



Combating Financing of Terror: An Indian Perspective

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Introduction

The Indian state possesses a unique characteristic of a mix of peace and conflict trajectories that greatly impact its policy and execution. This is true also of its policies on and responses to the most potent threat it faces in the form of externally sponsored terrorism spreading in through its porous borders and internal terror largely on account of weak governance. The country's federal political system leaves most policing responsibilities to the states, which usually possess their own counterterrorism and intelligence units. These forces, especially the local police, are often poorly trained and ill equipped. The past few years saw significant domestic turmoil in India. While dealing with existing terrorism threats, India's police and internal security system are highly fragmented and often poorly coordinated (Pradhan & Balchandran, 2008). In such circumstances, the foreign backed threats coalesce with a troubled internal security environment and some level of domestic radicalization to create a vulnerable situation.

India has been facing and combating terrorism in one form or another, almost since its independence and continues to be a significant target for terrorist groups. It has been aptly stated that India lives in region that is 'epicenter of global terrorism'. Unfortunately, it also carries the rather dubious distinction, not of its own making, of having been victim of terror for the longest period of time. Equally unfortunately, the situation is quite unlikely to abet in the foreseeable future.

While there is possibly no official compilation of various terrorist groups operating in India, in an extremely commendable exercise, the Delhi based Institute for Defense Studies and Analysis (IDSA) had last year (2014) published a book ‘Militant Groups in South Asia’, listing out 39 such outfits operating in different parts of the country (Sharma and Anshuman 2014). The list included terror groups operating out of Pakistan and Bangladesh as well. To these, one now needs to add a few more like the ISIS and Al Qaeda which have announced the setting up of separate cells for the Indian sub-continent. In the context of the subject matter under examination in this paper the book also carries a broad indication of sources of generation of funds by the listed terror groups and the transfer mechanism by each of the listed organization.

Financing of Terror:-

For any terrorist organization to survive and operate effectively, some of the key ingredients are ideological motivation, terrorist infrastructure with seamless recruitment mechanism, regional/international mobility, access to arms, ammunition, explosives and above all, reasonably assured sources of finance. Amongst these, it is believed that assured availability of financial resources is one of the most critical links in the entire network that sustains terrorism globally. Former US Secretary of State Collin Powell (2001-05) too had endorsed this view when he said, “Money is Oxygen for terrorism” (Ashley 2012). From the other end of the spectrum, even a hard core activist like Sheikh Saeed, a key al-Qaeda leader of Afghanistan, in an interview (May 2007) also highlighted the importance of finance for any terror organization, had said, ‘foremost need is financial’ and added, ‘there are hundreds of people willing to carry out martyrdom and seeking to

be the part of such operations, but they can't find to equip themselves. So funding is the lifeblood of terrorism (Shapiro 2009).

Basically, terrorist organizations through a wide range of de-centralized and self-directed network mobilize funds for meeting their organizational expenses to establish and maintain their complex and widely dispersed infrastructures, recruitment of terrorists, logistics, indoctrination, training, arms and ammunitions/explosives, propaganda and psy-war activities and most importantly, for actual financing of specific terror operations. Out of these, it is assessed that the expenditure on perpetrating any specific incident is possibly not as much as that required on their overall organizational activities. This view is supported by the details given in the table below on brief estimation of some major specific terrorist attacks since 9/11:-

Incident	Date	Estimated Cost¹ in US Dollars/British Pounds
Attack on World Trade Center and Pentagon	11 September 2001	> \$ 40,000
London transport system	7 July 2005	£ 8 000 ² GBP
Madrid train bombings,	11 March 2004	\$ 10 000
Istanbul truck bomb attacks,	15 & 20 November 2003	\$ 40 000
Jakarta JW Marriot Hotel	5 August 2003	\$ 30 000

¹ Unless otherwise noted, all estimates adapted from the August 2004 report of the UN Monitoring Team Report on al-Qaeda and the Taliban

² The United Kingdom Home Office (2006)

bombing		
Bali bombings	12 October 2002	\$ 50 000
USS Cole attack	12 October 2000	\$ 10 000
East Africa embassy bombings,	7 August 1998	\$ 50 000

In the Indian context, while investigating the Mumbai Terrorist attack of November 26, 2008, the Intelligence Bureau had reportedly concluded that approximately Rs 1,17,37,820 / - were spent by Pakistan state sponsored terror outfit Lashkar-e-Tayiba for the execution of these attacks. The IB Dossier on the subject further pointed out that the Jamat-ud-Dawah has been raising funds under the garb of charity and diverting it to the Lashkar coffers. The JuD is also reported to have a cadre of 50,000 personnel exclusively for funding activities against India. The IB report explained that the dossier was produced based on the statements by Pakisatani-American-Lashkar-e-Tayiba terrorist caught in USA David Headly and information through various credible sources. Out of the total money spent, around \$01, 30,000 USD were for paying off the families of the terrorists and training. It was further estimated that the Lashkar spent \$ 25,000 on weapons, \$500 USD on opening VOIP (Voice-over Internet Protocol) accounts for satellite based communication during the execution of the attack. Headly also admitted to having received a sum of \$40, 000 for conducting surveillance visits to India (Nanjappa 2014).

The estimates given above also support the view that bulk of the funds needed by terrorist organizations goes towards raising and maintenance of their network and

infrastructure and the most effective way of neutralizing them would be to completely starve them of availability of funds both at the stage of its generation and them at the movement stage.

Let's first examine the sources of generation of funds by terror outfits. According to details available in public domain reinforced by the information listed in the book 'Militant Groups in South Asia', different terrorist organizations resort to different ways of generating their financial resources based on their reach, capability and support base (Sharma and Anshuman 2014). These can be classified under three primary heads. The first source involves financial support from state entities or structures that can generate the funds and ensures its long term availability. Second source is 'self-funding' through their own local network and the third source encompasses 'revenue generating' activities such as criminal activities from low level fraud to well-planned crimes, donations and legitimate businesses. Another approach in classification of sources of finance could be as from 'Domestic' sources or from 'External' sources.

Irrespective of the form of classification used, it is widely agreed that bulk of the money for the terror groups comes from local contributions, donations, overseas collections, extortion, protection money, funds provided by state entities, 'zaquat' collections, diversion of funds by non-governmental and charitable organizations, proceeds of criminal activities, drug trafficking, gun running, proceeds from various forms of trans-national crimes, counterfeiting, investments in local businesses, commercial enterprises acting as front companies, real estate dealings and a host of such other illegal activities.

The Indian counter-terrorism experience fully endorses this view point. Punjab militancy could not have lasted for as long as it did, without the massive financial support from ISI and the huge flow of funds generated internationally and inducted illegally. The experience thus gained by Pakistan was equally effectively replicated in the context of its proxy war in the Jammu and Kashmir in which ISI remained the main source of funding. Along the line somewhere, Pakistan also discovered the hugely effective contribution that counterfeit currency and drug money could provide in financial sustenance to terrorist modules launched in and against India either through cross border routes from Pakistan and through equally effective mechanisms of hawala transfers/ couriers and money laundering (Marwah 2009).

It has been observed by investigating agencies and research analysts that the Indian scenario too is characterized by a distinct linkage between crime and money laundering in terror financing. It is also evident that three stage progression of terror financing - state sponsored, privatized and globalized finance of terrorism, has been in operation in promoting and sustaining terrorism in India. This came to notice way back in the context of the Naga insurgency that was supported by China in the form of training, weapons and finances in the sixties and mid-seventies (Shekatkar 2009) and in insurgency in Mizoram (Chadha 2009). In financing the Indian mujahedeen groups, their sponsor, Pakistan, also used the 'trinity' network of globalization, privatization and criminal activities in tandem. . Thus, due to its intricate nature, terror financing has turned into a complex challenge for the policy makers and law enforcing agencies of India. Based on its long years of dealing

with terrorism, India has identified the following major sources for terrorist financing (FT): funds/resources flowing from organizations outside India including foreign Non-profit Organizations / Non-Governmental Organization (NGO);, funds provided by state entities (read ISI), induction of counterfeit currency and funds generated through a variety of criminal activities such as drug trafficking and extortion (AGP June 25, 2010).

Movement of Funds:

Easy, smooth, and timely transfer of funds with utmost secrecy and deniability, are absolutely essential for any terrorist organization to function effectively and successfully. This is largely achieved through three different methods exclusively or in combination. These are; first, moving money by using financial system including transfers through hawala or other similar mechanism of illegal, informal transfer of funds in bulk; second, physical movement of money through cash couriers and the third involves use of international trade system in high valued items like diamonds and gold through laundering.

While keeping track of high value transactions and monitoring the generation of illicit funds, global financial institutions like World Bank have estimated that the volume of illegal wealth generated globally is extremely high and could even be higher than the nominal world GDP (Schulmeister 2009), (World Bank 2010). Global economy and global GDP have been on the rise over the last two decades and with these the magnitude of money laundering too has increased multifold. The IMF and World Bank estimate that 3%-5% of global GDP (UNODC 2011) is

laundered amounting to approximately \$2.17- \$ 3.61 trillion annually (US Department of States n.d.).

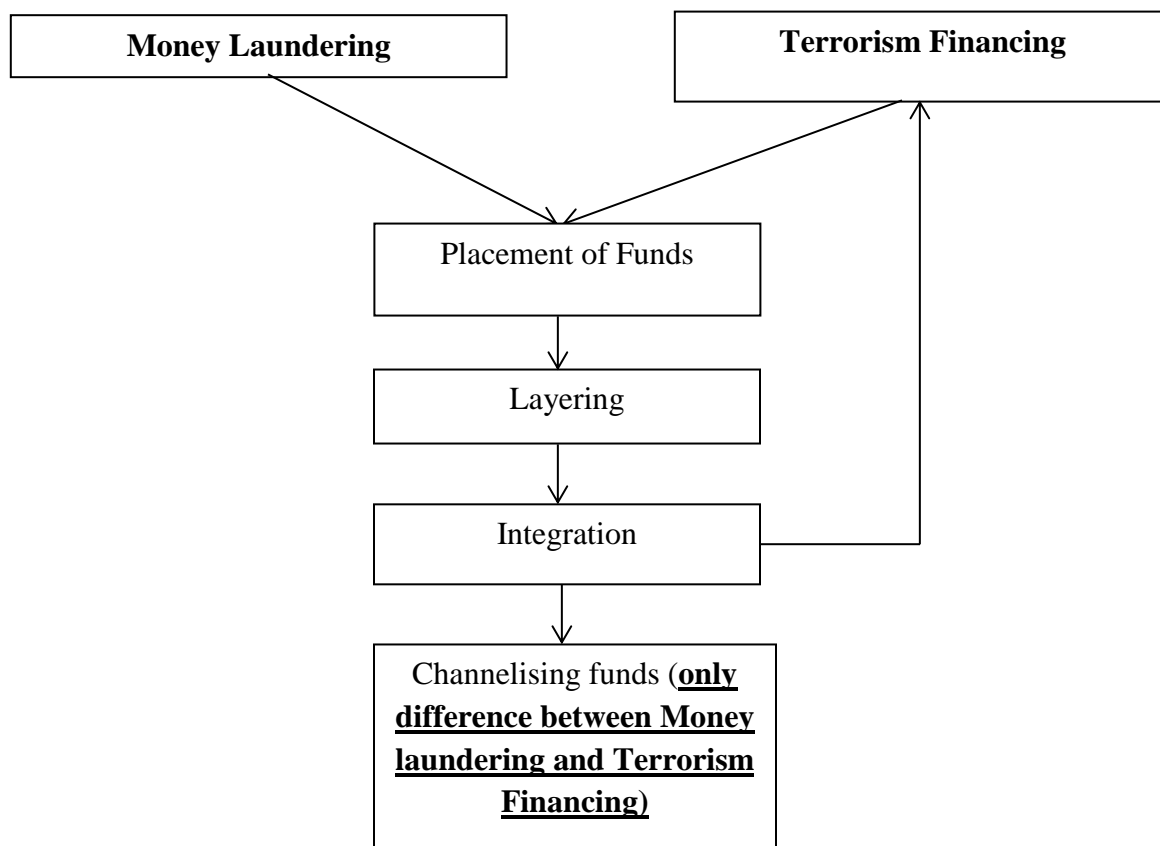
The generation and transfer of the funds through different high value as well as low value illicit industries that are used as means to finance the terror are listed below with their estimated valuation. The brief summary of the illicit markets with their estimated valuation will be of great use as given below.

Summary of Illicit Markets and Values (Germy February, 2011)

Market	Estimaed Value of Illicit International Trade
Trafficking in Drugs	\$ 320 billion
Trafficking in Humans	\$ 31.6 billion
Trafficking in Wildlife	\$ 7.8 to 10 billion
Counterfeiting Total	\$ 250 billion
Counterfeit Pharmaceuticals	\$ 35 to \$ 40 billion
Counterfeit Electronics	\$ 50 billion
Counterfeit Cigarettes	\$ 2.6 billion
Human Organs	\$ 614 million to \$ 1.2 billion
Small Arms and Light Weapons	\$ 300 million to \$ 1 billion
Diamods and Coloured Gemstones	\$ 860 million
Oil	\$ 10.8 billion
Timber	\$ 7 billion
Fish	\$ 4.2 to \$ 9.5 billion

Art and Cultural Property	\$ 3.4 to \$ 6.3 billion
Gold	\$ 2.3 billion
Total	\$ 639 to \$ 651 billion
Approximation	650 billion

Obviously these activities also lead to huge amounts of profit to the participants, making money laundering different from terrorism financing as shown in image below. It must be clarified here that not all the illegal money transacted through these routes is used for terrorist financing and also that some other innovative methods might also be in use for transfer of funds.



(Diagram – Difference between Money Laundering and Terrorism Financing)

The process of channelizing funds in money laundering makes it different from terrorism financing. The end process of channelizing the funds and utilization of that money need not be necessarily used for the financing of terrorism and can be used for various commercial benefits as well as in movement of unaccounted money. The NIA and law enforcing agencies have endorsed the linkage of Student Islamic Movement of India (SIMI) and Indian Mujahedeen (IM) with great concern about the large flow of foreign remittances into Kerala (Ramdas 2012) with the help of listed terror organisations from Saudi Arabia such as Harkat-ul-Ansar and its sub organisation Jamayyat-il-Ansar etc (Nanjappa, How SIMI set up terror shop in Kerala once again with ease 2011).

Money laundering –

There are different means to launder money. Most common money laundering methods are opening multiple bank accounts; intermingling criminal proceeds with assets of legal origin; purchasing bank cheques against cash and routing of funds through complex legal structures. For transnational organized crimes, methods used to disguise the criminal origin of the funds include the use of offshore corporations and trade based money laundering. Most countries have evolved their own mechanisms for domestic co-ordination and co-operation at both the policy and operational levels to identify new and emerging trends and to formulate appropriate responses.

Money Laundering for terror financing has been defined by the Financial Action Task Force (FATF) as “the process of disguising the proceeds of crime and moving value through the use of trade transactions in an attempt to legitimize their illicit

origins” (FATF.GAFI June,23. 2006). Due to its complex nature and globalized reach, it is extremely challenging for the law enforcing agencies to detect and quantify the linkages between the money so generated to its utilization for terror financing. It demands deep study and extensive coordination amongst domestic and international regulatory organizations, law enforcement and intelligence agencies.

There are certain cities around the world from where illegal transfer of funds through money laundering or other illicit means takes place. These include Amsterdam, Frankfurt, Dubai, Singapore, Bangkok, Kuala Lumpur and possibly some in Latin America as well. Amsterdam is considered to be the major target for laundering drug money as also commercial trade fraud etc... (E. U. Savona 2014). Amsterdam and Antwerp are known for gold and diamond trading where cash transaction takes places. Along with these markets the accounts of travel agencies, illegal funds generated in real estate activities etc. also contribute heavily to the huge volume of money transferred through laundering.

Though, Singapore is boosting its anti-money laundering rules in line with global regulations to regulate virtual-currency intermediaries including operators of bit coin exchanges and vending machines to address money laundering risks (Ying 2015), according Tan Boon Gin, Director of the Commercial Affairs Department, overseas criminals continue to seek to launder money through Singapore based bank accounts (Bloomberg in Singapore 2014). Similarly, Kuala Lumpur is also coming to notice as a hub of modern day crimes and internet scams (Campbell 2014). Malaysia will be among the first Asian nations to come under the scrutiny

of the Asia/Pacific Group on Money Laundering (APG) to assess its compliance with the FATF standards (Mansoor 2015). Thailand at the centre of the Golden Triangle network is a major hub for money laundering. The laundering here takes place through a variety of techniques such as depositing black money in bank accounts in false names, purchasing or selling stocks etc. (Maysakun 2010). The analysis here is only representative, aimed at highlighting the enormity of the task at hand. It must however be added here that both in Europe and the ASIAN regions, effective mechanism are in place to achieve cooperation in addressing the problems through intense monitoring by the concerned agencies. Unfortunately, such an approach is sadly missing in the South Asian region.

Challenges of Combating Terror Finance in India:-

Generation of funds for terror and its movement from varied sources to the final destination involves multiple complex processes and therefore countering or controlling financing of terror poses a tough challenge. India faces terrorist challenges from internal as well as external state and non-state actors. Its enormity can be assessed by the fact that, despite all efforts, terrorist activities increased by 70 per cent between 2012 and 2013 (Institute for Economics and Peace, Global Terrorism Index Report Measuring and Understanding the Impact of the Terrorism 2014) and number of deaths also recorded increase from 238 to 404. According to the global terrorism index report of 2014, at present 43 different terrorist groups are operational in antinational activities across India. These are categorized into three groups; Islamists, Separatists, and Communists or naxals (Institute for Economics and Peace 2014).

While constructing a comprehensive approach for combating flow of terror finance, identification of the sources of finance and its ambit is the first essential step. There are three primary sources, both internal and external, for financing terrorism. First source involves the financial support from state entities or structures with large organizational set up which can generate the funds and ensures its availability with all support. Second source is self-funding and encompasses 'revenue generating' activities such as criminal activities from low level fraud to well-planned crime and funds raised through donations and legitimate business could constitute the third. Insurgents and terrorist resort to several of these methods to finance their operations against India. Their main sources of funding are:-

- a. State Sponsored (such as ISI), funding generated from narcotics with the help of terrorist organisations like Lashkar-e-Taiba, Hizbul-Mujahideen and it is in the range of million dollars (Embassy of India, Washington D.C. 2007).
- b. Contribution from religious, fundamentalist, Pan Islamic terrorist organisations based in Pakistan who raise their funds before Eid-prayers and through *Zaquat*³. [*Zaquat* is one of the five pillars of Islamic traditions and is compulsory sanctioned method of alms giving in Holy Quran (Brisard December 19. 2002).] The holy meaning of the process is often misinterpreted by radical elements and under the name of *Jihad*, It is often used as a channel for spreading terror and is utilised through various means in the countries like India (Jihad 2013). As much as US\$ 100 million was

³ The Holy Quran, Surah Taubah (9), verse 60

generated was reportedly collected in Karachi itself at one time (Ministry of External Affairs 2002).

- c. Contributions from charitable organisations mainly in Pakistan and Saudi Arabia.
- d. Trans-national transactions from trans-national criminal groups or mafia group such as one led by Dawood Ibrahim.
- e. Money collected voluntarily or otherwise in the form of extortion or kidnapping etc.
- f. Narcotics smuggling and gun running.
- g. Fake Indian currency notes.
- h. Stock market operations by manipulating stock market (Germey February, 2011).

Based on investigations and interrogation reports of terrorist/militants during the Punjab crisis and militancy in J&K, the three major sources of terrorist funding identified for flow of funds were through trans-border couriers, money sent through hawala transactions and direct illegal remittances from external supporters and sympathizers. Use of different routing channels irrespective, the ISI involvement/complicity was near total. Use of drug money, counterfeit currency and other tools of terror financing got integrated with the above in due course. As far as the eastern theater was concerned, terror financing package also included local level extortion and protection money.

To deal with the complex issue effectively it is important to closely monitor both the aspects i.e. generation of funds and its induction/distribution. Proper capacity

building, reinforcing legal provisions, establishing financial regulatory and intelligence units, law enforcement and judicial capabilities, can all contribute significantly in combating terrorist financing. The international community can also help through better monitoring of their financial systems against abuse by terrorist financiers around the world irrespective of the target of terror activities.

The monitoring of financing of terrorist activities in India came into sharper focus post Kargil war. The recommendations of the high powered Group of Ministers headed by the then Deputy Prime Minister and Home Minister Mr. L K Advani. The group recommended specific legislation against financing of terrorism (Group of Ministers May 23, 2001). It may be noted that the issue of terror financing attracts provisions of a host of legislations including:-

- a) **The Unlawful activities (Prevention) Act – 1967.**
- b) **The prevention of money laundering act – 2002.**
- c) **Foreign exchange management act – [FEMA] 1999.**
- c) **Conservation of Foreign Exchange and Prevention of Smuggling Activities Act – 1976.**

It was felt that most of these vintage acts [laws] needed fresh evaluation to enhance their effectiveness in dealing with the evolving challenges in all its complexities. Some of these laws may not entirely comply with the UN resolution 1373 which highlights the need of comprehensive legislation against terrorism. It is recognized worldwide that there cannot be an universally applicable template to fight against terror financing. Therefore, India needed to evolve its own model based on the

peculiar and unique regional and domestic condition that could more effectively deal with this menace.

Indian initiative to set up Financial Intelligence Unit to combat trans-national movement of illicit funds is an evolving process in this direction. The unit was established in November 2004 for receiving, processing, analyzing and disseminating all information relating to suspect financial transactions. It is responsible for coordinating and strengthening efforts of national and international intelligence, investigation and enforcement agencies in pursuing the global efforts against money laundering and related crimes. It is an independent body reporting directly to the Economic Intelligence Council (EIC) headed by the Finance Minister (Financial Intelligence Unit 2004). Since 2009, India has further enhanced its capacity on preventing money laundering and strengthened its legal provisions for preventive action. However, there is still scope for improvement by resolving long-standing legal issues pertaining to domestic predicate offences.

Global and Regional Efforts:-

Since the menace of terrorism is global, needless to reiterate that it needs well-coordinated global effort for effective tackling. In pursuance of its total commitment to combating terrorism, India is reaching out to the international community seeking intense cooperation. India has strengthened its capabilities in association with the US agencies various regional organizations that are similarly committed to prevention of money laundering and terrorist financing. Some of the initiatives are;

(i) India-U.S. Economic and Financial Partnership Dialogue established under a Memorandum of Understanding signed in January this year (2015) provides for information sharing between the two countries' regulatory agencies for robust dialogue and meaningful cooperation on anti-money laundering and combating the financing of terrorism (G. Press Information Bureau 2015).

(ii) India is also consistently urging the UN member states to adopt a global terrorism treaty – the Comprehensive Convention on International terrorism as referred to by Prime Minister Narendra Modi in his speech at UN General Assembly speech on November 27th 2014 (Modi 2014).

(iii) At SAARC, India has urged the member states to actively cooperate on the issue of financing of terror as SAARC countries have already accepted the International Convention for the Suppression of the Financing of Terrorism of 1999 and UNSCR 1267. To comply with the international measures, many SAARC countries have enacted legislations against money-laundering and terrorist financing, and established the Financial Intelligence Units to monitor suspicious activities of the funds.

(iv) Further, India can initiate the regional database by using the Colombo based dormant Terrorist Offences Monitoring Desk and integrate the information related to terrorist financing, money-laundering and suspicious transactions from Financial Intelligence Units (FIUs) of the member states.

(v) It can also be facilitated through inter-government originations such as Global Financial Action Task Force and Asia-Pacific Group on Money Laundering. Along with the regional database, certain review mechanism can be initiated and member state can contribute through their respective finance sectors and retributive measures. Prime Minister Modi highlighted the need to deep engagements within South Asia and to build up a strong shared anti-terrorism network as a substantive step in this direction during 18th SAARC Summit (Press Information Bureau 2014).

Besides, India has successfully persuaded many countries bilaterally to commit themselves to closer cooperation on terrorism in all its aspects including terror financing. This issue has also been for some time now, an essential component of its global interaction on the security and intelligence cooperation agenda.

It must however be acknowledged that all these bilateral, regional and multilateral treaties and arrangements can be only as effective as the participating countries and their designated entities chose to be. This is amply seen in the case of Pakistan, undisputedly the worst offender in sponsoring and sustaining terror in India for decades. Even though Pakistan is an active member of the Asia/Pacific Group (APG) on Anti-Money Laundering /Countering the Financing of Terrorism (AML/CFT) and has made high-level political commitment to work with the Financial Action Task Force (FATF); enacted legislations to comply with UNSC Resolution 1373, it has, according to the latest US report on terrorism, it has not acted to 'freeze and confiscate terrorist assets' and allowed 'UN designated terrorist organizations to skirt sanctions by reconstituting themselves under

different name, often with little effort to hide their connections to previously banned groups'. The report goes on to observe, 'Lashkar e-Tayyiba (LeT) and its alias organizations continued to operate freely in Pakistan, and there were no indications that Pakistan took significant enforcement actions against the group'.

Conclusions:-

In the Indian context the majority of the work pertaining to countering terror financing has been region and entity specific such as in Punjab, North East, narcotics and drug trafficking, funding of naxal movement etc. It appears, however, that very limited work has been carried out on the subject of terror financing in its totality that would include all related issues such as funding resources, layering of funds, integration of funds and distribution through various channels. In today's context, extensive use of technology allows money to move anywhere in the world with speed and ease making the task of combating money-laundering and terrorist financing more urgent and more difficult than ever before to track. Not only in India, intelligence and security agencies the world over have been trying continuously to grapple with this menace but only with partial success.

As explained earlier terror financing runs over a financial network, which is seamless and transcends geographical boundaries, application of multiple laws and regulatory mechanism in different countries, which are often complex in nature and provide lacunae in their interpretation. It is also acknowledged that terror financing mechanism has been evolving faster than the efforts of the law enforcement agencies and counter-terrorism agencies. These now include even

electronic transactions in commerce, ‘digital laundering’, increasing use of digital currency etc.

Needless also to say here that an effective and comprehensive counter-terror financing strategy should encompass all the fundamental elements associated with the mechanics of financing of terrorism and plan to build up the capabilities accordingly. It should begin with contextualizing the threat analysis and framework to mitigate those threats. The complexity of its nature underpins the need to follow a dual track approach covering a holistic assessment along with development of capacity oriented strategy strengthening law enforcing agencies to tackle all kinds of challenge.

Tackling terrorism of all variety with all seriousness is absolutely inescapable for India which has been its victim for many decades. Situated in a region that has been described and designated as the ‘epicenter of global terrorism’, India urgently needs to redefine its strategy to deal with global terrorism by developing a comprehensive national security architecture including formulation of a comprehensive national policy on terrorism. It must recognize that acts of terror cannot be fought barely as a law-and-order problem. What India needs is a more comprehensive and inclusive approach that blends different key elements to form a credible counter-terror strategy. A comprehensive and effective legal framework to deal with all aspects of terrorism needs to be enacted. The law should have adequate safeguards to prevent its misuse.

An important component of revamping and restructuring of the counter-terror strategy should be beefing up of the intelligence capabilities on high priority. The security agencies will have to be enabled, both materially and through legal empowerment to prevent, pre-empt and deal with terrorist strikes. Without completely replicating the US or any other model developed in other countries yet taking these as good starting points, it is time India firmed up its approach on setting up the aborted National Counter Terrorism Centre. Needless further to add here that the National Counter Terrorism Center in its revised form, whenever established, sooner the better, must have a dedicated unit to deal with financing aspects of terror. But above all, India must as a nation, evolve The 'National Will' to deal with the menace of terrorism a resolute and united manner. In the US post-9/11 and elsewhere as well, apart from reforming/revamping their security and intelligence architecture to meet the new challenges, their governments, the people the media and the social networks, have shown remarkable spirit of national unity and resolute will to effectively deal with this. Sadly, this does not seem to have happened in India where the governments, the political parties and the people remain divided due to various sectoral considerations. We need to think seriously about this and act, since all these should be doable and must be attempted before another 26/11 hits us.

Bibliography

- AGP, FATF. *Anti Money Laundering and Combating Financing of Terrorism. India*. Mutual Evaluation Report, Financial Action Task Force, Asia-Pacific Group of Money Laundering, Paris: Financial Action Task Force Secretariat, June 25, 2010.
- Ashley, Sean Paul. "The Future of Terrorist Financing: Fighting Terrorist Financing in Digital Age." *Penn State Journal of International Affairs* 02, no. 01 (Spring 2012): 10.
- Brisard, Jean-Charles. "Terrorist Financing : Roots and Trends of Saudi Terrorism Financing." Report Prepared for the President, United Nations Security Council, JCB Consulting Agency, Paris, December 19. 2002.
- Chadha, Vivek. "India's Counterinsurgency Campaign in Mizoram." Chap. 02 in *India and Counterinsurgency: Lessons Learned*, by Sumit Ganguly and David P. Fidler, 36. London: Routledge, 2009.
- Embassy of India, Washington D.C. "Speech by National Security Adviser Mr. M.K Narayanan at the 43rd Munich Conference on Security Policy." <https://www.indianembassy.org>. February 11, 2007. https://www.indianembassy.org/archives_details.php?nid=927 (accessed March 12, 2015).
- FATF.GAFI. *Trade Based Money Laundering*. Analytical Report, Financial Action Task Force, Paris: FATF Secretariat, June,23. 2006.
- Financial Intelligence Unit. "Overview of FIU-IND." *Financial Intelligence Unit, Ministry of Finance, Government of India*. November 18, 2004. <http://fiuindia.gov.in/about-overview.htm> (accessed March 17, 2015).
- Germey, Haken. *Transnational Crime In The Developing World*. Analytical Report, Global Financial Integrity (GFI), , A Program of the Center for International Policy, Washington D.C.: Global Financial Integrity (GFI),, February, 2011.
- Group of Ministers, Government of India. *GROUP OF MINISTERS' REPORT ON "REFORMING THE NATIONAL SECURITY SYSTEM"*. Evaluatory Report on National Security of India, Group of Ministers, Government of India, New Delhi: Government of India, May 23, 2001.
- Institute for Economics and Peace. *Global Terrorism Index Report Measuring and Understanding the Impact of the Terrorism*. Analytical Report, New York: Institute for Economics and Peace, 2014, 21.

- Institute for Economics and Peace. *Global Terrorism Index Report: Measuring and Understanding of the Impact of the Terrorism*. Evaluatory Research Report, Institute for Economics and Peace, New York: Institute for Economics and Peace, 2014, 23.
- Jihad, Money. "Audit reveals ISNA funded militants." *moneyjihad.wordpress.com*. August 05, 2013. <https://moneyjihad.wordpress.com/2013/08/05/audit-reveals-isna-funded-militants/> (accessed March 27, 2015).
- Marwah, Ved. "India's Counterinsurgency Campaign in Punjab." Chap. 06 in *India and Counterinsurgency: Lessons Learned*, by Sumit Ganguly and David P. Fidler, 89. London: Routledge, 2009.
- Ministry of External Affairs, Government of India. "Fact Sheet on Jammu & Kashmir - In focus article." *mea.gov.in*. May 20, 2002. <http://mea.gov.in/in-focus-article.htm?18987/Fact+Sheet+on+Jammu+amp+Kashmir> (accessed March 01, 2015).
- Modi, Narendra. "Statement by H.E.Narendra Modi, Prime Minister of India, General Debate of the 69th Session of United Nations General Assembly." *www.un.org*. September 27, 2014. http://www.un.org/en/ga/69/meetings/gadebate/pdf/IN_en.pdf (accessed March 14, 2015).
- Nanjappa, Vicky. "How SIMI set up terror shop in Kerala once again with ease." *Rediff.com*. March 08, 2011. <http://www.rediff.com/news/report/how-simi-resumed-kerala-operations-with-ease/20110308.htm> (accessed March 17, 2015).
- . "JuD Used Charity Money to Fund Mumbai 26/11 attacks." *Rediff.com*, July 01, 2014.
- Pradhan, Ram, and V. Balchandran. *High Level Enquiry report on 26/11*. . High Level enquiry report, Government of Maharashtra, Mumbai: Government of Maharashtra, 2008.
- Press Information Bureau, Government of India. *Joint Statement of India-US Economic and Financial Partnership Dialouge*. February 12, 2015. <http://pib.nic.in/newsite/PrintRelease.aspx?relid=115406>.
- Press Information Bureau, Prime Minister's Office Government of India. "Speech by the Prime Minister at the SAARC Summit." *pib.gov.in*. November 26, 2014. <http://pib.gov.in/newsite/PrintRelease.aspx?relid=111876> (accessed March 18, 2015).
- Ramdas, P. "Mumbai blast accused was having free run in Kerala: NIA." *The New Indian Express*, November 06, 2012.

Schulmeister, Stephan. "A General Financial Transaction Tax: A Short Cut of the Pros, the Cons and a Proposal." *WIFO, Working Paper* (WIFO), October 2009.

Shapiro, Ari. "Obama Stays the Course on Terrorist Financing," accessed 3/20/09, pp. 1-4 available at -." *npr.org*. March 11, 2009.
<http://www.npr.org/templates/story/story.php?storyId=101676777> (accessed March 20, 2015).

Sharma, S. K., and Behra Anshuman. *Militant Groups in South Asia*. New Delhi: Institute for Defence Studies and Analyses and Pentagon Press, 2014.

Shekatkar, Dattatray B. "India's counterinsurgency campaign in Nagaland." Chap. 01 in *India and Counterinsurgency: Lessons Learned*, by Sumit Ganguly and David P. Fidler, edited by Sumit Ganguly and David P. Fidler, 24. London: Routledge, 2009.

The Holy Quran. *Surah Taubah (9)*. Vol. 09. Verse 60 vols. n.d.

US Department of States. "Anti-Money Laundering." *US department of States; Diplomacy in Action*. n.d. <http://www.state.gov/j/inl/c/crime/c44634.htm> (accessed March 18, 2015).

World Bank. "Gross Domestic Product 2010." *worldbank.org*. 2010.
<http://siteresources.worldbank.org/Datastatistics/Resources/GDP.pdf> (accessed March 28, 2015).

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