TERRORISM AND TRANSNATIONAL ORGANIZED CRIME: IRAN'S ISLAMIC REVOLUTIONARY GUARD CORPS (IRGC) - DUAL THREAT TO CANADA'S NATIONAL SECURITY

by

Timothy Opper

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Name:	*Timothy Opper*
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Examining Committee

Dr. Amy Prevost
GPC Chair
Director, School of Criminology and
Criminal Justice
University of the Fraser Valley

_____

Dr. Irwin Cohen, Associate Professor
Senior Supervisor
Associate Professor
School of Criminology and Criminal Justice
University of the Fraser Valley

_____

Dr. Raymond Corrado
External Examiner
Professor, School of Criminology
Simon Fraser University

_____

Date Defended/Approved: _____

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Abbotsford, B.C.

ABSTRACT

The Islamic Republic of Iran poses threats to its regional neighbors and the international community and has been identified as a state-sponsor for a number of terrorist organizations that share its anti-Western perspective. All of these activities are designed to project Iran's foreign policy and revolutionary ideals, the goals of which are regional and international hegemony. To assist in achieving these goals, Iran uses its Islamic Revolutionary Guards Corps (IRGC), whose involvement in transnational organized crime aids and abets terrorism and proliferation activities. In this Major Paper, the IRGC's activities in Canada are explored through an analysis of primary and secondary sources of information. This Major Paper argues that the IRGC represents a threat to Canada's sovereignty and Canadians' well-being, and also poses challenges to law enforcement, intelligence agencies, and Canada's national security.

DEDICATION

This Major Paper is dedicated to my wife and two children, thank-you so much for all of your support, help, and patience during my studies.

I also dedicate this Major Paper to my Mom and Dad, thank-you for a lifetime of unconditional love and support.

Love to all of you.

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ACRONYMS

ABWA – Ahlul Bayt World Assembly

AEOI – Atomic Energy Organization of Iran

AQ – Al-Qaeda

CBSA – Canada Border Services Agency

CBRN – Chemical, Biological, Radioactive, Nuclear

CIA – Central Intelligence Agency

CSIS – Canadian Security Intelligence Service

EU – European Union

FATF – Financial Action Task Force

FINTRAC – Financial Transactions and Reports Analysis Centre

IMF – International Monetary Fund

IRGC – Islamic Revolutionary Guard Corps

IRGC-QF - Islamic Revolutionary Guard Corps-Qods Force

IRPA – Immigration Refugee Protection Act

ISIL – Islamic State of Iraq and the Levant

JCPOA – Joint Comprehensive Plan of Action

MOIS - Ministry of Intelligence and Security

NATO – North Atlantic Treaty Organization

OECD – Organization for Economic Cooperation and Development

P5+1 – United States, United Kingdom, France, China, Russia-UN Security Council + Germany

QF – Qods Force

RCMP – Royal Canadian Mounted Police

RCMP-NICC - Royal Canadian Mounted Police-National Intelligence Coordination Centre

RCMP-NSP - Royal Canadian Mounted Police-National Security Program

TNOC – Transnational Organized Crime

UN - United Nations

UNODC – United Nations Office on Drugs and Crime

USD – US dollar

WB – World Bank

INTRODUCTION

The Islamic Republic of Iran (Iran) has been a controversial state since its founding in 1979 and it currently poses threats to its regional neighbors and the international community. Iran has been identified as a state-sponsor of terrorist organizations that share its anti-Western perspective, and the country has allegedly attempted to acquire the capability to produce nuclear weapons, much to the consternation of the international community (Alfoneh, 2013; Berman, 2016; Canadian Security Intelligence Service - CSIS, 2014; Jane's World Insurgency and Terrorism, 2015; O'Hern, 2012). These activities represent the strategic projection of Iran's foreign policy and revolutionary ideals, the goals of which are regional and international hegemony (Berman, 2016; Wigginton, et al., 2015).

To protect and advance its interests, Iran is also engaged in conventional warfare in various capacities with Sunni Islamic groups in Syria, Iraq, and Yemen. From a broader perspective, these conflicts reflect a proxy war between Shia Islam based Iran and its Sunni state rival, Saudi Arabia (Tabatabai, 2016). Intelligence agencies and international experts also identify Iran as an emerging cyber-terrorism/crime threat (Berman, 2016; Canadian Security Intelligence Service - CSIS, 2014).

This major paper will briefly discuss the Iranian Revolution of 1979 and the ideology behind the system of governance that it installed. This will include a discussion of how this relates to Iran's involvement in terrorism and Transnational Organized Crime (TNOC). This major paper will also define and contextualize the concepts and practices of terrorism and TNOC and relate them to Iran's activities. These discussions form the foundation for a review of the academic literature on the phenomenon of the convergence of TNOC and terrorism as it relates to Iran. The literature review will highlight the significance of

convergence to the international community, and demonstrate how Iran's Islamic Revolutionary Guard Corps (IRGC) is the focal point for the country's terrorism and TNOC activities.

The scope of Iran's activities related to promoting its interests and spreading its Shia Islamic revolutionary ideals is costly. The IRGC's role in TNOC allows Iran to support terrorist groups and engage in acts of terrorism. This is critical because the IRGC is the key player in control of Iran's ballistic missile program and drives the country's nuclear power/weapon ambitions. In this regard, this major paper will provide some examples of the IRGC's TNOC activities that aid and abet terrorism and the proliferation of nuclear technology.

As part of this major paper, the IRGC's potential presence and activity in Canada will be evaluated through academic literature and open source news examples that characterize the organization's mandate and practices. This analysis will demonstrate the negative effects that the IRGC has had in Canada. In a separate analysis section, it will be argued that the TNOC component of the IRGC's activity is a concerning issue for Canada's national security. This is compounded by the organization's terrorist and nuclear proliferation activities. Gaps in the academic study of the IRGC and its convergence with TNOC will be addressed, as will the challenges that hinder a better understanding of the organization and its relevance to Canadians.

Finally, this major paper will offer recommendations for solutions and strategies to address these issues. The parameters of this major paper do not allow for a detailed examination of all of the intricacies of the IRGC's international operations and internal machinations;

however, it does permit an opportunity to demonstrate that, due to a convergence of TNOC and terrorism, the IRGC poses a tangible dual threat to Canada's national security.

IRAN OVERVIEW

The Iranian Revolution and Governance

Lead by Ayatollah Khomeini, the Iranian Revolution of 1979 deposed the United States' (US) ally, Shah Reza Pahlavi, and installed a theocracy under the ideals of Shia Islam. Khomeini called for a pan-Islamic international revolution to eliminate all corrupt systems of governance (Alfoneh, 2013; Berman, 2016). He referred to this as jihad (holy war) of Muslims against enemies he considered to be "imperialists, their agents, Jews, and their machinations" (Alfoneh, 2013, p. 204). Khomeini's ideology is enshrined in the Iranian constitution. The IRGC has long perceived itself as the preeminent body in the exportation of the revolution, and in this regard the organization is active in most every region of the world (Alfoneh, 2013; Berman, 2016).

Theoretically, Iran is governed by a publically elected body of representatives referred to as the Majlis and a publically elected president who is the head of state (Hen-Tov & Gonzalez, 2011). Ultimately, the Supreme Leader controls the internal body and process that approves the candidates running for the Majlis and the presidency (Erdbrink, 2016). The people of Iran have very little voice in determining who they are represented by in government. In reality, Iran is a theocratic dictatorship that is ruled by the current Supreme Leader, Ayatollah Khamenei, who also serves as the commander-in-chief of the country's armed forces (Hen-Tov & Gonzalez, 2011; Rizvi, 2012).

A 1986 declassified US Central Intelligence Agency (CIA) memorandum identified the foreign policy objectives of the Iranian regime's use of international terrorism: expel American and Western influences from the Middle East, eliminate exiled opponents, and promote Islamic fundamentalism (Central Intelligence Agency - CIA, 1986). The IRGC deploys one of its five

branches to export terrorism both regionally and internationally as the exertion of Iran's Islamic ideals and foreign policy strategy. This branch is known as the Qods Force (QF) and is itself, a powerful entity whose activities have international impact.

The Role of the IRGC in the Iranian Revolution

During the Iranian Revolution of 1979, and in its immediate aftermath, the IRGC was comprised of several different militias that reflected either left wing political ideals, opportunists attempting to get rich from the revolution, or Islamist groups loyal to Khomeini (Alfoneh, 2013). Alfoneh (2013) explained that the National Guard was the largest of the four Islamist militias, and that its core was comprised of university graduates from the United States (US) and Canada. The Ayatollah Khomeini formally established the IRGC in May 1979 by consolidating the militias shortly after the conclusion of the Iranian Revolution of 1979 (Rizvi, 2012).

The original function of the IRGC was to protect the Islamic ideals of the Revolution and to guard Iran against internal and external counter-revolutionaries (Rizvi, 2012). Rizvi (2012) explained that the Iranian constitution enshrined the role of the IRGC as the protector of the Islamic purity of the country. The IRGC's role as a protector can also be characterized as an enforcer through internal and external political assassinations, and control and suppression of the movements and beliefs of the citizens of Iran (Ottolenghi, 2011).

Over time, the IRGC evolved into fully functional armed forces of Iran, but has always answered only to the Supreme Leader of Iran, Ayatollah Khamenei, the successor of Khomeini (Ottolenghi, 2011). A key turning point in its transformation was the Iran-Iraq War – 1980-1988, from which the IRGC emerged with substantial combat experience and prestigious stature (Ottolenghi, 2011; O'Hern, 2012; Frick, 2008). The IRGC's religious zeal, expressed through waves of combat suicide operations and fervent commitment to holding off the invading Iraqi

forces, earned the organization the reputation as the savior of the Islamic Republic. (Ottolenghi, 2011). Its increased post-war stature resulted in the IRGC taking control of the country's covert nuclear and ballistic missile programs. The West perceived Iran's nuclear program to be for the purpose of developing weapons rather than providing the country with another source of energy (Ottolenghi, 2011).

The Structure of the IRGC

The IRGC is a separate entity from the regular Iranian armed forces, known as the Artesh, which is comprised of conscripts. As an all-volunteer force with an elitist disposition, the IRGC maintains higher skill and attribute levels and religious devoutness than the Artesh (Hen-Tov & Gonzalez, 2011). This contrast in, and separation of, revolutionary forces from the regular forces was a deliberate strategy on the part of the victors of the 1979 Iranian Revolution (Ottolenghi, 2011). The IRGC was established as a counterbalance to the Artesh, due to suspicion of its lingering sympathies for the deposed regime of the Shah of Iran and the potential for a counter-coup (Ottolenghi, 2011). Although the number of personnel in the IRGC is less than the Artesh, it is the superior entity due to its constitutional mandate, direct line reporting and subservience to the Supreme Leader, control of the nuclear and ballistic missile programs, and its institutionalized place in Iran's economy and politics (Ottolenghi, 2011; Rizvi, 2012).

Estimates of the personnel numbers for the Artesh and the IRGC vary slightly depending on the sources consulted. According to Rizvi (2012), the Artesh maintains approximately 350,000 ground troops, 18,000 in the navy, 52,000 in its air-force, and another 40,000 paramilitary troops. This is contrasted with the IRGC that has 125,000-130,000 ground troops, 20,000 naval personnel, and 5,000 in the air-force (Ottolenghi, 2011; Rizvi, 2012). In addition to these numbers, the IRGC controls a 90,000 person unit, plus a 300,000 reservist domestic militia

known as the Basij, that is responsible for the day to day, street level enforcement of moral and religious laws (Frick, 2008). In a sense, the Basij operate as the eyes and ears of the Iranian government and can be found in government offices, industry, and post-secondary institutions (Frick, 2008). Upon the direction of the IRGC, the Basij played a key role in the violent suppression of Iranian citizens' protests in the wake of the contested results of the 2009 Presidential elections (O'Hern, 2012). The most important sub-entity, under the control of the IRGC, is the Qods Force (IRGC-QF/QF). The QF is the body that is a Listed Terrorist Entity as per the government of Canada and it is also a participant in TNOC supported by the Iranian government.

The Role of the IRGC in the Politics of Iran

The influence of former IRGC members in Iranian politics is commonplace. Ottolenghi (2011) indicated that many Iranian politicians and prominent figures in public life once served in the IRGC, including its intelligence and security functions. Former IRGC members have held cabinet positions in Commerce, Defense, Intelligence, Interior, and Energy. This is significant because this political influence transfers to economic power for the IRGC. Former IRGC members' participation in politics extends to the deputy minister and provincial governor levels (Ottolenghi, 2011).

Ottolenghi (2011) stressed that it does not necessarily mean that all former IRGC members represent a single political bloc. He pointed out that there are rivalries and factions amongst former IRGC members within the political realm, as there is within the IRGC. Hen-Tov and Gonzalez (2011) also mentioned that there is disagreement amongst observers of the IRGC about whether the organization represents a unified monolithic threat. However, Hen-Tov and Gonzalez (2011) identified a St Andrews University Iranian studies expert, Ansari (2010), who

contended that the loose relationships in the IRGC, which transfer to the political realm, are a source of strength for the organization. Ansari (2010) argued that the IRGC reflected a network and brotherhood in which personalities and relationships mean more than structure. It was also suggested that this fluidity makes the organization more of threat. This diffuseness makes it challenging to be aware of whom one is dealing with, as the political aspect of the IRGC transfers to the business side. As will be discussed below, the IRGC is heavily involved in business in Iran and around the world.

Safshekan and Sabet (2010) explained that since 2003, there has been a prevailing faction within the IRGC referred to as neo-principalists. The authors noted that this group presents a facade of Shia Islamic fundamentalism that has "anti-clerical, authoritarian, nationalistic, and pragmatic tendencies", and promotes economic development (Safshekan & Sabet, 2010, p. 550). This forms the basis for the authors' argument that the IRGC has evolved from its original purpose of protecting, promoting, and exporting the ideals of the Iranian Revolution to the militarization of the state and all of its institutions. Safshekan and Sabet (2010) further asserted that the Supreme Leader, Ayatollah Khamenei, is on side with the neo-principalist faction of the IRGC.

Hen-Tov and Gonzalez (2011) reached the same conclusion as Safshekan and Sabet, albeit more generically, that Iran is a de facto: military-led state. This notion has ramifications for the Iranian economy, and it may be argued that being a military-led state facilitates the convergence of the IRGC and TNOC (Helfstein & Solomon, 2014). The neo-principalist faction of the IRGC has a predilection to profit-driven activities, and, as will be discussed later in this major paper, the organization's direct involvement in internal and external illicit enterprises puts it in a position to work with elements of TNOC.

The Role of the IRGC in Iran's Economy

Background

Ottolenghi (2011) explained that the IRGC exploits its advantages in one sphere of Iranian society to augment its influence in another. For example, some IRGC officers have held the title of Chief Executive Officer (CEO) of key state-owned institutions prior to becoming CEO's of IRGC owned corporations (Ottolenghi, 2011). In 2011, a high-ranking IRGC officer left the organization to accept an appointment to be in charge of Iran's oil ministry. Ottolenghi (2011) strongly emphasized that this move signified the IRGC's taking control of Iran's most profitable asset. These examples help to explain the organization's interplay between the military, politics, and the economy in Iran. The profits from its financial enterprises fund its military activities and the enhancement of its ballistic missile and nuclear programs (Ottolenghi, 2011). This has the reciprocal effect of enhancing the IRGC's overall standing and reputation in Iran (Ottolenghi, 2011).

The IRGC controls an estimated 25 to 35% of the country's gross domestic product (GDP) (Hen-Tov & Gonzalez, 2011). Since approximately 2005, the IRGC has been the primary beneficiary of the liquidation of state assets in various privatization schemes (Hen-Tov & Gonzalez, 2011). During this time, the public sector share of Iran's GDP has gone from 80% to 40%. Hen-Tov and Gonzalez (2011) stated that the large transfer of wealth benefitted the IRGC and well-connected individuals within its broader network. This is significant because it puts the IRGC in a place of self-sufficiency, whereby, it does not need to be at the mercy of civilian and clerical leadership for funding (Hen-Tov & Gonzalez, 2011).

IRGC Companies

As per Ottenlenghi (2011), Khatam al-Anbiya (Ghorb) is the IRGC's civil engineering and construction firm and is managed by a council of the highest ranking officials within the organization's five main branches. The specific mandate of Ghorb is to develop the country according to the spirit of the 1979 Iranian Revolution (Ottolenghi, 2011). Ghorb is a massive conglomerate that is involved in many aspects of the Iranian economy. This IRGC corporation employs 25,000 engineers and staff, of which approximately 2,500 are IRGC members, and has 812 registered subsidiaries in Iran and around the world, with revenues of $12 billion as of 2008 (Rizvi, 2012).

Ghorb is deeply involved in Iran and abroad in the oil and gas industry, large industrial and critical infrastructure projects, and has a large stake in telecommunications inside the country (Hen-Tov & Gonzalez, 2011; Rizvi, 2012). The IRGC financially benefitted from Ghorb routinely being granted public contracts in the oil and gas and transportation industries, often in the form of a no-bid process (Frick, 2008). For example, in 2007 Ghorb was awarded a $1.3 billion contract to build a gas pipeline and a $2.09 billion contract to develop some natural gas fields in Iran (Frick, 2008). Katzman (2016) reports that the IRGC, Ghorb, and several of its subsidiaries, continue to be subject to US sanctions related to weapons proliferation.

Foundations – Bonyads

Bonyads are charitable foundations that are indirectly controlled by the Iranian government. It has been frequently reported that the bonyads were founded based on assets seized from the deposed Shah and his exiled wealthy supporters (Alfoneh, 2013; Maloney, 2000; Samii, 2006; Saeidi, 2009; Bakhash, 2008). The bonyads distribute various social welfare benefits to Iranian citizens, but are independent of governmental departments that provide

similar services (Universal Strategy Group, Inc., 2010). While the bonyads are involved in charitable good deeds, they are major business corporations operated by former high-ranking IRGC commanders (Safshekan & Sabet, 2010; Alfoneh, 2013).

One of the more prominent bonyads is the Bonyad-e Mostazafan (Foundation of the Oppressed of the Earth). The business interests of this charitable organization are diverse and include energy, mining, food and beverage, agriculture, manufacture of consumer goods, shipping (Bonyad Trade and Transport Organization – BTTO), domestic and international investments and real estate (Ottolenghi, 2011). Alfoneh (2013) described the bonyad as a surrogate used by the state to covertly fund IRGC operations. This is a plausible assessment because the mundane nature of some of the bonyad's business interests, and its dual status as a charity, conceal the clandestine funding of the IRGC. Another important bonyad is the Bonyad-e Shahid (Foundation of the Martyrs and Veterans Affairs), upon which the US has placed sanctions for its alleged role in funding groups involved in international terrorism (Katzman, 2016).

Supreme Leader Ayatollah Khamenei Linked Conglomerates

The Supreme Leader controls an entity referred to as the Headquarters for the Execution of Imam Khomeini's Order, also known as EIKO or Setad. Similar to the bonyads, Setad operates charitable trusts and a substantial business empire. Stecklow, Dehghanpisheh, and Torbati (2013) described Setad as an approximately $95 billion conglomerate with interests in the petro-chemical industry, real estate, weapons procurement, and telecommunications.

During testimony before a US Congressional hearing, Ottolenghi (2015) explained that the IRGC and Setad frequently do business together and are co-owners in a major telecommunication corporation in Iran. In 2013, Setad was subject to US Treasury Department

sanctions for posing a threat to the security of international finance (Ottolenghi, 2015). According to the US Treasury Department (US Department of the Treasury, 2013), Setad is comprised of a maze of 37 front companies that generates billions of dollars in profits for the Iranian government from unrecorded investments that are hidden from global financial regulations.

However, as part of the Joint Comprehensive Plan of Action (JCPOA) agreement on Iran's nuclear program signed in 2015 by Iran and the five members of the UN Security Council and Germany (United States, United Kingdom, France, China, Russia UN Security Council + Germany = P5+1), these sanctions have been lifted. There is concern that this allows Setad and the IRGC to continue to exploit the Iranian economy for their financial benefit; the proceeds of which are reinvested in the IRGC's facilitation and participation in terrorism (Katzman, 2016; Stecklow et al., 2013; Ottolenghi, 2015). Given Setad's inter-connectivity with the IRGC and its history of investment improprieties, one may argue that the organization is well placed to reap the benefits of legitimization that are provided by the JCPOA.

Private Companies

As a result of the privatization process, Rizvi (2012) reported that the IRGC is linked to potentially hundreds of companies that appeared to be private operations, but were actually run by former IRGC members. This provides the IRGC's financial empire with an informal network of current and former IRGC members that facilitate government business and IRGC interests (Rizvi, 2012). This has implications regarding the convergence of TNOC and terrorism. This broad informal network nurtured and exploited by the IRGC makes room for sharing of expertise, skills, and trafficking routes, and for the involvement of fixers, facilitators, and specialists that link TNOC groups/figures to terrorist entities.

TERRORISM

Definitions – Theory and Legislation

Hoffman (2012) assessed approximately 100 definitions of terrorism and distilled them into one that encompassed the most commonly reoccurring themes and concepts. The definition states that terrorism is the "intentional creation and exploitation of fear through violence, or the threat of violence, in the pursuit of political change" (Hoffman, 2012, p. 33). He stressed that the primary goal of terrorism is to spread fear broadly, throughout the public, beyond the initial targets of an attack. Hoffman (2012) also indicated that another goal of terrorism, in the aftermath of an attack, is for individuals and society, as a whole, to alter or change their lifestyle.

Canada's *Anti-Terrorism Act* was enacted in December of 2001 in response to terrorist attacks against Washington and New York on September 11, 2001. In many ways, the act resembles Hoffman's definition of terrorism. Section 83.01(1)(b)(i)(A) is considered the motives clause and defines terrorism as any act or omission, inside or outside of the country, that is committed for a political, religious, or ideological cause (Parliament of Canada, 2001). The legislation also refers to terrorism as an act that aims to frighten the public with respect to its general and economic security, thereby causing it to do, or refrain from doing, an act (*Anti-Terrorism Act*, 2001, s. 83.01(1) (b) (i)(B)). It should be noted that the *Anti-Terrorism Act* refers to attacks upon a person, segment of the public, the public as a whole, government, or domestic or international organizations.

The act also has provisions for terrorist attacks on what is considered Canada's critical infrastructure (*Anti-Terrorism Act*, 2001, s. 83.01(1) (b) (ii) (E)). Critical infrastructure is comprised of the various systems, facilities, technologies, networks, and services that underpin Canadians' health, safety, security, or economic welfare (Public Safety Canada, 2017). A terrorist attack on the country's critical infrastructure could directly cause loss of life and severe

injury and affect health and safety in the aftermath as a result of damaged and failing systems (Public Safety Canada, 2017).

The *Anti-Terrorism Act* is sufficiently broad and specific enough to cover domestic and international terrorist attacks, including conspiracies to conduct such attacks (Parliament of Canada, 2001). This legislation's inclusion of provisions that encompass Canada's critical infrastructure foretold trends such as cyber-terrorism. The legislation strikes a reasonable balance between public safety and recognition of Canadian's right to express themselves through civil disobedience, dissent, or withholding of labor in work stoppages (Parliament of Canada, 2001).

TERRORISM AND THE IRGC

Qods Force - Overview

Formed in 1980, the QF is comprised of approximately 10,000 to 15,000 men (Berman, 2016; Wigginton, et al., 2015). The QF plays a central role throughout the Islamic world in training, arming, funding, and backing terrorist organizations (Ottolenghi, 2011). This is an effective mechanism that allows Iran to express its revolutionary ideals by developing partnerships and affiliations for the purpose of distributing lethal best practices for terrorist attacks (Ottolenghi, 2011).

The QF operates covertly outside of Iranian borders, sometimes in Iranian embassies, to gather tactical intelligence and conduct surveillance to advance terrorist attack planning. The organization also coordinates the distribution of some of Iran's financial contributions to Islamic charitable causes (Ottolenghi, 2011). This puts the QF in a position to handle some the largesse of the bonyads, which do not always have well-intentioned goals.

Modell and Asher (2013) explained that the QF is also heavily engaged in more static exploits, such as working in front companies, religious/cultural/educational centers, and quasi-governmental bodies. For example, the Ahlul Bayt World Assembly (ABWA) serves as an

international public relations entity that speaks for the regime's revolutionary ideals and acts as a link between Iran's clerical elite and Shia clerics in other countries. ABWA also directly aids QF operations by using its cover to identify and recruit foreign students, assisting with intelligence collection, and transferring money and materials (Modell & Asher, 2013).

The QF has facilitated a variety of terrorist organizations and enabled them to conduct attacks around the world on behalf of their own cause. This assistance benefits the goals and ideals of the Iranian regime and serves to extend the reach of the country's foreign policy. The QF have armed and trained Shia groups such as Hezbollah, and numerous Iraq based Shia militias (Ottolenghi, 2011). It should be noted that a common Iranian practice is to support Sunni terrorist organizations, as it optimizes its networks and serves as a strategic measure to meet its needs. In this regard, the QF finances and arms Palestinian groups, such as HAMAS and Palestinian Islamic Jihad, in addition to other Sunni groups, such as the Taliban and Al-Qaeda (Ottolenghi, 2011).

Qods Force Support of Hezbollah

One example of the relationship between the QF and terrorism is Hezbollah. The group was established in Lebanon in 1982 by the QF. The QF was instrumental in consolidating several Lebanese Shia militias that were fighting the Israel Defense Forces, who had entered the country due to threats posed by entities active in the Lebanese Civil War (1975-1990) (Levitt, 2013; Blanford, 2011). The QF maintains a strategic and tactical partnership with Hezbollah, with the Iranians as the lead (Levitt, 2013). Iran deploys Hezbollah as a proxy force and as an extension of its foreign policy goals; they share a long-standing hostility towards the US and Israel (Levitt, 2013).

There are wide estimates regarding the financial support that the QF distributes to Hezbollah on behalf of the Iranian government. The common range of support is estimated to be $60 to $200 million per year (Blanford, 2011; Levitt, 2013; Jane's World Insurgency and Terrorism, 2015). However, these figures have been reported for years, and do not appear to have been updated recently (Levitt, 2005). It should be noted that Hezbollah allegedly receives funding from Iran's Supreme Leader's private charitable trust/business conglomerate, Setad (Levitt, 2005; Jane's World Insurgency and Terrorism, 2015). US sanctions on Setad have been removed and this may enhance Iran's ability to channel more funding to Hezbollah under seemingly legitimate auspices.

Hezbollah has been active as a terrorist organization since the early 1980s. The QF provides guidance and logistical support for these operations, sometimes coordinating strategy and planning with Hezbollah (Levitt, 2013; Jane's World Insurgency and Terrorism, 2015). For example, in 1983 the organization was responsible for hundreds of deaths as a result of attacks on the US and French armed forces barracks, and the US embassy, in Beirut, Lebanon (Levitt, 2013). In 1992 and 1994, Hezbollah operatives bombed the Israeli embassy and a Jewish cultural center in Buenos Aires, Argentina, killing a total of 114 people, and injuring hundreds more (Levitt, 2013). The QF has long been implicated in these attacks through the provision of funding and logistical support to Hezbollah.

Widdington et al. (2015) referred to statistics from 1979-2008 that indicated that Iranian agents conducted approximately 162 assassinations of regime opponents in 19 countries. In January 2010, the QF and Hezbollah began to strategize together on an approach to revenge some setbacks levied by the West's intelligence services. Hezbollah was still outraged and

vowed to retaliate for the 2008 assassination of one of its most revered leaders, Imad Mugniyeh, and Iran sought revenge for the assassinations of some of its nuclear scientists (Levitt, 2013).

The strategy agreed upon involved the QF targeting Israeli, US, and Saudi diplomats and related personnel, and Hezbollah attacking perceived soft targets, such as Israeli tourists. There were over 20 bombing or assassination plots from January 2010 to February 2012 (Modell & Asher, 2013). Other than the 2012 Bulgaria terrorist attack by Hezbollah, which was part of the strategy with the QF, the assassination of a Saudi diplomat by the QF in Pakistan in May of 2011, and the injuries suffered by four people as a result of a QF bomb placed on an Israeli embassy vehicle in India in February of 2012, the scheme was fraught with shoddy tradecraft and failures (Levitt, 2013). Planned attacks in Thailand, Georgia, Azerbaijan, Kuwait, and Turkey were thwarted by local authorities.

IRGC and QF involvement in Wars in the Middle East – Syria – Iraq – Yemen

The QF is involved in the wars in Syria and Iraq to protect the strategic and foreign policy interests of Iran (Modell & Asher, 2013). Iran perceives this area as part of its continuum of influence in the region. Ceding this territory to the Islamic State of Iraq and the Levant (ISIL) would pose national security threats to Iran and would greatly hinder the QF's operational capacity in the region (Modell & Asher, 2013). Preventing the fall of Syria or Iraq to ISIL is a paramount priority for Iran, and it uses its expeditionary QF to do so (Toumaj, 2016). The QF also supports the Al-Houthi Shia rebels in Yemen as an expression of Iran's foreign policy and in a direct challenge to Iran's arch state nemesis, Saudi Arabia (Wigginton, et al., 2015; Modell & Asher, 2013).

A German government official alleged that the Syrian regime has committed crimes against humanity on its own citizens, including torture, starvation, and the indiscriminate killing

of civilians during the Syrian Civil War (2011-present) and related combat against opposition forces, AQ, and ISIL (Karmon, 2016). The German government official further alleged that the QF and the militias that it established, trained, and armed are directly complicit in this activity (Karmon, 2016). Additionally, QF commanders allegedly impeded the evacuation of civilians from battle zones in Aleppo, Syria (Karmon, 2016).

According to the US Department of the Treasury (US Department of the Treasury, 2009), the QF armed and trained some of the Iraqi Shia militias that have killed American forces, Coalition Forces, and Iraqi Security Forces personnel. In 2009, the US Department of the Treasury designated the Iraqi Shia militia, Kata'ib Hizballah (aka: Hizballah Brigades-Iraq), as a Foreign Terrorist Organization on the basis of its attacks on American forces, Coalition Forces, and Iraqi Security Forces personnel (US Department of the Treasury, 2009). Kata'ib Hizballah is headed by an Iraqi citizen who is an advisor to the leader of the QF (US Department of the Treasury, 2009).

TRANSNATIONAL ORGANIZED CRIME (TNOC)

Definitions

Albanese (2004) identified several components that make up an organized crime organization; hierarchical structure, use of violence as an operational tool, corruption of public officials/authorities, strict membership criteria, non-ideological, security/secrecy- conscious, and planning oriented. This definition appears to be outdated because it considers an organized crime group to be hierarchical in structure. Much of the literature refers to the diffuse, network-based structure of organized crime groups (Shelley & Picarelli, 2002; Neumann, 2013; Mullins, 2009; Swanstrom, 2007; Helfstein & Solomon, 2014).

Transnational organized crime goes beyond internal territorial boundaries and is international in scope (Roberge, 2009). Referring to Williams' (2002) definition of TNOC,

Roberge (2009) added that it is a criminal enterprise that spans international borders. Rather than pure criminality, Williams conferred a business venture component to his definition of TNOC referenced by Roberge.

Based on a literature review conducted as part of a study for Public Safety Canada, Savona, Calderoni, and Remmerswaal (2011) defined organized crime as: involving three or more persons, systematic in planning and with assigned roles and tasks, informally hierarchical, profit driven without political or social goals, involving illegal activities, involving legal businesses operating as fronts for illicit activity and the use of violence or threats to gain power and influence. It is interesting to note that Savona et al. (2011) referred to the use of violence as a defining feature of organized crime. The use of violence in this respect is more tactical in nature compared with the strategic use of violence by terrorist organizations.

Savona et al. (2011) noted that the *Criminal Code* of Canada definition of organized crime denotes a group as three or more persons, inside or outside of the country, who are involved in a serious criminal offense that derives material benefit for one or more within the group. Under the *Criminal Code* of Canada, a serious criminal offense refers to an indictable offense that is punishable by five or more years in prison (Government of Canada, 2017). Although this aspect of the definition seems reasonable because it compels law enforcement to target sophisticated criminals, it tends to preclude organized petty crime that can be lucrative for a group. Bell (2006) described the Ressam group in Montreal and Vancouver in the 1990s as prolific petty criminals who were adept at pick-pocketing and simple frauds. Savona et al. (2011) explained that the Canadian definition of organized crime is similar to the United Nations (UN) Convention on Transnational Organized Crime, with the key common features being serious criminal acts committed by a group of three or more people for material/financial gain.

However, the UN Convention does not specifically define TNOC. It constitutes an implied understanding that TNOC encompasses criminal offences that occur in one State, but are orchestrated in another, crimes in one State committed by groups that have an operational presence in multiple States, and crimes perpetrated in one State that adversely affect another State (United Nations Office on Drugs and Crime - UNODC, 2017). The UN definition echoes the previous discussion regarding Roberge's (2009) perception of TNOC.

The UK Home Office's 2011 Organized Crime Strategy presented a more informal reference to organized crime. It stipulated organized crime to be individuals working together to commit serious crimes for the benefit of the group, with the usual elements of planning and coordination (Bergeron, 2013). The UK Home Office indicates that the motive for this type of crime is typically financial benefit, but there are exceptions, as in the instance of child sexual exploitation. This does not take into consideration that there may be organized crime groups that profit from the distribution and trafficking of such material.

Finally, the United States National Security Council (NSC) has a definition of TNOC. Given that the mandate of the NSC is to advise the President on national security and foreign policy issues, one may perceive that the US considers the TNOC to be a threat (United States Government, n.d.). The NSC definition emphasized that groups of individuals operate across borders for the purpose of acquiring power and monetary gain by way of illegal means, reinforced by corruption and violence (United States Government, n.d.).

Context

According to a UNODC assessment released in 2012, data for 2009 indicated that TNOC is an $870 billion dollar (USD) a year business that threatens global peace, security, and prosperity (United Nations Office on Drugs and Crime - UNODC, 2012; United Nations Office

on Drugs and Crime - UNODC, 2017). Some of the most lucrative, and particularly relevant to this major paper, examples of TNOC are money laundering, drug/weapons/human/migrant trafficking, infiltration of lawful businesses, and corruption/bribery of public officials (Penney, 2016). In 2009, estimates of annual profits for TNOC groups in drug trafficking were $320 billion (USD), $250 billion (USD) in counterfeiting of various consumer goods, $32 billion (USD) in human smuggling, and $7 billion (USD) in migrant smuggling (United Nations Office on Drugs and Crime - UNODC, 2012; United Nations Office on Drugs and Crime - UNODC, 2017; United Nations Office on Drugs and Crime - UNODC, 2017). More recent data indicates that on an annual, global basis, TNOC activity amounts to up to $1.5 trillion (USD) (Financial Transaction Reports and Analysis Centre of Canada - FINTRAC, 2015).

Shelley (1995) recognized TNOC as an enduring problem of the 20th century and an emerging threat to international stability over 20 years ago. The danger presented by TNOC goes beyond monetary figures, as it destabilizes the political, economic, and social systems of countries (Shelley, 1995). This can be a cyclical process that fosters further criminality that may degrade democratic institutions and the rule of law through the corruption of public officials in government and the legal system. TNOC groups also threaten the integrity of the economies of countries by infiltrating the banking/investment industry and legitimate commerce, which may influence the international monetary system (Shelley L. I., 1995; Shelley & Picarelli, 2002). As a testament to the threat posed by TNOC to the international economy, there are numerous bodies whose mandates involve facilitating cooperation between law enforcement agencies from the respective member countries (Dinev, 2014). These organizations include the Financial Action Task Force (FATF), the EGMONT Group of Financial Intelligence Units, the Organization for

Economic Cooperation and Development (OECD), the International Monetary Fund (IMF), the World Bank (WB), EUROPOL, and INTERPOL (Dinev, 2014).

The social consequences of the illegal activities of TNOC groups are often overlooked amidst the focus on massive amounts of profits (Shelley, 1995). TNOC's role in creating and feeding societal ills should be considered the crux of the issue. The misery caused by the strategic and planned practices of TNOC groups is measured in the deaths of innocents, victims of acts of violence, substance use and addiction, the degradation of trafficked human beings, and the exploitation of woman and children (Shelley, 1995; United Nations Office on Drugs and Crime - UNODC, 2012). From a public policy perspective, TNOC should be identified as an everyday public health and safety threat that should be a top priority for law enforcement agencies.

CONVERGENCE of TERRORISM and TRANSNATIONAL ORGANIZED CRIME

Background

The concept of a relationship between terrorist groups and TNOC has existed for several decades. Makarenko (2004) identified links between terrorist groups and drug trafficking going back to the 1970s. The terrorist groups represent diverse ethnicities and causes, such as the nationalism/separatism of the Kurdistan Workers Party (PKK) of Turkey, the Basque Homeland and Freedom Movement (ETA) of Spain, and Marxist/Leninist organizations such as FARC of Colombia and the Shining Path of Peru. Makarenko (2004) further noted that in the 1970s and 1980s, the PKK was well positioned geographically to profit from heroin trafficking from Asia to Europe.

The Cold War ended in 1991 with the official dissolution of the Soviet Union, and this precipitated the decline of state-sponsored terrorism (Makarenko, 2004). Subsequently, according to Makarenko (2004), organized criminal activities became a significant source of

funding for terrorist groups and the 1990s solidified the connection between crime and terrorism. Globalization also played a key role in providing criminals and terrorists with unfettered access to new technologies, international banking, and travel and transportation options (Makarenko, 2004; de Boer & Bosetti, 2015). It is in this environment that TNOC actors began to interact, and intersect with terrorist groups (Makarenko, 2004).

The Case against Convergence

One classic argument against the existence of a substantive connection between TNOC and terrorists is that there exist differences in motivation (Mullins, 2009). Through their violent actions, terrorists seek to elicit change in a political, ideological, or religious aspect of society, as opposed to the criminal whose primary goal is monetary/financial gain. Both engage in criminality, but the dichotomy of motivations is thought to preclude any real degree of cooperation (Mullins, 2009). TNOC groups do not want to overthrow the government or dramatically alter its make-up. Neumann (2013) further stated that TNOC groups benefit from a healthy state in many respects because it offers more opportunities to exploit and plunder. Although a TNOC group may benefit from the corruption, institutional decay, and lack of regulatory oversight of an unstable or failed state, a healthy state offers the critical infrastructure necessary for its criminal enterprise to flourish (Neumann, 2013).

Another common explanation against a tangible connection between TNOC groups and terrorists is that TNOC groups are averse to publicity and do not want to associate themselves with politically motivated violence (Dishman, 2002). As previously discussed, one of the goals of a terrorist is publicity for his cause that is generated beyond the initial attack. This type of publicity can make the smooth functioning of TNOC more challenging. Moreover, TNOC groups are typically not stricken with a moral dilemma with respect to cooperating with a

terrorist, but they are concerned about drawing law enforcement attention to themselves that may come about in relation to a terrorist attack. (Dishman, 2002). Law enforcement attention inhibits the generation of profit for the TNOC group. Similarly, Neumann (2013) noted that terrorist groups want to maintain separation from criminals for fear that the purity of their cause will be damaged by such a relationship. In this light, it is difficult to promote the group as freedom fighters if it is tainted with the association to 'common criminals'.

There is also the argument that the distinct financial and operational infrastructure requirements for TNOC and terrorists groups are vastly different, thus making cooperation less likely. Neumann (2013) indicated that TNOC groups have to convey larger amounts of money, goods, and people, in contrast with a terrorist group that may have less operational overhead. In reality, the day to day running of a terrorist group is just as cumbersome, as it also involves moving money, goods/material, equipment, and personnel. Neumann (2013) explained that an actual attack may be relatively inexpensive to carry out, but many terrorist groups have expenses and infrastructure related to training, safe-houses, websites, and the provision of social services to local communities.

The Case for Convergence

Still, a case can be made for the convergence of terrorist organizations and TNOC. Terrorist groups and TNOC both attempt to subvert governmental systems to achieve their goals (Neumann, 2013). According to Neumann (2013), TNOC and terrorist groups engage in a practice called activity appropriation in which criminal networks use terror methods, and terrorists take part in criminality. The activity appropriation is aided by their dealings with "shared fixers, specialists, and facilitators such as bankers, accounts, lawyers, shippers, real estate agents, travel agents, politicians, among numerous others" (Neumann, 2013, p. 251). This

process develops and flourishes as terrorists and TNOC often share the same international mechanisms to generate proceeds of crime and launder money, such as the same routes to traffic drugs, people, weapons, and counterfeit goods (Neumann, 2013). Terrorists and TNOC groups need to acquire the resources and means to achieve their goals, and these processes and people not only bring them together, but they begin to form more strategic partnerships (Neumann, 2013; de Boer & Bosetti, 2015). It is reasonable to perceive this as a business-like relationship in which cooperation and collaboration take place between these two entities because it is mutually profitable and beneficial (Björnehed, 2004; Mullins, 2009).

There is a body of literature that criticizes the theory that terrorism and TNOC are mutually distinct paradigms (de Boer & Bosetti, 2015; Shelley L. I., 1995; Shelley & Picarelli, 2002; Shelley L. I., 2006; Björnehed, 2004; Mullins, 2009; Makarenko, 2004). Shelley (2006) argued that the distinction is based on an out of date understanding of the issues; particularly that terrorists are solely motivated by ideology and that organized crime and TNOC groups are solely motivated by financial greed. The author argued that perceptions of organized crime are still mired in images of Traditional/Italian organized crime run by mafia bosses (Shelley L. I., 2006). She contended that this mentality has hindered intelligence and enforcement operations, as well as the development of sound public policy with respect to counter-terrorism endeavors.

Shortly after 9/11, UN Security Council Resolution 1373 acknowledged the close connection between international terrorism and TNOC (Björnehed, 2004). In NATO's 2010 Strategic Concept report, the organization identified terrorism, CBRN, drug/weapon/human smuggling, cyber-warfare, critical infrastructure protection, and energy security as new security threats to the international community (Bergeron, 2013). As has been discussed, many of these issues directly relate to TNOC and terrorist activity. It also should be noted that many of these

issues are representative of the Islamic Republic of Iran's facilitation of TNOC in furtherance of its state-sponsorship of terrorism.

State-Sponsored Terrorism – Convergence with TNOC

Helfstein and Solomon (2014) recognized a lack of research on the issue of state-sponsorship of organized crime groups compared to the sizeable body of literature on organized crime in general, and specific to possible convergences with terrorist groups. These researchers identified and discussed several key issues regarding state-sponsored terrorism converging with TNOC that are especially relevant to this major paper. Some states develop, foster, and direct non-state entities to further their foreign policy goals regionally and internationally. For example, Iran uses Hezbollah as a foreign policy tool by arming and funding the organization, which allows the latter to directly influence Lebanese politics (Katzman, 2017). Helfstein and Solomon (2014) added that states may also actively implement criminal ventures for economic purposes that may also advance its foreign policy. Although the relationships can be murky, the privileged political class, intelligence services, and organized crime figures are entwined in some countries (Helfstein & Solomon, 2014).

States, such as North Korea, Pakistan, and Iran, have constructed international criminal networks to subvert sanctions, and, in the case of Iran, engage in, and facilitate terrorist acts through proxies, such as Hezbollah and HAMAS (Helfstein & Solomon, 2014). In the case of Iran, state sponsorship and participation in terrorism are enabled by its intelligence services through secret, underground operations that are intended to obscure the country's involvement. Helfstein and Solomon (2014) further explained that a states' support of its criminal networks is also managed in the same manner. Helfstein's and Solomon's (2014) research and social network

analysis of the convergence of TNOC and terrorists led them to posit that a state intelligence representative acts as a liaison between the state and the criminal realm.

States that develop and maintain, or at least permit, illicit markets, facilitate the connectivity between TNOC and terrorist groups as they seek the benefits of cross-border activities that allow for overcoming sanctions, the transfer of weapons, and the targeting of enemies. Helfstein and Solomon (2014) further noted that countries with means and resources engage in illegal sub-state practices for the purpose of advancing revolutionary causes. The Cold War era example of this is the Soviet Union. A revolutionary state exercises its power derived from the resource base that it has available and from its terrorist and TNOC activity, to express and export its ideological goals (Helfstein & Solomon, 2014).

The researchers conclude by arguing that the revolutionary state of Iran and its IRGC are prime examples of the global exportation of terrorism and TNOC, which is accomplished through the IRGC'S control of internal licit and illicit markets and its covert international financial and procurement networks (Helfstein & Solomon, 2014). Neumann's (2013, p. 258) explanation of Farah's (2012) concept of the "criminalized state" provides a further understanding of Iran and the IRGC. In a criminalized state, the senior political leadership is tacitly aware of or directly complicit in TNOC endeavors and uses TNOC as part of the apparatus of its foreign policy. The advantage of a criminal state is that it may allow for the advancement of political, religious, or ideological goals, terrorism, accumulation of personal wealth, or all of these variables (Neumann, 2013). In this regard, the Islamic Republic of Iran can be characterized as a criminalized state.

IRGC AND QODS FORCE – TNOC CONVERGENCE

IRGC & QF – Front Companies – Nuclear and Ballistic Missile Program Ambitions

Modell and Asher (2013) explained that the QF constructed and developed an international business operations and infrastructure that facilitates the acquisition of nuclear and ballistic missile technology and equipment. The modus operandi of the QF is to set up seemingly genuine, revenue generating companies that allow the organization to operate across the world in a clandestine manner (Modell & Asher, 2013). The use of front companies, rather than shell companies, allows the QF to generate profits and act covertly. Frick (2008) observed that the military apparatus' of most countries are involved in spending money, not generating profits, and this is a distinctive feature of the IRGC inside of Iran, and the QF internationally.

However, the profits are used to finance the country's nuclear ambitions and ballistic missile programs. The IRGC is the custodian of Iran's nuclear program (Frick, 2008; Rezaei & Moshirabad, 2016). Rezaei and Moshirabad (2016) argued that the IRGC viewed the development of a nuclear weapons capability as a deterrent against its enemies and as a cover to export the revolution. The authors conducted a statistical analysis of the IRGC financial empire pre-sanction (before 2009) and during the sanctions period, and concluded that the organization still did well financially during the latter (Rezaei & Moshirabad, 2016). They reasoned that the rationale for the powerful IRGC's tacit support of the JCPOA, or non-opposition, was that it had evolved from a military/security body to a multinational financial entity that adhered to the bottom line of business (Rezaei & Moshirabad, 2016). This assertion by the authors has merit, but it is more reasonable to conclude that the IRGC's activities reflect that of a criminal state and that it saw the potential for more profits.

Some of the IRGC's businesses likely serve legitimate purposes, but in many instances, they do not. The IRGC uses some of its questionably legitimate businesses to launder the proceeds of crime, which are in turn used to finance illicit activities (Ottolenghi, Ghasseminejad, Fixler, & Toumaj, 2016). For example, by agreeing to the terms of the JCPOA, international sanctions against Iran were removed and this allowed the IRGC to enter into talks with France's largest cellular communication company to purchase a stake in Iran's largest cellular phone company (Ottolenghi, Ghasseminejad, Fixler, & Toumaj, 2016). The IRGC is the majority owner of Iran's largest cellular phone company in question.

Approximately 90 current and former IRGC members, entities, and companies will be removed from various international sanctions lists, which preclude doing business with Iran and the aforementioned, as will several smaller companies, including those involved in the acquisition or manufacturing of military material (Rezaei & Moshirabad, 2016). In this respect, the IRGC stands to benefit financially from the JCPOA. It should be noted that sanctions relief for Iran under the JCPOA does not pertain to its involvement in conventional weapons proliferation, ballistic missile program development, human rights violations, and terrorism (Ottolenghi, Ghasseminejad, Fixler, & Toumaj, 2016).

Given the statistical analysis by Rezaei and Moshirabad, it is reasonable to speculate that the IRGC will continue to do well in these areas even while subject to sanctions. Rezaei and Moshirabad (2016) concluded by observing that the JCPOA resulted in the removal of QF companies from sanctions lists that previously assisted its proliferation endeavors, support for terrorism, and bolstering of the Assad regime in Syria. The QF companies are now in a position to legally carry-out these internationally destabilizing activities.

Qods Force and the People's Republic of China (PRC)

As two modern day countries conceived through revolution, the PRC and Iran have been cooperating with each other for many years. Iran has relied on China to augment its defense industry since the early days of Iranian Revolution in 1979 (Taleblu & Megahan, 2016). China continues to provide Iran with ballistic missile technology and hundreds of billions of dollars are slated to be invested in Iran by the Chinese (Berman & Schanzer, 2016). Singh (2016) expressed concern that the recent JCPOA nuclear agreement between Iran and the P5+1 will embolden China to send more ballistic missile technology to Iran, in keeping with the two countries' expanding business relationship.

Prior to the signing of the nuclear agreement, Iran sometimes found it challenging to finance its global illegal proliferation operations. In this respect, the PRC played an important role in facilitating the TNOC activities of the QF. Referring to an unspecified Western intelligence agency reported on by Reuters (2014), Albright and Dishner (2014) described how private Chinese banks and companies played a key role in aiding the operations of the QF in these endeavors. Money is moved from accounts associated with QF companies in Iran to accounts of QF owned companies in Chinese financial institutions such as the Bank of Kunlun. The Bank of Kunlun distributed the money to entities that allow the QF to make purchases in China or to bankroll clandestine operations around the world. Albright and Dishner (2014) reported that there was no indication that the Bank of Kunlun or the Chinese government was aware of a QF link to the bank. Although there may not be tacit awareness in this instance, it strains the bounds of reason to suggest that the PRC is not familiar with Iran's IRGC or its QF component. For example, the US Treasury Department sanctioned Kunlun in 2012 for

transferring money associated with an IRGC linked company (US Department of the Treasury, 2012).

IRGC Cyber Terrorism - Emerging Threat/Trend

Rudner (2013) broadly described cyber-terrorism as the use of internet-based information technology to carry out disruptive and destructive procedures in the electronic, digital realm to create and promote violence or the threat thereof, for the purpose of advancing an extreme political, ideological, or religious belief system. Similarly, cyber-attacks can be characterized as the electronically "unauthorized access, use, manipulation, interruption or destruction of electronic information and/or the electronic and physical infrastructure used to process, communicate and/or store that information" (Public Safety Canada, 2016). Cyber-terrorism takes many forms, but the most common practices engaged in by Iran involve disrupting, altering, degrading, or destroying computer systems or illegally gathering sensitive, restricted, private, or classified information from public and private cyber-realms (Rudner, 2013; Kirsch, 2012). Rudner (2013) indicated that the cyber-security of governments' and countries' energy, transportation, utilities, and financial sectors are particularly valuable targets of cyber-terrorism/cyber-attacks because the prospect of harming an enemy's industrial and economic infrastructure is appealing to terrorist organizations and states involved in such activities (Rudner, 2013).

According to Rudner (2013), state-sponsored cyber-attacks are asymmetric weapons that represent a relatively low cost means to cause economic and secondary damage to a target. State-sponsored cyber-espionage involves stealing government and military information and privately held intellectual property and technological research and development, which may have governmental/military applications (Rudner, 2013). It may be argued that stealing this

technology is a more effective and efficient practice than a country engaging in its own research and production. Countries with thriving and advanced sectors, such as biotechnology, aerospace, and telecommunications, are attractive targets for state-involved or state-sponsored cyber-espionage (Rudner, 2013).

Iran is an emerging international cyber threat to the West, whose capabilities have grown in recent years (Kagan & Stiansen, 2015). Intelligence indicates that Iran has invested heavily in this area since 2010 and that the IRGC is the lead entity in the country (Berman, 2016; Ottolenghi et al., 2016). During US Senate testimony in February of 2016, the Director of National Intelligence ranked Iran as the third most dangerous cyber threat after Russia and China (Ottolenghi et al., 2016). The Director assessed that Iran lacked the skill and sophistication of Russia and the frequency of China's cyber-attacks.

Since 2012, Iranian cyber-actors have attacked or stolen very sensitive material from the networks of government agencies and critical infrastructure companies around the world (Berman, 2016). Cyber attacks have also been conducted on energy and utility companies around the world (Berman, 2016). It may argued that there is potential for the IRGC to exploit its cyber capabilities and engage in criminal activities such as online fraud. Companies seeking to invest in Iran's telecommunication and technology firms are cautioned, given the IRGC's involvement in cybercrime and its ownership of these types of enterprises (Ottolenghi et al., 2016).

IRAN'S STATE SPONSORED CRIMINALITY – QODS FORCE AND TNOC

Illicit Markets in Iran

The IRGC is the preeminent stakeholder in Iran's illicit underground economy and generates between $12-$30 billion per year (Ghasseminejad, 2015; Dehghanpisheh, 2010). All modes of conveyance of goods and entry into the country are controlled by the IRGC, and in many instances legitimate companies conceal illegal activity (Dehghanpisheh, 2010;

Ghasseminejad, 2015). The regime allows the black market to exist and is actively involved in it through the IRGC (Hen-Tov & Gonzalez, 2011; Keefe, 2013).

Drug Trafficking and Production

Overview

The QF directly engages in drug trafficking to supplement its terrorism and subversion campaigns around the world (Kronenfeld & Guzansky, 2013). Zand (2014) and Kronenfeld and Guzansky (2013) contended that the QF has been trafficking drugs for years and that the regime is allegedly complicit as part of a strategy to poison Western societies. The QF's partaking in this illicit industry allows it direct access to elements of TNOC and its platforms for human smuggling, fraudulent documents, money laundering, and unregulated underground banking, which in turn, facilitate terrorist operations.

Based on 2010 data from the UN, the global heroin/opiate drug trafficking market was estimated between $55-$65 billion – USD (United Nations Office on Drugs and Crime, 2010). Afghanistan accounts for approximately 80% of all heroin production in the world (United Nations Office on Drugs and Crime, 2015). Iran's geographical proximity to Afghanistan contributes to Iran being a significant transshipment point for heroin destined for Western markets (United Nations Office on Drugs and Crime, 2015). Kronenfeld and Guzansky (2013) claimed that the QF has established relationships with Afghan drug traffickers and well placed TNOC actors that move the product to Western countries.

In 2012, the US Department of the Treasury designated QF General Gholamreza Baghbani, who was in charge of a region in Iran that bordered Afghanistan, as a Specially Designated Narcotics Trafficker under the provisions of the Foreign Narcotics Kingpin Designation Act (Kingpin Act) (US Department of the Treasury, 2012). The QF General was allegedly responsible for permitting Afghani heroin/opiate traffickers to move the product

through Iran in exchange for assistance in transporting weapons to the Taliban on behalf of the QF. General Baghbani also orchestrated the smuggling of chemicals into Iran that are used in drug processing labs inside the country.

Qods Force in the Americas

Overview

During his 2016 Congressional testimony, the former head of the DEA asserted that the QF and Hezbollah remain prominent destabilizing entities the Americas (Braun, 2016). Berman (2014) argued that Iran's presence in the Americas reflects a methodical, long-range approach to exerting power in the region. The QF's presence goes back to the early 1990s with its assistance to Hezbollah in carrying out two terrorist attacks in Buenos Aires, Argentina (Wigginton, et al., 2015). Over the years, the QF has built up informal networks that allow for illicit activities.

As part of a far-reaching foreign policy, Iran set up formal relations with governments in the region that share similar anti-US perspectives and that have natural resources that are useful in developing Iran's nuclear and ballistic missile programs (Berman, 2014). Iran has economic links to Venezuela and other countries, such as Bolivia and Ecuador, and the QF has provided training to Venezuela's security intelligence and law enforcement bodies. Berman (2014) stated that Iran has established 11 embassies in the region and the various cultural centers that seem to go with them, and that provide the QF with an operational presence in a country. Humire (2014) explained that Iran's strategy to spread its influence and presence in the Americas progressed through a trajectory of cultural, diplomatic, economic, and military relations with the region's respective nations. While this may be a normal process for many countries, for a criminal state such as Iran, it offers a foundation for illicit activities. The Americas represent an arena for the QF and its proxy organization, Hezbollah, to engage in drug trafficking and money laundering (Berman, 2014).

Drug Trafficking

Braun (2016) stated that Hezbollah and the QF are involved progressively more in cocaine trafficking in the region. He indicated that his statement was not theoretical, but based on case after case of evidence that has been assessed through judicial scrutiny in US federal courts. Braun (2012) characterized Hezbollah and the QF as learning organizations that have benefited from the operational expertise of TNOC groups, such as the Colombian and Mexican drug cartels. As a result of this relationship, Hezbollah and QF operations continue to take advantage of and benefit from these TNOC groups' infrastructure for transportation, money laundering, human smuggling, and arms trafficking. The QF and Hezbollah are conscious of and interested in the operations of Mexican drug cartels in approximately 250 US cities (Braun, 2012). This may be perceived by the QF and Hezbollah as opportunities to penetrate the homeland defenses of the US (Braun, 2012).

QF and Los Zetas Mexican Cartel - Plot to Assassinate the Saudi Ambassador to the US

In 2011, an Iranian-American citizen from Texas was arrested for allegedly conspiring with QF members in Iran to have the Saudi Arabian ambassador to the US assassinated while in Washington, DC (US Department of Justice, 2011). Manssor Arbabsiar was a Texas used car salesman who allegedly arranged to contract members of the Los Zetas Mexican drug cartel to assassinate the Saudi ambassador on behalf of his cousin, a QF officer (Modell & Asher, 2013). However, the people that Arbabsiar met with were actually DEA confidential informants posing as Los Zetas members. In 2013, Arbabsiar was sentenced to 25 years in prison. (US Department of Justice, 2013).

This case is widely cited as the definitive example of Iran's capability and intent to conduct terrorist attacks against its enemies and of its links to Mexican drug cartels (Braun,

2012; Wigginton, et al., 2015; Levitt, 2013; Kronenfeld & Guzansky, 2013; Modell & Asher, 2013). However, there are numerous skeptics of the plot who point out its impracticality and improbability (Savage & Shane, 2011; Warrick & Erdbrink, 2011). The amateurish nature of the plan directly contradicts the narrative of the QF as an elite, highly connected, clandestine expeditionary power able to exert the world vision of the Iranian regime.

Levitt (2013; 2012) provided explanations for the poor QF tradecraft and rebutted the line of reasoning that the organization is averse to coordinating terrorist attacks with criminals. In October 2011, signals intelligence revealed that an Azeri organized crime group, with links to an unspecified Iranian intelligence body, transferred explosives and weapons from Iran into Azerbaijan. The Azeri group then assisted Iranian operatives with preoperational surveillance of Jewish schools, a US owned fast food chain, oil company offices, and the US embassy in Azerbaijan. An attack on the US embassy and staff was thwarted by Azerbaijan authorities in February 2012. This was part of a string of largely unsuccessful attacks previously discussed in this major paper. It has also been posited by Levitt (2012; 2013) that a quick succession of promotions of average QF members into management after 2009 resulted in weakened operational planning expertise.

There are numerous examples of public safety officials around the world and in Canada that appear to give credence to the QF plot to contract a Mexican drug cartel to carry out the assassination. The reaction to US law enforcement officials' explanation of the plot by high level people suggests that it had a degree of credibility (Savage & Shane, 2011; Warrick & Erdbrink, 2011). For example, Obama administration officials, particularly the Attorney General, spoke openly of the merits of the threat (US Department of Justice, 2011; US Department of Justice, 2013). There are official Canadian government documents that reference the plot as allegedly

orchestrated by the QF (Public Safety Canada, 2013). The Director-General of the UK's domestic counter-intelligence and security agency, MI5, noted the plot in a speech and suggested that it implied the knowledge/approval of the regime's leadership (Evans, 2012). In 2012, the Director General – Department of Foreign Affairs and International Trade – Middle East and Maghreb Bureau, Barbara Martin, mentioned the plot without any apparent skepticism during testimony before a Canadian Senate committee (Martin, 2012).

Warrick and Erdbrink (2011) discussed the possibility of rogue elements within the Iranian regime or the QF as being responsible for hatching a dangerously conceived plan to contract out an assassination of a Saudi diplomat in the US. The authors noted the competing interests in the regime at the time, and that it may have been a case of one faction attempting to embarrass the other by initiating the plan. As previously discussed, the IRGC has never been a homogeneous monolith that is impervious to internal dissension. The IRGC was formed amidst group factionalism in the immediate aftermath of the revolution, saw itself in the middle of a power struggle in 2009-2010 between the Iranian president and the Supreme Leader, and is currently controlled by a group of neo-principalists that have moved the organization and country towards criminal statehood.

CANADIAN CONTEXT

Terrorism – General

Since 2001, approximately 203 Canadians have been killed in terrorist attacks or fighting terrorism. A total of 45 Canadians have been directly killed in terrorist attacks, primarily in foreign countries, in addition to 158 Canadian Armed Forces personnel killed in Afghanistan (Public Safety Canada, 2013; The Globe and Mail, 2016; CBC News, 2017; Bell, 2014). The continually evolving nature of terrorism affects Canada.

In 2012, the government of Canada officially designated the Shia-based Islamic Republic of Iran as a state sponsor of terrorism due to its ongoing financial, material, and philosophical support of terrorist organizations, such as Hezbollah (Canadian Security Intelligence Service - CSIS, 2014). In 2014, CSIS assessed Hezbollah as a continuing threat to Canadians and Canadian interests due to its involvement in terrorist operations around the world and its direct participation in wars in the Middle East. The Canadian component of Hezbollah's international network continues to be involved in Canada in recruiting, fundraising, and procuring equipment and technology to further its operations around the world (Public Safety Canada, 2016). Moreover, Canadians' security and Canada's interests are at risk due to Iran's destabilizing actions and presence in the wars in Syria and Iraq, its nuclear proliferation ambitions, and cyber operations (Canadian Security Intelligence Service - CSIS, 2014; Public Safety Canada, 2013). Iran and Hezbollah are currently involved in combat in parts of the Middle East with Al Qaeda (AQ) and spinoff groups such as ISIL (Wigginton, et al., 2015).

According to Public Safety Canada (2016), the primary terrorist threats to the country are Sunni Islamic groups, such as AQ and ISIL, and individuals inspired by them. Canada maintains a national terrorist threat warning system to advise Canadians of threats to their safety. As of August 2016, the national threat level in Canada for an attack by one of these groups or an individual inspired by them was Medium (Public Safety Canada, 2016).[1]

[1] Canada's National Terrorism Threat Levels:
Very Low - a violent act of terrorism is highly unlikely – measures are in place to keep Canadians safe.
Low - a violent act of terrorism is possible but unlikely - measures are in place to keep Canadians safe.
Medium - a violent act of terrorism could occur – additional measures are in place to keep Canadians safe.
High - a violent act of terrorism is likely - heightened measures are in place to keep Canadians safe. Canadians are informed what action to take.
Critical - a violent act of terrorism is highly likely and could occur imminently – exceptional measures are in place to keep Canadians safe. Canadians are informed what action to take.
(Public Safety Canada, 2016, p. 10)

Since the passing of the *Anti-Terrorism Act* in 2001, there have been 20 persons convicted under its provisions (Public Safety Canada, 2016). An additional 21 individuals have been charged with terrorism-related offenses, 16 of these since 2015, and are awaiting trial or have warrants for their arrest (Public Safety Canada, 2016). It should be noted that there have been no publically documented instances of law enforcement investigations or arrests relating to QF activity in Canada or of young Shia Muslim Canadians traveling to the Middle East to fight in conflicts on the side of the QF. However, there are indicators that are suggestive of QF activity in Canada.

CANADIAN CONTEXT – QODS FORCE

Overview

The past five years have been eventful with respect to the government of Canada's foreign policy approach to Iran and its affiliated government bodies. Canada's Conservative government expelled all Iranian diplomats from the country in September 2012, and declared them personae non-gratae, while, at the same time, called home all Canadian diplomats from Iran (CBC News, 2012). The Conservative government's Foreign Affairs minister justified Canada's actions as a response to Iran's support of international terrorism and the Assad regime in Syria and its violation of human rights. Also, in September 2012, the Canadian government officially designated Iran and Syria as state sponsors of terrorism (Government of Canada, 2012). In December 2012, Canada listed the QF as a terrorist entity, but not the IRGC in its entirety (Canadian Security Intelligence Service - CSIS, 2014). The Canadian government refrained from identifying the IRGC as a terrorist group in its entirety due to concern about violating state immunity laws pertaining to a country's armed forces (Dubowitz, 2011).

Further actions by the Conservative government continued over the next two years. In May 2013, under the provisions of the *Special Economic Measures Act*, the government placed

additional sanctions on Iran regarding its nuclear proliferation activities and formally announced the cessation of almost all economic activity with Iran. By the spring of 2014, the government of Canada ceased to have any diplomatic contact with Iran (Canadian Security Intelligence Service - CSIS, 2014).

The election of a Liberal federal government in October 2015, suggested a different approach in Canada's relationship with Iran. In February 2016, the new government removed many of the sanctions on Iran with the exception of those related to specific individuals and those with military applications (Tasker, 2016). Proponents of the new approach included the Canadian Chamber of Commerce, who lauded the potential for business to take advantage of a market of 80 million people in Iran (Tasker, 2016). In June 2016, the government of Canada announced that it was in discussion with Iran regarding re-establishing diplomatic relations (Kent, 2016).

Although the change in Canadian foreign policy appears to represent a real benefit to the country's economy, there are potential ramifications. The convoluted nature of IRGC corporate involvement in Iran's economy and the QF's use of front companies in the international setting make it almost impossible for Canadian firms to practice due diligence in ensuring that they are conducting business with a legitimate company (Ottolenghi, 2011). One of the key tactics of TNOC is to infiltrate the legitimate economies of countries (Shelley & Picarelli, 2002). It may be argued that in Iran's case, this process is facilitated by the country being a criminal state. The change in Canadian foreign/trade policy also facilitates this because it instantly legitimized some nefarious business enterprises. It appears that the federal government's justification for this is the lure of financial profit and job creation for Canadian businesses. All of this has potential

ramifications for Canadian law enforcement and security intelligence as enterprises that span the TNOC and terrorism continuum gain access to Canadian markets and industry.

Overview - Qods Force Proliferation Activities in Canada

Wikileak documents from 2008 indicated that front companies have been set up in Canada by hundreds of Iranian, Chinese, and other foreign citizens to export controlled technologies back to their home countries (Freeze, 2011). Iranian proliferation activities in controlled technologies in Canada are a major concern for CSIS and they are one of the several threats posed to the country by Iran (Yaworski, 2011). The threats include espionage and attempts to exert foreign influence in Canada through religious, cultural, and educational liaison (Yaworski, 2011). These pursuits are synonymous with QF endeavors to acquire technology to advance its nuclear and ballistic missile programs. Iran is attempting to acquire technology and knowledge from Canadian sources to advance these programs (Yaworski, 2011). Canada's sophisticated technology sector and free trade policies make it ripe for exploitation by the QF (Yaworski, 2011).

The QF uses front companies to acquire the materials that it needs and the organization is very adept at avoiding law enforcement and regulatory body attention by frequently changing company names, involving multiple companies in transactions, and falsifying statements declaring the end use of products and technology (Yaworski, 2011; Leckey, 2011). Canada Border Services Agency (CBSA) encounters unscrupulous intermediaries, like freight forwarders and brokers, who alter end destination and user certificates of technology destined for Iran or elsewhere (Leckey, 2011). Leckey (2011) referred to other modus operandi of Iranian operatives that speak to QF expertise.

For example, it is common for operatives to sidestep ports with high enforcement rates or to shift modes of transport if detection rates are higher in one area. Leckey (2011) explained that it is also common for the QF to use third-country transshipment centers and duplicitous freight forwarders who alter manifests. Many of these techniques and relationships are suggestive of the involvement of intermediaries that may be connected to TNOC elements (Neumann, 2013). These persons, previously referred to as fixers and facilitators, are important nodes that may connect TNOC elements with terrorist agents.

Obstacles and Barriers in Countering Qods Force Proliferation Activity in Canada

The proliferation issue is incredibly complex, often involving multiple companies, countries, bank accounts, and individuals. This makes it difficult to develop intelligence and conduct enforcement investigations for the purpose of prosecution (Yaworski, 2011). Yaworski (2011) stated that information sharing protocols between CSIS and its partners, including the RCMP, are working well. However, the RCMP and law enforcement, in general, remain challenged by disclosure issues regarding moving intelligence to evidence for the purpose of criminal prosecution (Cabana, 2011). This situation is not unique to Canada, as US agencies experience similar challenges when using intelligence to further criminal prosecutions (Freeze, 2011). Compounding this problem is that CSIS receives most of its information from foreign security intelligence services that it cannot share with the RCMP (Yaworski, 2011). According to Yaworski (2011), from a security intelligence perspective, Canada consumes more intelligence than it produces. This is a situation that must change as Canada needs to generate more of its own security intelligence for a variety of important reasons, including easing the intelligence to evidence process.

Another issue that arises from counter-proliferation investigations is the sheer volume of the activity. In 2008, CBSA indicated that it was inundated with investigations of Iranian and Chinese nationals, and Canadians with dual citizenship using front companies to conceal their efforts in acquiring controlled goods technology (Freeze, 2011). CSIS, the RCMP, and CBSA have adapted to all these obstacles by emphasizing that successful outcomes of investigations do not often equate to criminal convictions, but instead involve levying fines, seizing goods and equipment, preventing sensitive Canadian technology from illegal exportation, and collecting more information on suspect companies and individuals (Senate of Canada, 2011). It is crucial that Canadian authorities take the opportunity to exploit the collected information to fill intelligence gaps and to facilitate proactive enforcement action.

Examples – Qods Force Proliferation Activities in Canada

It should be noted that none of these case studies presented below specifically refer to or implicate the QF. However, given the nature of the operations, the orientation towards Iran, the technologies being exported, and the modus operandi of the use of front companies, it is reasonable to surmise that these are indicative of QF activity in Canada. At the very least, these cases suggest the involvement of criminal intermediaries that facilitate access to markets on behalf of terrorist groups or their intermediaries. It may be argued that these cases suggest the convergence of TNOC players and those of the criminal state of Iran.

Mahmoud Yadegari

In 2010, Yadegari became the first person in Canada to be convicted of supplying nuclear equipment to Iran (Gillis & Armstrong, 2010). Yadegari allegedly contacted over 100 people and sent over 2000 emails across North American trying to locate and acquire equipment used in the enrichment of uranium for nuclear fuel. The bigger story, in this case, is the TNOC network that

played a role in supplying nuclear technology and equipment. The individual directing Yadegari from Iran was Nima Alizadeh Tabari, who had numerous people working for him, including others in Canada. Tabari's company in Iran, Tajhiz Sanat Ideal (TSI), dealt with the acquisition of just about anything, including nuclear technology. A Maclean's magazine investigation revealed that Tabari was part of a network of others involved in nuclear proliferation (Gillis & Armstrong, 2010). Maclean's investigative journalists learned through an unspecified law enforcement contact that, TSI is a front company for Kalaye Electric Company in Iran, which is a branch of the Atomic Energy Organization of Iran (AEOI) (Gillis & Armstrong, 2010). The AEOI is a civilian body that conducts nuclear research on behalf of the IRGC (Frick, 2008; Rezaei & Moshirabad, 2016).

Tabari and TSI take advantage of an Iranian government program that pays anyone that can deliver controlled goods technology (Gillis & Armstrong, 2010). Independent contractors like Tabari stand to earn a lot of money in the high-risk proliferation business. According to a US Immigration and Customs Enforcement (ICE) official, this is profit oriented criminal activity on the part of bigger players like Tabari and low-level players such as Yadegari. Another ICE official indicates that individuals get involved in this criminal enterprise via connections through relatives or through relationships originating from military service in Iran. An unspecified Canadian investigator suggested that there are thousands of individuals like Tabari around the world. The CSIS Director at the time of the Yadegari investigation publically reported that Toronto is a refuge for nuclear proliferators (Gillis & Armstrong, 2010). Yadegari was originally sentenced to four years and three months in prison (Toronto Star, 2011). In 2011, an Appeal Court judge in Ontario reduced his sentence by three months and based on credit for double time served, Yadegari is presumably a free man today.

Dr Reza Akrami

In May 1998, Greater Vancouver area residents Reza Akrami and Mohsen Lessan were arrested locally for allegedly attempting to acquire missile guidance technology and fighter jets from a US undercover officer (Depalma & Bergman, 1998). They were released on bail and the US unsuccessfully attempted to extradite the retired doctor, and Lessan, a real estate agent. Akrami allegedly received a fax from an unspecified government official in Iran who was looking for the hardware. Other faxes indicate that Akrami's contact in Iran was willing to pay for the transaction with a large quantity of heroin. Akrami backed away from the deal and subsequently denied any wrongdoing (Depalma & Bergman, 1998).

During testimony in 2012, before a US congressional committee, former DEA chief, Michael Braun, reported that it was common practice to trade narcotics for high-level weapons systems and other valuable contraband (Braun, 2012). He went on to assert that "there is ample evidence that the Qods Force routinely attempts to trade heroin for sanctioned military equipment of value; the number of times they succeed in their attempts is anyone's guess" (Braun, 2012, p. 12). While the circumstances of the Akrami case are not entirely clear, it is interesting to note the possibility of QF modus operandi in action, and Braun's testimony bears a warning for law enforcement and national security investigations in Canada.

Qods Force in Canada: General Presence and Operations

The QF has a covert presence in Iranian embassies around the world, which are sometimes complimented by a contingent of Iran's Ministry of Intelligence and Security (MOIS), a non-IRGC, civilian agency (Frick, 2008; Meir Amit Intelligence and Terrorism Information Center, 2012). Iran has a history of using its embassies as clandestine staging grounds for terrorist attacks, general gathering of intelligence, and modes to intimidate dissidents

of the regime that live in other countries (Ottolenghi, 2012). According to Ottolenghi (2012), QF operatives sometimes get hired at an embassy as non-diplomatic staff, such as drivers, janitors, or as administrative personnel.

Under the guise of diplomatic cover, QF operatives travel internationally and gain access to the societies that they infiltrate (Ottolenghi, 2012). QF operatives establish and maintain outreach to charitable, religious, cultural, and educational institutions that provide the organization with the operational flexibility to conduct subversive activities and to propagate the ideals of the Iranian revolution (Meir Amit Intelligence and Terrorism Information Center, 2012; Dubowitz, 2013). Information suggests that there may have been a QF presence in Canada.

In July 2012, allegations arose that the Iranian embassy in Ottawa was involved in recruiting Iranian-Canadians to subvert Canadian interests on behalf of the regime (Carlson, 2012). Hamid Mohammadi, a cultural affairs counselor at the Iranian embassy, allegedly told a Farsi language news interview that Iranian-Canadians should seek to "occupy high-level key positions", and he noted some were currently in prominent government jobs (Carlson, 2012). The cultural affairs counselor also explained plans to use cultural outreach in Canada as a ruse to recruit Iranian-Canadians to work as agents of the Iranian regime.

A 2012 CBSA intelligence assessment on Iranian migration trends to Canada acquired by the National Post revealed concerns about the involvement of TNOC figures facilitating the migrants' travel, and their motives or goals upon arrival (Canada Border Services Agency, 2012). The report indicated that involved human smugglers were connected to organized crime figures inside and outside of Canada. This determination was based on information provided by the migrants.

From 2008-2012, 19 Iranians were deemed inadmissible to the country under Section 34 of the *Immigration Refugee Protection Act* (IRPA) regarding threats to national security (Canada Border Services Agency, 2012). Keeping in mind the context of the CBSA assessment, Section 34 refers to some activity that can be characterized as classic QF, namely espionage, subversion of democracy/government and related institutions, engagement in terrorism, and generalized threats to Canada's national security (Government of Canada, 2017). Although 19 individuals over five years represent a minuscule number in terms of exclusions, it is difficult to qualify/quantify the impact that this may have had on Canada's national security.

From 2008-2012, two Iranians were barred from entering the country under Section 37 of *IRPA* that refers to organized criminality (Canada Border Services Agency, 2012). It should be noted that Section 37(b) refers to TNOC activities, such as human smuggling/trafficking and money laundering (Government of Canada, 2017). From 2008-2012, 125 Iranians were ruled inadmissible under Section 36(1) related to serious criminality (Canada Border Services Agency, 2012). The *IRPA* provisions barring Iranians due to serious/organized crime do not necessarily preclude the possibility that these individuals were QF members or intermediaries in its international criminal network.

There are indications that the Iranian regime has been behind cyber-attacks that have targeted Canadian critical infrastructure. Since 2012, Iranian groups and individuals with alleged close links to the IRGC have conducted cyber-espionage operations with the intent of stealing sensitive information and materials from the networks of Canadian government agencies and critical infrastructure companies (Berman, 2016). For example, cyber-attacks were aimed at Canadian energy and utility companies (Berman, 2016). Iranian cyber-attack entities also have an internal presence within the Canadian cyber-realm. According to Kagan and Stiansen (2015),

some of these groups/individuals are subjected to international sanctions and others are linked to the IRGC. They all host websites, mail servers, and other IT systems in Canada and other Western countries (Kagan & Stiansen, 2015).

CANADIAN CONTEXT – TNOC

Roberge (2009) claimed that Canada was susceptible to TNOC groups, but contended that it was not necessarily a preeminent target for TNOC. He noted that the country's long border with the US and accessibility to the Pacific and Atlantic oceans make Canada appealing to TNOC groups. Roberge (2009) added that perceptions of Canada as having more lenient criminal justice and immigration systems than the US are positive draws for TNOC groups. The contradictory nature of Roberge's analysis reflects his concern about a lack of empirical study of organized crime and TNOC from the political science discipline. Roberge (2009) argued that much of the information about TNOC in Canada is provided by governments that are focussed on informing and influencing the public's perceptions of the issue.

Charters (2007) contended that because TNOC transcends international boundaries and affects more than one country, it is inherently a foreign policy matter. According to Charters (2007), TNOC is a national security threat due to its potential to destabilize various functions of a country. However, in his study, Charters referred to rather dated information and research on TNOC groups' activities in Canada, which he argued only amounted to an indirect threat to national security.

Hataley and Leuprecht (2013) also pointed to Canada's geographical proximity to the US border as a factor that allows TNOC groups to operate freely across international and provincial boundaries. The authors gave more credence than Roberge and Charters to the threat posed by TNOC to Canadian and US economic and national security. Hataley and Leuprecht (2013)

referred to a 2010 RCMP Integrated Border Enforcement Team (IBET) assessment of the Akwesasne reservation that straddles the New York state and Ontario and Quebec borders, and how it benefited TNOC groups through the facilitation of free flows of numerous types of contraband in both directions. Statistics cited below are strongly suggestive of TNOC activity in Canada, and generally, support the perspective of Hataley and Leuprecht.

In March 2012, the former head of the US Drug Enforcement Administration (DEA), Michael Braun, quoted UN data while testifying before a US Congressional hearing. Braun stated that, of the estimated $322 billion (USD) in the annual international drug trade, $147 billion (USD) could be attributed annually to the North American market, constituting Mexico, the US, and Canada (Braun, 2012). Another estimate for the North American market placed the figure at approximately $142 billion (USD) (Organization of American States, 2013). In both instances, these are references to UN data from 2003 that was released in 2005.

Former RCMP Superintendent Rick Penney (2016), OIC of the Greater Toronto Drug Section between 2009 and 2013, estimated that the proceeds of crime laundered by TNOC in Canada to be $5-$15 billion per year. This appears to be the most recent data pertaining to TNOC money laundering in Canada, as the IMF referred to the same numbers in a recent assessment (International Monetary Fund, 2016). Roberge (2009) refers to an RCMP estimate that places the figure at $5-$27 billion per year.

FINTRAC, Canada's financial intelligence analysis program, stated that yearly, hundreds of millions of dollars of proceeds of crime are frozen to inhibit the laundering process (Roberge, 2009). Roberge questioned the impact of freezing hundreds of millions of dollars when billions are at play. One may speculate that if there are still billions of dollars left for TNOC groups after government agencies have seized hundreds of millions, then there is little discernible impact on

these groups. Roberge (2009) claimed that available statistics on this topic are a challenge to use from a research outlook and he added that depending on the figures referred to, the TNOC threat can be minimized or overstated.

Akhavan (2011) claimed that many upper-level figures in the Iranian government and their family members have made homes in Canada. Elites of the regime have allegedly invested several million dollars in real estate in Toronto and elsewhere in the country (Akhavan, 2011). The implication is that the wealth is derived from illicit means and that it may be part of money laundering schemes (Akhavan, 2011). Although anecdotal, two individuals from the Iranian dissident community in Greater Vancouver have expressed concern that recent Iranian immigrants tend to have more extreme religious views than those who came to Canada in the early days after the revolution in 1979 (Todd, 2016). There are similar allegations that individuals with unspecified links to the Iranian regime are investing in high-end property in the Greater Vancouver area and have influence within some mosques (Todd, 2016).

With respect to drug trafficking, Afghani heroin trafficking routes typically follow three particular paths; the Balkan route, northern route, and the southern route. The southern route, which spans Iran, Pakistan, and India, is the most relevant with respect to heroin that ends up in Canada (United Nations Office on Drugs and Crime, 2015). A 2015 UN report referenced RCMP National Intelligence Coordination Centre (NICC) data that indicated that between 2009-2012, approximately 90% of heroin seizures in Canada originated from Afghanistan (United Nations Office on Drugs and Crime, 2015). The data also indicated that 50% of the seizures were channeled through the southern route. As of 2011, Middle Eastern and Asian Organized Crime groups in Canada and overseas were key players in smuggling heroin to Canada (United Nations Office on Drugs and Crime, 2013).

As previously discussed, the QF and Hezbollah are aware that Mexican drug cartels have a presence throughout the US (Braun, 2012). The QF and Hezbollah may perceive this scenario as an opportunity to make headway into the US for potentially facilitating future terrorist attacks (Braun, 2012). Canada is not immune to the presence of Mexican drug cartels operating in the country. A 2015 Vancouver Sun article referenced an internal RCMP report that indicates that cartel members are directly involved in Canada in the importation and distribution of cocaine, and money laundering (Bolan, 2015). A high ranking Vancouver Police Department officer estimated the number of upper echelon Mexican cartel members in the region to be 12-25 (Bolan, 2015).

As of December of 2016, Canada no longer stipulates that citizens of Mexico must obtain a visa in order to travel here. An internal CBSA assessment of the implications of the change was obtained by Canadian media, and it predicts that Mexican cartels will exploit the new policy to expand their presence and operations in the country (Bolan, 2016). One may argue that the broader concern is that terrorist operatives may attempt to enter Canada using fraudulent identity documents that portray themselves as Mexican citizens. A 2012 declassified CBSA intelligence report identified Mexico City, Mexico, and Caracas, Venezuela as two of the four most common departure points for Iranians migrating to Canada (Henderson, Humire, & Menéndez, 2014). It is a common practice for individuals and groups involved in TNOC and terrorism to use fraudulent or stolen identity and travel documents to facilitate illegal activities (INTERPOL, 2017).

ANALYTICAL CONCLUSIONS

Shelley and Picarelli (2002) asserted that the social, political, criminal, and public health and safety issues created by TNOC groups and terrorists will be the definitive national security public policy concern for nations for the 21st century. The authors contended that states that

continue to address TNOC and terrorism as unrelated issues will not be successful in combating these co-threats to a country's national security (Shelley & Picarelli, 2002; Shelley L. I., 2006). In this light, it is reaffirmed that Iran's Qods Force represents a co-threat to Canada's national security due to its entrenchment in TNOC and terrorism.

On one hand, the current Government of Canada recognized the threat that Iran and the QF present to the safety and stability of Canadians and the international community at large. The government expressed its concern regarding Iran's state-sponsorship of terrorist organizations, threats towards Israel, ballistic missile program, and its nuclear capability ambitions (Global Affairs Canada, 2016). Since 2003, Canada has lead UN resolutions regarding the human rights abuses in Iran, and it continued this tradition in 2016 (Global Affairs Canada, 2016).

Alternatively, the Government of Canada supported the JCPOA nuclear agreement between the P5+1 and Iran that curtails the latter's nuclear program for 10-15 years and is currently intent on re-establishing diplomatic and economic relations with Iran (Global Affairs Canada, 2016). Canada followed the lead of the US, UK, EU, and the UN and removed many of the sanctions placed on Iran for its previous active pursuit of a nuclear capability. The Government of Canada removed the previous government's sweeping sanctions that went beyond the requirements of the UN, and opened the door to renewed trade, investment and the provision of financial services between Iran and Canada, and Canadian businesses (Global Affairs Canada, 2016). However, the sale of certain restricted goods to Iran is still banned.

Export of goods and services to Iran from Canada were close to $800 million in 1997 and plummeted to $46 million in 2014 as a result of the sanctions prohibiting trade with Iran (Global Affairs Canada, 2016). The Canadian Government indicated that its new policies free up business relations with Iran and will allow Canadian companies competitive access to the

burgeoning marketplace comprised of 80 million people in Iran. Although the Government urged Canadian companies to use caution and exercise due diligence in conducting business in Iran, it has clearly prioritized economic development and cooperation with a criminal state over the dual national security threat to Canadians posed by Iran and its QF.

The QF and its business activities, illicit front organizations, terrorist group facilitation, and subversive operations represent a threat to Canada's territorial and economic sovereignty. Canadians should be alarmed that agents/operatives of foreign governments live amongst them and use the country's freedoms, infrastructure, and prosperity to aid, abet and propagate ideologies that directly threaten Canada's national well-being and interests. The QF's involvement in international money laundering schemes and the alleged use of illicit funds to invest in Canadian real estate by members of the Iranian regime pose a threat to the integrity of the Canadian economy.

There should be concern about the potential threat to the security of Canada's oil and gas sectors. IRGC owned/affiliated oil and gas corporations had a presence in the Canadian energy industry in Alberta (Ottolenghi, 2011). For example, the parent company of Kala Naft Canada, Kala Naft Co, was sanctioned in 2010 by the US and the European Union due to alleged illegal procurement actions (Iran Watch, 2016). In 2015, Japan restricted Japanese companies from doing business with Kala Naft Co due to concerns about the company's involvement in the procurement of biological, chemical, and nuclear weapons (Iran Watch, 2016). The United Kingdom took the same approach in 2015 due to concerns regarding the company's proliferation activities relating to weapons of mass destruction (Iran Watch, 2016).

In addition to cyber-attacks on Canada's critical infrastructure by IRGC affiliated entities, there have been alleged instances of Iranian embassy personnel trying to subvert and co-opt

Iranian-Canadian citizens, religious, cultural, and educational institutions in Canada to spread the ideals of the Iranian Revolution of 1979. In 2012, the Canadian government expelled a member of the Iranian embassy for a variety of similar activities (CBC News, 2012; Carlson, 2012). Although the embassy official was not identified by the media as a QF operative, it is reasonable to surmise that this was his role here because it is classic modus operandi for QF operatives to conduct operations in and against its host country while stationed in Iranian embassies.

Moreover, the PCJOA agreement of 2015 slows Iran's path to nuclear capability. However, the tangle of international front networks established by the IRGC to circumvent the original sanctions regime remains intact and is used to enhance Iran's ballistic missile program. As previously reviewed in this major paper, the networks involve an array of intermediaries and special facilitators associated to TNOC. A February 2017, US Department of the Treasury press release indicated that the department sanctioned multiple networks and supporters of Iran's ballistic missile procurement efforts (US Department of the Treasury, 2017). The sanctions process involved identifying and placing entities on a list that precludes other companies and individuals from conducting business with them. Recently listed were an important Iranian procurement agent and eight people and companies in his Iran/China-based network (US Department of the Treasury, 2017). This is significant because it illustrates the ongoing militaristic cooperation between Iran and China.

Iran/QF is believed to have extensive nuclear and ballistic missile technology proliferation capabilities in Canada, which, once again, draws the convergence between TNOC and entities engaged in activities that threaten the national security of Canada. Re-establishing diplomatic relations with Iran may mean that it will be permitted to re-open an embassy in Canada. This will provide the QF with diplomatic access to Canada, adding to the already

existing procurement networks here. In the name of economic development, the government of Canada appears to be prepared to risk manage the threat that this poses from a TNOC and national security perspective. The question that remains is whether Canadian citizens want their government to be complicit in the development of Iran's ballistic missile program and, potentially, its pursuit of nuclear capability.

All of the issues present themselves in the form of criminal activity to Canadian law enforcement and the RCMP National Security Program (RCMP-NSP). As a law enforcement entity itself, the RCMP-NSP conducts investigations involving criminal activity associated with national security and terrorist threats and attacks (RCMP, 2016). There is a variety of TNOC and national security convergence issues that will place operational pressures on Canadian law enforcement agencies and the RCMP –NSP. These issues include a renewed diplomatic presence in Ottawa facilitating a covert QF presence, open business markets with Iran that expose Canadian companies to IRGC corporations and illicit front organizations, QF proliferation activities in Canada, the involvement of TNOC actors, drug trafficking and money laundering.

TNOC and terrorism should not be perceived as high-level esoteric concepts that rarely affect the average person, nor should the convergence of these issues be dismissed. Instead, it is critical to recognize that the convergence and overlap reflects a real public health and safety concern for Canada. This major paper considered the QF's practice of spying on, harassment, and recruitment and influencing of the Iranian Diaspora and regime dissidents. These practices are particularly reprehensible because Iranians who fled the repressive policies and practices of the Iranian regime (internally enforced by IRGC and related bodies) are sometimes re-victimized in their adopted countries of refuge. There are anecdotal accounts of this type of activity directed

against Iranian regime dissidents in Canada, in addition to threatening to harm relatives back in Iran (Todd, 2016; Zand, 2014). This alleged criminal harassment is not exclusive to the QF.

Bell (2006) documented similar treatment in Canada in the 1990s of Tamil refugees from Sri Lanka by members or supporters of the terrorist organization, Liberation Tigers of Tamil Ealam (LTTE). Tamil refugees were sometimes subjected to mandatory money collection efforts or extortion by LTTE personnel and threats to harm family in Sri Lanka for non-compliance. This criminal activity is an affront to the Canadian practice and ideal of proudly welcoming refugees and immigrants.

It should be recalled that the majority of the heroin trafficked to Canada sometimes hits Iran as a key transshipment point and that the process in Iran is controlled by the QF. This is significant because it represents an example of an expeditionary terrorist organization, which is listed as such by the Government of Canada, being directly involved in the movement of narcotics. These issues affect local law enforcement who deals with the day to day problems, and it may feed into the local organized-crime gang scene.

The IRGC-QF will continue to represent a dual threat to Canada's national security and general well-being. This major paper addressed some of the internal conflicts within the political realm in Iran and within the IRGC itself. The neo-principalist faction that has the support of the Supreme Leader will likely continue to express faux religious zeal to enhance its criminal business enterprises. In this respect, the regime still represents a threat to the Middle East region and the international community at large. Iran's pattern of belligerent, aggressive foreign policy practices started in the 1980s and appears to continue to the current day. It is the joint responsibility of the Government of Canada, regulatory bodies, CSIS, CBSA, Immigration,

major municipal police departments, and the RCMP-NSP to proactively counter the TNOC and terrorist activities of the criminal state of Iran.

POLICY RECOMMENDATIONS

The proposed recommendations are intended to inspire discussion and debate regarding the dual threat that the IRGC's convergence with TNOC poses to Canada's national security. These recommendations require a different law enforcement and federal government mindset regarding the convergence of terrorism and TNOC because they represent an alternative approach to the status quo. The recommendations touch on the spheres of government policy, and law enforcement at the strategic, operational, and tactical levels, and may be applied broadly beyond the specific scope of this major paper.

Government Policy

The government of Canada should designate the entire IRGC as a listed terrorist entity under the *Anti-Terrorism Act*. Currently, only the QF portion of the IRGC is listed as a terrorist group. The federal government of the day chose not to list the IRGC in its entirety because it believed that identifying the armed forces of a foreign state as a terrorist organization would contravene international precedent regarding state sovereignty and immunity (Dubowitz, 2011; Bunker & Hazim, 2007). Traditionally, designating an organization as a terrorist entity has been reserved for non-state actors (Bunker & Hazim, 2007). However, the original founding purpose of the IRGC is to preserve and protect the Iranian revolutionary mandate internally, and to actively export it regionally and internationally. The IRGC, as the superseding body of the QF, has actively pursued these goals for over 30 years.

Proponents of a full designation of the IRGC argued that the organization's history of sponsoring, facilitating, and participating in terrorism and the proliferation of nuclear technology

demonstrate that it does not deserve to be perceived as a traditional, conventional armed forces (Ottolenghi, 2012; Dubowitz, 2011). As discussed above, it is important to distinguish the IRGC from the Artesh, which is the conventional armed force of Iran. The Artesh is the military institution in Iran that would more likely be identified as the traditional armed forces representing the sovereignty of Iran.

It has been argued that Iran is no longer a clerical-led state that allows even an inconsequential semblance of citizen participation, but is ruled by a military-criminal class (Bunker & Hazim, 2007; Hen-Tov & Gonzalez, 2011; Safshekan & Sabet, 2010; Dubowitz, 2011). Bunker and Hazim (2007) further posited that if the IRGC was, in fact, comprised of "criminal soldiers", the sovereign state that created it should also be considered criminal. The international political ramification for this approach would be the effective questioning of the validity of the sovereignty of Iran (Bunker & Hazim, 2007). This explains, in part, why Canada elected to only list the QF as a terrorist entity.

The primary benefit cited for listing the IRGC, rather than just the QF, is that it would make it easier for the RCMP-NSP and CSIS to target one entity, rather than multiple front companies that commonly close down and re-open as something new (Dubowitz, 2011). It would do away with pointless quibbling about whether suspected Iranian activity was IRGC or QF related. Arguably, given the discussion in this major paper, the IRGC is the QF and vice-versa.

Law Enforcement – Strategic

Strategic intelligence is forward-looking, with the intent of identifying emerging threats and trends that inform larger policy development (Sullivan, 2007). The government of Canada should request a coordinated strategic intelligence assessment of the convergence of TNOC and IRGC activity in Canada to formally qualify and quantify the issue for decision makers and

stakeholders (Coyne & Bell, 2011). Strategic intelligence is essential to informing law enforcement decision makers about this complex and evolving threat to Canada's national security. The strategic assessment should not be solely founded upon internal case file analysis. This merely informs what is already understood or not understood with internal holdings. The strategic assessment should ideally include information collection and assessment on how the international picture correlates with what is being observed and investigated in Canada, and vice versa. Such an endeavor should also include the collection and assessment of information from multiple government departments and partner agencies, such as major municipal police departments, FINTRAC, Canada Revenue Agency, CBSA, and CSIS.

The process will inform the prioritization of targeting and the identification of intelligence gaps. This allows law enforcement to proactively target the threats presented by the convergence of TNOC and terrorists for intelligence development and investigation, instead of reacting to seemingly disparate pieces of criminal activity. Coyne and Bell (2011) explained that law enforcement should continue to evolve towards the use of strategic intelligence as part of a planned approach to reaching its objectives.

Law Enforcement – Operational

There is a considerable body of literature that emphasized the necessity of ending the outdated, institutionalized, and bureaucratic law enforcement practice of treating TNOC and terrorism as unrelated and unconnected criminal activity that are targeted with separate intelligence and investigative structures (Shelley L. I., 2006; Modell & Asher, 2013; Neumann, 2013; Schneider & Hurst, 2008; Braun, 2012; Makarenko, 2004; Dishman, 2002; Sullivan, 2007). Dinev (2014) stressed the importance and effectiveness of countering/targeting the convergence of TNOC and terrorism by deploying a proactive approach to developing

intelligence based on the strategic intelligence process. The author further emphasized this as the preferred approach, instead of habitually reactive investigations. Zegart (2007) cautioned against the tendency for law enforcement to be overly focussed on the individual case file, thus missing or not considering the broader scope and magnitude of an investigation or an issue. The individual case file driven practice will have a negligible effect in countering TNOC, terrorism, and the convergence of the two.

As an accompanying strategy to the recommendation for a change of mindset mentioned above, the more frequent use of specially comprised units and/or multi-disciplinary/agency task forces may prove to be more effective and efficient ways to deal with dual TNOC/terrorism threats such as Iran's Qods Force (Modell & Asher, 2013; Schneider & Hurst, 2008; Sullivan, 2007; Dishman, 2002). Schneider and Hurst (2008) commented that, in the past 20-25 years, the UK, Australia, and Italy established new, centralized national law enforcement institutions solely focussed on organized crime. This is an interesting consideration for a similar approach to TNOC and terrorism. Whatever the model decided upon, it should be staffed by civilian Analyst and sworn officer subject matter experts, forensic accountants, people with multiple language capabilities, investigators with strong investigative and intelligence development backgrounds, and supplied with modern analytical and investigative software. Schneider and Hurst (2008) stated that pooling expertise and resources is an effective way to fight the converging nature of TNOC and terrorist groups.

Finally, CSIS must become a net producer of security intelligence, instead of over-relying on foreign partner agencies (Yaworski, 2011). Perhaps this would facilitate a better flow of security intelligence to Canadian law enforcement for use in national security/TNOC criminal investigations. Similarly, Braun (2012; 2016) testified to the importance of old-fashioned police

work such as developing human sources to gather information for development into intelligence that can further TNOC/terrorism investigations.

Law Enforcement - Tactical

Braun (2016; 2012) explained that if illicit commodities are targeted and followed in criminal investigations, it often leads to finding and seizing of illicit commodities. The 33 year veteran of the DEA was not suggesting that this is not an important aspect of TNOC/terrorist convergence investigations, but he emphasized the importance of pursuing the money trail whenever viable. Similarly, Neumann (2013) underscored the importance of critically analyzing TNOC/terrorism connections and relationships to address the principal criminal activity. This goes toward the philosophy that removing or disrupting the stream of funding makes it difficult for TNOC and terrorist groups to operate (Neumann, 2013).

The final recommendation is to give more intelligence and investigative attention to the facilitators and intermediaries that are the key nodes between networks and TNOC and terrorist group players. This major paper identified the concept of facilitators and intermediaries with special knowledge, skills, access, and attributes that pave the way for the convergence. These individuals are sometimes complicit in the schemes, but unknowing dupes in other instances. In any case, the literature identified these players as instrumental in the functioning of TNOC and terrorist groups, and in the convergence of the phenomena (Shelley L. I., 2006; Modell & Asher, 2013; Neumann, 2013). Providing some additional focus on these players may disrupt networks and stimulate the recruitment of human sources that would lead to, a better understanding of the networks, and enforcement action.

Dr. Ely Karmon (2016), the Senior Research Scholar at the International Institute for Counter-Terrorism in Israel, explained that the numerous components of the Iranian

government's foreign policy are designed to achieve the strategic objectives of regional dominance and obtaining a prominent place on the global stage. In pursuit of these goals, the IRGC and its subsidiary, the Qods Force, engage in the export of the ideals of the Iranian revolution, pursuit of a nuclear capability, belligerent intrusion in the affairs of neighboring states, and the complex use of international terrorism (Karmon, 2016). Karmon (2016) urged the international community to realize the ramifications of the totality of Iran's goals.

It should be reiterated that Iran's foreign policy goals are not detached from the IRGC's transnational, organized crime, and terrorist activities. In fact, they are all interwoven, and amount to a significant problem for Canadian law enforcement, regulatory bodies, and security intelligence agencies. Dr. Karmon's prophetic assessment of Iran and the IRGC succinctly encapsulated the central message of this major paper, namely that the IRGC's involvement in terrorism and TNOC represents a dual threat to Canada's national security.

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