to terrorists and those who finance, plan and support them (Security Council, 2001). In December 2001, Canada responded with Bill C-36 – the *Anti-Terrorism Act* – that amongst other things amended the *Proceeds of Crime (Money Laundering) Act* to become the *Proceeds of Crime (Money Laundering) and Terrorist Financing Act* (PCMLTFA). The substantive objectives provided by the PCMLTFA are:

to implement specific measures to detect and deter money laundering and the financing of terrorist activities to facilitate the investigation or prosecution of money laundering and terrorist financing offences ... (and)
to respond to the threat posed by organized crime by providing law enforcement officials with the information they need to investigate and prosecute money laundering or terrorist financing offences, while ensuring that appropriate safeguards are put in place to protect the privacy of persons with respect to personal information about themselves
... (Government of Canada, 2001, PCMLTFA)

In addition to police forces who investigate and assist in prosecution, the key actor in implementing the financial crime aspects of the PCMLTFA is FINTRAC. The current role of FINTRAC is “to facilitate the detection, prevention and deterrence of money laundering and the financing of terrorist activities.” (FINTRAC) Their regime includes reporting requirements for a broad range of reporting entities from financial institutions to casinos, real estate brokers and dealers in precious metals.

The assumptions behind the ML/TF model is that terrorist financing as a process resembles money laundering so that the same or very similar processes designed to detect and block the cycle will have the same effect. According to the FINTRAC webpage, the Canadian ML/TFM is presented as comprising three stages: placement, layering and integration. This is the same model that UNODC titles the “money-laundering cycle.” Illegal funds generated from crime enter in the first stage, are laundered in the second through multiple transfers, false loans and false invoices and are returned to the criminal in the third for the purchase of investments and goods. The Egmont Group of Financial Intelligence Units differentiates between the intent

and origins of funds destined for money laundering or terrorism but sees, as does FINTRAC, a commonality of methods for disguising the funds: “While terrorists are not greatly concerned with disguising the origin of money, they are concerned with concealing its destination and the purpose for which it has been collected. Terrorists and terrorist organizations therefore employ techniques similar to those used by money launderers to hide their money.”(Egmont) This view of similarity of technique supports the use of comparable regulations and detection measures.

The three stages are not named in the ML/TF logic model presented below but the activities in the program treat the movement of funds into, through and out of the financial system. Strictly speaking, the money-laundering process assumes that money is illegally acquired, that placement is into the Western financial system, that the funds return to the original actor, and that the end products purchased are legitimate ones. Although the model is still the model of reference, FINTRAC acknowledges that terrorist financing may involve legitimately raised funds, which tends to be in smaller amounts, in addition to funds from criminal activity. FATF’s 2016 consolidated strategy on combatting terrorist financing also broadens its scope of types of financial support (e.g. self-funding) and includes material support to terrorist groups such as Foreign Terrorist Fighters, recruitment and propaganda services (FATF, *Consolidated ...*, 2016). It would appear that those organizations responsible for the domestic and international anti-money laundering/counter-terrorist financing (AML/CTF) regime are working towards integrating and addressing what is unique to terrorist financing, but still within the general money laundering framework.

In 2010, Capra International Inc. provided a 10-year evaluation of Canada’s anti-money laundering and anti-terrorist financing regime for the Department of Finance (Capra Inc., 2010). The Capra evaluation provides the most recent publically available logic model framework that serves as a useful reference point for comparison with the TRM-based model. The Capra model did not present a theory of change, but included in the report was an updated logic model (Annex B) created in 2007 by Goss Gilroy Inc. (Goss Gilroy Inc., 2007). The Capra document identified the same impact as the PCMLTFA, adding “to contribute to the control and deterrence of ML, organized crime and TF activities” (Capra Inc., p. 13) as a goal. The intermediate outcomes, recorded in the ML/TF logic model at Annex B, are: Enhanced detection of ML and TF activities; Increased public acceptance of the Regime; Enhanced protection of the integrity of the financial, economic and charitable sectors; Creation of an environment hostile to ML and TF; and, Reduction in the profitability of crime (Capra Inc., 2010, p. 13). Those outcomes are attained through the delivery of six key activities indicated on the Capra Inc. logic model (Annex B): Operationalizing National and International Obligations and Commitments; Liaison, Cooperation and Education; Facilitating and Monitoring Compliance; Intelligence Gathering and Analysis; Investigation; and, Adjudication and Sanctioning.

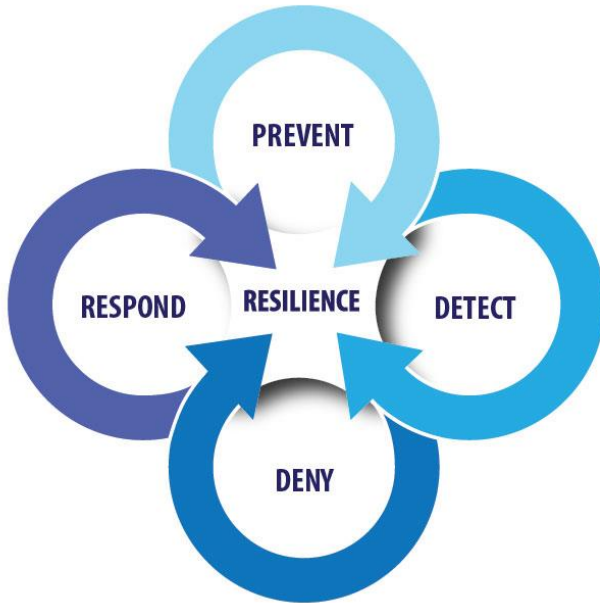
A logic model for Canada’s Counter-Terrorism Strategy

The Harper government produced *Building Resilience Against Terrorism: Canada’s Counter-terrorism strategy, 2nd ed.* (2013) with the aim of “countering domestic and international terrorism in order to protect Canada, Canadians and Canadian interests.” The purpose or goal of the strategy is to “prevent individuals from engaging in terrorism” and it has a countering violent extremism focus in that it seeks to work with communities to strengthen their resistance to violent extremism, developing counter-narratives and reducing the risk of

individuals “succumbing” to radicalization. The framework includes four “mutually reinforcing elements” built on six principles (figure 5).

Figure 5.

FRAMEWORK OF CANADA'S COUNTER-TERRORISM STRATEGY



AIM

To counter domestic and international terrorism in order to protect Canada, Canadians and Canadian interests.

PRINCIPLES

1. Building resilience
2. Terrorism is a crime and will be prosecuted
3. Adherence to the rule of law
4. Cooperation and partnerships
5. Proportionate and measured response
6. A flexible and forward-looking approach

Source: (Government of Canada, *Building Resilience ...*, 2013)

The strategy details the purpose, desired outcomes and programs and activities of each element, along with the roles and responsibilities of the federal departments and agencies. Although a logic model is not provided in the 2013 counter-terrorism strategy, all of the information is provided to do so, and is used to build a Canadian counter-terrorism strategy logic model (Annex C). Further details on the measurable outputs of those activities are detailed in each department's Report on Plans and Priorities (RPP) and the results in their annual Departmental Performance Reports (DPR).

Since 2010, the Canadian government has produced a series of legislation reinforcing Canada's counter-terrorism capabilities. In 2013, the *Combating Terrorism Act* renewed the provisions of the 2001 *Anti-Terrorism Act*, created penalties for leaving Canada to join a terrorist organization and set stiffer penalties for supporting terrorism, and, in particular for:

knowingly participating in or contributing to any activity of a terrorist group for the purpose of enhancing the ability of any terrorist group to commit a terrorist activity. This includes providing training, receiving training, or recruiting a person to receive training. (Government of Canada, *Combating ...*, 2013)

The *Protection of Canada from Terrorists Act* (Government of Canada, *Protection ...*, 2015) was passed in 2015, granting CSIS the mandate to conduct operations outside Canada, and adjusted the enactment of the law on revoking citizenship. Also in 2015, the Harper government pushed through with noticeable public outcry Bill C-51 the *Anti-Terrorism Act, 2015*, that

created amendments to numerous Acts such as the intelligence gathering power of CSIS and detainment procedures (Government of Canada, *Anti-Terrorism ...*, 2015). Legislation has also led to revisions of the *Criminal Code of Canada* and articles 83.02 – 83.04 rules that everyone who knowingly provides, collects or makes available property for a terrorist activity are liable to imprisonment for up to ten years (Government of Canada, *Criminal ...*, 12 April 2016). Similarly, in article 83.18, everyone who knowingly directly or indirectly enhances the ability of a terrorist is also liable to the same sentence.

The counter-terrorism strategy and action plan, and the 2013 and 2015 legislation have reinforced measures to deal with terrorist resourcing, particularly with activities within the detect and deny objectives.

The two preceding models – the Canadian counter-terrorism model (with legislation not incorporated into the 2013 strategy in mind) and the Capra Inc. model – will be compared to the TRM-based logic model to highlight the convergences and divergences and to draw conclusions about whether there are gaps in the current approach that could be covered by adopting a TRM perspective as the basis for a counter-terrorist resourcing strategy or if those gaps are already covered by the overarching Canadian counter-terrorism strategy.

Comparison

There are many similarities between the TRM and ML/TF models, primarily related to detecting, tracking, intercepting and blocking the movement of funds, and the prosecution of terrorists or people knowingly supporting terrorist organizations. The differences are summarized in Table 2. The ML/TF regime is a complex endeavour requiring national, international and private sector collaboration. It ultimately relies on the quality and perspicacity of the reporting entities. It also requires interdepartmental collaboration – eleven federal actors are identified in the Capra Inc. evaluation – and cooperation from many provincial departments and agencies, regulators and self-regulatory organizations. The complexity of the TRM model stems from the scope of its outcomes. By setting broader outcomes that include the acquisition and conversion of goods and services, it requires strategies and inputs that expand beyond the eleven departments named by the ML/TF model, such as DND/CAF and the Communications Security Establishment.

Table 2. Summary of differences: TMR – ML/TF models

Model elements	TRM differences with ML/TF	ML/TF differences with TRM
Outcomes	Addresses acquisition and conversion. Addresses goods and services. Seeks to dissuade.	Reporting system in place and monitoring of compliance of reporting entities. Seeks a reduction in the profitability of crime. Does include increased public awareness of the ML/TF initiatives, but to understand the regime not for deterrence purposes.
Strategies/	Includes non-financial passive	Education of private and public sector.

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Activities	disruption activities (tgt protection), active disruption related to the internet/social media, and passive pre-emption. Pre-empt with border controls on the movement of people.	
Outputs	Includes outputs related to end-use goods, messaging, and community involvement	All the legal and regulatory measures and resources in place for reporting and monitoring, detection, asset freezing, investigation and sanctioning.
Resources/Inputs	Requires municipal collaboration and coordination. Requires community involvement.	

The TRM model as presented seeks to dissuade resourcing, which includes community participation, local police involvement, passive pre-emption linked to the development of counter-narratives and active disruption of the internet and social media. It also includes non-financial passive disruption measures designed to protect vulnerable and critical targets against attack, and pre-emptive strategies designed to prevent people (and not just money) from entering or leaving Canada. Both models recognize the vulnerability of the ML/TF regime to non-traditional and non-Western financial systems, and FINTRAC acknowledges the challenges it faces with certain elements of terrorist financing related to funding amounts (less than \$10,000 within 24 hours), legal origins and domestic electronic fund transfers.

The two program logic models complement one another but there are elements that are in the TRM that are not in ML/TF program. When those differences are compared to the Canadian counter-terrorism strategy logic model it is evident that the prevent, deny and respond strategies provide coverage for those missing elements. The three are like Russian dolls with the ML/TF regime inside the TRM, which itself is inside the Canadian counter-terrorist strategy.

The five-stage TRM and three-stage ML/TF model should lead to different outcomes and strategies and different program logic models. They do, but perhaps not because of the models themselves. The comparison highlights how the money laundering model – placement, layering and integration – is not evident, visibly or in terms of outcomes and strategies, in the ML/TF logic model. The Capra Inc. model, and the Government’s ML/TF regime, is based on the PCMLTFA, which itself may not have been premised on the three stage model. This could infer that the ML/TF model itself does not matter and, therefore, the debate between TRM versus ML/TF is simply academic at this point.

Conclusion

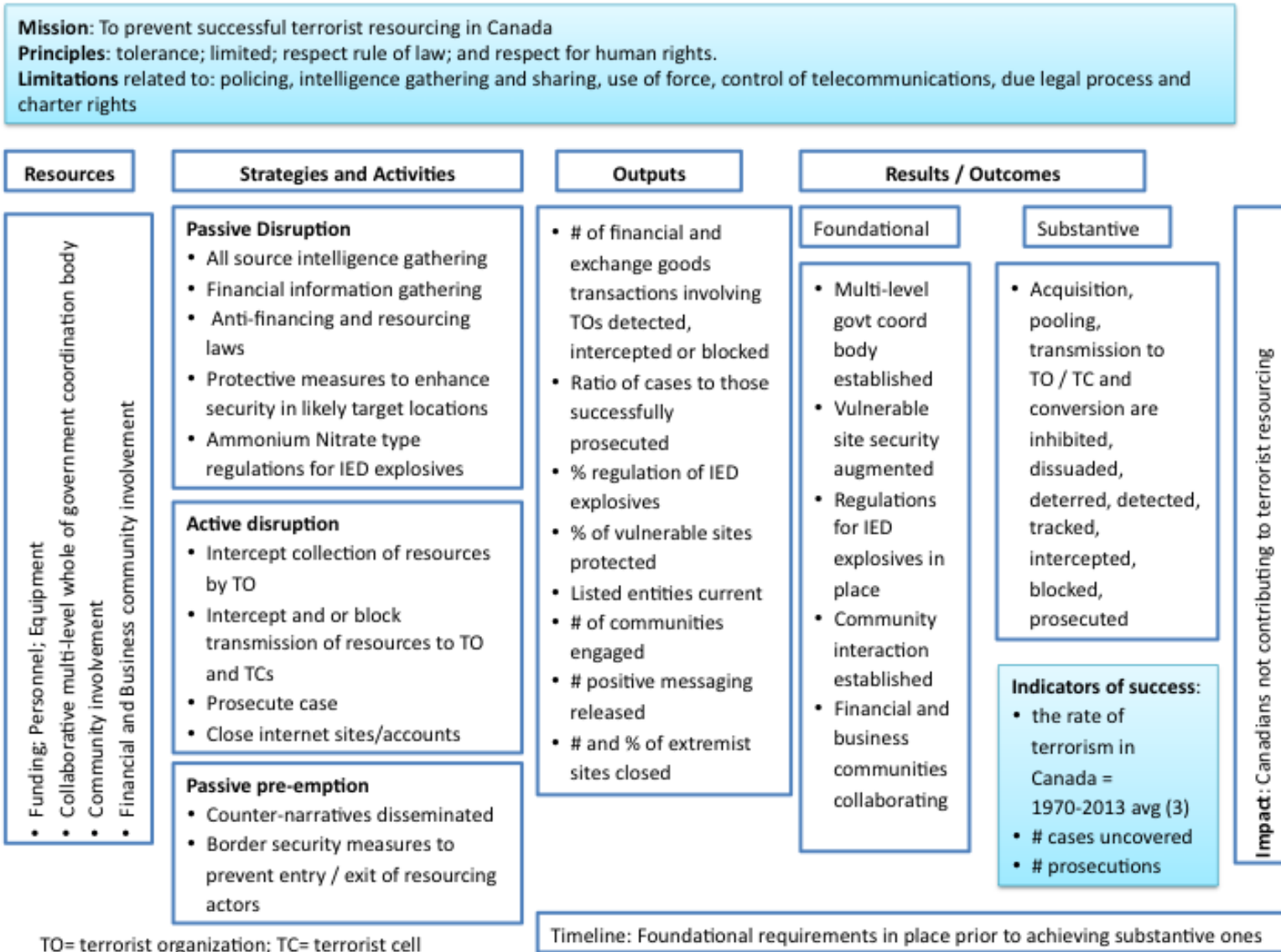
This paper used John Schmidt’s terrorist resourcing model (TRM) to develop a TRM-based theory of change and logic model, presented the 2010 ML/TF logic model from Capra Inc. and noted the basis for that model, cited recent changes in legislation that have increased

counter-terrorism capabilities, and derived a logic model from the Government of Canada's 2013 counter-terrorism strategy *Building Resilience Against Terrorism: Canada's Counter-terrorism Strategy, 2nd ed.*. It compared the TRM-based model with the ML/TF one to identify similarities, differences and gaps. It then compared the results with the Canadian counter-terrorism strategy logic model to determine whether those gaps are covered elsewhere in Canadian security policy.

The comparison revealed that the TRM does provides a more holistic approach to resourcing with a broader and more inclusive scope that goes beyond purely financial aspects and incorporates funding and exchange goods of lower amounts. Those elements that extend beyond ML/TF are, however, operationally covered by other strategies and activities of the broader Canadian counter-terrorism strategy. They are akin to three Russian dolls, one inside the other.

The descriptive comparative analysis of the three models demonstrated how logic models can be a useful heuristic and program tool for counter-terrorist resourcing policy and program development, execution and evaluation. The logic model was used elevate TRM from a perspective into a program outline. It provided a suitable method to compare objectives and strategies of two competing policy approaches. Finally, it provided a means to identify differences and gaps in different policies.

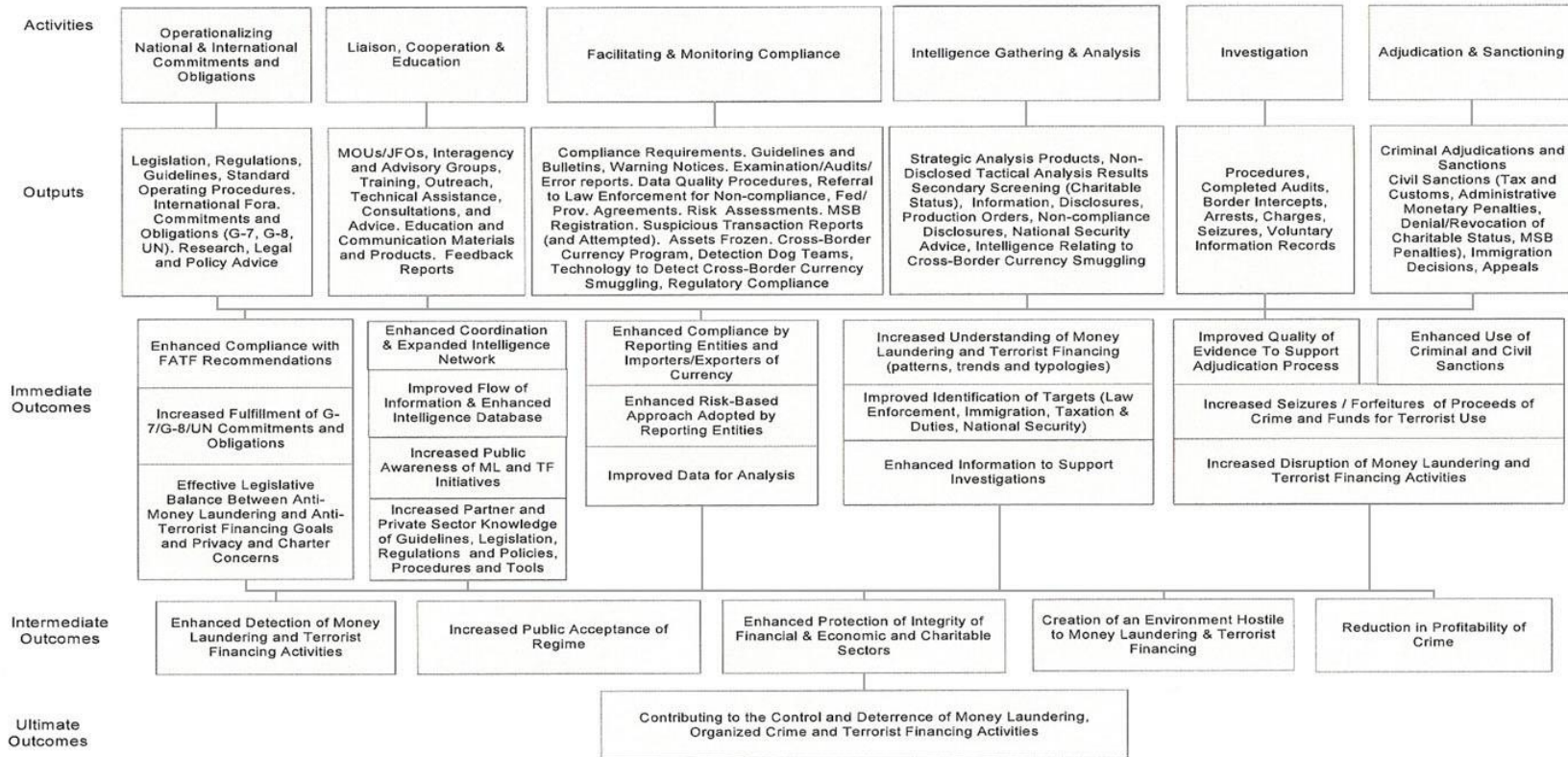
Annex A: A TRM-based Counter-Terrorist Resourcing Program Logic Model



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Annex B: Capra Inc. (2010). 10-Year Evaluation of Canada’s Anti-Money Laundering and Anti-Terrorist Financing Regime: Final Evaluation Report

Anti-Money Laundering and Anti-Terrorist Financing Regime – Logic Model (Final Version)



Annex C: Compiled Canadian Counter-Terrorism Strategy

Source: *Building Resilience Against Terrorism: Canada's Counter-terrorism strategy, 2nd ed. (2013)*

Mission/Aim: To counter domestic and international terrorism in order to protect Canada, Canadians and Canadian interests
Principles: building resilience; crime; rule of law; cooperation; proportionate response; flexible and forward looking.

Resources	Strategies and Activities	Outputs	Results / Outcomes	
<ul style="list-style-type: none"> • Funding; Personnel; Equipment • Community involvement • Collaboration between Federal depts and agencies: CBSA, CRA, CATSA, CSIS, CIC, CSEC, CSC, Dept of Fin, Global Affairs Cda, Dept Justice, DND/CAF, FINTRAC, GOC, Health Cda, ITAC, PCO, PHAC, PPSC, Public Safet Cda, RCMP (INSET), Tpt Cda, 	<p>Prevent: prevent individuals from engaging in terrorism</p> <ul style="list-style-type: none"> • Building partnerships e.g. RCMP's National Security Community Outreach <p>Detect: detect the activities of individuals and organizations who may pose a terrorist threat</p> <ul style="list-style-type: none"> • Collection; Analysis; Dissemination <p>Deny: deny the means and opportunity to carry out activities</p> <ul style="list-style-type: none"> • Deny access to capacity abroad • Disrupt the movement of people and money and the acquisition of weapons / deny access at border • Reduce security vulnerabilities • Investigate and prosecute <p>Respond: proportionately, rapidly and in an organized manner; mitigate effects</p> <ul style="list-style-type: none"> • Counter-narratives disseminated • Border security measures to prevent entry / exit of resourcing actors 	<ul style="list-style-type: none"> • As per departmental RPP • E.g. Public Safety Canada: Critical Infrastructure Resilience Score • % of statutory obligations completed • % of people at border refused entry • E.g. FINTRAC: % of disclosures helpful for investigations • E.g. RCMP: # participants who are more knowledgeable on pathways to violent extremism • E.g. DND: % of response operations that met objectives 	<p>Prevent</p> <ul style="list-style-type: none"> • Bolster community resilience • Effective counter-narratives • Risk of individuals succumbing to extremism reduced <p>Detect</p> <ul style="list-style-type: none"> • Threats identified in timely way • Detection and alerting systems • Info sharing in and outside Canada <p>Deny</p> <ul style="list-style-type: none"> • Maintain strong CT capabilities • Successful prosecutions • Terrorist means and opportunities denied • Strong cooperation with allies and non-traditional partners <p>Respond</p> <ul style="list-style-type: none"> • Capabilities in place • Rapid response and recovery of critical infrastructure • Continuity of gov't and social institutions ensured • Gov't leadership demonstrated 	<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Impact: Canada, Canadians and Canadian interests protected</p>

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