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Financing Extreme Right-Wing Volunteers in Ukraine: Past Lessons for New Risks?

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About Project CRAAFT

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Since 2014, the war in Ukraine has attracted thousands of foreign nationals to fight on both the Russian and Ukrainian sides.[1] The presence among these foreigners of a small minority of right-wing extremists has become a growing source of concern for state authorities,[2] echoing past experiences of foreign fighters joining the conflicts in Afghanistan in the 1980s, and Iraq and Syria in the 2010s. In those cases, the concentration of Islamist extremists in conflict zones led to the creation of cadres of well-connected and battle-hardened individuals, capable of deploying to other wars or launching terrorist attacks, as evidenced by the Paris attacks in November 2015.[3] These past experiences suggest a risk that the war in Ukraine might lead to similar developments on the extreme right. Despite the low numbers of extremists in Ukraine, these individuals will be acquiring combat experience, possibly radicalising and deepening already-growing transnational networks. Thus, the risk posed by the return of these – even if few – individuals as operationally capable individuals prepared to mount domestic attacks makes the case for informing a timely policy response.[4]

The presence among these foreigners of a small minority of right-wing extremists has become a growing source of concern for state authorities

To this end, this briefing looks at one aspect of the phenomenon, where there are both parallels between past extremist behaviours and potential existing policy options for preventative action: financing. Extremists seeking to fight or provide support for their chosen side need to generate and use a modest amount of funds to travel, purchase combat gear, support themselves, and – potentially – return home. Such activities have been vulnerable to disruption in the past, as indicated by coordinated countering the financing of terrorism (CFT) measures against Islamic State travellers. The case of extremist volunteers in Ukraine presents a vastly different context, yet such an approach might offer options for the current crisis too.

The briefing therefore reviews the financing techniques that have supported the travel of Islamist extremist fighters, as well as what is currently known about the behaviours of right-wing extremists joining the Ukraine conflict, comparing and contrasting their modus operandi. The briefing then explores past CFT measures used against terrorist travellers, how they might be profitably applied again in the current context, and puts forth novel recommendations to employ financial intelligence against extremist actors.

Defining Terms

Definitions in this field are commonly a matter of academic (and often political) dispute. It is beyond the scope of this briefing to embark on a comprehensive definition of the extreme right, and it will thus use the broad description given by the UN Security Council Counter-Terrorism Committee Executive Directorate (UN-CTED) of a 'shifting, complex and overlapping milieu of individuals, groups and movements (online and offline) espousing different but related ideologies, often linked by hatred and racism toward minorities, xenophobia, islamophobia or anti-Semitism'.[5]

Defining those travelling to fight is somewhat more challenging, however. One of the most commonly used terms is 'foreign fighter', which the Geneva Academy of International Humanitarian Law and Human Rights defines as an 'individual who leaves his or her country of origin or habitual residence to join a non-state armed group in an armed conflict abroad and who is primarily motivated by ideology, religion, and/or kinship'.[6] A

1. Jane Dalton, 'At Least 16,000 Foreign Volunteers Are Coming to Help Fight Putin's Army, Says Zelensky', *The Independent*, 7 March 2022.
2. Emma Graham-Harrison, 'Checks at UK Airport over Fears Far-Right Extremists May Travel to Ukraine', *The Guardian*, 16 February 2022; US Department of Homeland Security, '7 March 2022 DHS CBP Intelligence Note re United States Citizens Joining the Fight for Ukraine', US Customs and Border Protection, 2022, <https://propertyofthepeople.org/document-detail/?doc-id=22022879> , accessed 29 July 2022.
3. Jean-Charles Brisard, 'The Paris Attacks and the Evolving Islamic State Threat to France', *CTC Sentinel* (Vol. 8, No. 11, 2015), pp. 5–8.
4. Nino Bucci, 'Five Australians Free to Return After Fighting in Ukraine Far-Right "Finishing School" Alongside Russian Nationalist Militia', *ABC News*, 23 April 2019.
5. UN Counter-Terrorism Committee Executive Directorate (UN-CTED), 'Member States Concerned by the Growing and Increasingly Transnational Threat of Extreme Right-Wing Terrorism', *CTED Trends Alert*, April 2022.
6. Geneva Academy of International Humanitarian Law and Human Rights, *Foreign Fighters under International Law*, Academy Briefing No. 7 (Geneva: Geneva Academy of Humanitarian Law and Human Rights, 2014).

further term with wide currency is 'foreign terrorist fighters' (FTF), defined by UN Security Council Resolution 2178 (2014) as 'individuals who travel to a State other than their States of residence or nationality for the purpose of the perpetration, planning, or preparation of, or participation in, terrorist acts or the providing or receiving of terrorist training, including in connection with armed conflict'.[7]

For the objectives of this briefing neither term is wholly appropriate. Most foreign fighters in Ukraine are unlikely to be motivated by extreme-right ideologies.[8] Moreover, those that are cannot easily be labelled as terrorists, given that there is no reporting to suggest that they are involved in anything other than conventional military combat at present. Furthermore, since the full Russian invasion of February 2022, extremists have joined official Ukrainian forces, such as the International Legion of Defence of Ukraine (ILDU),[9] not non-state armed groups as was the case in the Islamic State context. For this reason, the term 'foreign volunteer' has been used by some scholars,[10] and this briefing will follow suit by referring to extreme-right foreign volunteers, or simply 'extremist volunteers'.

The Islamic State Experience

According to a UN estimate, by 2015 approximately 40,000 individuals had travelled to Iraq and Syria to fight, with about 80% joining the Islamic State.[11] The large numbers of foreigners travelling to fight for an Islamist extremist group was a major concern for the international community,[12] and there was considerable research by the Financial Action Task Force (FATF) into how these individuals had financed their travel, sourced accommodation while travelling, procured outdoor clothing, camping goods, mobile phones/plans, food and other general living expenses, and sustained their day-to-day lives in the conflict zones.[13] Interestingly, the manner of funding to support travel and initial expenditures proved to be largely mundane for many. Because of relatively modest needs, Islamic State foreign fighters were found to have been able to fund themselves and their activities mostly by diverting legitimate sources of income, such as wages, state benefits, donations from family and friends and commercial loans that they never intended to pay back.[14] Some individuals also engaged in petty criminality such as theft, robbery and credit card fraud to generate funds.[15]

The FATF noted that there was more limited information available regarding the sources of funds individuals used in-region, and for their return from the conflict zone,[16] although Europol has noted many instances of funds being sent directly by families and friends or via charities and non-profit organisations. Many of these funds appear to have been sent via the formal banking system, money transfer services such as MoneyGram and Western Union, traditional value-transfer mechanisms such as *hawala*, and cash couriers.[17]

The Experience in Ukraine

Since the beginning of hostilities following the Russian annexation of Crimea in early 2014, and most significantly since the full-scale Russian invasion of Ukraine in February 2022, the conflict has attracted foreign volunteers on both sides.[18]

7. UN Security Council Resolution 2178, S/RES/2178, 24 September 2014.
8. Kacper Rekawek, 'A Trickle, Not a Flood: The Limited 2022 Far-Right Foreign Fighter Mobilization to Ukraine', *CTC Sentinel* (Vol. 15, No. 6, 2022), pp. 6–14.
9. *Ibid.*
10. Kacper Rekawek, 'Western Extremists and the Russian Invasion of Ukraine in 2022: All Talk, But Not a Lot of Walk', Counter Extremism Project, May 2022.
11. UN Office on Drugs and Crime (UNDOC), 'Foreign Terrorist Fighters', <https://www.unodc.org/unodc/en/terrorism/expertise/foreign-terrorist-fighters.html>, accessed 25 July 2022.
12. UN Security Council Resolution 2170, S/RES/2170, 15 August 2014.
13. Financial Action Task Force (FATF), 'Emerging Terrorist Financing Risks', Report, October 2015.
14. Europol, *European Union Terrorism Situation and Trend Report 2016* (The Hague: European Union Agency for Law Enforcement Cooperation, 2016); Tom Keatinge and Florence Keen, 'A Sharper Image: Advancing a Risk-Based Response to Terrorist Financing', *RUSI Occasional Papers* (March 2020).
15. Europol, *European Union Terrorism Situation and Trend Report 2016*.
16. FATF, 'Emerging Terrorist Financing Risks'.
17. *Ibid.*
18. Egle E Murauskaite, 'Foreign Fighters in Ukraine: Assessing Potential Risks', Vilnius Institute for Policy Analysis, February 2020; Kacper Rekawek, 'Career Break or a New Career? Extremist Foreign Fighters in Ukraine', Counter Extremism Project, April 2020.

The Ukrainian Side

Since 2014, Ukraine has counted on the armed support of aligned but formally autonomous non-state groups, who themselves have relied on foreigners to bolster their ranks. Possibly the most well-known armed group to attract foreign nationals and international attention is the Azov Battalion, created in May 2014 by Andriy Biletskiy, leader of the far-right political organisation Patriot of Ukraine and related to the Social-National Assembly. The Azov Battalion attracted numerous foreign volunteers, and indeed many of them had extreme-right tendencies. It must be said, however, that as a non-state actor at the time, the Azov Battalion was one of the few options foreigners had to join, so joining it does not necessarily imply an extremist affiliation.[19] Another far-right extremist organisation to gain notoriety in Ukraine was Right Sector and its military branch, the Ukrainian Volunteer Corps, which also attracted numerous international volunteers.[20] According to Kacper Rekawek, the leading researcher on these groups, its success in facilitating the arrival of fellow extremists was due to its links to an 'already internationalised and networked XRW [extreme-right wing] milieu' very proficient in its use of social media for recruitment and fundraising purposes.[21] How these foreign volunteers funded themselves, or were funded, is not wholly clear, although interviews conducted by Rekawek suggest that these individuals were largely self-financed and their travel and personal logistics self-organised, with those who had several spells fighting using time away from the battlefield to generate funds and save so they could afford to return to the front.[22]

Following the full Russian invasion of Ukraine in February 2022, President Volodymyr Zelensky made a call to foreign volunteers to join Ukraine's struggle, and the Ukrainian government set up a website to provide information on how to join the newly created ILDU.[23] In media reports from early March, Ukraine's foreign minister, Dmytro Kuleba, reported that 20,000 foreigners from 52 countries had volunteered.[24] Yet, it is important to note the distinction between intending to travel, travelling and actually fighting as a combatant. The real number of volunteers that joined the ILDU is much lower[25] and how many of these might have extreme-right sympathies is currently unclear. It seems likely that most are non-extremists moved to defend a country under attack, contribute their veteran combat experience, or are simply Ukrainian expatriates returning home.[26]

The ILDU website makes no mention of funding for travel, and actively recommends volunteers 'to bring their own military kit, such as clothing or its items, equipment, helmet, body armour, etc'[27] suggesting that the earliest recruits will have self-funded through their own resources. However, additional financial support has been provided to volunteers through charitable fundraising, with units such as the Belarusian Kalinoŭski Battalion fundraising up to $300,000.[28] Healthcare technology entrepreneur Anthony Capone has also created Ukrainian Democracy LLC, to support international volunteers financially and logistically to join the ILDU, providing funds and support with flights, transport and necessary equipment.[29]

Some extremist volunteers will have inevitably used self-funding and benefited from these legitimate sources. However, there are also indications that some have used online crowdfunding methods. In a recent case, Henry Hoeft, a 28-year-old American national, set out to join the Ukrainian side and duped his local newspaper into running his story.[30] The article described him as 'a former infantryman in the US Army and half-Ukrainian on his father's side', failing to convey his complete profile: that he was also a member of the Boogaloo Bois, an extreme-

19. Rekawek, 'Career Break or a New Career?'.
20. Vyacheslav Likhachev, *The Far Right in the Conflict Between Russia and Ukraine*, Notes de l'IFRI 95 (Paris :IFRI, 2016).
21. Rekawek, 'Career Break or a New Career?'.
22. *Ibid.*
23. Ministry of Foreign Affairs of Ukraine, 'International Legion of Defence of Ukraine', 2022, <https://fightforua.org>, accessed 25 July 2022.
24. Lisa Abend, 'Meet the Foreign Volunteers Risking Their Lives to Defend Ukraine—and Europe', *TIME*, 7 March 2022.
25. Rekawek, 'A Trickle, Not a Flood'.
26. Andrew R C Marshall, 'For Foreign Fighters, Ukraine Offers Purpose, Camaraderie and a Cause', *Reuters*, 8 March 2022.
27. Ministry of Foreign Affairs of Ukraine, 'International Legion of Defence of Ukraine'.
28. Kalinoŭski Battalion, Telegram, 20 July 2022, <https://t.me/belwarriors/1783>, accessed 3 August 2022.
29. Ukrainian Democracy, <https://www.ukrainiandemocracy.com>, accessed 25 July 2022.
30. Yilun Cheng, 'Central Ohio Veteran Heads to Ukraine to Fight Despite Safety Risks, Legal Uncertainties', *Columbus Dispatch*, 6 March 2022, <https://web.archive.org/web/20220306113519/https:/www.dispatch.com/story/news/2022/03/06/ohio-veteran-henry-hoeft-heading-ukraine-fight-russia-legion/9376048002/>, accessed 28 July 2022.

right movement in the US. Thanks to the free publicity, he managed to raise at least $5,000 through GiveSendGo,[31] a Christian fundraising platform similar to GoFundMe, to cover his expenses to join the Georgian Foreign Legion in Ukraine.[32]

The Russian Side

Despite the Kremlin's alleged motivation of 'de-Nazifying' Ukraine, since 2014, Russia has counted right-wing extremists among its ranks, most commonly in non-state groups supporting its military campaign. The Wagner Group, a notorious private military contractor with obscure financial ties to the Kremlin,[33] has around 1,000 mercenaries concentrated in eastern Ukraine,[34] allegedly including many extremists.[35] Furthermore, Russian neo-Nazi groups have been engaged in the conflict since 2014, such as Russian National Unity, and numerous extremist volunteer battalions.[36] Several other extremist groups have actively sought to bring in volunteers from outside Ukraine. Supporters of the Other Russia, a party descended from the outlawed fascist party the National Bolsheviks, claimed to have recruited 2,000 individuals through party structures to go to fight in Donbas in 2014–15.[37] The Russian Imperial Movement (RIM), designated as a terrorist group by the US Department of State on 7 April 2020,[38] has also trained and equipped foreign volunteers for the conflict in eastern Ukraine.[39] Among others, the RIM has provided paramilitary training to the Rusich neo-Nazi group, now integrated into Wagner and fighting in Ukraine, as well as Swedish members of the Nordic Resistance Movement,[40] the German National Democratic Party,[41] and Australian extremists.[42] Thus, Russian extremists developing their combat skills and networks in conflict zones such as Ukraine might entail a risk for Western countries. If they gain further international prominence due to their involvement in the war, they might continue to attract more Western extremists to join their training and financial networks.

Information on how members of these groups have funded and organised their preparation and travel to join the conflict is also limited. It seems likely that self-funding plays an important role here, too. Nonetheless, they have also enjoyed financial support either from Russian or external extremist groups themselves, who have used classic fundraising techniques to support their involvement in the conflict, mainly through donations,[43] but also through selling merchandise, membership fees and event fees.[44] Again, the proficiency of RIM in recruiting and fundraising depends on its social media presence, with 13,000 followers on VKontakte.[45] Alexander Zhuchkovsky, a Russia-based supporter of RIM, raised 200 million roubles (around €3.3 million) through social media accounts and online payment methods to purchase

31. GiveSendGo, 'Help US Veterans Travel to Poland for Ukraine', 2022, <https://www.givesendgo.com/vets4ukraine>, accessed 28 July 2022.
32. Matt Stieb, 'The Beefing Boogaloo Boys of Ukraine', *New York Magazine*, 17 March 2022.
33. Joana de Deus Pereira, 'Playing in the Shadows: Putin's Doppelgänger Army', *RUSI Commentary*, 15 April 2022.
34. Miriam Berger, 'What Is the Wagner Group, the Russian Mercenary Entity in Ukraine?', *Washington Post*, 9 April 2022.
35. Candace Rondeaux, Jonathan Deer and Ben Dalton, 'Neo-Nazi Russian Attack Unit Hints It's Going Back Into Ukraine Undercover', *Daily Beast*, 26 January 2022.
36. Likhachev, *The Far Right in the Conflict Between Russia and Ukraine*; Alia Shoaib, 'How the Russian Officer Elite Is Being Decimated in Ukraine – 27 Generals and Commanders Who Were Killed in Action', *Business Insider*, 1 May 2022.
37. Likhachev, *The Far Right in the Conflict Between Russia and Ukraine*.
38. Nathan A Sales, 'Designation of the Russian Imperial Movement', remarks by the Coordinator for Counterterrorism, US Department of State, Washington, DC, 6 April 2020, <https://2017-2021.state.gov/designation-of-the-russian-imperial-movement/index.html>, accessed 5 August 2022.
39. Center for International Security and Cooperation, 'Russian Imperial Movement', <https://cisac.fsi.stanford.edu/mappingmilitants/profiles/russian-imperial-movement>, accessed 2 August 2022.
40. Europol, *European Union Terrorism Situation and Trend Report 2022* (The Hague: European Union Agency for Law Enforcement Cooperation, 2022).
41. Kristie Pladson, 'German Neo-Nazis Trained at Russian Camps: Report', *Deutsche Welle*, 5 June 2020.
42. Bucci, 'Five Australians Free to Return After Fighting in Ukraine Far-Right "Finishing School" Alongside Russian Nationalist Militia'.
43. Counter Extremism Project, 'Russian Imperial Movement (RIM)', <https://www.counterextremism.com/threat/russian-imperial-movement-rim/report>, accessed 2 August 2022.
44. Tom Keatinge, Florence Keen and Kayla Izenman, 'Fundraising for Right-Wing Extremist Movements: How They Raise Funds and How to Counter It', *RUSI Journal* (Vol. 164, No. 2, 2019).
45. Roland Oliphant, 'Far-Right Russian Group Claims Donald Trump Labelled Them Terrorists to Win Election', *The Telegraph*, 12 April 2020.

weapons and military equipment for RIM and other pro-Russian fighters in Donbas and facilitated their travel.[46] Cryptocurrencies are known to appeal to extreme-right extremists, and cryptocurrency donations equivalent to around $2 million have been identified to have been sent to pro-Russian groups, including RIM and other extremist groups.[47]

Comparing Islamists and the Extreme Right

The contexts of Syria and Ukraine are different and so is the nature of the foreign fighters and volunteers involved in the conflicts. First, as addressed above, Islamist foreign fighters were 'terrorist' in nature, unlike the 'extremist' volunteers involved in Ukraine. Furthermore, the number of, and role played by, foreign volunteers in Ukraine are merely supportive, unlike the central role played by those that joined Islamic State in the 2010s. However, while a lot less is currently known about the funding of foreign extremist volunteers in Ukraine than those Islamists who fought in Iraq and Syria, it is apparent from the material presented that there are points of similarity. Those going to fight for the Islamic State, and those fighting for either Ukraine or Russia, are likely to have been largely self-funded, probably from mundane personal sources. There is limited evidence to suggest that any group – Islamist or extreme right – has provided financial support on a large scale to facilitate the entry of volunteers into war zones. Although it seems more likely that extremist groups of whatever ideology have provided some financial and material support to the volunteers while in the combat zone, it is notable that there are examples of Islamists fighting overseas asking friends and family for additional financial support, and extreme-right extremists in Ukraine leaving the battlefield to generate new funds to support additional tours of combat.

That said, groups within both movements have also undertaken general fundraising efforts to support their military activities in different theatres, and these are likely to have gone towards supporting the needs of foreign volunteers – among many other organisational funding requirements. Whether these sources of financing have proved more significant for Islamists or the extreme right is difficult to assess, although it seems that the permissive support of governments, for example Russia, have aided the fundraising efforts of the latter.[48] Indeed, up until relatively recently, many extreme-right groups have not been designated as terrorist organisations in Western countries to the same degree as Islamist extremist groups,[49] creating easier opportunities for fundraising to support their cause and to use the formal financial system to raise and move funds. The deft use of technology by both ideological groups for the establishment of transnational support networks adds to one of the growing concerns of the international community: the return of foreign volunteers.

Why Does This Matter?

There are three main risks attached to foreign nationals joining the conflict in Ukraine: many join the Russian aggressor side; engagement in the conflict allows extremists to radicalise, develop fighting skills and establish transnational networks; and extremists might return to their home countries to pursue a violent agenda, making use of the enhanced opportunities that the conflict has provided.

Support for Ukraine has led many governments to criminalise joining pro-Russian forces and many of their nationals have been convicted. Furthermore, foreign volunteers can also become radicalised, or deepen their radicalisation.[50] At the same time, the involvement of individuals in conflict allows them to acquire combat experience, grants them access to arms, ammunitions, and training in the assembly and use of explosive devices. Ali Soufan, head of the Soufan Group, stated that 'instability in Ukraine offers white supremacy extremists the same training opportunities that instability in Afghanistan, Iraq, and Syria has offered jihadist militants

46. US Department of the Treasury, 'U.S. Sanctions Members of Russian Violent Extremist Group', press releases, 15 June 2022, <https://home.treasury.gov/news/press-releases/jy0817>, accessed 3 August 2022.
47. Chainalysis, '$2 Million and Counting: How Dozens of Pro-Russian Groups Are Using Cryptocurrency Donations to Fund the War in Ukraine', 29 July 2022, <https://blog.chainalysis.com/reports/pro-russian-crypto-donations-war-in-ukraine/#:~:text=The%20crypto%20donations%20sent%20to,devices%20and%20various%20other%20supplies>, accessed 4 August 2022.
48. Robyn Dixon, 'Inside White-Supremacist Russian Imperial Movement, Designated Foreign Terrorist Organization by U.S. State Department', *Washington Post*, 13 April 2020.
49. Lizzie Dearden, 'UK's Failure to Ban Far-Right Groups Undermines Fight Against Online Extremism, Report Finds', *The Independent*, 19 January 2020.
50. Soufan Center, 'White Supremacy Extremism - The Transnational Rise of the Violent White Supremacist Movement', September 2019.

for years'.[51] A lesson from these past experiences was that not pursuing an adequate policy framework against foreign fighters increases the risk of extremists returning undetected and becoming a terrorist threat at home.[52] Extremists, in particular, have had access to the conflict through pre-established networks and engagement in it enables the growth and deepening of these connections.

Even if a small minority, extremist foreign fighters in Ukraine pose a considerable threat to their home countries

It is precisely for these reasons that, despite the limited number of extremist volunteers engaged actively in the war in Ukraine, it is important to recognise the threat posed by those returning home. As the war in Afghanistan and against the Islamic State have shown, foreign fighters do not only pose a threat in the conflict zone; the risks attached to the eventual return of these fighters led to the unanimous adoption of Security Council Resolution 2396 (2017).[53] Not pursuing an adequate repatriation and, where due, prosecution of foreign fighters, increases the risk of extremists returning undetected.[54] However, as described in this briefing, the threat is not just the return of individuals who could then operate as wrongly labelled 'lone wolves'. The experience of returning Islamic State FTFs showed, in practice, that their engagement in conflict did in many cases increase their ability to establish networks transnationally with other extremists, with many seeking to activate these networks for attacks upon their return home. A tragic example of this was the Paris attacks in November 2015, where the investigation found that at least eight of the plotters, including attackers and facilitators, were FTFs returning from Syria.[55] Although divided, the international support from Western far-right extremists towards both sides has been documented, as have their established contacts and networks which have been directly involved in the combat training provided by extremists on the ground. For this reason, even if a small minority, extremist foreign fighters in Ukraine pose a considerable threat to their home countries.

CFT and Foreign Volunteers

The presence of concentrated numbers of extremists in conflict zones is a major policy challenge for governments, for reasons outlined, and in the past example of the influx of foreign volunteers into Iraq and Syria, the international community took concerted action to stop it with UN Security Council Resolution 2178 (2014).[56] The Global Coalition Against Daesh was established to lead a comprehensive CFT campaign to disrupt and prevent the Islamic State's financing, and the coalition also set up a Working Group on Foreign Terrorist Fighters to tackle the problem of foreign volunteers. Overall, the financial policy response was marked by three approaches:

1) Improving the working of the current CFT suspicious activity reporting regime, whereby firms in the financial and other sectors are obligated to report concerns about client conduct to national financial intelligence units. Here, government agencies provided more detailed and precise typologies regarding traveller behaviour to inform the calibration of private sector transaction monitoring mechanisms.[57] The FATF also contributed to these efforts, developing typologies and recommendations on the issue of foreign fighters.[58] These included details on account-holder age and gender, patterns involving the purchase of airline or long-distance bus tickets to certain key destinations, extended periods of account dormancy, noticeable changes in account use, unusual use of remittance services, and ATM or credit-card use in recognised hotspots.[59]

2) Using newly developing public–private intelligence sharing mechanisms such as the UK's Joint Money

51. Cora Engelbrech, 'Far-Right Militias in Europe Plan to Confront Russian Forces, a Research Group Says', *New York Times*, 25 February 2022.
52. UNODC, 'Foreign Terrorist Fighters'.
53. UN Security Council Resolution 2396, S/RES/2396, 21 December 2017.
54. UNODC, 'Foreign Terrorist Fighters'.
55. Brisard, 'The Paris Attacks and the Evolving Islamic State Threat to France'.
56. UN Security Council Resolution 2178, S/RES/2178, 24 September 2014.
57. Federal Financial Institutions Examination Council, 'Appendix F: Money Laundering and Terrorist Financing "Red Flags"', in 'FFIEC Banking Secrecy Act/Anti-Money Laundering Examination Manual', <https://bsaaml.ffiec.gov/manual/Appendices/07>, accessed 7 August 2022.
58. FATF, 'Emerging Terrorist Financing Risks'.
59. Tom Keatinge, 'Identifying Foreign Terrorist Fighters: The Role of Public-Private Partnership, Information Sharing and Financial Intelligence', International Centre for Counter-Terrorism – The Hague (ICCT) and RUSI, 2015.

Laundering Intelligence Taskforce or the Netherlands Terrorism Financing Taskforce for the sharing of tactical financial intelligence on customers of concern.[60] Public–private partnerships and financial intelligence sharing partnerships create channels for public agencies to ask for information on key individuals of interest within a proportionate legal framework, and give the obligated private sector opportunities to clarify issues about the types of indicators it should be seeking to identify in its monitoring and investigatory work.

The presence of concentrated numbers of extremists in conflict zones is a major policy challenge for governments

3) Prosecuting those financing travel or contributing towards the expenses of Islamic State foreign fighters overseas, based both on counterterrorist legislation and the designation of the Islamic State and other groups as terrorist organisations under sanctions regimes. This culminated in the prosecution and conviction of several individual ideological supporters and transnational financial networks.[61] Many families of FTFs were also convicted, a matter which raised legal and ethical questions regarding the actual terrorist financing intent of relatives in contrast to the possible simple motivation of supporting a family member.[62]

It is impossible to assess the overall significance of these financial measures in tackling the problem of foreign volunteers to the Islamic State; certainly, given that they were only initially implemented as foreigners were already travelling to the Middle East, they are unlikely to have had any major effect at the early stages of the conflict. However, once established, the efforts of the Global Coalition Against Daesh helped to establish international CFT controls to disrupt foreign fighter flows and their financing, and, along with other measures such as law enforcement cooperation with airlines, have contributed to curtail the flow of volunteers.

Some of these pre-existing financial measures are in use against the extreme right; for example, the US designated Swedish national, Anton Thulin, as a Specially Designated Global Terrorist on 15 June 2022, for his links to RIM. Due to the designation, Thulin is now subject to a US travel ban and is precluded from using the US financial system.[63] However, there is no similar coordinated international campaign to tackle the potential involvement of right-wing extremists in the war in Ukraine, using financial or other measures. This is possibly because of the relatively low numbers involved in comparison with those that joined the Islamic State in the 2010s,[64] and the basic reality that the conflict in Ukraine is an inter-state war, with extremists playing a supporting rather than central role. However, these factors do not remove the risk that extremists' involvement in the war will not play a similar role to previous conflicts, creating opportunities for these individuals to network and improve their military skills, raising the question of whether more might be done to apply financial measures – among other tools – in a preventative way.

Conclusion

Numerous recommendations have been put forward, such as preventing the exit of violent extremists from their home countries, monitoring their travel, and documenting their activities in the conflict zone.[65] What financial measures might help in the case of Ukraine?

Most foreign nationals joining the war in Ukraine, including the small proportion of right-wing extremists, self-fund their travel and buy their own kit, using legitimate sources such as their salaries, or support from family and friends. Disrupting the use of these funds through terrorist designations and account freezes could be of value in a small number of clear-cut cases – that is, for known extremists already under law enforcement or intelligence surveillance – but would be impractical on a wider scale, and would also risk the disruption of innocent non-extremists. However, for the avoidance of doubt,

60. Nick J Maxwell, 'Expanding the Capability of Financial Information-Sharing Partnerships', *RUSI Occasional Papers* (March 2019).
61. FATF, 'Emerging Terrorist Financing Risks'.
62. Berenice Boutin, 'Has Countering the Financing of Terrorism Gone Wrong? Prosecuting the Parents of Foreign Terrorist Fighters', ICCT, 2 October 2017, <https://icct.nl/publication/countering-the-financing-of-terrorism-gone-wrong-prosecuting-the-parents-of-foreign-terrorist-fighters/>, accessed 4 August 2022.
63. Ned Price, 'Designation of Anton Thulin as a Specially Designated Global Terrorist', US State Department, Press Statement, 15 June 2022, <https://www.state.gov/designation-of-anton-thulin-as-a-specially-designated-global-terrorist/>, accessed 3 August 2022.
64. Jeff Seldin, 'Anticipated Foreign Fighter Flow to Ukraine Likely Just a Trickle', *VOA News*, 27 May 2022.
65. Soufan Center, 'Foreign Fighters, Volunteers, and Mercenaries: Non-State Actors and Narratives in Ukraine', Special Report, April 2022.

such measures should be applied where tests of necessity and proportionality are met, as has been the case with Islamist extremists; double standards against extremism should be avoided.[66]

The experience of dealing with volunteers to the Islamic State drives home the need to ensure that financial intelligence is being produced by the private sector and used by state agencies

More broadly, the experience of dealing with volunteers to the Islamic State drives home the need to ensure that financial intelligence is being produced by the private sector and used by state agencies, not only to aid 'hard' disruption methods such as designations, but also 'softer' interventions such as personal warnings not to travel from state officials, as well as developing the intelligence picture on extreme-right activities and connections. States should therefore ensure that they are providing appropriate typologies for use in transaction monitoring, and fully exploiting public–private partnership channels to share both strategic and tactical information on extremist elements that have not been designated as terrorist actors.

A key element of this with the extreme right is ensuring that the concept of partnership around financial intelligence is not limited to the 'legacy' financial services sector, but also brings in newer platforms involved in crowdfunding or payment services, as well as social media and e-commerce – all ways in which extreme-right groups appear to have raised organisational funds to support activities in Ukraine.

A further final – and quite novel – consideration is the role of governments and other organisations in preventing funding that supports right-wing extremists travelling to fight. Although much volunteer funding is self-generated, some official and charitable funds – however few – are likely to have helped support the travel of some extreme-right extremists to the conflict. As a result, government agencies and charitable third parties supporting travel have a responsibility to ensure any additional funds they might provide to volunteers are not being used to support right-wing extremism. This means that these organisations need to undertake proper due diligence on volunteers before they travel. For official bodies, this could involve requesting background checks from countries whose nationals are volunteering, and for charities, the use of commercially available adverse media screening that is already in wide use across the sector for existing anti-money-laundering and CFT checks. There is little that can be done to effect the Russian side of the conflict, but these measures might help prevent Western nationals from joining Moscow's side of the conflict.

Although none of these measures are foolproof, they might provide additional obstacles to those seeking to go and fight for concerning reasons, and will – at the very least – provide a better intelligence picture for those tasked to fight the growth of violent extremism.

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66. Jelena Beslin and Marija Ignjatijevic, *Balkan Foreign Fighters: From Syria to Ukraine*, EUISS Issue Brief, No. 20 (Paris: EUISS, 2017).