

RESEARCH MONOGRAPH

Assessing the Global War on Terror: Measuring the Impact of U.S. Foreign Terrorist Organization Designation on Salafi Jihadis Group Behavior

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Abstract

U.S. counterterrorism (CT) operations have prevented another attack on the scale of 9/11 but have they been truly effective? Academic and operational evaluations of the effectiveness of core CT tools—particularly foreign terrorist organization (FTO) designation—have not carefully compared terrorist groups' activities before and after designation. To fill this gap, this study measures the effectiveness of FTO designation and designation-associated activities on Salafi jihadist terrorist organizations, specifically how and where effects were achieved. Using publicly available, national-level data from 2001 to 2018, this research takes a quantitative and qualitative mixed methods approach to characterizing the impact of FTO designation on Salafi jihadist terrorist groups' behavior over time. The quantitative portion examines the impact of designation across three primary dependent variable behavior categories: number of groups/membership, number of attacks/lethality, and targeting. The qualitative portion looks at the range of possible outcomes for group attack behavior after designation to determine which, if any, designation-associated activities drove group outcomes.

Overall, the quantitative findings countered, rather than supported, the hypothesis that U.S. CT policies would reduce behavior across all three dependent variables. Post-designation Salafi jihadist areas of operations grew in both the number of groups and group membership. Trends in North Africa and in certain groups in Afghanistan/Pakistan, Somalia, and Southeast Asia showed flatter growth for designated groups, however, indicating a potential stall in otherwise exponential rises in membership. Quantitative measures of groups' operational behavior suggest FTO designation reversed some pre-designation trends in rising attack frequency and lethality, but the results are not statistically significant and, therefore, noncausal. Moreover, designation does not significantly impact groups' targets or attack type.

The qualitative case studies focused on the role of designation-associated activities rather than on other drivers of behavior outcomes. Official U.S. Government data on designation-associated activities from the Departments of Justice, State, and Treasury, along with captured media, revealed that a terrorist group's international versus national presence before designation better explains the variation in outcomes than does FTO designation and its associated activities. Groups able to flex across geographic or national boundaries seem more resilient to CT pressure. The most international group, AQIM, appeared to be the least affected by designation while the most regional focused group, TTP, was the most affected.

This mixed-methods approach ultimately affirms that, while FTO designation was not causally linked to the desired Salafi jihadist behavioral outcomes, designation-associated activities and their effects still warrant further study, including gathering improved official data and yearly metrics on designation-associated effects. As the United States reduces its CT footprint, FTO designation and associated metrics can inform future U.S. Government CT efforts by helping guide operations to target Salafi jihadist groups more efficiently.

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Preface

This monograph represents the capstone of a 24-month Research Fellowship at the Ann Caracristi Institute for Intelligence Research (CIIR) at National Intelligence University (NIU). It is also the working paper for the author's dissertation at the University of Maryland, with a defense scheduled for Spring 2023. Comments and suggestions can be directed to absturm@umd.edu. Any errors remain the author's own.

The Problem

For nearly 20 years, U.S. national security policy has centered on disrupting, defeating, and eliminating two key Salafi jihadist groups: al-Qa'ida and ISIL. Yet more Salafi jihadist groups operate in more places today than on September 11, 2001,*,1,2,3 terrorist lethality has increased,4,5 and more soft-target and target-of-opportunity attacks have occurred as high-value targets were hardened.6 Although the most recent U.S. National Security Strategy (2017) returns focus to state actors, Salafi jihadist terrorist organizations are still considered the "most dangerous terrorist threat to the Nation." Measuring the impact of the tools used to counter those groups is essential to moderating the threat. Yet, how best to measure the effectiveness of U.S. and allied efforts against al-Qa'ida, ISIL, and affiliated groups continues to elude policymakers and academics because of terrorism's inherent complexity, the breadth of governments' activities against these groups, opaque methods, and confusing desired end states. In addition, the multidisciplinary community studying counter-terrorism efforts approaches their assessments from a range of overlapping and inconsistent areas of expertise. As far back as 2005, a Congressional Research Service (CRS) report advocated for the "formulation of practical, useful measurement criteria" to evaluate counterterrorism's effectiveness, and blamed its absence on "the inherent secrecy and compartmentalization of both terrorist organizations and government responses."

FTO designation—a consistently applied policy choice with identifiable associated activities—identifies a clear decision point and the output the CRS was seeking.† It has an immediate legal effect on groups and triggers a basket of formal and informal activities by involved U.S. Government agencies to give "the U.S. Government more policy arrows in its counterterrorism quiver." It allows agencies to take concurrent action pursuant to their authorities, including:

 Criminal prosecution and civil penalties for individuals who provide "material support or resources" to the listed terrorist organizations (Justice Department).

^{*} According to the Center for Strategic and International Studies, 67 Salafi-jihadist groups operated across the globe in 2018, a 180 percent increase from 2001. Robin Wright wrote in *The New Yorker* that the Islamic State in its heyday reportedly attracted about 40,000 foreign fighters from at least 110 countries just in Iraq and Syria, compared to the 170 alleged core al-Qa'ida members in 2002. Robin Wright, "Are We Nearing the Endgame with Isis?," *The New Yorker*, 2017, https://www.newyorker.com/news/news-desk/are-we-nearing-the-endgame-with-isis.

[†] Legal challenges have questioned the constitutionality of foreign terrorist organization designation, primarily arguing that the classified nature of some supporting material in the IC review step prevents due process. Despite the challenges, U.S. courts have repeatedly reinforced the Secretary of State's authority under the 1996 Antiterrorism and Effective Death Penalty Act (AEDPA). See Jason I. Poblete, "Foreign Terrorist Organizations and the Listing Process in a Post-9/11 Context," SSRN Electronic Journal (2005).

- Immigration and international movement restrictions in individuals who provide resources or support to listed organizations (Homeland Security).¹¹
- Banking restrictions to freeze all group assets under U.S. financial control (Treasury).
- Informal consequences, including "naming and shaming" groups publicly and using public diplomacy to press the international community (specifically the UN and EU) to also designate and sanction (State Department).

Designation also raises public and international awareness of groups whose threats may otherwise remain clandestine. 12, 13

Despite the 9 Salafi jihadist groups initially designated by President George W. Bush's administration having grown to more than 40 by the end of 2018, designation—a cornerstone of U.S. Government CT strategy—is still an understudied tool. Developing a better understanding of the role of FTO designation in CT efforts against Salafi jihadist groups is one way to measure effectiveness across 20 years of operations. Although examining all facets of designation's impact is beyond the scope of this research, publicly available data can and should guide the U.S. Government and IC in adopting more rigorous CT metrics to encourage more efficient outcomes.

Research Question

Using publicly available data, this study examines whether designating a group as a Foreign Terrorist Organization (FTO), and that designation's associated activities, alters terrorist activity. To that end, the following broad research question is proposed:

What has been the measurable impact of U.S. national-level counterterrorism designations from 2001 to 2018 on Salafi jihadist foreign terrorist organizations, and how and why do designation outcomes differ across these organizations?

Scope

To assess whether FTO designation matters in countering the threat from Salafi jihadist groups, this research paper measures if/when designation alters terrorist groups' behavior in a way that lessens the threat to U.S. and allied interests. It provides a quantitative and qualitative assessment of the effectiveness of U.S. Government CT policy by comparing the articulated goals—as signaled by successive U.S. Counterterrorism strategies—with changes in Salafi jihadist terrorist groups' behavior over time. It uses FTO designation as a proxy for measuring the impact of national-level U.S. CT activities against terrorist behavior for a quantitative analysis of the impact of designation. It then presents four qualitative case studies of Salafi jihadist groups across a range of post-designation behavior to determine if/when designation is most effective. FTO designation, therefore, is a useful—if complex—independent variable to concisely measure a decision point in U.S. policy to target a specific terrorist organization. As the U.S. Government focuses more resources on countering state actors and reduces its counterterrorism expenditures, clarity on

FTO designation and its associated activities provides a guide for how the designation toolkit can more efficiently target Salafi jihadist groups.

Purpose Statement

This research represents a starting point for understanding if the decision to designate represents a turning point for a group's trajectory, and, if so, how and when the tools applied after designation alter the group's behavior. It considers the measurable impact of national-level U.S. CT policy designation decisions from 2001 to 2018 on Salafi jihadist foreign terrorist organizations and how and where desired behavior changes were achieved. It then proposes recommendations to improve operations.

This research is timely, as U.S. Government resources are needed to counter challenges from major nearpeer state competitors and reemergent domestic terrorist threats. It builds on a 2020 West Point CTC study, which evaluated the effectiveness of FTO designation and the related Specially Designated Terrorist Group (SDTG) designation, as nonkinetic counterterrorism tools. That study concluded that "because no solid metrics have been identified as key indicators regarding whether these programs are working or not, it is hard to assess if they are working beyond the financial impact to limit or change the behavior of terrorist groups." It did not isolate Salafi jihadist groups or tie designation to U.S. policy goals. The Center noted its research was intended as a "resource for future efforts to understand and, ultimately, assess these types of counterterrorism programs." 15

This paper furthers those efforts by considering designation's role in combating Salafi jihadist groups. Focusing on Salafi jihadist threats narrows the original characterization of the conflict by referring only to groups who advocate returning to a pure form of Islam and believe violent jihad is a religious obligation, which usually, but not always, means advocating for a war against the unbelievers, typically the West. This helps distinguish Sunni political groups from Salafi jihadists, excludes Shi'a and other terrorist organizations outside the primary conflict, and focuses on the groups historically of highest U.S. national security concern. It also distinguishes this work from others that include the full range of groups declared by the United States, regardless of ideology.

FTO Designation's Relevance to the Intelligence Community

This research acknowledges the IC's complex role in FTO designation. Although designation is not the U.S. Government's only "listing" tool, it is a recognized point of "lucidity in the complicated interagency process of coordinating the actions of Executive agencies, by giving them a central focal point upon which the efforts converge." As a primary tool in the CT toolbox, FTO designation is both dependent on IC expertise and a useful proxy for national security professionals to measure effectiveness against targeted (designated) groups. IC expertise is used in the six-step designation process (See Figure 1). The IC, the National Security Council, and the Departments of Defense, Homeland Security, Justice, and Treasury determine whether an FTO

Figure 1. State's Six-Step Process for Designating Foreign Terrorist Organizations (FTO)



Source: United States. Government Accountability, Office. Combating Terrorism: Foreign Terrorist Organization Designation Process and U.S. Agency Enforcement Actions. Bethesda, Md: ProQuest, 2015, 6.

poses a threat to U.S. interests.^{17, 18} The IC provides background on the group being considered and assesses its capabilities. By law and practice, to be designated an FTO an organization must be foreign, must engage in terrorist activity or retain the capability to engage in terrorism, and must, through their activity, threaten U.S. citizens or U.S. national security.^{19, 20, 21}

Designation is more than just a "yes" or "no" decision. The information the IC provides will feed into a policy decision that can be fraught with controversy. Some current and former national security professionals have criticized designation as largely political or symbolic. 22 Such complaints were particularly acute surrounding the designation of the Haqqani Network (HQN) in 2012, years after it had been established as a U.S. national security concern. In a

2018 interview, former Director of National Intelligence James Clapper called designation "more symbolic—more political—than substantive," indicating that at his level designation did not drive national intelligence decisionmaking.²³ Clapper did reveal, however, that FTO designation has an internal government purpose, citing the list's utility in determining personnel allocation and management of IC resources. He stated:

I think it did cause us to ensure that people were paying attention to this group [that] they might not have otherwise....I do think it would add some impact there if you went to, for example, a DNI organization [such as] the National Counter Terrorism Center. They do pay attention to who is on that list, and they do have people and analysts assigned to track each one of them.²⁴

Clapper's observation highlights the duality of the list and reflects the academic discourse surrounding its use: FTO designation in its informal capacity is symbolic and used as a tool of public diplomacy, yet it is also used to set and enforce bureaucratic priorities, drive the U.S. Government's operational CT focus, and allocate resources.

Literature Review

The key bodies of literature that speak to the potential impact of U.S. FTO designation on Salafi jihadist group behavior include definitions of terrorism and counterterrorism; evaluations of measures of CT effectiveness; assessments of how the U.S. Government has used FTO declarations to prompt and coordinate actions against targeted groups; and the limited existing measures of FTO designation's effectiveness. Any assessment of FTO designations also requires understanding the articulated objectives of U.S. CT policy since 9/11—specifically how the U.S. Government defines success—and recognizing that terrorist groups' organizational structure, behavior, and capabilities also evolve independent of CT activities.

Defining Terrorism and Counterterrorism

The definition of terrorism is so fraught with controversy that terrorism researcher Walter Laqueur once famously labeled the term indefinable.^{25, 26, 27} Indeed, terrorism expert Bruce Hoffman devoted 44 pages of his book, *Inside Terrorism*, to modern definitions of terrorism before settling on differential criteria to distinguish the phenomenon from other types of violence. Hoffman's definition—"the deliberate creation and exploitation of fear through violence or the threat of violence in the pursuit of political change"²⁸—shares many features with the more than 20 definitions used by the U.S. Government.²⁹ As Hoffman points out, this duplication "reflects the priorities and particular interests of the specific agency involved."³⁰ Given these agency-specific definitions of terrorism, achieving interagency agreement to label a group an FTO becomes noteworthy as a consensus-based decision that highlights the threat a group poses across agency jurisdictions and definitions.

Of all the U.S. Government definitions, Hoffman argues the State Department's is unique in emphasizing the premeditation and political nature of the act and the "subnational" status of the actor.³¹ The State Department defines terrorism as "premeditated, politically motivated violence perpetrated against noncombatant agents by subnational groups or clandestine agents." ³² This research adopts that definition, because of Hoffman's endorsement³³ and because the State Department oversees the FTO designation process, which makes its definition most closely align with the measures of this study. The University of Maryland's National Consortium for the Study of Terrorism and Response to Terrorism (START) also uses this definition to aggregate the open-source data on terrorist incidents on behalf of the U.S. Government, which informs this paper.^{34, 35} Although many valid definitions of terrorism exist in the academic and policy communities, this definition sets consistent parameters.

The definition of counterterrorism is similarly complex. Depending on the source, CT can include a range of military, nonmilitary, political, financial, and engagement activities designed to impede the violent aims

of a nonstate actor.³⁶ U.S. Government CT practices during the past 20 years have included increasing domestic spending, hardening potential targets, imposing economic sanctions against specific groups, and, more visibly, deploying military forces overseas and executing targeted strikes. DoD's definition reflects these broad activities, stating that "CT activities and operations are taken to neutralize terrorists, their organizations, and networks in order to render them incapable of using violence to instill fear and coerce governments or societies to achieve their goals."37 Yet, even this definition—while specifying the desired behavior change to render the targeted group incapable of using violence—does not specify the full range of national, operational, and tactical activities included. In their 2017 book, Countering Terrorism, experts Martha Crenshaw and Gary LaFree argue that the difficulties "conceptualizing exactly what the content of counterterrorism is, or should be, impede efforts to determine its effectiveness." Given that FTO designation is the outcome of a "whole of government" policy process, the CT activities undertaken by the agencies with designation can be weighed against outcomes, in response to Crenshaw and LaFree's concerns.

Measures of Effectiveness for Counterterrorism

Crenshaw and LaFree also consider at length whether counterterrorism's effectiveness can be evaluated. They point out that the many disciplines involved in researching terrorism—ranging from psychology to social science—have wrestled with how to measure effectiveness because of difficulties in defining the scope of CT activities, conceptualizing ends and means, determining metrics to measure progress, and using valid statistical methods in a data-limited discipline.³⁸ Much of this difficulty arises because CT activities involve exercising national power across a range of diplomatic, economic, financial, information, intelligence, law enforcement, and military entities.³⁹ It is a monumental task to aggregate the effects of these combined elements of national power into one comprehensive national-level measure of effectiveness against the range of groups targeted since 9/11—one beyond the scope of this research. Indeed, West Point's CTC study detailed early measures of the impact of FTO designation, but it concluded that, "evaluating the efficacy of all of the world's counterterrorism efforts, regardless of whether they involve the military or not, is far beyond the scope of this report."40

Even measuring the impact of national-level CT policy is difficult given the differing nature, geography, and history of the targeted groups—and the fact that CT is, by necessity, an opaque process targeting clandestine actors. Nevertheless, a December 2019 Perspectives on Terrorism review of literature on countering terrorism and violent extremism identified more than 200 academic articles published since 2008 that attempted to aggregate, measure, and analytically frame metrics of effectiveness. 41 This body of work concludes that a one-size-fits-all CT approach is ineffective. Rather, effective CT actions must address the ideology, geography, and history of specific groups. 42, 43, 44, 45, 46 That recognition has driven research

[‡] Given inconsistencies in counterterrorism definitions, this research only considers the range of military and nonmilitary activities applied against specific terrorist actors as potential outcomes of the designation process, which helps counter Crenshaw and LaFree's caution that "the breadth of definition of counterterrorism and the incredible range of actions that are typically included make it extremely challenging to establish priorities, integrate activities, and then to analyze outcomes." Crenshaw and LaFree, Countering Terrorism, 168.

on establishing measures of effectiveness at the tactical and operational levels to inform military decision-makers on activities in specific areas of operations, but much of this specialized work does not address the range of diplomatic, economic, financial, information, intelligence, law enforcement, and military activities involved in national-level CT efforts.

Think tanks, like the RAND Corporation, and established counterterrorism scholars, like Max Abrahms, Kim Cragin, Sara Daly, and Brian Jackson, attempt to fill this gap by arguing for designing and evaluating CT interventions by group to address both terrorists' ability to sustain their organization and to conduct operations. ^{47, 48, 49} Variations of this analysis, particularly in the U.S. military, refer to an "effects-based" approach that targets a terrorist organization's processes and its ability to generate outcomes, often measured as incidents of terrorism. ⁵⁰ In other words, as long as the interventions against a particular group reduce the number of incidents, the interventions can be categorized as broadly effective. These approaches allow for more consistent comparisons across groups, as reductions in operational effectiveness can be compared among geographic areas and across disparate groups. This study will also use a reduction in incidents and accompanying lethality as one measure of effectiveness.

Other research on CT's effectiveness focuses on the demise of terrorist organizations, which Audrey Kurth Cronin argues only rarely is the result of a state's CT actions.⁵¹ Hoffman focuses less on eliminating groups than on denying their efforts to win attention, recognition, authority, and governance.⁵² Both scholars allude to disrupting terrorists' ability to regenerate their organizations (process) and execute attacks (outcomes), which are generally considered the hallmarks of a successful CT campaign and align closely with the military's effects-based approach. This work ties groups' operational longevity to their ability to sustain membership, which is why this research treats group membership as a behavioral outcome.

Researchers broadly agree that process and outcome impacts should be measures of success across all types of terrorist groups. Process impacts include removing terrorist leaders; disrupting recruitment; impeding communication, travel, and funding; disturbing group cohesion; and degrading technical or learning capacity. ^{53, 54, 55, 56, 57} Outcome impacts include reduced attack frequency (to include deterrence), weaker impact (e.g., lower sophistication of attacks, fewer casualties, less property damage, curtailed political or economic effects), and loss of safe havens and logistical support. ^{58, 59, 60, 61, 62, 63, 64, 65, 66, 67} How best to achieve these goals and measure the change is where the literature diverges, most notably around which CT tools have the greatest impact on terrorist organizations' behavior.

Counterterrorism's Impact on Terrorist Organizations

This research is also grounded in the debate over which CT policies most reduce the frequency, lethality, and destructiveness of terror attacks. One debate focuses on removing terrorist leaders, i.e., the targeted killing/decapitation of terrorist groups.^{68, 69} According to Crenshaw and LaFree, "In recent years it has been one of the most commonly studied counterterrorism tactics, probably because, despite government secrecy, assassination represents a relatively concrete behavior that is easier than most tactics to quantify."⁷⁰ Although some research argues that targeted strikes against terrorist leaders degrade an organization and its ability to mount

attacks, 71, 72, 73 counterarguments suggest this holds true only for highly centralized organizations and can provoke a backlash that drives up recruitment. 74, 75, 76, 77, 78, 79, 80, 81, 82, 83 Other scholars argue that the measures of effectiveness for targeting terrorist leaders are biased: those seeking success will measure reduced attacks as the dependent variable while those looking for failure measure civilian casualties as the dependent variable.⁸⁴ Additionally, works evaluating the targeting of terrorist leaders have emerged in the social science community—yet removing terrorist leaders is just one part of the U.S. Government campaign against Salafi jihadist groups. 85 Also, because these assessments are often time-limited, the broader strategic impact of interventions is difficult to assess. Crenshaw and LaFree argue that when focusing on specific aspects of CT policy rather than taking a holistic approach, "researchers and policymakers should beware of confusing short-term success in assassinating a suspected terrorist with reducing the number of future attacks over the long run."86

In short, although empirical research on CT's effectiveness has produced voluminous studies on its impact across a range of activities, a comprehensive analysis of the effectiveness of the national-level U.S. campaign during the past two decades is lacking because of difficulties in defining the full scope of terrorism and counterterrorism, conceptualizing ends and means, identifying proper metrics to measure progress, grounding analysis in statistical methods, and weighing short-term vs. long-term results.⁸⁷ This research seeks to fill a small part of that gap by focusing on FTO designation and its impact.

Impact of FTO Designation

Literature on the impact of FTO designation is nascent and largely examines the discrete outputs of the process—focusing, for example, on its impact in terms of asset seizure and criminal prosecution, or critiquing the process's susceptibility to politicization. 88, 89, 90, 91 The West Point CTC study provides an important touchstone for academics measuring FTO designation's effect. For example, in Figure 2, CTC used descriptive statistics on terrorist behavior to identify a rise in terrorist attacks preceding designation and noted a small decrease about 3 years after designation. CTC also noted that the average number of fatalities increases during the 2 years immediately after designation (Figure 3). These findings raise yet unanswered questions about designation and its impact on terrorist behavior, for example:

- Must the standard of success of FTO designation be a reduction in overall attacks or can success be considered if the upward trend in attacks diminishes?⁹²
- Why does the ferocity (lethality) of violence seem to peak 1-2 years after designation? Is it already on an upward trend pre-designation, or does designation impact a group's targets?⁹³

CTC's work establishes the benefit of rigorous quantitative evaluation of the impact of FTO designation, as it reveals that interesting—but, as yet, unexplained—phenomena are occurring in the periods 1-2 years and 3-5 years after designation. Where the descriptive statistics illuminate possible effects, the authors determined that "these impacts are often second-order effects from the designation themselves, such as increased awareness of a group or enhanced prosecution through leveraging material support to FTO charges."94 Their findings suggest intermediate variables—or the designation-associated activities prompted by the "fact of" designation—are driving the difference in outcomes in terrorist behavior.

The West Point CTC study also echoes the literature on the difficulty in measuring the impact of CT activities given opaque U.S. Government metrics. It notes that despite statements from U.S. officials extolling the benefit of designation:

It is difficult to find a clear statement of how the U.S. Government measures and assesses the efficacy of the FTO list.... Indeed if one of the goals of the FTO process is to deter negative activities, how can one measure if that impact is successful? Measuring how an action taken leads to actions not taken is an incredible [sic] difficult challenge, one that goes far beyond the field of terrorist designations.95

This gap between policy decision (FTO designation) and strategic metrics erroneously assumes that the U.S. goals and metrics are, or should be, derived from FTO designation rather than treating designation as an interagency policy decision made in support of, and subordinate to, broader national strategic goals. Reframing FTO designation as a tool used across administrations in support of U.S. national-level CT strategy allows an alignment of useful metrics and is broadly consistent with the

Figure 2. Average Number of Attacks, 5 Years Before and 5 Years After FTO Designation (1997-2018)

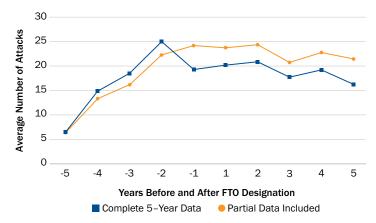
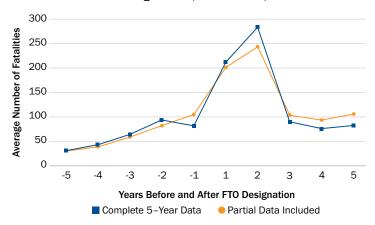


Figure 3. Average Number of Fatalities, 5 Years Before and 5 Years After FTO Designation (1997-2018)



Source: Seth Loertscher et al., The Terrorist Lists: An Examination of the U.S. Government's Counterterrorism Designation Efforts (West Point: Combatting Terrorism Center, 2020), 15-16.

measures West Point chose for their descriptive analysis. Selecting dependent variables focused on operational outcomes (e.g., attacks, lethality, etc.) is also congruous with the methods used by most counterterrorism researchers cited above to measure CT activities' effectiveness.

U.S. Counterterrorism Strategic Goals and Measures of Effectiveness

The four official post-9/11 U.S. Government Counterterrorism Strategies from Presidents Bush, Obama, and Trump are remarkably consistent, allowing for comparisons across administrations on FTO designation's strategic goals. All four strategy documents focus on defeating international terrorism, defined as eliminating terrorist organizations and their aspirants (although they differ on labeling it a primary or secondary goal); denying terrorists the ability to attack U.S. territory, citizens, or interests; and defending or hardening defenses to prevent terrorist attacks against critical infrastructure or the use of WMD.§ These goals, detailed in Appendix A, inform the dependent variables for this study.

Although each administration shared the same national strategic goals, they focused on different groups. (See Appendix B.) Each administration added (and in only two cases removed) Salafi jihadist foreign terrorist designations from 1999 to 2018, 96,97 which implies that the same amount of CT resources has had to be divided against an ever-increasing number of targets during the past 20 years. Furthermore, the focus on new groups suggests the impact of an FTO designation may wane as different groups become the target of different presidential administrations.

Despite the growth in targeted groups, their similarities make developing consistent national-level metrics from these strategies relatively straightforward. With each new designation, the United States seeks to reduce the number of terrorist organizations, their membership, and the impact of their attacks to prevent mass casualty or catastrophic attacks. These three effects, consistently articulated across all three president's strategies, can be measured as desired outcomes of the FTO process and substituted as the metrics sought by FTO designation. In other words, if FTO designation moves toward these strategic goals for any specific groups, it may provide evidence of the impact lacking in the aggregated West Point CTC study.⁹⁸

This approach, examining outcomes from the consistent benchmark of a national policy decision, builds on a model developed by David Easton in 1975 for evaluating policy effectiveness. ⁹⁹ Limiting measures of effectiveness to these national-level policy outcomes also addresses many of the challenges in defining the scope of counterterrorism efforts and their effect, which as the literature detailed above shows, is measured inconsistently at best. This approach allows for a measure of what Easton coined as impact effectiveness—the lasting impact of the application of U.S. CT policy over time—answering Crenshaw and LaFree's concerns that immediate measures alone are insufficient for gauging the success of CT interventions.

Salafi Jihadist Membership, Attacks, and Targets

Despite the broadly accepted and well-documented aggregate increase in terrorist groups, members, attacks, and lethality—evidence may still exist that FTO designation activities lessen the problem, particularly if a targeted group's growth diverges from broader trends identified in the academic discourse.

[§] U.S. CT strategy objectives arise from the four *National Strategy for Combating Terrorism* documents produced by the White House since 9/11 (Bush 2003 and 2006, Obama 2011, and Trump 2018). It is important to note that these formal strategies also serve a political purpose to reassure and inspire citizens. Randall A. Yim, "Evaluation of Selected Characteristics in National Strategies Related to Terrorism," U.S. Congress, House Committee on Government Reform, Subcommittee on National Security and International Relations, GAO-04-408T, February 3, 2004, 3, http://purl.access.gpo.gov/GPO/LPS57221.

[¶] This growth includes the rebranding and merger of several groups into new organizations, which can be argued does not represent growth, but rather movement of individuals across groups.

In other words, even though there may be more groups engaging in more attacks with more lethal consequences, if the numbers of individuals, attacks, or lethality, affiliated with targeted groups remain relatively flat or drop after FTO designation, then the designation and its associated activities could arguably be categorized as successful. By using FTO designation as a proxy for U.S. action, one can delineate a "before" and "after" categorization within the limited open-source data available on targeted groups and members. Researchers can then evaluate more precisely where U.S. efforts may buck global trends. This study will challenge and complement current understanding by seeking to identify places where the established Salafi jihadist increase in groups, members, attacks, lethality, and targeting has changed, stalled, or temporarily reversed, as potential indicators of FTO designation's impact that run counter to established global trends.

Changes in Terrorist Group Behavior Independent of U.S. Action

Changes within an organization are not necessarily tied to U.S. policy activities and can be driven by internal rather than external dynamics. For example, the public split between al-Qa'ida and ISIL in 2014 cleaved the global terrorist movement because of a public disagreement between the two organizations over tactics and goals—and personal enmity between respective group leaders, Ayman al-Zawahiri and Abu-Bakr al-Baghdadi. 100, 101, 102, 103, 104, 105, 106, 107 The al-Qa'ida/ISIL divorce was the latest evolution of a pattern of union and dissolution characteristic of al-Qa'ida's global brand of jihad developed over decades via the merger of otherwise local or regional terrorist groups. 108

Affiliation and splintering enhance the longevity of terrorist movements (and are, therefore, survival strategies), ^{109, 110} and the ensuing competition between splinter groups increases violence or shifts targets. ¹¹¹ In other words, U.S. policies that promote splintering can be counterproductive in reducing terrorist attacks, at least in the short term. For example, ISIL adopted the affiliation and franchising model that underpinned al-Qa'ida's expansion from 2001 to 2014, and now its ability to claim affiliates of its own offers a prime example of how internal dynamics and priorities drive terrorist behavior. ¹¹² Additionally, despite the complicated dynamics among core, affiliate, and alliance groups examined in the academic literature, policymakers and academics tend to focus on the core groups in assessing the threat Salafi jihadist groups present to the United States. ^{**} This research will use selected case studies to assess behavioral change among and within both the core and its affiliate groups targeted by U.S. CT policy from 2001 to 2018.

^{**} The *National Strategy for Counterterrorism 2011* illustrates this tension, stating: "Therefore, this National Strategy for Counterterrorism maintains our focus on pressuring al-Qa'ida's core while emphasizing the need to build foreign partnerships and capacity and to strengthen our resilience. At the same time, our strategy augments our focus on confronting the al-Qa'ida-linked threats that continue to emerge from beyond its core safe haven in South Asia." See also President Barack Obama's 2014 claim that al-Qa'ida's affiliated movements, like ISIL at the time, represented a more "junior-varsity" version of a terrorist group, found in David Remnick, "Going the Distance: On and Off the Road with Barack Obama," *The New Yorker*, January 27, 2014.

Research Methodology

Using publicly available data, this study examines whether designating a group as a foreign terrorist organization (FTO) and applying the associated designation measures alters terrorist activity. The research question is as follows: What has been the measurable impact of U.S. national-level counterterrorism designations from 2001 to 2018 on Salafi jihadist foreign terrorist organizations, and how and why do designation outcomes differ across these organizations? The paper uses a mixed methods approach that combines quantitative measures—using publicly available data to assess the potential impact of designation—with qualitative case studies on how and why designation outcomes differ across targeted Salafi jihadist terrorist organizations.

Hypothesis

FTO designation's impact is an understudied aspect of one of the United States' core national-level counterterrorism tools, with West Point's Combating Terrorism Center noting in September 2020 that "little work has been done to understand the impact of these programs." This lack is particularly noteworthy in the case of Salafi jihadist groups, whose belief that violent jihad is a religious obligation 114, 115 places them near the top of the list of U.S. national security concerns. 116, 117 The few studies that exist found weak relationships, at best, between designation and terrorist outcomes, and West Point's CTC study found no discernible effect. However, these studies did not provide qualitative context for the designation process and its impact as part of coordinated U.S. Government strategy. 118

Despite these findings, this study hypothesizes that *U.S. designation of Salafi jihadist groups does have a measurable effect on the behavior of Salafi jihadist terrorist groups, quantified most clearly through lower membership, reduced frequency/lethality of attacks, and fewer/no attacks on critical infrastructure and/or using weapons of mass destruction.* This study narrows its aperture to Salafi jihadist groups and posits that combining interrupted time series analysis with qualitative analysis will show that U.S. FTO designation-associated activities have had a measurable effect on terrorist behavior. The null hypothesis is that FTO designation has no impact or, potentially worse, causes more lethal and complex attacks. The long-term impact of designation is expected to wane at the four- to five-year mark, as additional groups are designated and new Presidential administrations transition, splitting U.S. policy focus across more groups.

Key Questions

Five subsidiary questions informed the research question and helped guide the research.

- 1. What are the articulated national-level goals and objectives of U.S. counterterrorism policy since September 11, 2001?
- 2. How has the U.S. Government used the FTO designation process and follow-on actions to target Salafi jihadist groups?
- 3. What is the impact of FTO designation, or more precisely designation-associated activities, on the frequency, lethality, and destructiveness of terrorist attacks committed by Salafi jihadist groups?
- 4. What accounts for variation in outcomes of FTO designation-associated activities?
- 5. What lessons can be drawn to assess the impact of and improve U.S. counterterrorism policy and operations?

Research Design: Quantitative Analysis

The quantitative analysis measured FTO designation's impact on three desired outcomes of FTO designation, drawn directly from the U.S. strategic goals identified in national-level CT strategies:

- 1. Eliminating terrorist groups^{††}—measured by a reduction in the number of groups and their membership broken down by operational area, as terrorists do change affiliations within their sphere of operations.
- Reducing terrorist attacks against U.S. territory, citizens, or interests—measured by the number of attacks perpetrated by a group, the number of Americans killed or wounded, and the overall number of injuries and fatalities caused by the attacks. Data on incident damage is too incomplete to be useful.
- Preventing groups from adapting to the hardening of defenses against critical infrastructure and WMD attacks—measured by changes in attack type (e.g., simultaneous or suicide), weapon type, and target pre- and post-designation.

Variables

The study variables are shown in Figure 4. FTO designation is the independent variable, which is aggregated to the year of designation (0) for each group from 2001 to 2018 and arranged on a time series from "years preceding" to "years following" designation to facilitate cross-group comparisons. Twenty Salafi jihadist groups designated between 1998 and 2018 were selected for the study, based on the criteria that they had at least 40 instances of terrorism, with at least one year of attack data preceding and following

^{††} Given the evolution of the policy aim from "eliminating" terrorist groups to "reducing" them, eliminating is used here to reflect the directional goal and reducing is the measurement. A goal of zero terrorist groups is not a genuine metric for CT effectiveness.

designation.^{‡‡} Appendix C shows the full list. The intermediate variables are the actions that accompany U.S. designation to drive U.S. policy outcomes. All are drawn from the authorities of the U.S. agencies involved in the decision to designate. Case studies will assess the likely role of intermediate variables in driving the outcomes measured by the quantitative data. The dependent variables are the outcomes of terrorist group behavior, measured 1-2 and 4-5 years after designation. Descriptions of the dependent variables follow.

Independent Variable Intermediate Variables Dependent Variable Designated Range of actions that accompany • Outcomes in Group Behavior U.S. designation designed to Non-Designated • 1-2 Years, 4-5 Years impact terrorist behavior and · Year of Designation drive U.S. policy outcomes Military³ **Eliminating Groups** Financial³ ŧ FTO Designation Reducing Terrorist Attacks Diplomatic Hardening Defenses Executive Actions

Figure 4. Study Variables

Eliminating Terrorist Groups

The first dependent variable—eliminating terrorist groups—is measured using terrorist group and membership data in the State Department's annual *Country Reports on Terrorism* (pre-2004, Patterns of Global Terrorism). Confirming the hypothesis requires comparing the number of groups aspiring to attack Western interests and their members pre- and post-designation to determine if designation-induced measures prompted Salafi jihadist group membership or the number of groups to drop, remain flat, or grow at a slower rate. Although often cited as wide ranges (500-1,000) or vague statements (low thousands^{§§}), aggregating the data over time allows for a comparison of estimated group totals pre- and post-designation.

Assessing membership data is complicated by terrorists' frequent switches in affiliation, especially in their local area. The Stanford Militant Mapping project is an online tool for tracking these changes in alliance

^{‡‡} Although short of the 50 events that many quantitative methods require to measure differences in outcomes over time series data, 40 attacks ensure enough data to attribute a change to FTO designation rather than chance. Some groups, like Boko Haram, with overlapping/adjacent geographic regions were grouped as designation dates suggest concurrent U.S. targeting. \$\\$ When data is nonspecific "hundreds" or "thousands," it will be annotated as the lowest possible number (hundreds=200, thousand=1000, thousands=2000s).

and affiliation. For example, the Armed Islamic Group (GIA) and Salafist Group for Preaching and Combat (GPSC), both active in North Africa in the 1990s, gave birth to al-Qa'ida in the Islamic Maghreb (AQIM), which aligned with and competed against Ansar al-Dine, based primarily in Mali. As the Islamic State left al-Qa'ida for its own vanguard, Ansar al-Shari'a emerged in Tunisia and Libya. The North African Salafi jihadist affiliates split and merged yet again, eventually becoming al-Mourabitoun and, ultimately, Jama'at Nusrat al-Islam wal-Muslimin (JNIM). The Stanford data shows that Salafi jihadist groups in North Africa generally develop within a single area of operation that does not necessarily conform to country or regional boundaries. Rivalries, alliances, and splits alter group and membership counts. To address the highly local nature of jihadist affiliation, the 20 groups in the study were sorted into eight regions: North Africa, Nigeria, Libya, Egypt, Somalia, Iraq/Jordan/Syria, Afghanistan/Pakistan, and East Asia to allow for easier aggregation of State Department membership numbers.

Attacks and Lethality

For the second dependent variable, terrorist attacks and lethality, a simple linear regression, modeled as $y = \alpha + \beta x + \varepsilon$ can be used to measure the impact of FTO designation. The slope of the line (y) is driven by the impact of the independent variable (x) on the coefficients. However, this model assumes that the slope of the regression line does not change over time, while this paper's hypothesis posits a post-designation change in behavior. Specifically, the hypothesis predicts that a pre-designation upward sloping line depicting increasing terrorist attacks would flatten or turn down post-designation. West Point's moving averages model of terrorist attacks over the 5 years pre- and post-designation shows, on average, "a significant uptick in operational activity for FTOs in the years preceding their designation."

Given this expected (and desired) change post-designation, the standard regression formulation is not well suited to a nuanced understanding of the data trends. An alternative quantitative model, based on a segmented or interrupted linear regression, would look like this:

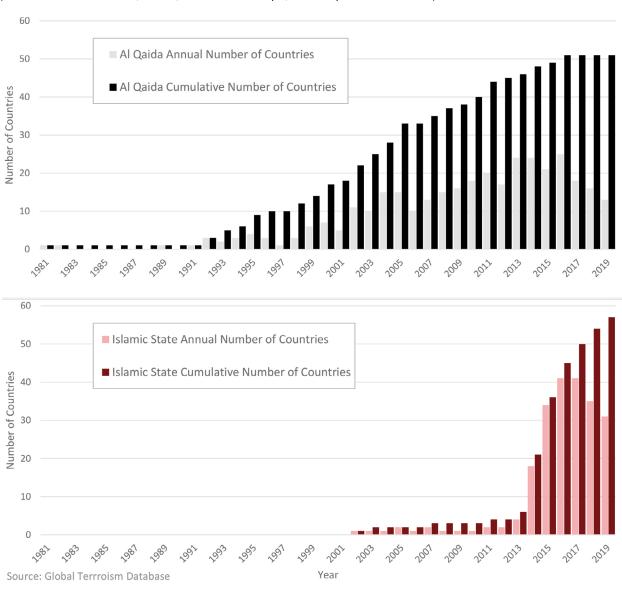
$$y = \alpha + \beta 1T + \beta 2X + \beta 3XT + \varepsilon$$
.

T represents time, broken into phases before (β 1), at (β 2), and after (β 3) an interruption or treatment. To show a relationship between designation and terrorist behavior outcomes, this interrupted treatment analysis would probably be sufficient, but both seasonality (the possibility of a seasonal or time of year impact) in panel data and autocorrelation (the possibility of a relationship between two data points in a series) can pose challenges for this model. The attack and lethality data in the University of Maryland's START Global Terrorism Database (GTD), provided in a day/month/year format, was aggregated yearly, by group, to control for seasonal trends, such as the annual uptick in attacks in Afghanistan since 2002 during the Afghan Taliban's summer "fighting season." Autocorrelation is trickier with terrorist attack data; events in a time series are likely to be related to the data points that precede and postdate them—which violates the principal of data independence for a pure linear regression model. ¹²⁰ For example, increased

^{¶¶} For more information, see: http://web.stanford.edu/group/mappingmilitants/cgi-bin/maps/view/north-africa.

attacks by a group probably boosts membership and organizational support, so a change in attack activity is often part of an overall trend. Thus, terrorist activity in one year is autocorrelated to the neighboring years. This additive trend can be seen in Figure 5. To account for autocorrelation and seasonality in CT trends, researchers in economics and criminology have adopted quasi-experimental design methodology based on medical interventions. Health professionals use interrupted time-series analyses to divide treatment and control groups in public health experiments.

Figure 5. Geographic Reach of Al Qaida- and Islamic State-Related Terrorism, 1981-2019 (Includes Predecessors, "Core," Affiliated Groups, and Inspired Individuals)



Source: Geographic Reach of al-Qa'ida- and Islamic State-Related Terrorism, 1981-2019, from Miller, Erin. 2020. "Global Terrorism Overview: Terrorism in 2019." College Park, MD. July 2020. https://www.start.umd.edu/pubs/START_GTD_GlobalTerrorismOverview2019_July2020.pdf

One of the advantages of using interrupted time series (ITS) analysis in this study is that it avoids using nondesignated groups as comparison or control groups. Designated FTOs meet the criteria of section 219 of the Immigration and Nationality Act (INA), indicating a threat to the United States, and should not be compared to groups that do not meet that basic standard. However, given the low number of American casualties, an ITS is not well suited to measuring impact of attacks and lethality. In *The Handbook* of the Criminology of Terrorism, Robert Apel and Henda Hsu highlight an established tool for measuring CT interventions called an autoregressive integrated moving average model (ARIMA), or Box-Jenkins method. 121 To assess the relation between data points in a time series, it compares the moving averages preand post-intervention, accounting for the time since intervention. The iterative process selects the precise model to indicate the probable impact of a single intervention over time, while accounting for irregularities in time series data. The ARIMA/Box-Jenkins method will be used to assess the hypothesis that FTO designation will reduce attack frequency and lethality. It is an established tool for measuring counterterrorism interventions, so it is consistent with best practices in assessing their impact.

Hardening Targets

The impact of target hardening, arguably the most complex dependent variable in this study, can be deduced from changes in attack patterns and terrorists' behavior in response to actions taken (jersey barriers built, dollars dedicated to embassy fortifications, etc.) to protect critical infrastructure and deter the use of WMD. Measuring what terrorists target over time provides insight into groups' pre- and post-designation attack preferences to show whether groups are altering attack patterns. Given these variables categorical nature, ITS is less useful for illustrating potential post-designation changes in terrorists' targeting, so this study will use are the University of Maryland's GTD data, which characterizes attacks by category, weapon used, and target type to compare attacks on critical infrastructure and WMD pre- and post-designation. Given the many reasons terrorists change tactics other than hardening of targets—particularly during ongoing conflict—very limited conclusions can be drawn beyond that any post-designation increases in sophisticated (simultaneous) attacks, the use of WMD, or the targeting of U.S. Government or critical infrastructure will contradict the hypothesis.

Data Collection Sources, Strategy, and Challenges

The primary sources of quantitative data are the University of Maryland's GTD and for qualitative data the State Department's Country Reports on Terrorism (previously Patterns of Global Terrorism). The GTD was the official repository of statistics on global terrorism for the U.S. Government during the majority of the years of this study and remains and one of the most complete, openly available, primary datasets on FTOs. State Department's Country Reports on Terrorism is a qualitative description of all U.S. government activities in specific countries and countering designated organizations in a given year. The data sets are consistent because the Maryland's START Center has provided the statistical annex data for the Country Reports since June 2012.122 The GTD data—on more than 180,000 terrorist incidents since 1970—includes the groups claiming credit (attribution), numbers killed and injured (lethality), and whether they were simultaneous or connected (sophistication).

In the GTD, each row represents a single terrorist incident arranged by date and location and attributed to a group if possible. Although simultaneous attacks across a city/country will cross rows—the 9/11 attacks, for example, have four rows: one for each tower, the Pentagon, and the crash in Pennsylvania—the straightforward and consistent entry method enables researchers to aggregate or separate data for complex and simultaneous attacks as needed.

For this study, the overlapping attribution across groups posed a challenge. Attribution can be more difficult because rows catalogue a single event at a single location, which can include as many as three groups that participated or claimed responsibility for the attack. To reduce data duplication, this study created an individual line of code for each group that participated in an attack to capture all attacks attributed to a specific group, even if it acted in concert with others. An attack attributed to al-Qa'ida, Tehrik-e Taliban Pakistan (TTP), and Laskar-i-Tayyiba (LET) would appear in three separate lines.

Collapsing some groups or removing them from the quantitative analysis reduced the dataset from 42 groups to 20 cases and eliminated repetition. For example, all 16 attacks attributed to al-Mulathamun Battalion (AMB), which broke away from AQIM in 2012, overlapped with AQIM, rendering an independent AMB assessment meaningless. AMB also did not meet the minimum 40 attacks required for the ITS. Al-Qa'ida in the Indian Subcontinent was similarly excluded.

The unequal time periods between groups' founding and designation also complicated working with the longitudinal data. The Haqqani network, founded in the early 1970s, was not designated until 2012, while al-Qa'ida in the Arabian Peninsula (AQAP) was designated just one year after it was founded in January 2009. Selecting groups with significant data pre- and post-designation (ideally 5 years on either side) allows for a more rigorous evaluation of impact, yet in many cases, this data begins the year preceding designation. The "Years of Available Data" table in Appendix C shows data available for each group, an important caveat on this overall report.

Assumptions

The quantitative portion of this paper compares the activities of a group pre- and post-designation—while not assuming all changes are signs of CT success. It assumes the U.S. Government undertook aggressive actions—the intervening variables—after designation that drove the group to change behavior. However, even if a relationship between designation and outcomes in terrorist activity is established, a straight line from U.S. Government designation to terrorist outcome is far from certain. Rather, this research suggests the quantitative data will indicate a correlation between designation and its associated activities and the measured change in terrorist behavior. The qualitative portion of the study will try to get to causality. Aggregating the groups and arranging the ITS by date of designation helps control for differences in groups' terrorist activity due to their location and capabilities. For example, because AQIM historically has been less lethal than its peers, it cannot be assumed that a downward slope on attack frequency results from designation.

Research Design: Qualitative Analysis

The qualitative analysis explores the intervening variables more closely to examine how and why designation actions—military/intelligence activities, diplomatic/consular activities, legal actions, material support to terrorism legal charges, executive actions, border and immigration activities, and financial sanctions—drive policy outcomes. International organization action was included in the coding to identify where it may have played a role in outcomes. Coding the influence of designation-associated activities enables the qualitative analysis to explore how U.S. Government activities helped achieve desired outcomes post-designation.

Case Study Design

To select the case studies, the potential outcomes from designation were arranged in a quad chart that considered the short-term (1-2 year) and long-term (4-5 year) impact of designation on terrorist incidents and lethality—the clearest examples of potential impact drawn from the trends in the quantitative findings.***

Figure 6. Qualitative Case Studies: Range Of Outcomes



Target and attack type were excluded because the results were tenuous. The lack of clear results still proved useful for developing the qualitative cases, as it demonstrated that designation's impact varies widely by group. In Figure 6, the most desired outcome—both a short-term and long-term decrease in events and lethality—appears in the upper right quadrant.

Case studies were selected from each quadrant. To generate the selection criteria, all 20 groups were arranged in the quadrant that matched the short-term and long-term impact on their activities. To generate the matrix, the

total number of attacks by a group in the year prior to and the year of FTO designation was compared to the number of attacks 1-2 years and 4-5 years after designation. The data was then coded:

- -1 = fewer events or lower lethality
- 0 = no impact
- +1 = more events or greater lethality

^{***} The short- and long-term time horizons reflect the trend observed in the quantitative analysis—1-2 year changes in incidents were not the same for lethality, and the potential impact of designation was stronger 4-5 years out. These time-frames are consistent with the length of presidential CT strategies, after which new groups were designated.

Similarly, to generate the lethality range, the total number of individuals killed or wounded in terrorist attacks by the group in the year prior to and the year of FTO designation was compared to the same measure 1-2 years and 4-5 years after designation.

To combine the measures of impact and lethality, the (-1, 0, 1) inputs for short-term and long-term impact were added to get an overall short-term and long-term score on a range from:

- -2 = fewer events AND less lethality
- -1 = fewer events OR less lethality
- 0 = no impact
- 1 = more events OR greater lethality
- 2 = more events AND greater lethality

Al- Nusrah, ISIL-Khorasan, ISIL-Libya, and Hizb-ul-Mujahideen were dropped from qualitative consideration because their late designation meant they lacked long-term post-designation data, which dropped the groups considered for the qualitative case studies to 15. Additionally, all 0's on the axis line are indicative of mixed results—either fewer events with more lethality or the inverse—and put them in the "no impact" box in the column where the zero score appears. LET and Jemaah Islamiyah (JEM) could not be allocated along the quad chart because their contradictory short-term and long-term impacts (-1/+1) cancel out the effect. In other groups, like the Indian Mujahideen and the Haqqani Network, the desired effect of declining attacks and lethality is clear in the short term or long term, respectively, and thus can be allocated to boxes 2 and 4, respectively. Figure 7 reveals likely candidates for the case studies in each quadrant.

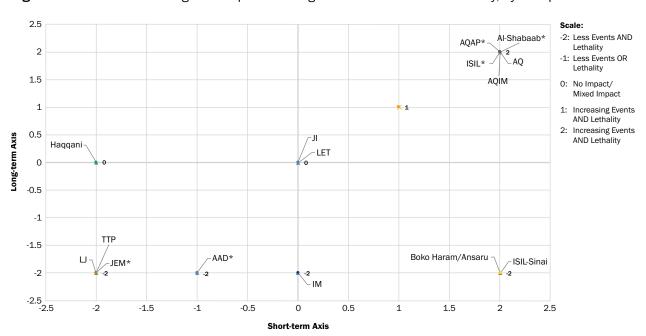
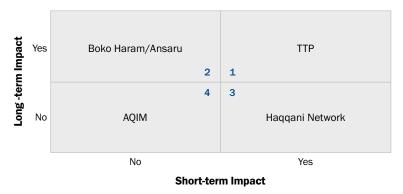


Figure 7. Short-term and Long-term Impact of Designation on Attacks and Lethality, by Group

Selected Case Groups, Data Sources

After matrixing the groups, selecting qualitative case studies relies on the qualitative data available on U.S. Government activities that accompany designation. A number of candidates were generated for each outcome, but very short pre-designation phases (the year of designation and one year before) for al-Shabaab, Ansar al-Dine (AAD), AQAP, ISIL, and JEM limit the amount of comparative qualitative data for a case

Figure 8. Qualitative Case Studies: Group Selection



study. These groups are annotated with asterisks in the preceding Figure. As Crenshaw and LaFree addressed, consistently available information on groups and CT activities against their activities is sparse.

To cover all possible activities, U.S. Government interventions were coded according to the legal responsibilities of the agencies in the FTO process. 123 Case studies examined military activities (DoD); immigration, border,

and defense activities (Homeland Security); legal activities (Justice); executive actions (NSC); diplomatic and consular activities (State); and financial activities (Treasury). The data came from Treasury's summaries of terrorist financial sanctions, Justice's material support charges, State's annual *Country Reports on Terrorism*, and captured media. Combined they cover the official legal activities that can accompany designation and the activities that can informally accompany designation. Data availability ultimately determined AQIM, Boko Haram, the Haqqani Network (HN), and TTP to be the "best examples" of the range of designation outcomes. (See Figure 8.)

Assumptions and Difficulties With This Approach

The qualitative analysis is designed to assess if post-designation changes are tied to a different application of activities accompanying designation, but the literature suggests many changes in group behavior are not related to designation. This study used information on terrorist alliances, organizational change, and the activity and capability of groups compiled from primary source documents from terrorists' captured media as checks on the case study conclusions. When captured media was not available, additional source material was gathered on the groups' views of U.S. Government targeting and internal dynamics independent of U.S. activity. If the case studies revealed something intrinsic to the nature of the groups that explains the differences, that is still a valuable finding for informing future CT efforts.

Findings

Overall Findings

This research found that designation largely did not affect terrorist group membership. Except for a few limited groups in North Africa, Afghanistan/Pakistan, Somalia, and Southeast Asia, terrorist group membership growth followed the exponential trends in the established literature. The flatter growth trends for a handful of designated groups indicated a potential stall in otherwise rising membership but could not be validated given the poor data on group membership overall.

KEY FINDINGS:

The quantitative measures indicated that:

- 1. Designation did not decrease terrorist group membership—countering the study's hypothesis. Overall group membership rose from 2,200 in 1998 to 71,500 in 2018.
- 2. For some groups, designation-related activities reduced the number of terrorist incidents and their lethality, although the results were not statistically significant.
- 3. The overall number of suicide attacks increased 2-3 years after designation, but noticeably declined between years 4 and 5.

The qualitative case studies indicated that:

- 1. Designation did not drive differences in terrorist groups' attack types, weapon type, or target type, which were consistent before and after designation.
- The international vs national orientation of terrorist groups was the most persuasive determinant of post-designation outcomes. Narrowly focused groups (TTP) were more affected by designation-associated actions than groups (AQIM) whose activities were more broadly focused internationally.

This project also concluded that designation activities do precede changes in terrorist group behavior—reducing the number of terrorist incidents per year for some groups and, in some cases, the number of people killed and wounded—but the results are not statistically significant and represent little more than a random chance of impact. Interrupted time series analysis indicates designation is a complex independent

variable, in some cases reversing escalating trends of terrorist incidents and lethality spikes and in others seemingly having an opposite or no impact. This finding rejects the hypothesis and, consistent with the literature, suggests that designation does not have a universal impact on the most tactically important behavior of Salafi jihadist groups. However, trend lines identified in the quantitative analysis suggests this is an initial finding and worthy of future study, particularly as the qualitative analysis suggests the intervening variables operationalizing the designation probably are driving successful outcomes beyond the "fact of" designation.

In terms of hardening defenses, FTO designation resulted in an increase in suicide attacks and simultaneous attacks 1-2 years after designation, with a noticeable decline between years 4 and 5. This mixed impact suggests any designation associated effect on targeting lags, consistent with the lethality findings, which increase in the 1-2 years after designation. Attack type, weapon type, and target type remained remarkably consistent before and after designation—with a small increase in bombing attacks and a lack of WMD attacks both before and after designation. Overall, the data indicated too few changes in attack patterns to determine that designation and a hardening of associated targets made a significant impact on Salafi jihadist group behavior—further evidence for the null hypothesis.

Last, using the most promising results from the quantitative data, incidents and lethality, the case studies sought to illustrate the range of short-term and long-term outcomes for designated groups and determine if differing application of designation-associated activities was driving the gamut of outcomes. The case studies ranged from no short-term or long-term impact (AQIM) to both short-term and long-term impacts (TTP) on terrorist incidents and lethality, with mixed short-term and long-term results for Boko Haram and the Haggani Network. The case studies repeatedly demonstrated that it was not the expected nonkinetic designation-associated activities like financial sanctions or legal action driving outcomes; rather the groups and official documents most often cited military and intelligence operations as prompting change in group behavior. Even more important, the international vs. national orientation of the terrorist group significantly explained the matrix of outcomes for the case studies, suggesting the nature of the groups themselves more persuasively determined outcomes following designation than any specific U.S. or allied designation-associated activity. Breakouts of the overall findings are detailed below.

Targeted Groups and Membership

The findings on the impact of FTO designation against the Salafi jihadist groups counter this study's hypothesis because—despite U.S. efforts during the past 20 years—more designated Salafi jihadist groups are operating in more areas of concern across the globe than on 9/11. The official statistics from the State Department's Country Reports on Terrorism show that the approximately 2,200 jihadists in 1998 had grown to more than 71,500 by the end of 2018. Figure 9 includes the approximate membership, over time, of 18 of the 20 groups included in this study.††† Collectively, the impact of FTO designation on Salafi jihadist group numbers and membership tracks with broader trends identified in the academic literature, indicating FTO designation does not appear to lessen the number of groups or members. This finding is significant,

^{†††} Ansar al-Dine (AAD) and Ansar al-Shari'a were excluded because of a lack of membership data.

despite questions about the validity of the State Department's membership counts, which are often oddly unchanging from year to year. Poor official membership data makes assessing definitive trends impossible. For a clearer assessment of designation's impact on membership, official U.S. Government data on groups pre- and post-designation would need to significantly improve. Terrorist attack data—discussed later—more precisely reflects groups' attack capability relative to designation.

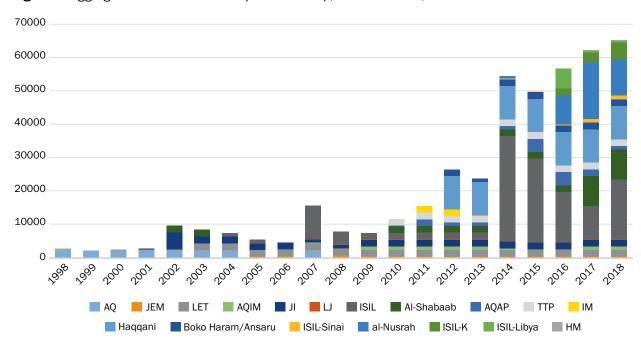


Figure 9. Aggregate Salafi Jihadist Group Membership, Year Over Year, 1998-2018

Taking the highest possible State Department estimates for each of the study's targeted groups where a range (e.g., 100-200) exists elucidates the nuanced trends of regionally flat growth more clearly. Although the Salafi jihadist movement has expanded in aggregate since 2001, overall membership trends probably were flatter at times because of designation and follow-on activities by U.S. and allied forces. Understanding these pockets of success may help optimize future CT operations. Better data and greater transparency in the U.S. Government's assessment of terrorist group growth and membership fluctuations will enhance future research on these trends. For now, they show that U.S. efforts in North Africa, Southeast Asia, and, at times, the Middle East may have had a small impact in limiting group and membership growth.

Reducing Groups and Membership Detailed Analysis

The assessment of group and membership trends was broken into eight areas of operation: North Africa, Libya, Egypt, Nigeria, Somalia, Iraq/Jordan/Syria, Afghanistan/Pakistan, and East Asia. This breakdown was done because trends in North Africa, and in certain groups in Somalia, Afghanistan/Pakistan, and Southeast Asia show flatter growth, suggesting designation may have had a controlling and dampening

effect on group and regional growth 5-6 years later. Some growth represents shifts in group allegiance and identity as new groups emerge, splinter from, and replace legacy organizations. In Afghanistan/Pakistan for example, the number of militants appears largely consistent, but group affiliations have changed. Because the upward curve in growth of Salafi jihadism group membership worldwide is not mirrored by all groups, more granular measures of CT effectiveness are worthy of exploration. Charts are presented by year growth with red lines to reflect designation dates of groups in the region and green lines to indicate the formation of or naming of a new group—which as explained above—impacts regional growth dynamics. The counts reflected in the chart represent all jihadists in the region associated with Salafi jihadist groups, extracted from the State Department *Country Reports on Terrorism* data.

North Africa

The Country Reports data shows that North African jihadist membership leveled off at about 300 jihadists after the Salafist Group for Preaching and Combat (GSPC) was designated in March 2002—a significant drop from the late 1990s, when an estimated 900 to 1000 jihadists belonged to the Armed Islamic Group (GIA) and GSPC. (See Figure 10.) The drop is a potential indicator that early U.S. efforts to counter the spread of jihadist groups worked. The drop after the FTO designation of Ansar al-Dine (Mali) and Ansar al-Shari'a (Tunisia) also suggests that CT efforts in 2013-14 were effective at flattening growth. A new alliance in March 2017 among Ansar al-Dine, al-Murabitun, and AQIM's Sahara branch—Group for the Support of Islam and Muslims (JNIM)—under the al-Qa'ida banner, drove up Salafi jihadists numbers to 1,000-2,000, however, and prompted JNIM designation. These patterns of flattened membership after major designations, occurring in the context of an ever-increasing global problem, makes them more compelling as evidence of U.S. effectiveness 1-5 years after designation in North Africa.

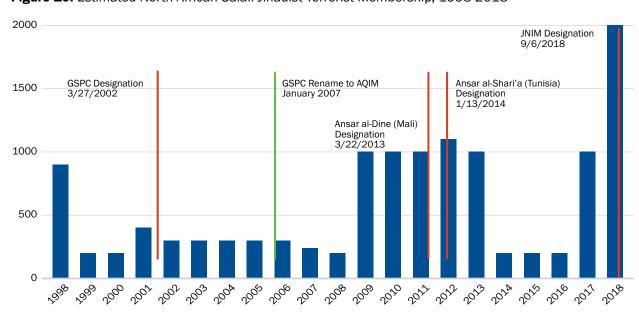


Figure 10. Estimated North African Salafi Jihadist Terrorist Membership, 1998-2018

Libya

The Libyan counts are too poor to draw useful conclusions. Flat membership data for the Libyan Islamic Fighting Group from 2002-09 raises questions about how the data is obtained. Is the count rerun every year from zero or is the previous year's number assumed accurate? This is not to criticize the painstaking work of accounting for terrorist group membership, particularly in conflict zones like Libya, but rather to reemphasize that measuring CT effectiveness is fraught with complex data issues given the clandestine nature of groups.

Egypt

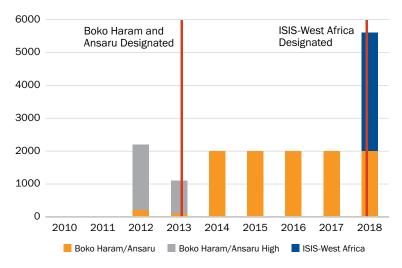
ISIL-Sinai, formerly Ansar Bayt al-Maqdis (ABM), is the primary group in Egypt to assess in terms of membership changes pre- and post-designation. ABM (Supporters of Jerusalem Group) emerged after the 2011 Arab Spring and claims Egyptian origins, although some analysts suggest the group shares its ideology, founding, and vision with the Gaza-based Mujahideen Shura Council (MSC). By early 2014 the group's increasingly violent attacks against Cairo and along the Nile Delta earned it FTO designation. Shortly after ABM declared allegiance to Abu Bakr al-Baghdadi, joining new ISIL affiliate pledges in Algeria, Yemen, Libya, and Saudi Arabia. Despite designation, ISIL-Sinai's estimated membership grew from 200 to 1,200 between 2014 and 2018, the surge likely stemming from the group adopting the ISIL-moniker. The Egyptian case demonstrates again that designation does not have the impact on membership that policymakers desired, although, given the limited data for the group (only 5 years) and the

relatively quick U.S. designation, few conclusions should be drawn.

Nigeria

The network of allied Salafist jihadist factions that has emerged in Nigeria since 2010, known as Boko Haram, was formally designated in 2013, with seemingly no impact on membership. Figure 11 shows 2013 as the low point for State Department membership data on the group. Membership skyrocketed in 2018 when Boko Haram's merged with ISIL and a splinter group

Figure 11. Nigerian Salafi Jihadist Group Estimated Membership, 2010-18



^{‡‡‡} Egypt's role in the global jihadist movement predates al-Qa'ida's and ISIL's modern iterations, but by 9/11 "Blind Shaykh" Omar Abdel Rahman's Jamaat al-Islamiyya had ended its activities and Ayman al-Zawahiri's Egyptian Islamic Jihad (EIJ) had merged with al-Qa'ida.

renamed itself ISIL-West Africa. This raises interesting questions about the differences between Nigeria and North Africa, where designation appeared to be followed by years of flat membership growth. Were actions that accompany designation (sanctions, criminal charges, military and partnership activities) used more often in North Africa than against Boko Haram? Further research should compare the sequencing of activities used against AQIM and Boko Haram/Ansaru pre- and post-designation to further assess how the Nigerian groups and U.S. efforts against them compare to other African Salafi jihadist groups.

Somalia

Al-Shabaab, which emerged from the Islamic Courts Union in Somalia, was founded in December 2006¹²⁶ and pledged allegiance to al-Qa'ida in 2009, but it was not formally welcomed into the Salafi jihadist fold by Ayman al-Zawahiri until 2012.¹²⁷ The earliest State Department count of al-Shabaab's membership numbers appeared in 2010 and stayed consistent at 2,000 until 2017, which would appear to confirm the hypothesis. Static growth may be indicative of designation's effectiveness at holding a group below the expected rise of an undesignated group. But the large jump in al-Shabaab's strength in 2017-18—to between 7,000 and 16,000—leaves one skeptical of estimates of clandestine group size in determining the impact of designation.

Iraq and Syria

The membership counts for the ISIL and al-Nusrah groups, competing under the global ISIL and al-Qa'ida banners respectively, belie the evolution of the groups, their relationship, and the designation and targeting of the groups by U.S. policy. ISIL was first designated as its predecessor organization, al-Qa'ida in Iraq in December 2004, with the State Department adding al-Nusrah as an alias of the group in December 2012.¹²⁸ The estimated number of jihadists in Iraq and Syria remained comparatively low until the Syrian uprisings in March 2011 and the U.S. withdrawal from Iraq. The number of jihadists, estimated to be 5-10 thousand at the height of the Iraqi insurgency in 2006-07, had doubled by 2014. The drop since then, reflected in both the low-end and high-end State Department estimates of ISIL's total membership, is attributed to direct U.S. military intervention conducted after designation. When the United States announced the global coalition to defeat ISIL in September 2014, it identified specific efforts to defeat ISIL—providing military support, impeding the flow of foreign fighters, disrupting financing, easing the humanitarian crisis, and using countermessaging to expose ISIL's true nature. This CT campaign was more aggressive than most FTOs experienced but was consistent with many of the tools used in a smaller scale post-designation. 129

The lack of change in membership after designation and the role of military force suggest a slight modification of the original hypothesis in Iraq's case. In areas of active U.S. military engagement (Afghanistan, Iraq, and other areas of operations), designation may serve as a less compelling proxy than military force for U.S. policy attention and focus. In the cases where U.S. forces are engaged in major joint combat operations, the proxy measure may not be needed. Future studies should compare the role of designation in combat versus non-combat operations to see if the tools used vary outcomes.

Afghanistan/Pakistan

With the most designated Salafi jihadist groups of any region, Afghanistan/Pakistan (Af/Pak) is the most complicated area in which to track Salafi jihadist group membership, particularly post-9/11, and arguably the most important for measuring progress. Figure 12 shows aggregate membership escalating from 200 fighters in 1998 to more than 17,000 by 2018, but the increase has come from the proliferation of jihadist groups from one to fourteen. For example, al-Qa'ida's 200 members before 2001 grew to 2,000 after 9/11, and stayed steady through 2004, when the State Department stopped estimating total membership—except for 2007. The lack of data stymies any useful analysis of al-Qa'ida's membership in Af/Pak in the intervening years.

A chronological examination of group membership illustrates the difficulty in using changes in group membership to assess FTO designation's impact on regionally aligned groups. The individual membership in groups designated soon after 9/11 (2001-03), such as JEM, LET, and LJ, ebbs and flows, but regional membership remains in the 2-3,000 militant range for 15 of the past 21 years, if AQ is taken out of the mix. Static Salafi jihadist membership across groups designated in the same period suggests group membership is a less effective metric than proposed to assess designation's impact in Af/Pak. Yet, before we discard the membership metric for Af/Pak, it is important to note the debate within the CT community about whether LET, LJ, and the HQN meet the definition of Salafist jihadism. The Blair Institute for Global Change excludes LET, HQN, and the Taliban from their criteria for jihadism based on the groups' inconsistent "Support for expansion of Muslim lands." Because all four groups pre-date al-Qa'ida's and ISIL's vision of global jihad, it is worth considering excluding these groups.

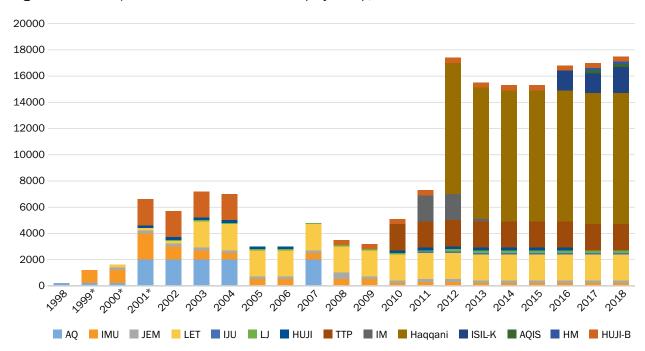


Figure 12. Total Af/Pak Salafi Jihadist Membership by Group, 1998-2018

Excluding them would leave only the Uzbekistan-based groups from the early days of the Global War on Terror, which were excluded from this study because of their low level of terrorist incidents, even though their influence on group and membership numbers in the Af/Pak region is worth noting. CT efforts appeared to have lowered membership in the Islamic Movement of Uzbekistan (IMU), designated in 2000. The group's membership peaked at around 2,000 post 9/11 and has since shrunk to a mere 200. Even accounting for the split with the follow-on group the Islamic Jihad Union (IJU), designated in 2005, U.S. success in discouraging membership in Uzbek groups affiliated with Salafi jihadist ideology has been strong, which may account for their lack of attacks in the GTD dataset.

The last groups to discuss in terms of membership in the Af/Pak region are the native Pakistani groups, the first crop of which were designated between 2001 and 2003. The consistency in membership in Jaishe-Mohammed (JEM) at about 200, Lashkar-e Tayyiba (LET) at 2,000, and Lashkar i Jhangvi (LJ) at 100-200 members provides little insight into the impact of U.S. CT efforts. Like with Libya, the static membership numbers for these Pakistani-based groups raises questions about State Department data, or another cause of the unusual consistency compared to the Uzbekistan groups. It is possible that the nativist Pakistan groups remained relatively stable because of different designation-associated U.S. activities. The different trendlines in membership following U.S. designation for the Uzbek and Pakistani groups are a particularly interesting finding because of the debate about Salafi jihadi ideology and the longer history of some of the Pakistani groups—LET and LJ date back to 1990 and 1996, respectively.¹³¹

The rest of the Af/Pak groups, HM, HQN, HUJI/HUJI-B, IM, ISIL-K, and TTP, were not designated until after 2006. The only Af/Pak group designated after the initial Bush administration response to 9/11 was the Islamic Jihad Union in 2005, when it left IMU. The rapid designation of six Af/Pak groups before 2003 and the precipitous drop after invading Iraq in 2003 underscores the broader point of this work: U.S. Government policy attention and priority is reflected, at least in part, in the designation patterns of FTOs.

Except for ISIL-K, these Af/Pak groups also show the same statistically unlikely data consistency as the Libyan data. For 2010-18, State Department records show a consistent 2,000 members for TTP, designated in 2010, and 10,000 members from 2012-18 for HQN, designated in 2012. Kashmir-based Hizbul Mujahideen (HM), designated in 2017, has a consistent 200 members the year of and the year after designation. HUJI is recorded as having several hundred members from 2001 to 2018 and HUJI-B as having 2,000 members from 2001 to 2004 and 400 members from 2008 to 2018. The only outlier is the Indian Mujahedeen, an India-based Islamic group that claimed a string of attacks across India in 2008. After its designation in 2011, the State Department calculated it had 2000 members, but that number dropped to several hundred by 2013, probably because of improved CT cooperation between the U.S. and India.

The last group, ISIL-Khorasan is made up of former members of TTP and other Af/Pak militant groups. ISIL-K announced its affiliation with ISIL in January 2015¹³⁴ and quickly declared war on the Afghan Taliban, compounding the number of militant groups in Afghanistan competing for military and political power. ¹³⁵ ISIL-K was designated in 2016 and estimates of its size have grown from 1,500 fighters in 2016 to as high as 5,000 fighters in 2018. This growth should have led to a decline in competing regional group membership, but this splintering trend is not reflected in the data, which compounds the confusion regarding total Salafi jihadist group members operating in Af/Pak.

In summary, the Salafi jihadist groups in Afghanistan and Pakistan seem largely unchanged in total membership across the region despite U.S. designation, except for the Uzbek groups, where clear gains can be identified post designation and targeting. This highlights the importance of qualitative research to determine if and how different groups were treated in the same area of operations post-designation. If different designation-associated activities account for differences in militant counts, it will help support the hypothesis. If not, it is equally possible that designation did not have the desired impact on group members or that the data on Salafi jihadist group membership is simply too poor to draw useful conclusions.

Southeast Asia

The oldest designated Salafi Jihadist group in East Asia, Abu Sayyaf, was originally founded in 1991 and designated an FTOs in the first batch by the U.S. State Department in October 1997. Abu Sayyaf's designation date puts it outside the bounds of this research, but its group membership is still relevant to tracking the overall membership of Salafi jihadist groups in East Asia after 9/11 and U.S. efforts to combat their spread. Abu Sayyaf's membership was estimated in the low hundreds until 2000, when membership abruptly jumped to 2,200 before falling to the low thousands and settling at the 200-500 range from 2002-2018.

Jemmah Islamiya (JI), a comparably larger organization based primarily in Indonesia, emerged in 1990, with the goal of establishing an Islamic Caliphate in Southeast Asia. ¹³⁷ JI engaged in several high-profile bombings and attacks, particularly against Christians in Southeast Asia in the early 2000s. The Bali nightclub bombing in October 2002 killed more than 200 people, including 88 Australians, and landed JI on the U.S. State Department's designation list less than two weeks later. ¹³⁸ JI's founding leaders were killed in 2009 and 2012, and since then the group's membership has remained largely static at 500-2,000 fighters. Both the low or high end of the State Department estimates indicate a decline in the number of Salafi jihadists operating in Southeast Asia. Membership data in the region after ISIL Bangladesh/Philippines's designation on February 28, 2018, would be helpful to compare to the trendlines from the early 2000s, but the impact is outside the bounds of this study. Nevertheless, the 2019 *Country Reports on Terrorism* cited several hundred supporters for ISIL-B and an unknown number in the Philippines. ¹³⁹ How those numbers trend in future years will be indicative of the effectiveness of designation in Southeast Asia in deterring membership growth.

Reducing Attacks and Lethality

The models for incidents and lethality show that designation decreases the slope of terrorist incidents and lethality, but the finding is not statistically significant—meaning the changes can also be attributed to random chance. The full findings are detailed in respective sections that follow, but the totality of the quantitative results rejects the hypothesis and suggests that designation does not have the desired impact on the behavior of Salafi jihadist groups. There are some indications in the data that a case could be made for directionality shifts in reversing the upward operational trends of groups pre-designation. A reversal in aggregate behavior trends in incidents and lethality in the years after designation would more clearly reflect the desired U.S. Government impact of FTO designation on altering the attack frequency and lethality

of Salafi jihadist groups, confirming the hypothesis. Given the noise in the data, the null hypothesis that designation is not producing the results the U.S. government seeks—or at least not designation alone—is consistent with the findings and extent literature.

Yet, for many groups the year of designation marks a change in the slope of the line of increasing attacks, indicating that there are likely intervening variables that accompany designation that reduce the number of incidents of terrorist attacks per year for certain groups. That effect is increased in the years after designation through at least year 8 for the groups whose trend lines reverse. However, after year 8 there is an argument both that designation's impact would be overcome by other events, along with an increasing ISIL's attack trajectory that alters the data so significantly that aggregating the groups becomes problematic. Removing al-Qa'ida and ISIL from the analysis shows the effect more starkly, with precipitous drops in aggregated attacks by year 5. This raises interesting questions about the sequencing of designation-associated activities, the length of counterterrorism campaigns, and how they impact group behavior.

Lethality peaks about a year after designation—further rejecting the hypothesis, but for some groups lethality has changed to a downward slope by year 2. It is hard to draw conclusions because the number of Americans killed and wounded from FTO-associated terrorist activities is so low, but the data shows the number of U.S. persons killed and wounded peaks 1 year after designation but stays relatively low 2-5 years after designation, even controlling for 9/11. This is probably because lethality is a function of incidents—but for policymakers using designation to reverse rising terrorism trends, an immediate surge in lethality the year after designation is less than ideal. This quantitative data, which suggests changes in group behavior in attacks and lethality in the years leading up to and following designation, particularly between years 1 and 2 after designation and certainly by year 5, is worth further study. It is possible that designation's associated effects—because of the number of years required to implement a full counterterrorism campaign—may lag years after designation.

Total Incidents

To build the incident model, data on the total incidents at years of designation was aggregated for all 20 groups in the study, and then the totals by years relative to designation were added, including dummy variables for the periods pre- and post-designation. These charts, depicted in Table 1 and Figure 13, closely resemble the CTC model, except these only include the 20 Salafi jihadist groups that met the FTO designation and incident criteria required for this study. Additionally, because ISIL begins to skew the data in year 8, the groups were adjusted to a logarithmic scale for ease of comparison, and data past year 8 was excluded.

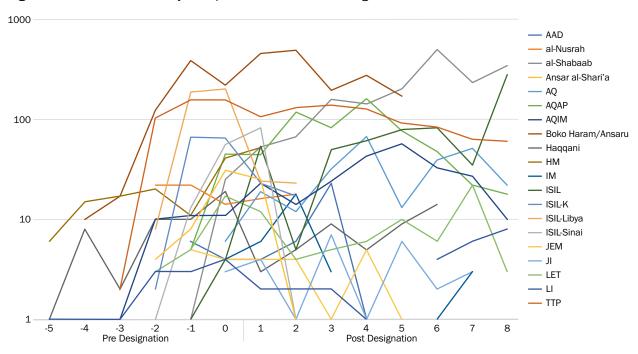
Model Specifications

ARIMA/Box-Jenkins models are defined by three terms (p, d, q), where p identifies the number of autoregressive components in the model, d represents the stationary (or nonstationary and differenced) components in the model, and q represents the number of moving average components in the model. ¹⁴⁰ Ideally,

Table 1. Total Incidents by Group Relative to Year of Designation

Years to Designation	AAD	al-Nusrah	al-Shabaab	Ansar al-Shari'a	AQ	AQAP	AQIM	Boko Haram/ Ansaru	Haqqani	нм	IM	ISIL	ISIL-K	ISIL- Libya	ISIL- Sinai	JEM	JI	LET	n	ТТР
-5									1	6			2						1	
-4								10	8	15									1	
-3					2		1	17	2	17	24								1	2
-2		22		4			10	123	10	20			2	8	1		44	3	3	103
-1	6	22	1	8		5	11	389	10	11	3	1	66	187	13	5		5	3	156
0	4	14	25	31	6	45	11	221	19	41	4	4	65	200	56	4	3	17	4	156
1	4	16	53	25	19	44	23	454	3	52	6	54	23	24	83	4	4	12	2	106
2	6	18	67	1	12	118	14	491	5		18	5	17	23	1	4	1	4	2	131
3	23		159		32	83	24	195	9		3	50				1	7	5	2	139
4	1		142		67	161	43	275	5			61			1	5	1	6	1	127
5			201		13	77	57	170	9			79				1	6	10		91
6			499		39	48	33		14		1	82					2	6	4	84
7			232		51	22	27				3	35					3	22	6	63
8			342		22	18	10					279						3	8	60
9			355		36		14					434					6	1	31	
10			260		33		9					1095					1	2	21	

Figure 13. Incident Counts By Group Relative to Year of Designation



values for *p*, *d*, and *q* are selected before running the analysis to ensure the model chosen best fits the data. In practice, researchers use several statistical tests to narrow down many potential Box-Jenkins/ARIMA models to find the best fit to the data pattern. In this study, determining a best fit model was a mix of both. Autocorrelation issues are likely when a previous year's activity is correlated with the following year's incidents (so not representative of a random walk). Moreover, the randomness of terrorist attack data meant it probably would need to be differenced or logarithmically transformed to develop valid conclusions about

trends. This suggests an ARIMA model of (1, 1, 0) for the type of intervention model and terrorist attack available in the GTD. A glance at the overall incidents per years of designation at the available data (5-17 years post designation) confirms the data is nonstationary.

Autocorrelation function tests were performed to determine the best-fit value of p. The results of autocorrelation functions at lags through 16 (See Appendix D) confirmed that a (1, 1, 0) model—which is a first order autoregressive model with one order of nonseasonal differencing, mathematically represented as: $\hat{Y}t = \mu + Yt-1 + \phi 1$ (Yt-1 - Yt-2)— would be a good fit for representing the data within a 95-percent confidence bound. Tabachnick and Fidell, in *Using Multivariate Statistics*, recommend taking the logs of incident totals in the data to smooth the extremes as the variability in the mean and dispersion. This revealed less statistically significant (p = 0.035 vs. 0.014), and weaker relationships (-.205 vs. -63.6) at the point of designation, which stands to reason as logarithmic functions smooth extremes in data patterns. As terrorism is an inherently irregular phenomenon, the log transformation in this case was not of additional explanatory value, but the logs of the model are included in Appendix E and F for a point of comparison.

Results for Total Incidents/Groups

The ARIMA (1,1,0) model results for all 20 groups can be seen in Table 2. Before designation, the coefficient for pre-designation (*d*Timeperiod), which equals the slope of the regression line, indicates an increase of 53.9 terrorist instances per year. This is consistent with both the research and quantitative trends identified by CTC in terms of a general increasing frequency of attacks by terrorist groups before U.S. designation, often part of the justification for designation in the first place.¹⁴³

Table 2. ARIMA Model Parameters, Total Incidents

					Estimate	SE	t	Sig.
Total Incidents-	Total Incidents	No Transformation	Constant		-30.154	373.901	081	.937
Model_1			AR	Lag 1	021	.254	085	.934
			Difference		1			
	dTime Period	No Transformation	Numerator	Lag 0	53.906	89.005	.606	.553
	Interact	No Transformation	Numerator	Lag 0	-65.591	89.884	730	.475
	Designation	No Transformation	Numerator	Lag 0	154.542	427.865	.361	.722

In reading the output, the co-efficient for designation is disregarded as it is a dummy variable indicating before or after designation. The coefficient for interact (-65.60) is the difference between slope pre- and post-designation, with a p-value of (0.47). Adding the pre-designation slope to the interact reveals the post-slope at the year of designation—a very slight decline in the slope of terrorist incidents—that is not more significant than random chance.

While this result is disappointing, of most interest is the long-term impact, ideally measured by a decline in the slope of terrorist incidents in the years after designation. The impact 1-8 years after designation (see Table 3) shows an increasingly downward slope from the pre-designation incident trendline at each additional year following designation—but with *p*-values that become progressively higher (ranging from 0.36-0.41). Although this trend starts to reverse 8 years after designation, only 8 of the 20 groups studied had

Table 3. Change in Slope After Designation, Incidents

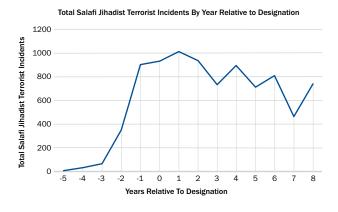
Year	Co-efficient for Designation	<i>P</i> -Value
1	-304.75	0.36
2	-370.39	0.36
3	-436.02	0.38
4	-501.65	0.38
5	-567.27	0.39
6	-632.87	0.40
7	-698.46	0.41

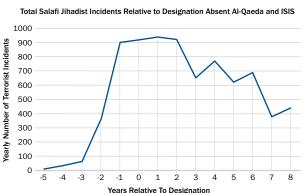
useable data at that time. Additionally, at 8 years post-designation, ISIL's attack pattern begins to skew the data significantly, which renders analysis in years 8, 9, and 10 dubious at best. Therefore, the data presented in the full ARIMA model stops at year 7.

Total Incidents Minus al-Qa'ida and ISIL

ISIL's skewing of the data raised an interesting question—how would the interrupted time series change if the two largest groups, al-Qa'ida and ISIL, are removed? For this study, a full ARIMA model is not necessary, as the overall impact of FTO designation on Salafi jihadist incidents is clearly larger if the largest, most transnational groups are removed from the analysis, as shown in the Figure 14. The implications are interesting as troops have withdrawn from Iraq and Afghanistan. The data demonstrates that jihadist incidents not fueled by the two groups decline more dramatically post-designation—but the presence of U.S. troops provided both a target-rich field for attacks and a central point against which to focus their efforts. Reassessing designation's impact in areas subject to military operations versus areas that experienced only nonkinetic designation measures is therefore critical to further assessment of the policy impact.

Figure 14. Salafi Jihadist Incidents Relative to Designation, Total and Absent al-Qa'ida and ISIL





Total Lethality

Figure 15 shows a significant visual decline in lethality after the first year post-designation, indicating a potential lagging effect after the policy decision that may account for department/agency implementation of designation-associated activities. To run a similar interrupted time series ARIMA model for lethality, the total number of individuals killed or wounded in terrorist attacks by each group was aggregated for each year relative to designation (nkill+nwound by group). Although this may exaggerate the true impact of terrorist incidents by including wounded people, the injuries from terrorist attacks can be life-altering, and the difference between life and death is sometimes random or determined by the availability of medical personnel.¹⁴⁴ Therefore, to accurately capture the number of physically impacted individuals in terrorist incidents, the number of wounded was added to the number killed to bias the results toward maximum potential lethality.

Adding together the total wounded and killed by group provides total lethality relative to designation, including dummy variables for the periods pre- and post-designation. Total lethality (wounded+killed) relative to designation looks similar to the incident graph, which makes sense—lethality will only occur when a terrorist incident takes place. The data points for 9/11 were removed.¹⁴⁵

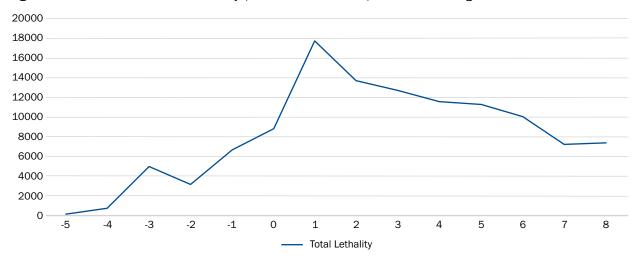


Figure 15. Total Salafi Jihadist Lethality (Killed and Wounded) Relative to Designation

For lethality, the logarithmic transformation of the selected ARIMA (1,1,0) Model was also compared to the standard, which revealed that the *p*-value improved (0.29). However, to keep the analysis consistent, the natural logs model for lethality (see Appendix F) preserved the same parameters as the incident model (ARIMA 1,1,0). That the model improves slightly using natural logs for lethality affirms the methodology, but the result is still poor in terms of statistical significance. Even though the data trends indicate a reversal of some of the upward trend in incidents and lethality in the years after designation, there is nothing compelling to indicate this result is causal or tied to designation specifically. In fact, the lagging change for lethality may point more compellingly to specific U.S. activities that accompany designation, the intervening variables, as discussed in the qualitative findings.

Results for Lethality

Table 4. ARIMA Model Parameters, Lethality

					Estimate	SE	t	Sig.
Total Lethality-	Total Lethality	No Transformation	Constant		49.150	5532.879	.009	.993
Model_1			AR	Lag 1	242	.343	705	.493
			Difference		1			
	Interact	No Transformation	Numerator	Lag 0	-644.194	1333.047	483	.637
	dTime Period	No Transformation	Numerator	Lag 0	494.841	1311.232	.377	.712
	Designation	No Transformation	Numerator	Lag 0	1903.515	6676.979	.285	.780

Table 4 shows the ARIMA (1,1,0) lethality model results of the aggregated lethality totals (nkill+nwound) for all 20 groups. The coefficient for pre-designation (dTimeperiod) is 494.8, indicating the slope of the lethality regression line increases considerably before designation, which is consistent with the research and West Point CTC's findings of increased attack lethality in the years before and 1 year after U.S. designation. ¹⁴⁶ In reading the model results, the coefficient for designation is disregarded because it is a dummy variable indicating pre- or post-designation. The coefficient for interact (-644.19) is the difference between the slope pre- and post-designation, with a *p*-value of (0.64). Adding the pre-designation slope to the interact, we get the post-slope at the year of designation—a slight decline in the slope of lethality, even if the absolute value of the number of individuals killed and wounded increases in the first year after designation. The lack of statistical significance, however, rejects the hypothesis in favor of the null.

While Table 5 shows an increasingly downward slope from the incident trendline pre-designation at each additional year through year 8, the explanatory value of this analysis is poor. Like the previous incident data, ISIL skews the lethality total significantly beginning in year 8—rendering analysis in years 8-10 dubious at best. Additionally, the *p*-values are higher for the lethality data, which appears far more variable, than the incident data—rendering conclusions even more tenuous. The data presented again stops at year 7 to remove the ISIL outlier data.

Overall, the lethality ARIMA model is not as clear or as strong as one would hope to demonstrate the impact of designation on terrorist lethality, in part because of the randomness variation in lethality across the range of terrorist incidents and because lethality is a function of incidents. Still, the data change in directionality at year 2 is important as it indicates some yet unexplained change in behavior after the point of designation, again potentially pointing to the tools applied post-designation.

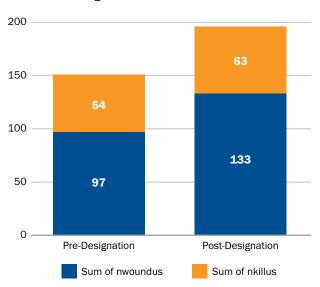
Table 5. Change in Slope After Designation, Lethality

Year	Co-efficient for Designation	<i>P</i> -Value
1	-2606.91	0.60
2	-3250.97	0.59
3	-3894.93	0.59
4	-4538.80	0.59
5	-5182.58	0.59
6	-5826.28	0.60
7	-6469.91	0.60

Designation's Impact on American Casualties

The number of American citizens killed or wounded by terrorist attacks peaks 1 year after designation. §§§ At first glance, researchers may conclude that FTO designation flattens lethality for Americans post-designation in the out years, but a descriptive comparison reveals more U.S. persons fell victim to terrorist attacks in the years after designation. (See Figure 16) The difference is so small (45 people) that the change following

Figure 16. U.S. Persons Killed or Wounded Relative to Date of Designation



FTO designation is inconclusive at best—again hardly distinguishable from random chance—and, therefore, does not confirm the hypothesis. This is an important conclusion for policymakers who may hope to use designation to reduce American casualties from terrorist incidents. Overall, the number of Americans killed or wounded in terrorist attacks by FTO-designated groups averages fewer than one person per year.

Hardening Targets

Overall, the study found an increase in suicide attacks and simultaneous attacks 1-2 years after designation, with a noticeable decline between years 4 and 5. This mixed effect indicates any impact of designation lags years behind the decision to designation

nate, which is consistent with the quantitative findings and reinforces questions about designation associated activities and sequencing. Additionally, attack type, weapon type, and target type remained remarkably consistent before and after designation—with a notable lack of use of WMD by Salafi jihadist groups both before and after designation. FTO designation and targeting, therefore, probably has little impact on choice of tactics, weapons, or targets—an interesting finding for U.S. agencies looking harden defenses against terrorist attack.

The fascinating exception to these findings is aviation—a component of critical infrastructure that went from 1 percent of attacks to no attacks post-designation for all the Salafi jihadist groups in this study. This may reflect the impact of a U.S. Government focus, post-9/11, on eliminating aviation attacks, long considered the gold standard for the terrorist modus operandi. Yet, even this change is not significant enough to assess FTO designation as effective, according to the hypothesis. The data indicates FTO designation and designation-associated activities do not alter terrorist targeting behavior enough to be judged a success in hardening defenses.

Among the U.S. efforts to harden defenses against terrorists' use of chemical, biological radiological, and nuclear weapons (CBRN), nuclear is the most important given its potentially catastrophic destructive

^{§§§} An interrupted time series proved less useful for examining the impact of designation on American casualties—a subset of overall lethality—because the numbers are too low for sophisticated quantitative techniques.

impact. As such, it is singled out under preventing WMD attacks in the 2006 and 2011 counterterrorism strategies specifically.¹⁴⁷ And for this strategic goal, post-9/11 efforts seem successful as no FTO-designated Salafi jihadist groups have acquired, built, or used nuclear weapons despite the well-documented desire by al-Qa'ida and like-minded groups to acquire nuclear material before 2001.¹⁴⁸ However, because no Salafi jihadist or other ideologically-aligned terrorist organization had executed a successful nuclear attack before 9/11 either, the absence of both pre- and post-designation nuclear attack data precludes categorizing FTO designation as a successful hardening measure against nuclear attack.

Qualitative Case Study Findings: Explaining Variation in Impact

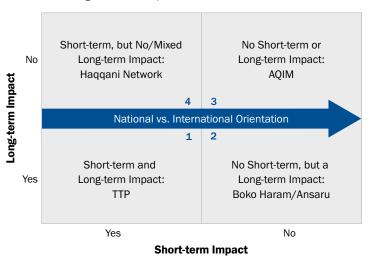
The case studies revealed initial evidence of a potentially significant, but unexpected finding: the international orientation, goals, and operational focus of the groups seem better correlated to outcomes than designation-associated activities. In other words, the most international group, AQIM, was the most unaffected by designation, while the most regional, narrowly focused group, TTP, was most impacted. The hypoth-

esis that designation-associated activities drive the differences observed in terrorist group outcomes pre- and post-designation was not validated in the case studies.

TTP: Designation Has Both Short- and Long-term Impacts

Tehrik-i-Taliban Pakistan (TTP) was formed in December 2007, under former leader Baitullah Mehsud, and engaged in its first high-profile attack against a Pakistani military convoy in Mingora that same month, killing 13 people and wounding another 25.^{149, 150} Despite the TTP's founding as "as a by-product of the

Figure 17. National Vs. International Group Orientation and FTO Designation's Impact



intra-jihadi politics that followed the 2001 U.S. invasion of Afghanistan" and its shared history and alliance with al-Qa'ida, the United States did not formally designate TTP a terrorist group until December 2010.^{151,} 1⁵² According to the quantitative data and case study methodology presented in Chapter 3, the TTP is the "best case" outcome for this study, where the group experienced both short- and long-term post-designation declines in incidents and lethality. Yet, even within the case study, the U.S. Government activities accompanying designation did not appear to drive the outcome. In fact, the two most significant follow-on activities cited in support of FTO designation—financial sanctions and material support to terrorism charges—barely factor into the TTP case study.

Official U.S. Treasury data reflects a surprisingly small number of financially sanctioned groups during the past 20 years despite the growing FTO designation list. Until the early 2000s, Treasury focused on blocking the assets of only a small number of groups, primarily al-Qa'ida, the Taliban, HAMAS, and Palestinian Islamic Jihad. TTP does not appear until Treasury's 2017 Annual Report, which shows a mere \$224 seized from the group. By 2018, TTP's blocked assets rose to \$318, clearly not enough to explain any post-designation changes in the group's behavior. This finding is surprising, because FTO designation's reputation as one of the most effective nonkinetic CT tools is linked principally to asset seizure and material support charges.

Neither are material support charges sufficient to explain change in TTP's behavior. In fact, the number of charges brought against individuals associated with groups in this study is surprisingly small. From 1998 to 2017, the Justice Department pursued material support charges (2339A and 2339B Cases) against only six named individuals associated with the TTP, convicting four, acquitting one, and dismissing charges against the last. TTP was the only group whose members had material support charges levied against them during the study period, but the charges are unlikely to be the source of differentiation between outcomes among FTOs.

That leaves official State Department annual reports, the *Country Reports on Terrorism*, and captured media as the last potential reason why FTO designation appears successful against TTP. Executive action, which makes up 13 percent of the references to TTP in the official State Department documents, dwarfs the mere 2-3 percent for AQIM and Boko Haram, and is more comparable to the 23 percent for the Haqqani Network (HN). This larger executive-level national security focus on the TTP and HN is interesting but does not explain why TTP's short- and long-term behavior changed after designation.

Captured media, the last data source for the qualitative case studies, is perhaps the most reflective of the driving factors for TTP. Even though captured media provides a limited window into a group's decision-making, it is instructive when assessing how U.S. policy impacts and interacts with terrorist group behavior. The data set is biased because captured media is only selectively released by U.S. officials, and it reflects only a narrow aperture of the group's total operations. To improve the insight of this tool, only internal letters and correspondence not made for public propaganda were used to assess the strategic calculus and concerns of the designated groups. Figure 18 shows several documents that helped illuminate TTP's concerns, including documents released as part of the Harmony Project at West Point CTC and captured media from the raid against Usama Bin Laden in May 2011. Three of the documents were specific to the TTP and identified as such, additional references to TTP were identified across the captured media and noted as appropriate in Figure 18.

^{¶¶¶} For a full list of Treasury Summaries of Terrorist Asset Reports (TARs) focused on the impact of designations from 1994 to 2019, see: U.S. Department of the Treasury, "Counter Terrorism Sanctions," https://home.treasury.gov/policy-issues/financial-sanctions/sanctions-programs-and-country-information/counter-terrorism-sanctions.

^{****} The Treasury Departments lists terrorist sanction data annually, summarizing as "Blocked Funds in the United States Relating to the SDGT, SDT, and FTO Programs" in their annual report. Although this data includes two other designation programs that can allow for U.S. Treasury asset seizures, it is still broadly reflective of the impact of FTO designation on terrorist group asset seizures.

Figure 18. TTP Leaders Internal Letters and Correspondence

Document and Date	Case	Number	Author	Coded Themes
Letter to Hakimullah Mahsud, December 3, 2010	TTP	SOCOM-2012- 0000007	Atiyah Abd al-Rahman & Abu Yahya al-Libi	Authority in jihad
Letter to Shaykh Azmaray (UBL), February 4, 2008	TTP	UBL Media	Unknown	Internal alliance and rival formation
Tehrik-e-Taliban Pakistan Charter, Date Unknown	TTP	UBL Media	Unknown, commentary by Atiyah Abd al-Rahman & Abu Yahya al-Libi	Authority in jihad; internal alliance and rival formation
Atiyah Letter to UBL, April 2011	AQIM	UBL Media	Atiyah Abd al-Rahman	Authority in jihad; international vs. national terrorist group
Letter to Shaykh Abu Abdallah, July 2010	AQIM	UBL Media	Atiyah Abd al-Rahman	Internal alliance and rival formation; international vs. national terrorist group
Letter to Shaykh Mahmud Ref. Arab Spring, undated, likely 2010-2011	AQIM	UBL Media	Possibly UBL	Authority in jihad

Most of these documents reflect al-Qa'ida senior leadership's advice on the appropriate authority, decision-making, and targeting for jihadist organizations affiliated with their brand. While the frequency of the authority theme is significant, the debates focus more on who has the authority for internal Shura decisionmaking than targeting strategies and are more reactive than prescriptive. The glaring exception is the document from August 2010, likely written by Bin Laden, which refers to an unknown letter from Shaykh Abu-Muhammad (likely a reference to Ayman al-Zawahiri) that raises the issue of "several Pakistani brothers wanted to pledge their allegiance to the Pakistan Taliban" a reference to the TTP. The response from Bin Laden is to direct Atiyah Abd al-Rahman (the likely recipient of the letter) to inform the Pakistani brothers directly:

[Our] opinion is that they should stay with al-Qa'ida, the reasons being that it is a worldwide organization, not a national one; it has pledged its allegiance to the commander of the faithful, God preserve him; and al-Qa'ida has broader expertise in many areas. So, we believe our religion would be greater served by [their] remaining. They should be told this in so many words, and very politely, but if you believe our religion could be greater served through the Pakistan Taliban, then I leave it up to you. 156

This theme—the comparative advantage of an international terrorist organization rather than a national one, articulated likely by Bin Laden himself—was both unexpected in the qualitative case studies and indicative of broader patterns reflected across the data. As the additional case studies will show, it became the most likely explanatory factor for the different outcomes across designated groups and emerged out of the captured media from the TTP case.††††

^{††††} The TTP captured media was also compared against control themes discussed in the Boko Haram and AQIM cases but the limited media revealed only three themes: internal alliance and rival formation, authority in jihad, and confirmation of active communications between affiliates and core. None were directly applicable to designation-associated activities and thus were cut from the analysis.

Boko Haram: Long-term Impact Only

For Boko Haram, designation's short-term impact was counterintuitive—an immediate increase in incidents and lethality preceded a gradual decline in incidents and lethality after year 2. This result is unlike its peer FTOs. Boko Haram was founded in 2002 and designated in November 2013 after an increasingly brazen series of attacks against the UN and local Nigerian police and military forces.¹⁵⁷ Its designation, therefore, occurred while the group was on an exponentially upward trajectory of attacks and lethality in the 2 years before designation, as visible in Figure 19.

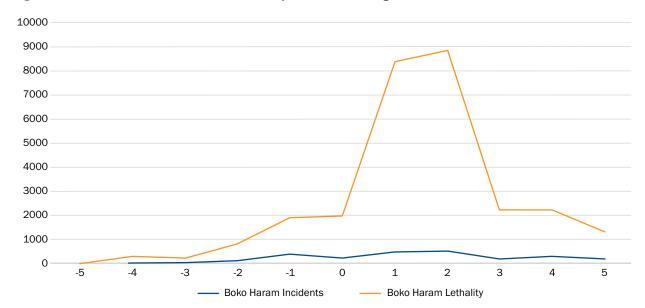


Figure 19. Boko Haram Incidents and Lethality Relative to Designation

One of the immediate questions arising from the Boko Haram case, not answerable from the data, is why FTO designation was delayed despite its expanding international threat, particularly since the State Department Country Reports on Terrorism first mentions Boko Haram in 2009. 158 Press reports suggest that the State Department began a contentious debate about FTO designation for Boko Haram as early as 2012, when three Boko Haram leaders were included in the lesser Specially Designated Global Terrorist list. 159 According to The Washington Post, Nigeria objected to the designation, fearing that blocking assets would hamper the humanitarian support needed to combat the group. 160

Yet, asset blockage again seemed to be a nonfactor in deterring the group's behavior. ### According to the Treasury Department, asset seizures for Boko Haram did not begin until 2018—5 years after its designation—when \$11,514 in assets were blocked. 161 Similarly, no material support charges were levied against

^{‡‡‡‡} Although the author concedes the humanitarian support needed by the Nigerian government may have been impacted, that is beyond the scope of this study.

Boko Haram/Ansaru members from 1998 to 2018, again undermining the two most touted policy benefits of the FTO designation. ¹⁶²

State Department's *Country Reports on Terrorism* reveals the bulk of U.S. and allied designation-associated activities focused on Boko Haram came in two categories: military and intelligence operations and legal actions, mostly focused on legal and investigative improvements in the countries surrounding the Lake Chad region of Cameroon, Chad, Niger, and Nigeria, where Boko Haram operates.

The military and intelligence operations reflected as the dominant response to Boko Haram in the State Department's own reporting are fascinating, particularly U.S. support in 2014 for creating a Multinational Joint Task Force between Cameroon, Niger, and Chad. 163 The Task Force's accomplishments were considered a major driver in countering the terrorist group, both in U.S. Government documents and in the group's own captured media.

Only two documents in the captured media were directly relevant to Boko Haram, both from the Bin Laden raid. The letters, one from Boko Haram's leader Abubakar Shekau and the other from Abdallah Abu Zayd to the leader of AQIM, Abdelmalek Droukdel, are seeking guidance to support Boko Haram's campaign against Nigeria and more broadly the West. While the letters deal primarily with authority in jihad and appealing to al-Qa'ida for support, the second highlights the difficulty Boko Haram had in direct military engagement, including the death of more than 200 fighters. Abdallah Abu Zayd reveals Boko Haram's strategy, based on his alleged communications with Shekau:

When they withdrew, individually or in groups, some went to other countries and others went to the jungle. The enemy is unforgiving and will kill you for any offense. There are a lot of wounded brothers. They recounted another event in which the brothers raided an enemy center and took forty rifles. They escaped into the jungle and have not been heard from since. They said they have been waging jihad, trying to kill the biggest of the criminals, but have achieved nothing so far. Right now they are trying to avoid confronting the enemy except through martyrdom operations and IEDs. Once they have real bases in the mountains or the jungle, then they can launch attacks. 164

Figure 20. Boko Haram Captured Media

Document and Date	Case	Number	Author	Coded Themes
Letter from Boko Haram to al-Qa'ida, undated	ВН	UBL Media	Abubakar Shekau, leader of Boko Haram	Authority in jihad
Letter from Abdallah Abu Zayd Abd-al-Hamid to Abu Mus'ab 'Abd-al-Wadud, undated	BH & AQIM	UBL Media	Abdallah Abu Zayd Abd-al- Hamid	Authority in jihad Military and intelligence operations Lack of material and external support Operational guidance from leaders

The importance of military and intelligence operations for Boko Haram is significant and somewhat surprising, again given that FTO designation is publicly heralded as one of the most effective nonkinetic

tools of counterterrorism. Yet, military and intelligence operations were in the top five themes reflected in the Boko Haram captured media. Boko Haram's case suggests that reconciling the kinetic effects of a nonkinetic public policy tool—beyond the scope of this unclassified project—is a worthy topic for future research.

It is also worth noting that the Boko Haram case study seems to affirm some of the TTP conclusions: Boko Haram's survival depended on their ability to hide in the jungle and engage in guerilla tactics against the CT forces of Nigeria, Cameroon, Chad, and Niger. The State Department's annual reports repeatedly note the refuge provided Boko Haram by the Lake Chad region's fluid borders and suggest that the group's international presence, expanding beyond their Nigerian Taliban roots, factors into their success. This theme of international vs. national terrorist group and the significance of military operations also appears in the case studies on AQIM and the Haqqani Network.

AQIM: No Short- or Long-term Impact

Of the four case studies, al-Qa'ida in the Magreb (AQIM) has the longest history of terrorism and the most available data, which shows that FTO designation quantitatively had no short- or long-term impact on incident and lethality trends of the group (Figure 21). Despite the clear increase in incidents and lethality after its 2002 designation, the State Department's Country Reports on Terrorism still compared AQIM's incidents and lethality favorably with its 1990s-era predecessors. For example, the 2008 Report states for Algeria, "Despite the upsurge of AQIM activity in August, the overall security situation remained greatly improved from the situation of the late 1990s."165 The quote, however, goes on to point out how AQIM evolved the terrorist threat beyond the limits of its predecessors, specifically citing the national agenda of the former Armed Islamic Group (GIA) and the Salafist Group for Preaching and Combat (GSPC). "The Algerian military and security forces were often criticized as slow to adapt to AQIM's changing tactics as well as slow to accept that they faced a better organized international threat in the form of AQIM rather than a purely internal threat." This commentary mirrors this author's observations that, based on the case studies, the national vs. international focus and resources of a group may better explain the outcomes observed than designation-associated activities.

Again, for AQIM, neither material support charges nor asset blockage appear to be drivers despite their cited utility in FTO designation. Of the 81 material support charges levied against al-Qa'ida from 1998 to 2017, none were associated with AQIM.¹⁶⁷ Only in 2020 was a material support indictment identified that specifically cited AQIM, 18 years after their designation.¹⁶⁸ Similarly, al-Qa'ida asset blockages, which appear in the Department of Treasury's annual summaries from 1999 on, are not broken out by group until 2019, and even then do not include AQIM, making a full assessment of AQIM's asset seizures from Treasury reporting impossible. §§§§

^{§§§§} Al-Qa'ida's assets are referred to as Usama bin Laden's assets in early Treasury Assets Reports, then later broken out by group. See: Office of Foreign Assets Control, "Twenty-Eighth Annual Report to the Congress on Assets in the United States Relating to Terrorist Countries and International Terrorism Program Designees," ed. U.S. Department of Treasury (Washington D.C.2019)., 11.

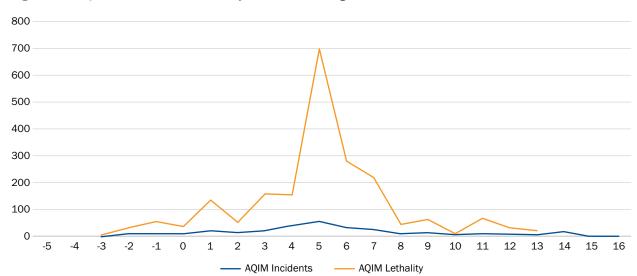


Figure 21. AQIM Incidents and Lethality Relative to Designation

In a full review of the designation-associated activities touted by the State Department as successes in the case of AQIM, the *Country Reports on Terrorism* credit military and intelligence operations and legal actions in countries where AQIM operates, similar to the Boko Haram case study. It is worth noting that AQIM receives a longer narrative assessment of the group's trajectory, threat to the West, and European partners than the other groups in this study, possibly because of the number of locations and areas in which it operated or as a warning to policymakers of the continuing threat posed by a group when designation and follow-on actions did not deter or reverse behavior.

AQIM captured media is also the largest captured media repository in this study, encompassing 34 items from the Bin Laden raid, two letters released by West Point's CTC Harmony project, and one strategy document written by AQIM leadership that circulated in the *Associated Press*. The designation-associated themes reflected in these captured documents focus primarily on AQIM's concern for military and intelligence operations and secondarily on financial concerns (mostly raising funds through hostage taking, but also reflecting tighter financial regulations in North Africa).

However, if the coding is expanded beyond designation themes, the AQIM media tells a different story. As a control on the qualitative analysis, the captured media and *Country Reports on Terrorism* were coded for consistent themes beyond the seven that would support the hypothesis. The full list of alternative explanations considered for all the case studies appears in Figure 24, but it is introduced here as the AQIM captured media provided the largest counterpoint to the argument that designation-associated activities were driving outcomes. AQIM's media reflects that their primary concerns are internally driven rather than externally focused. The top themes include:

- Seeking operational guidance from leaders.
- Internal alliance and rival formation.
- Authority in jihad, responses to the Arab Spring.

- Recommendations on operational alignment.
- Seeking or receiving directions on hostage taking.
- Secret diplomatic negotiations with countries (usually regarding hostage payments).
- Touting their own successes.
- Psychology of the group.

Military and intelligence operations and financial sanctions were 12th and 13th in importance. This reflection of internal AQIM priorities from their private communications with al-Qa'ida leadership and allies shows designation-associated activities were not a primary concern. This perhaps is not surprising given that AQIM is the example of no short-term or long-term impact from designation, but the themes reflected by all the case study captured media indicate greater concern with military and intelligence operations than any of the nonkinetic or designation-associated activities that are the focus of this study.

Haqqani Network: Short- But No Long-term Impact

The Haqqani Network (HN) is the most confounding case study in this research, as it exhibited some impact to incidents and lethality after its 2012 designation, but the effects were short lived. The trendline is easily visible in the Figure 22, where incidents and lethality dip in the immediate year after designation (between year 0 and year 1) and then dramatically increase.

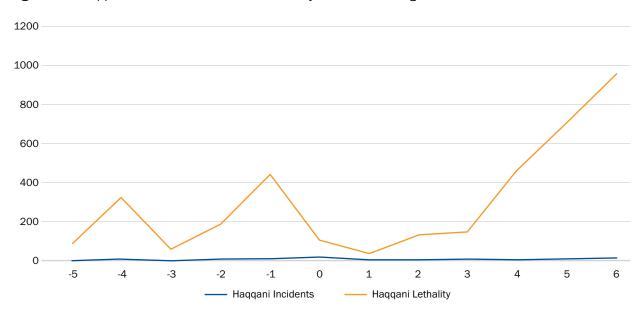


Figure 22. Haggani Network Incidents and Lethality Relative to Designation

Problematically, HN also has a paucity of data compared to the other case studies. No material support charges were brought against Haqqani figures from 1999 to 2018. 169 It is also not until 2017, 5 years after

designation, that HN even appears in the annual Treasury Asset Report, which notes \$1,108 blocked from the group.¹⁷⁰ By 2018 that number had increased to only \$3,626—a tiny amount compared to the \$6,416,827 in al-Qa'ida assets blocked the same year.¹⁷¹ For this final case study, material support charges and financial sanctions are again less significant than expected at the outset of this research.

The *Country Reports on Terrorism* reflects a similar lack of data on HN, despite its founding in the early 1970s.¹⁷² HN is not even referenced until 2005 and, even then, its leader Jalaluddin Haqqani is identified only as a "leading Taliban figure" and mentioned only once.¹⁷³ It is not until 2007 that the Network appears as anything other than a casual mention of its existence as a Taliban-associated affiliate, and then the reference focuses on Sirajuddin Haqqani's addition to the UN 1267 Sanctions Committee list of entities associated with Bin Laden.¹⁷⁴

This highlights an interesting trend found in the State Department's HN write-ups the reports focused extensively on executive actions taken against Haqqani leaders, with a frequency that did not occur in the other case studies. These actions included listing leaders in the FBI's Rewards for Justice program, sanctioning leaders, and adding Haqqani leadership to the Specially Designated Global Terrorism list, along with international sanctions. This focus is reflected in the coding of the *Country Reports on Terrorism*, with executive action making up more 20 percent of the cited designation associated activity against the group. Only the TTP comes close to that level of cited effort, with 13 percent of the references against that group tied to executive action over the same period. Like the other case studies, military and intelligence operations and legal actions make up the next highest categorical references for designation-associated activities.

The Haqqani Network also lacked captured media to reference from the timeframe of this study. HN was referenced three times in other captured media, but only in relation to its alliance with and direct communication supporting al-Qa'ida. The only open-source HN captured media available are nine documents from West Point CTC that date from the 1990s, illustrating the Network's longstanding connections with Pakistani intelligence (ISI) and al-Qa'ida. Yet these documents, while outside the scope of this study, further affirm the results from the other three case studies.

In a comprehensive evaluation of the Haqqani Network published by West Point CTC in 2011, which focused directly on this body of captured media, researchers Ron Rassler and Vahid Brown establish that HN's nexus position among al-Qa'ida, the Taliban, and associated militants in Afghanistan and Pakistan is the source of the group's strength.¹⁷⁷ They state:

The Haqqani network maintains its nexus position by providing services or other items of value that suit the interests of its local, regional, and global partners. The primary way it does this is by

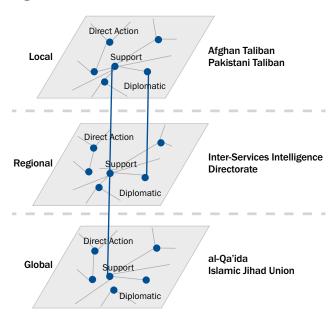
^{¶¶¶¶} The coded themes assessed from these three documents, which the Director of National Intelligence declassified and released as part of the Usama Bin Laden bookshelf, were: Authority in Jihad, Response to the Arab Spring, Hostage Directions, Operational Guidance from Leaders, and Internal Alliance and Rival Formation—none of which directly point to designation-associated activities.

^{*****} To see these original documents see, Combating Terrorism Center at West Point, "Harmony Program," (2005).

functioning as a reliable and effective platform through which violence, driven by the specific interests of each actor, can be interjected into Afghanistan and/or launched abroad.¹⁷⁸

As a nexus-actor operating between local groups (the Taliban) and global groups (al-Qa'ida), the Haqqani Network's post-designation trajectory suddenly makes more sense. Initial designation-associated activities, to include executive actions, probably did alter the group's behavior—but the capability of HN to regroup post-designation was probably stronger than other regional actors, given their nexus posi-

Figure 23. Dimensions of Jihad



Source: Ron Rassler and Vahid Brown, "The Haqqani Nexus and the Evolution of Al-Qa'ida," (West Point: Combating Terrorism Center, 2011), 53.

tion. Figure 23, from the CTC study, illustrates the advantages of the Haqqani's nexus strategy; HN is capable of flexing its relationships at the local, regional, and global levels to further its relatively limited goals of "maintaining its autonomy and influence locally in Loya Paktia and North Waziristan, while also supporting efforts to spread jihad elsewhere." ¹⁷⁹

In other words, HN paradoxically is a terrorist group engaged in local aims but enmeshed in supporting regional and global conflicts in furtherance of their agenda. Rassler and Brown argue that, as part of that strategy, the Haqqani Network has intentionally "portrayed itself as a local actor preoccupied with local concerns," while actually serving as "important to the development and sustainment of al-Qa'ida and the global jihad more than any other single actor or group." This paradox, which allows for greater adaptability for HN, helps explain the confounding decrease in incidents and lethality

immediately post-designation and the precipitous increase in incidents and lethality as the group adapts in the years after designation. This insight, while gleaned from older captured media, helps to strengthen the qualitative findings that the strategic orientation of a group is a better explanation for post designation outcomes than designation-associated activities.

Additional Findings for Qualitative Case Studies

As a check on the qualitative case studies, this study compared the matrix coding of all the data from the *Country Reports on Terrorism* and captured media referenced in the case studies to look for alternative explanations beyond designation-associated activities. The results of this matrixed query, shown in Figure 24, clearly demonstrate that the international vs. national focus of the group plays a part in both how it fares post-designation from the U.S. perspective and how it adapts from a terrorist perspective.

Figure 24.

Coded Theme	AQIM	Boko Haram	Haqqani	TTP
1: Authority in Jihad	3	0	0	0
2: Active Communication Between Affiliates and Core	0	0	1	0
3: Corrections to Jihadists	0	0	0	0
4: Ambiguous Counterterrorism Policies	48	47	4	4
5: Assessment	194	45	21	26
6: Border and Immigration Activites	21	15	4	4
7: Diplomatic and Consular Activities	19	35	4	1
8: Executive Actions	14	5	16	10
9: Financial Sanctions	14	2	5	1
10: International Organization Action	11	14	2	0
11: Legal Actions	96	50	7	9
12: Material Support-Arrests	1	0	0	0
13: Military and Intelligence Operations	112	109	8	21
14: Security Cooperation	1	0	0	0
15: Directions on Support to Mujahideen	0	0	0	0
16: Disrupted Attacks	17	3	1	3
17: Domestic Political Accommodations	2	6	0	0
18: Hostage Directions	0	0	1	0
19: Internal Alliance and Rival Formation	38	24	24	10
20: International Vs. National Terrorist Groups	107	79	25	23
21: Jihadist Difficulties	1	0	0	0
22: Jihadist Needs from Headquarters	0	0	0	0
23: Lack of Material and External Support	6	0	0	0
24: Media Guidance from Leadership	14	9	0	1
25: Operational Guidance from Leaders	1	0	0	0
26: Psychological Operations	0	0	0	0
27: Recommendations on Operational Alignment	0	0	0	0
28: Response to Arab Spring	0	0	0	0
29: Secret Diplomatic Negotiations with Countries	3	2	2	0
30: Target Americans	15	8	4	5
31: Terrorist Successes	283	159	0	54

The coded reflections of the groups' international vs. national presence in both official State Department documents and captured media were in order of least impacted by designation to most impacted: AQIM, Boko Haram, HN, and TTP. Similarly, the international action coding followed suit, with AQIM cited as

the target of the greatest number of international efforts, followed by Boko Haram, HN, and TTP. While the military and intelligence effort to counter AQIM and Boko Haram was cited more often in the case study material—it was the only designation-associated activity to exceed the references to international vs. national presence.

Qualitative Findings Summary

In summary, the hypothesis is not born out by the qualitative case studies—formal designation-associated activities do not appear to drive the difference in outcomes across the groups in this study. Designation appears to matter in some cases, preceding a reduction in terrorist incidents and lethality, but formal designation-associated activities do not appear to be driving the differences in outcomes across groups. The group's international presence or, more important, the lack thereof, was a larger predictor of policy success. This finding is consistent with established literature on the importance of sanctuary for a terrorist group's survival and makes logical sense given the nation-state centric role of the State Department and the purposes under which the FTO designation process began, prior to 9/11. Understanding that, the terrorist group's pre-designation posture is therefore a good predictor of policy success and may help fine tune designation activities and intelligence in support of future operations.

Additionally, military and intelligence operations seemed the most impactful and cited counterterrorism activity, despite the oft-hailed nonkinetic focus of designation. This counterintuitive result is an excellent subject for future research. Over reliance on kinetic tools following designation may undermine the expressed nonkinetic primary purposes of designation. Military and intelligence tools have the potential to amplify violence more than using financial, legal, and diplomatic tools to coerce a change in behavior. Even if military and intelligence tools are more effective, the underused financial and legal avenues addressed in the case studies suggest future operations could be more carefully calibrated to enable greater nonkinetic efforts to target terrorist groups. This focus on nonkinetic tools and outcomes will be increasingly important in the years ahead.

Conclusion and Implications

This study measured whether the U.S. designation of 20 Salafi jihadist groups as foreign terrorist organizations and the associated designation activities changed the groups' membership, the number of attacks they undertook and their lethality, and type of target. The hypothesis—that the U.S. policy to designate terrorist groups would change their behavior and that designation-associated activities determined outcomes—was not borne out by the data. Yet, the change in trajectory of some group behavior following designation is worthy of continued study, as the application of post-designation tools did not match the professed benefits of the program. Most important, the nature of the groups' operational and geographic reach seemed a strong determinant of the behavioral outcomes sought by the designation process—and points to the need to better understand the local support and reach of a groups' influence in predicting the response to U.S. action.

Summary of Findings

Overall, the findings demonstrate that FTO designation itself does not drive changes in Salafi jihadist group behavior in terms of the frequency and lethality of their attacks. Any impact post-designation seems to have less to do with specific designation-associated activities and more to do with the nature of designated groups and their national vs. international orientation and presence. These findings follow from the literature and are consistent with research on how terrorist groups end and on the importance of sanctuary in sustaining a group. These findings also suggest a few ways the designation process, including the decision to designate, could be improved to target Salafi jihadist groups more efficiently.

Implications

The findings—that international vs. national posture is a greater explanatory factor for outcomes than designation-associated activities—are supported by academic literature on counterterrorism. Audrey Kurth Cronin's work on how terrorism ends, the benchmark for comparative CT case studies across all groups and types, suggests many factors play into a terrorist group's demise.

The relevant factors can be both internal and external: terrorist groups implode for reasons that may or may not be related to measures taken against them. Nor are they necessarily separate and distinct. Indeed, individual case studies of terrorist groups often reveal that more than one dynamic was responsible for their decline. The typical focus on government counterterrorist measures slights

the capabilities and dynamics of the group itself and is frequently misguided; even among groups that decline in response to counterterrorist campaigns, the picture remains complex.¹⁸¹

According to Cronin, at least seven factors categorically precipitate a group's end: killing/capturing its leader; unsuccessful generational succession; achievement of the cause; transition to a legitimate political process; loss of popular support; repression; and transition out of terrorism to another illegal activity.¹⁸² Consistent with her findings, this study determined that the international vs. national goals and positioning of a group ensures its longer survivability once it is targeted by the United States or allied powers via designation and associated activities. Given the many tools the United States and allied countries have at their disposal, it is not surprising that the most geographically flexible groups, in terms of presence and aims, appear most resilient to targeting.

The international posture and presence of AQIM and Boko Haram, and the ability of the Haqqani Network to adapt from local to regional actor, reinforces that having sanctuaries or safe havens significantly enhances terrorist groups' survivability. Sanctuary is widely recognized in the academic literature as critical to the success of any terrorist group, and a key target for CT efforts. 183, 184, 185, 186, 187, 188, 189, 190, 191, 192, 193 In 2015, 39 of the 58 groups that the United States designated as FTOs were assessed to have at least one safe haven. 194 Yet, all safe havens and logistics hubs are not created equal, as Elizabeth Grimm Arsenault and Tricia Bacon argue in their typology of safe havens. They use the example of Pakistan to sort safe havens into three groups: government-enabled (LET in Pakistan); government-sponsored (HN and the Afghan Taliban in Pakistan); and contested (al-Qa'ida and the TTP in Pakistan). 195 Each type requires tailored U.S. Government policies. 196 Arsenault and Bacon's examples dovetail with this research, with the TTP—the most impacted by designation—operating from a contested space and HN—the least impacted—in a government-sponsored safe haven.

These findings reflect a logical truism about the FTO designation process validated by this research. The program, established in 1996 well in advance of 9/11, is a diplomatic tool to coerce states to address terrorism within their borders. It is, therefore, not surprising upon further data analysis and discussion that designation appears more effective for groups based in and reliant on single-nation support and with more nationally limited goals. Groups that operate across larger borders and territories, like AQIM and Boko Haram, exist in more permissive environments and are more difficult to counter, as the number of countries needed to cooperate increases. This reality is reflected in the Intelligence Report and Terrorism Prevention Act of 2004 (IRTPA) requirement that the State Department include an assessment of each foreign country with a terrorist sanctuary in its annual Country Report on Terrorism. Yet, merely reporting on sanctuary presence is not enough.¹⁹⁷ This research suggests that designation decisions should factor in a group's international vs. national orientation and goals as a predictor of policy and operational success. Emergent terrorist groups operating in multiple states, like Boko Haram in 2009-12, should be considered for expedited designation rather than a phased process, because delaying designation allows the group to move further up the exponential curve of incidents and lethality.

The findings also point back to the contradiction between the articulated importance of designation as a policy tool to unify whole of government CT efforts and its dismissal as a purely political tool. If designation were purely political or merely diplomatic, then delaying designation to appease a foreign power, alleged Boko Haram example, would be immaterial. Yet the increasing curve of terrorist incidents and lethality precipitating designations in this study and the change in slope post-designation for some groups indicate delaying designation may be dangerous, as it defers collective U.S. and international action. Former CIA Deputy Director Michael Morell made this point in a 2020 panel at George Mason University, where he established the FTO designation as a prerequisite for CT intelligence activities:

If a group is not designated as a foreign terrorist organization, then the United States intelligence community would have no business being involved in that in any way. Any leader of integrity that I know would push back hard against any request to involve the intelligence community in such an effort. ¹⁹⁸

Although Mr. Morell was responding to a question about domestic targets, his insistence that FTO designation precede CT operations underscores designations centrality. This research finds that designation should be enacted early against Salafi jihadist groups to prevent a precipitous incline in attacks and lethality or a more firmly established transborder sanctuary.

Earlier designation, however, runs afoul of current bureaucratic process. The fastest FTO designation process reportedly took 3 days, with the average processing taking 3 to 9 months, including 5 to 10 weeks just to gather the supporting justification material.¹⁹⁹ The CTC study articulates that the complexities and length of the process are required to pass judicial review, yet the layers of processing raise real questions about the efficiency of the CT policy architecture. According to CTC:

Moving the designation proposal through up to 10 different State Department offices can be a formidable chore in and of itself, and once out of the State Department, it must navigate through the bureaucracies of the Treasury and Justice Departments before coming back to the Secretary of State for the final decision...but the greatest impediment to timely designations lies in the interagency clearance process.²⁰⁰

The point is not to question the significant and painstaking efforts of agencies and their employees to analyze, vet, and propose designation, but rather to raise the question of whether earlier designation can reverse the trends of rising incidents and lethality sooner, and limit international presence? Efficacy can be a powerful motivator to make the process more efficient. This research suggests more timely designation, in some cases, could reduce terrorist operational reach enough to justify a more expedited decision-making process.

Paradoxically, while this research provides a compelling argument for earlier designation, it also raises questions about nonkinetic designation associated activities. From 1998 to 2018, this research identified a lack of material support charges and Treasury asset blocks against the case study groups and a comparative over-reliance on military and intelligence support reflected in State Department and captured terrorist communications. This finding is consistent with an observation from the West Point CTC study that "While these prosecutions are important and, in some cases, play a factor in arguments for designating

groups as FTOs, they are rarely tallied and presented as a metric tied to the impact of a designation, as are asset seizures in the TAR. **** They go on to argue that material support prosecutions are difficult to connect to terrorist disruptions, despite the tool being an oft-cited benefit of FTO designation.

Not only that, but while these prosecutions certainly disrupt the activities of designated groups, it is difficult to draw the linkage between a group's designation, these domestic prosecutions, and whether the terrorist organization is ultimately weakened as a result.²⁰¹

The lack of material support charges against declared FTOs in this study and the lack of a systemic metric to track the impact of this designation-associated activity is surprising for such a central counterterrorism tool.

West Point's CTC argues there are at least four reasons why the State Department does not track material support charges more closely: "the primacy of short-term priorities, scarce resources, the presence of bureaucratic challenges, and the inherent difficulty of evaluating the success of counter-terrorism policy."202 Although those reasons are certainly persuasive, it is worth noting that legal scholars have also questioned the utility of FTO designation and the related Specially Designated Terrorist Group (SDTG) designation as prerequisites for material support charges. Many SDTG designations, which limits entry into the United States, precede FTO designation, and thus limits the utility of FTO designation.²⁰³ Numerous reviews of 2339A and 2339B material support cases cite the rise in charges against domestic American Somali/al-Shabaab sympathizers under the Obama Administration for the increasing use of the statute after 2008, indicating its utility for domestically linked international terrorist cases.²⁰⁴ If part of the rationale for FTO designation's utility is the material support charges that accompany designation, one simple conclusion from this research is that 2339A and 2339B cases are not used consistently against all groups, increasing the variation in designation's effectiveness. More consistent tracking by the State Department of the efficacy of FTO designation for material support charges, combined with faster FTO designation, could allow for more comprehensive evaluation of its utility, more targeted use, and likely better operational outcomes.

Finally, this research reinforces that nonkinetic CT tools are still under-studied and under-researched compared to their kinetic counterparts. The lack of high-quality data tied to designation-associated activities is a major oversight, consistently cited in this research. There is a missed opportunity in the annual Country Reports on Terrorism process to evaluate CT progress using consistent metrics to improve yearly data on group and membership counts, to total asset seizures in partner countries, and to catalog material support charges. While the State Department may be resource challenged to provide that fidelity of data, it is necessary to demonstrate the efficacy of this whole of government program and would pay dividends as CT efforts are pressed to become more cost efficient. Better metrics would reinforce and justify effective efforts and eliminate ineffective ones. For example, choosing to keep consistent measures of impact, similar to the annual Treasury Asset Reports, for border restrictions or legal prosecutions would demonstrate

^{†††††} Terrorist Assets Report

the efficacy of the designation program. As the West Point CTC study argues "Developing data and resources to provide metrics for evaluation is an important part of determining when these designations are most effective." ²⁰⁵

Improving the official data related to terrorist designation activities is not unprecedented. The TAR reports became increasingly sophisticated over the course of this study, evolving from lists containing a handful of groups to detailed accountings of assets seized compared to the preceding 2-3 years, beginning in 2005. ****** Similarly, the State Department has continually evolved its *Country Reports on Terrorism* at the behest of Congress and as an internal priority. For example, under the Obama Administration, the annual report included detailed summaries of the Voice of America efforts to provide counter programming metrics against terrorist propaganda. Beginning in 2010, some attempt was made to match the narrative style of the annual report to the purposes of the designation program, with sections broken out by country for an overview, legislative and legal actions, counter terrorist finance, attacks, and regional/international cooperation.

Yet these improvements paint only a positive picture of U.S. progress and do not provide an objective year-to-year comparison. To be useful in gauging efficacy, the reports need to be more candid in comparing year-to-year metrics on arrests, asset seizures, legal charges, etc. That is not to say they need to evolve into a quantitative bean counting exercise, but rather they should be developed to resemble the TAR reports in clarity, brevity, and consistency. Rather than being extraneous to State Department efforts, developing better metrics to evaluate nonkinetic CT programs will become increasingly important as withdrawals from areas of active combat operations accelerate. The U.S. Government and its allies will continue to rely more heavily on nonkinetic CT tools and improved data will help target designations and associated activities where they can be most effective. Improving the data is not extraneous to State's mission, but rather an essential requirement for efficient CT operations.

Areas for Further Research

Improved annual tracking of data on designation-associated activities would open up numerous opportunities for additional research. First, this study has dealt only with Salafi jihadist organizations—so a similar comparative work could include all FTOs. While the West Point CTC study considered this larger group using descriptive statistics, a more indepth analysis has yet to be developed off that work. Using this study as a guide, researchers could compare Salafi jihadist FTOs to other ideologically motivated groups to see if designation impacts types of groups differently.

^{‡‡‡‡‡} Part of the reason for the improvement in data was the creation of the Office of Intelligence Analysis within the Treasury in 2004. The author wishes to thank her intelligence colleague at Treasury for highlighting this fact: Office of Intelligence and Analysis, "Strategic Direction, Fiscal Years 2012-2015," ed. Department of the Treasury (Washington, DC: Office of Intelligence and Analysis), 2.

Additionally, while the qualitative cases in this study were carefully selected based on the short-term and longterm quantitative data, a potential bias in the study exists as all the cases come from Africa or Afghanistan/ Pakistan. Additional qualitative case studies assessing the impact of FTO designation on a greater expanse of Salafi jihadist groups with more geographic diversity would further validate or challenge the results. These studies should also consider the international vs. national orientation of groups and the role sanctuary plays in sustaining terrorist movements facing nonkinetic CT pressure.

One unexplained phenomenon that emerged from this study is the number of references to military and intelligence operations as compared to other formal designation-associated activities. Another area of future research is a comparison of kinetic strikes with nonkinetic tools to see how the blended effort impacts operations on a more granular level. The U.S. military drawdowns in Afghanistan and Iraq will also provide the opportunity to study the balance of kinetic vs. nonkinetic activities against designated groups and compare outcomes providing additional insight into designation as a policy tool.

Last, this study focused on U.S. policy choices and outcomes and, while it included data on international partnerships in the qualitative coding, international alliances and actions were largely excluded from the analysis. The data suggests that early international partnerships in conjunction with designation helps counter the cross-border international presence of groups like Boko Haram and AQIM. In areas where local governments are complicit in supporting a group, as in the case of the Haqqani network, terrorism is more difficult to combat. Additionally, international bodies like the UN often mirror and designate the same groups as the U.S.—and their efforts may have entirely different results. Validating these results with more qualitative case studies focused on nonkinetic and designation-associated tools, in combination with local governments and international partnerships, will help support efforts to promote greater diplomatic and international cooperation on counterterrorism. This effort will be all the more important as the United States leans harder on international partners following the military drawdowns and aims to work more CT missions by, with, and through international partnerships.

Conclusion

The U.S. Government is reallocating resources across the national security architecture to counter major nation-state actors and needs the continuing CT mission to be cheaper, faster, and more effective than ever before. This research shows FTO designation of Salafi jihadist groups does not have the broad measurable impact on FTO behavior in terms of reducing the number of incidents perpetrated and their lethality, as policymakers would prefer. Rather, to the extent designation matters, it appears most effective when applied to groups already limited in their geographic presence. This is an important finding that can help tailor and target earlier designation in the policy process to geographic areas where it can be most effective.

While designation does not appear to impact group membership or targeting methodology, improved data and metrics focused on designation associated activities may reveal greater kinetic and nonkinetic consequences of designation, allowing a further tailoring of this important policy decision and associated tools in the counterterrorism fight. Even without improved metrics, this data shows earlier designation is preferable to later for Salafi jihadist groups and that internationally focused groups with more porous support are more adaptable and resistant to designation's effects, reinforcing the need to limit terrorist sanctuaries in trans-border regions.

Improved official data that includes year-over-year metrics of designation associated activities can better inform U.S. Government efforts to counter terrorist groups using both kinetic and nonkinetic tools. These measurements, as demonstrated in this study, provide the tools to gauge the effectiveness of the nationallevel U.S. CT mission more accurately and precisely against specific groups, which will in turn allow policymakers to more efficiently allocate resources to those activities having the greatest success, improving operations. Foreign terrorist organization designation has served as a cornerstone of our CT policy for more than 20 years. If its effects are evaluated more consistently, it can serve as a guide for where, when, and how to most efficiently engage in and focus future operations.

Appendix A:

Comparison of Objectives from U.S. CT Strategies

Objective	First Bush Strategy Feb 2003	Second Bush Strategy Sep 2006	Obama Strategy Jun 2011	Trump Strategy Oct 2018
Identify/locate/destroy terrorists and organizations	Х	Х	X (especially destroy AQ)	Х
State sponsorship of terrorism	Х	X		X
Establish international accountability	X	X	X	
Strengthen international counterterrorism collaboration	Х	X	Х	Х
Interdict and disrupt material support to terrorism	Х	X	Х	Х
Eliminate terrorist sanctuary/safe havens	Х	X (Legal, Cyber, Financial)	Х	Х
Diminish partner capacity building	Х		X	X
Delegitimize terrorism (war of ideas/ counter-radicalization/strategic communication)	X		X	X
Defend U.S. citizens and interests at home and abroad	Х	X	X (#1)	Х
Create national strategy for homeland security	Х			
Attain domain awareness (threat identification)	Х			
Identify and protect critical infrastructure	Х	Х		X
Integrate defensive measures for U.S. citizens abroad	Х			
Create integrated incident management capability	Х			

Objective	First Bush Strategy Feb 2003	Second Bush Strategy Sep 2006	Obama Strategy Jun 2011	Trump Strategy Oct 2018
Deny terrorists entry into the United States and disrupt international travel		Х	Х	Х
Defend potential targets of attack		X		
Determine terrorist WMD intentions and capabilities		X	Х	
Deny rogue states/terrorists access to WMD		X	Х	
Deter use of WMD		Х	Х	
Disrupt movement of WMD materials		Х	Х	
Prevent/respond to WMD-terrorist attack		Х	Х	
Define nature/source of terrorists' WMD devices		X		
Enhance interagency collaboration		X (intellectual/ human capital)	Х	Х
Degrade links among terrorist organizations			Х	
Use strategic communications to amplify impact of CT operations				Х
Prevent development of cyber attack capabilities				Х
Deploy integrated Federal CT community at local level				Х
Support intervention, reintegration, and counter recidivism efforts				Х
Combat terrorist influence online				Х
Institutionalize prevention architecture				Х

Appendix B:

Targeted Groups Added Under Presidents' Terms/Strategies

#	Pre-Bush Strategy 9/11/2001- 2/2003	Bush Strategy 1 2/2003- 9/2006	Bush Strategy 2 9/2/2006- 1/2009	Early Obama 1/2009- 6/2011	0bama Strategy 6/2011- 1/2017	Early Trump 1/2017-10/2018 and Trump Strategy 10/2018-12/2019
	Jaish-e- Mohammed (JEM)	Ansar al-Islam (AAI)	Harakat ul-Jihad- i-Islami/ Bangladesh (HUJI-B)	Kata'ib Hizballah (KH)	Indian Mujahedeen (IM)	Hizbul Mujahideen (HM)
2	Lashkar-e Tayyiba (LeT)	ISIL (formerly al-Qa'ida in Iraq)	al-Shabaab	al-Qa'ida in the Arabian Peninsula (AQAP)	Jemaah Anshorut Tauhid (JAT)	ISIL-Bangladesh
3	Al-Aqsa Martyrs Brigade (AAMB)	Libyan Islamic Fighting Group (LIFG)		Harakat ul-Jihad- i-Islami (HUJI)	Abdallah Azzam Brigades (AAB)	ISIL-Philippines
4	Asbat al-Ansar (AAA)	Moroccan Islamic Combatant Group (GICM)		Tehrik-e Taliban Pakistan (TTP)	Haqqani Network (HN)	ISIL-West Africa
5	al-Qa'ida in the Islamic Maghreb (AQIM)	Islamic Jihad Union (IJU)		Jundallah	Ansar al-Dine (AAD)	ISIL-Greater Sahara
6	Jemaah Islamiya (JI)			Army of Islam (AOI)	Boko Haram	al-Ashtar Brigades (AAB)
7	Lashkar i Jhangvi (LJ)				Ansaru	Jama'at Nusrat al-Islam wal- Muslimin (JNIM)
Во	old = New During tha	t Period Ita	alics = Existing [Designation	<u>Underline</u> = Delist	ed (Date)

APPENDIX B: TARGETED GROUPS ADDED UNDER PRESIDENTS' TERMS/STRATEGIES 71

#	Pre-Bush Strategy 9/11/2001- 2/2003	Bush Strategy 1 2/2003- 9/2006	Bush Strategy 2 9/2/2006- 1/2009	Early Obama 1/2009- 6/2011	0bama Strategy 6/2011- 1/2017	Early Trump 1/2017-10/2018 and Trump Strategy 10/2018-12/2019
8	al-Qa'ida (AQ) (10/8/1999)				al-Mulathamun Battalion (AMB)	
9	Islamic Movement of Uzbekistan (IMU) (9/5/2000)				Ansar al-Shari'a in Benghazi	
10					Ansar al-Shari'a in Darnah	
11					Ansar al-Shari'a in Tunisia	
12					ISIL Sinai Province (formerly Ansar Bayt al-Maqdis)	
13					al-Nusrah Front	
14					Mujahidin Shura Council in the Environs of Jerusalem (MSC)	
15					Jaysh Rijal al-Tariq al Naqshabandi (JRTN)	
16					ISIL-Khorasan (ISIL-K)	
17					ISIL-Libya	
18					al-Qa'ida in the Indian Subcontinent	
19					Libyan Islamic Fighting Group (LIFG) (12/9/2015)	
20					Moroccan Islamic Combatant Group (GICM) (5/8/2013)	

Bold = New During that Period Italics = Existing Designation Underline = Delisted (Date)

Appendix C: Designated Foreign Terrorist Organizations in Study

#	Name of Group	Date Designated	Years of Data	Number of Records	Notes
1	al-Nusrah Front	5/15/2014	5	134	Heavy overlap with ISIL
2	al-Qa'ida (AQ)	Designated in 1999, but use 9/11*	21	801	Included despite pre-9/11 designation; overlap with some affiliates
3	al-Qa'ida in the Arabian Peninsula (AQAP)	1/19/2010	10	1,050	Includes some cross listings with ISIL provinces in Yemen not formally designated as FTOs
4	al-Qa'ida in the Islamic Maghreb (AQIM)	3/27/2002	20	262	
5	al-Shabaab	3/18/2008	12	3,795	Does not include Al-Shabaab al-Mu'minin, a Zaidi Shi'a group active in Yemen, minimal overlap with ISIL
6	Ansar al-Dine (AAD)	3/22/2013	6	65	Mali-specific, overlap with AQIM
7	Ansar al-Shari'a	1/13/2014	5**	90	Called Ansar al-Shari'a in Benghazi, Darnah in Libya and Tunisia; heavy overlap with ISIL-Libya
8	Boko Haram/Ansaru	11/14/2013	10	2,671	Combined Nigerian groups, same designation date
9	Haqqani Network (HN)	9/19/2012	13**	113	Overlap with TTP
10	Hizbul Mujahideen (HM)	8/17/2017	21****	283	Significant overlap with LET and TTP
11	Indian Mujahedeen (IM)	9/19/2011	8	62	Overlap with LET
12	Islamic State of Iraq and the Levant (ISIL)	12/17/2004	16	7,233	Formerly al-Qa'ida in Iraq; Note: START stopped coding as AQI in 2013, from 2003 to 2014, largely, but not exclusively, overlapped with AQ (more than 650).
13	ISIL-Khorasan (ISIL-K)	1/14/2016	6	216	Overlap with LeT and TTP

#	Name of Group	Date Designated	Years of Data	Number of Records	Notes
14	Islamic State of Iraq and the Levant's Branch in Libya (ISIL-Libya)	5/20/2016	5	553	Overlap with Ansar al-Shari'a
15	ISIL Sinai Province (ISIL-Sinai)	4/10/2014	6	219	Formerly Ansar Bayt al-Maqdis
16	Jaish-e-Mohammed (JEM)	12/26/2001	11	112	
17	Jemaah Islamiya (JI)	10/23/2002	12	82	
18	Lashkar-e Tayyiba (LeT)	12/26/2001	20	287	
19	Lashkar i Jhangvi (LJ)	1/30/2003	20	182	Heavy overlap (45) with TTP and other South Asian groups
20	Tehrik-e Taliban Pakistan (TTP)	9/1/2010	12	1,480	Overlap with AQIS, ISIS-K, and LET

Total: 19,806

Note: Included only groups with more than 40 incidents as recommended by the literature.

^{*}Although AQ was designated in 1998, this study uses 2001 because 9/11 changed how the U.S. targeted designated groups.

^{**}Ansar al-Shari'a incidents for 2017 and 2018 were excluded because they were tagged as possible "doubt terrorism" in the GTD Codebook.

^{***}Although 13 years of data was available, only 12 years was used because the ITS only measured incident trends starting 5 years before designation to provide consistency across groups.

^{***}Although 21 years of data was available, only 7 years were used because the ITS only measured incident trends starting 5 years before designation, to provide consistency across groups.

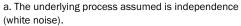
Appendix D:

ARIMA Model Check— **Autocorrelation and Partial** Autocorrelation Functions For Incidents

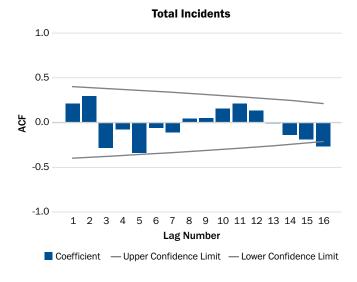
Autocorrelations

Series: Total Incidents

			Box-Ljung Statistic				
Lag	Autocorrelation	Std. Errora	Value	df	Sig.b		
1	.209	.199	1.095	1	.295		
2	.294	.195	3.374	2	.185		
3	283	.190	5.599	3	.133		
4	078	.185	5.776	4	.217		
5	336	.179	9.283	5	.098		
6	058	.174	9.393	6	.153		
7	110	.169	9.819	7	.199		
8	.044	.163	9.892	8	.273		
9	.047	.157	9.981	9	.352		
10	.156	.151	11.049	10	.354		
11	.210	.144	13.159	11	.283		
12	.130	.138	14.050	12	.298		
13	010	.131	14.055	13	.370		
14	140	.123	15.357	14	.354		
15	191	.115	18.101	15	.257		
16	267	.107	24.391	16	.081		



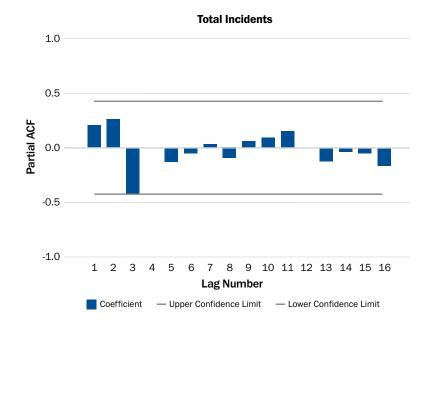
b. Based on the asymptotic chi-square approximation.



Autocorrelations

Series: Total Incidents

Lag	Partial Autocorrelation	Std. Error
1	.209	.213
2	.262	.213
3	430	.213
4	012	.213
5	129	.213
6	052	.213
7	.030	.213
8	096	.213
9	.059	.213
10	.091	.213
11	.153	.213
12	.005	.213
13	124	.213
14	038	.213
15	053	.213
16	167	.213



Appendix E: Log of Incident Model

Model Fit

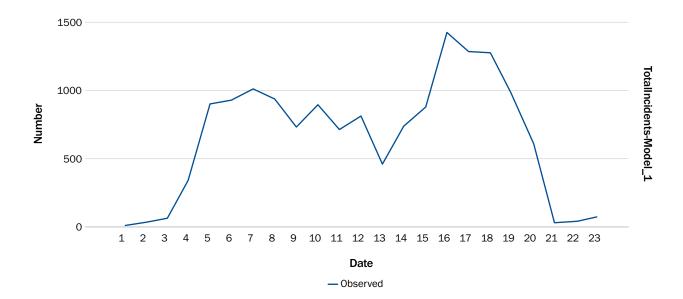
					Percentile						
Fit Statistic	Mean	SE	Minimum	Maximum	5	10	25	50	75	90	95
Stationary R-squared	.327		.327	.327	.327	.327	.327	.327	.327	.327	.327
R-squared	.101		.101	.101	.101	.101	.101	.101	.101	.101	.101
RMSE	454.107		454.107	454.107	454.107	454.107	454.107	454.107	454.107	454.107	454.107
MAPE	127.186		127.186	127.186	127.186	127.186	127.186	127.186	127.186	127.186	127.186
MaxAPE	1834.504		1834.504	1834.504	1834.504	1834.504	1834.504	1834.504	1834.504	1834.504	1834.504
MAE	294.103		294.103	294.103	294.103	294.103	294.103	294.103	294.103	294.103	294.103
MaxAE	1090.213		1090.213	1090.213	1090.213	1090.213	1090.213	1090.213	1090.213	1090.213	1090.213
Normalized BIC	12.939		12.939	12.939	12.939	12.939	12.939	12.939	12.939	12.939	12.939

Model Statistics

	Model Fit Statistics	Lj				
Model	Number of Predictors	Stationary R-squared	Statistics	DF	Sig.	Number of Outliers
Total Incidents-Model_1	3	.327	14.187	17	.654	0

ARIMA Model Parameters

					Estimate	SE	t	Sig.
Total Incidents- Model_1	Total Incidents	Natural Logarithm	Constant		1.726	1.032	1.673	.113
			AR	Lag 1	092	.257	357	.726
			Difference		1			
	Designation	No Transformation	Numerator	Lag 0	-1.395	1.176	-1.186	.252
	dTime Period	No Transformation	Numerator	Lag 0	203	.245	829	.419
	Interact	No Transformation	Numerator	Lag 0	.170	.247	.690	.500



Appendix F:Log of Lethality Model

Model Fit

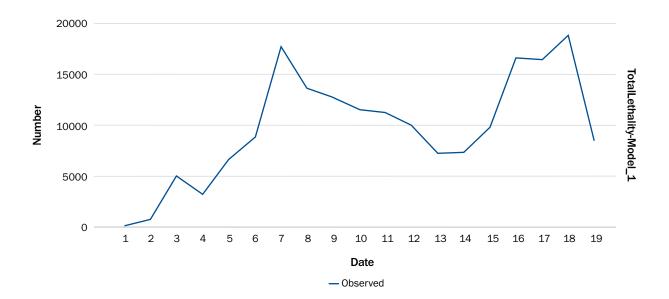
					Percentile						
Fit Statistic	Mean	SE	Minimum	Maximum	5	10	25	50	75	90	95
Stationary R-squared	.555		.555	.555	.555	.555	.555	.555	.555	.555	.555
R-squared	.078		.078	.078	.078	.078	.078	.078	.078	.078	.078
RMSE	5534.919		5534.919	5534.919	5534.919	5534.919	5534.919	5534.919	5534.919	5534.919	5534.919
MAPE	46.043		46.043	46.043	46.043	46.043	46.043	46.043	46.043	46.043	46.043
MaxAPE	242.795		242.795	242.795	242.795	242.795	242.795	242.795	242.795	242.795	242.795
MAE	3810.772		3810.772	3810.772	3810.772	3810.772	3810.772	3810.772	3810.772	3810.772	3810.772
MaxAE	10378.036		10378.036	10378.036	10378.036	10378.036	10378.036	10378.036	10378.036	10378.036	10378.036
Normalized BIC	18.041		18.041	18.041	18.041	18.041	18.041	18.041	18.041	18.041	18.041

Model Statistics

		Model Fit Statistics	Ljı	ing-Box Q(1		
Model Number of Predictors		Stationary R-squared	Statistics	DF	Sig.	Number of Outliers
Total Lethality-Model_1	3	.555		0		0

ARIMA Model Parameters

					Estimate	SE	t	Sig.
Total Lethality-Model_1	Total Lethality	Natural Logarithm	Constant		2.366	.624	3.794	.002
			AR Lag 1		282	.293	964	.353
			Difference		1			
	dTime Period	No Transformation	Numerator	Lag 0	382	.148	-2.577	.023
	Designation	No Transformation	Numerator	Lag 0	-2.182	.742	-2.943	.011
	Interact	No Transformation	Numerator	Lag 0	.368	.150	2.451	.029



Endnotes

- 1. Leah Farrall, "How al Qaeda Works," Foreign Affairs 90, no. 1 (March/April 2011): 128-38.
- 2. Bruce Hoffman, "Al-Qaeda's Resurrection," Council on Foreign Relations, Expert Brief, March 6, 2018, https://www.cfr.org/expert-brief/al-qaedas-resurrection.
- 3. Katherine Zimmerman, "Beyond Counterterrorism: Defeating the Salafi-Jihadi Movement," American Enterprise Institute, October 8, 2019, https://www.aei.org/wp-content/uploads/2019/10/Beyond-counterterrorism-one-pager. pdf?x88519.
- 4. National Consortium for the Study of Terrorism and Responses to Terrorism (START), Will Terrorism Continue To Decline in 2019?, by Gary LaFree (February 28, 2019).
- 5. Gary LaFree and Laura Dugan, "Evolution of Global Terrorism: The Growing Lethality of Attacks," in *Peace and Conflict 2017*, ed. Ravinder Bhavnani, David Backer, and Paul Huth (New York: Routledge, 2018).
- 6. Alex P. Schmid, "Layers of Preventive Measures for Soft Target Protection against Terrorist Attacks," in *Handbook of Terrorism Prevention and Preparedness*, ed. Alex P. Schmid (The Hague: International Center for Counter-Terrorism Press, 2020).
- 7. The White House, National Security Strategy of the United States (Washington, DC, December 20, 2017), https://www.hsdl.org/?view&did=806478.
- 8. Martha Crenshaw and Gary LaFree, Countering Terrorism (Washington, DC: The Brookings Institute, 2017).
- 9. Seth Loertscher et al., *The Terrorist Lists: An Examination of the U.S. Government's Counterterrorism Designation Efforts* (West Point: Combatting Terrorism Center, 2020), 7.
- 10. U.S. Library of Congress, Congressional Research Service, Foreign Terrorist Organization (FTO), In Focus, IF10613, January 15, 2019, https://crsreports.congress.gov/product/pdf/IF/IF10613.
- 11. U.S. Government Accountability Office (GAO), Combating Terrorism: Foreign Terrorist Organization Designation Process and U.S. Agency Enforcement Actions, GAO-15-629 (Washington, DC, June 25, 2015).
- 12. U.S. Library of Congress, "Foreign Terrorist Organization (FTO)."
- 13. Loertscher et al., Terrorist Lists, 7.
- 14. Loertscher et al., Terrorist Lists, vii.
- 15. Loertscher et al., Terrorist Lists, 4.
- 16. U.S. Library of Congress, Congressional Research Service, The "FTO List" and Congress: Sanctioning Designated Foreign Terrorist Organizations, by Audrey Kurth Cronin, RL32120, October 21, 2003.
- 17. U.S. GAO, Combating Terrorism, 21.
- 18. U.S. Department of State, news release, State Department Terrorist Designations of ISIS Affiliates and Senior Leaders, February 27, 2018, https://www.state.gov/r/pa/prs/ps/2018/02/278883.htm.
- 19. "Designation of Foreign Terrorist Organizations," Pub. L. 104-132, § 302, 110 Stat. 1214, 1248.
- 20. Immigration and Nationality Act, section 219, U.S. Code 8 (1952), § 1189.
- 21. U.S. Department of State (DoS), Office for Combatting Terrorism, *Country Reports on Terrorism (2004-17)*, which replaced *Patterns of Global Terrorism (1983-2003)*, http://purl.access.gpo.gov/GPO/LPS1488.

- 22. Karen DeYoung, "Obama Administration Divided Over Designating Haqqani Network as Terrorist Group," *Washington Post*, August 31, 2012.
- 23. Tim Legrand, "'More Symbolic—More Political—Than Substantive': An Interview with James R. Clapper on the U.S. Designation of Foreign Terrorist Organizations," *Terrorism and Political Violence* 30, no. 2 (March 4, 2018): 356-72.
- 24. Legrand, "'More Symbolic—More Political—Than Substantive," 364.
- 25. Walter Laqueur, Terrorism (Boston: Little Brown, 1977), 7.
- 26. Walter Laqueur, The Age of Terrorism (Boston: Little, Brown, 1987), 11, 142-56
- 27. Bruce Hoffman, Inside Terrorism, 3rd ed. (New York: Columbia University Press, 2017), 36.
- 28. Hoffman, Inside Terrorism, 1-44.
- 29. Hoffman, Inside Terrorism, 32.
- 30. Hoffman, Inside Terrorism, 33.
- 31. Hoffman, Inside Terrorism, 33.
- 32. U.S. Department of State, Office for Combatting Terrorism, "Patterns of Global Terrorism," https://www.state.gov/j/ct/rls/pgtrpt/.
- 33. Hoffman, Inside Terrorism, 32.
- 34. U.S. DoS, Country Reports on Terrorism (2004).
- 35. National Consortium for the Study of Terrorism and Responses to Terrorism (START), Country Reports on Terrorism 2017, Statistical Annex (2017), https://www.start.umd.edu/research-projects/country-reports-terrorism-statistical-annex.
- 36. Crenshaw and LaFree, Countering Terrorism, 168-70.
- 37. U.S. Joint Chiefs of Staff, Joint Publication 3-26: Counterterrorism, November 13, 2009, http://purl.fdlp.gov/GPO/gpo28939,
- 38. Crenshaw and LaFree, Countering Terrorism, 165-93.
- 39. Brian Greata et al., "Countering Threat Networks: A Standard Lines of Effort Model," *Small Wars Journal* (2017), https://smallwarsjournal.com/jrnl/art/countering-threat-networks-a-standard-lines-of-effort-model.
- 40. Loertscher et al., Terrorist Lists, 1.
- 41. Joshua Sinai et al., "Effectiveness in Counter-Terrorism and Countering Violent Extremism a Literature Review," *Perspectives on Terrorism* 13, no. 6 (2019): 90-108.
- 42. Crenshaw and LaFree, Countering Terrorism, 129.
- 43. Ben Connable, Embracing the Fog of War: Assessment and Metrics in Counterinsurgency (Santa Monica, CA: RAND Corporation, 2012), 29.
- 44. Richard English, Does Terrorism Work? A History, 1st ed. (Oxford: Oxford University Press, 2016),123-24.
- 45. Seth G. Jones and Martin C. Libicki, *How Terrorist Groups End: Lessons for Countering Al Qa'ida*, (Santa Monica, CA: RAND Corporation, 2008), 51.
- 46. Tricia Bacon, Why Terrorist Groups Form International Alliances (Philadelphia: University of Pennsylvania Press, 2018), 281-83.
- 47. Brian A. Jackson and David R. Frelinger, *Understanding Why Terrorist Operations Succeed or Fail* (Santa Monica, CA: RAND Corporation, 2009).
- 48. Kim Cragin and Sara A. Daly, *The Dynamic Terrorist Threat: An Assessment of Group Motivations and Capabilities in a Changing World* (Santa Monica, CA: RAND Corporation, 2004).
- 49. Max Abrahms, "What Terrorists Really Want: Terrorist Motives and Counterterrorism Strategy," *International Security* 32, no. 4 (2008).
- 50. Connable, Embracing the Fog of War.

- 51. Audrey Kurth Cronin, *How Terrorism Ends: Understanding the Decline and Demise of Terrorist Campaigns* (Princeton: Princeton University Press, 2009).
- 52. Hoffman, Inside Terrorism, 268.
- 53. Brian A. Jackson et al., *Aptitude for Destruction. Volume 1, Organizational Learning in Terorist Groups and Its Impli- cations for Combatting Terrorism*, prepared for the National Institute of Justice (Santa Monica, CA: RAND Corporation, 2005), ix-xv, https://www.rand.org/pubs/monographs/MG31.html.
- 54. R. V. G. Clarke and Graeme R. Newman, *Outsmarting the Terrorists* [in English] (Westport, CT: Praeger Security International, 2006), 79-83.
- 55. Stephen Vertigans, *The Sociology of Terrorism: Peoples, Places and Processes* [in English] (Abingdon, Oxon: Routledge, 2011), 140-47.
- 56. Susanne Martin and Leonard Weinberg, *The Role of Terrorism in Twenty-First-Century Warfare* (Manchester: Manchester University Press, 2017), 228, 231-32.
- 57. Jacob N. Shapiro, *The Terrorist's Dilemma: Managing Violent Covert Organizations* (Princeton: Princeton University Press, 2013).
- 58. Diego Muro, ed., When Does Terrorism Work? [in English] (Abington, Oxon: Routledge, 2019).
- 59. David Omand, Securing the State [in English] (New York: Columbia University Press, 2010).
- Andreas Wenger and Alex S. Wilner, *Deterring Terrorism: Theory and Practice*, (Stanford: Stanford University Press, 2012).
- 61. Peter M. McCabe, ed., *JSOU Report 18-5: Countering Transregional Terrorism* (MacDill Air Force Base, FL: JSOU Press, 2018), https://jsou.libguides.com/ld.php?content_id=43990994.
- 62. Office of the Chairman of the Joint Chiefs of Staff, National Military Strategic Plan for the War on Terrorism (Washington, DC, 2006), https://purl.access.gpo.gov/GPO/LPS66747.
- 63. David Kilcullen, *Out of the Mountains: The Coming Age of the Urban Guerrilla* (Oxford: Oxford University Press, 2013).
- 64. Blake W. Mobley, *Terrorism and Counter-Intelligence: How Terrorist Groups Elude Detection*, (New York: Columbia University Press, 2012).
- 65. U.S. Library of Congress, Congressional Research, Combating Terrorism: The Challenge of Measuring Effectiveness, by Raphael Perl, RL33160, November 23, 2005, http://www.congressionalresearch.com/RL33160/document.php.
- 66. John Mueller and Mark Stewart, *Chasing Ghosts: The Policing of Terrorism* (New York: Oxford University Press, 2016).
- 67. Richard A. Posner, Countering Terrorism: Blurred Focus, Halting Steps (Lanham, MD: Rowman & Littlefield, 2007).
- 68. Bryan C. Price, "Targeting Top Terrorists: How Leadership Decapitation Contributes to Counterterrorism," *International Security* 36, no. 4 (2012).
- 69. Bryan C. Price, *Targeting Top Terrorists: Understanding Leadership Removal in Counterterrorism Strategy* (New York: Columbia University Press, 2019).
- 70. Crenshaw and LaFree, Countering Terrorism., 84.
- 71. Price, "Targeting Top Terrorists: How Leadership."
- 72. Price, Targeting Top Terrorists: Understanding Leadership Removal.
- 73. Alex S. Wilner, "Targeted Killings in Afghanistan: Measuring Coercion and Deterrence in Counterterrorism and Counterinsurgency," *Studies in Conflict & Terrorism* 33, no. 4 (2010).
- 74. Patrick B. Johnston, "Does Decapitation Work? Assessing the Effectiveness of Leadership Targeting in Counterinsurgency Campaigns," *International Security* 36, no. 4 (2012).

- 75. Daniel Byman, "Essays-Do Targeted Killings Work?," Foreign Affairs 85, no. 2 (2006).
- 76. Daniel Byman, "Why Drones Work: The Case for Washington's Weapon of Choice," *Foreign Affairs* 92, no. 4 (2013).
- 77. Megan Smith and James Igoe Walsh, "Do Drone Strikes Degrade Al Qaeda? Evidence from Propaganda Output," Terrorism and Political Violence 25, no. 2 (2013).
- 78. Eric van Um and Daniela Pisoiu, "Dealing with Uncertainty: The Illusion of Knowledge in the Study of Counterterrorism Effectiveness," *Critical Studies on Terrorism* 8, no. 2 (2015).
- 79. Austin Long, "Assessing the Success of Leadership Targeting," *Combating Terrorism Center at West Point Sentinel* 3, no. 11-12.
- 80. Jenna Jordan, "When Heads Roll: Assessing the Effectiveness of Leadership Decapitation," *Security Studies* 18, no. 4 (2009).
- 81. Jenna Jordan, "Attacking the Leader, Missing the Mark: Why Terrorist Groups Survive Decapitation Strikes," *International Security* 38, no. 4 (2014).
- 82. "Whack-a-Mole or Coup De Grace? Institutionalization and Leadership Targeting in Iraq and Afghanistan," *Security Studies* 23, no. 3 (2014).
- 83. Audrey Kurth Cronin, "Why Drones Fail: When Tactics Drive Strategy," Foreign Affairs 92, no. 4 (2013).
- 84. Eric van Um and Daniela Pisoiu, "Dealing with Uncertainty: The Illusion of Knowledge in the Study of Counterterrorism Effectiveness," *Critical Studies on Terrorism* 8, no. 2 (2015): 229-45, http://dx.doi.org/10.1080/17539153.2014.9814.
- 85. Cronin, "Why Drones Fail."
- 86. Crenshaw and LaFree, Countering Terrorism, 193
- 87. Crenshaw and LaFree, Countering Terrorism, Chapter 6.
- 88. Brian J. Phillips, "Foreign Terrorist Organization Designation, International Cooperation, and Terrorism," *International Interactions* 45, no. 2: 316-43.
- 89. Jason Poblete, "Foreign Terrorist Organizations and the Listing Process in a Post-9/11 Context," National Security Law Seminar, George Mason University School of Law, March 28, 2005.
- 90. U.S. GAO, Combating Terrorism.
- 91. Anna Grace Cotter, "The Politics of the Terrorist Watch List," (master's thesis, University of Michigan, 2016), https://deepblue.lib.umich.edu/handle/2027.42/133354.
- 92. Loertscher et al., Terrorist Lists, 16
- 93. Loertscher et al., Terrorist Lists.
- 94. Loertscher et al., Terrorist Lists, vii.
- 95. Loertscher et al., Terrorist Lists, 10-11.
- 96. Thomas J. Badey, "US Counter-Terrorism: Change in Approach, Continuity in Policy," *Contemporary Security Policy* 27, no. 2 (2006).
- 97. Joshua A. Gelzer, "Trump's Counterterrorism Strategy Is a Relief," *The Atlantic* (2018), https://www.theatlantic.com/international/archive/2018/10/trump-counterterrorism-strategy/572170/.
- 98. Loertscher et al., Terrorist Lists, 3.
- 99. David Easton, A Framework for Political Analysis (Englewood Cliffs, N.J: Prentice-Hall, 1965).
- 100. Hoffman, Inside Terrorism., 313-41.
- 101. Daniel L. Byman and Jennifer R. Williams, "ISIS vs. Al Qaeda: Jihadism's Global Civil War," Brookings, February 24, 2015, https://www.brookings.edu/articles/isis-vs-al-qaeda-jihadisms-global-civil-war/.
- 102. William McCants, *The ISIS Apocalypse: The History, Strategy, and Doomsday Vision of the Islamic State* (New York: St. Martin's Press, 2015).

- 103. Fawaz A. Gerges, ISIS: A History, (Princeton: Princeton University Press, 2016).
- 104. Jessica Stern and J. M. Berger, ISIS: The State of Terror (New York: HarperCollins Publishers, 2015).
- 105. Amy Buenning Sturm, "Is the Sound Bite Mightier Than the Sword? Strategic Communications as a Tool to Export the Global Jihad, 2001-2009," (master's thesis, Georgetown University, 2010).
- 106. Joby Warrick, Black Flags: The Rise of ISIS (New York: Doubleday, 2015).
- 107. Michael Weiss and Hassan Hassan, ISIS: Inside the Army of Terror, 2nd ed. (New York: Regan Arts, 2016).
- 108. Hoffman, Inside Terrorism, 313-41.
- 109. Charles W. Mahoney, "Splinters and Schisms: Rebel Group Fragmentation and the Durability of Insurgencies," *Terrorism and Political Violence* 32, no. 2 (2017).
- 110. Brian J. Phillips, "Terrorist Group Cooperation and Longevity," International Studies Quarterly 58, no. 2 (2014).
- 111. Stephen Nemeth, "The Effect of Competition on Terrorist Group Operations," *Journal of Conflict Resolution* 58, no. 2 (2014).
- 112. U.S. Department of State, media note, State Department Terrorist Designations of ISIS Affiliates and Senior Leaders, February 27, 2018.
- 113. Loertscher et al., Terrorist Lists, viii.
- 114. Seth Jones et al., *The Evolution of the Salafi-Jihadist Threat*, Center for Strategic and International Studies, November 20, 2018, 4, https://www.csis.org/analysis/evolution-salfi-jihadist-threat.
- 115. Sam Heller, "Rightsizing the Transnational Jihadist Threat," International Crisis Group, December 12, 2018, https://www.crisisgroup.org/global/rightsizing-transnational-jihadist-threat.
- 116. U.S. Congress, Senate, Select Committee on Intelligence, Open Hearing on Worldwide Threats, 115th Cong., 1st sess., 2018.
- 117. U.S. Congress, House, Homeland Security Committee, Worldwide Threats to the Homeland: Statement before the House Homeland Security Committee, 115th Cong., 2nd sess., 2020.
- 118. U.S. Congress, House, Homeland Security Committee, Worldwide Threats.
- 119. Loertscher et al., Terrorist Lists, 15.
- 120. National Consortium for the Study of Terrorism and Responses to Terrorism (START), Global Terrorism Overview: Terrorism in 2019 (2020), 7.
- 121. Robert Apel and Henda Y. Hsu, "Interrupted Time Series Analysis in the Study of Terrorism," in *The Handbook of the Criminology of Terrorism*, ed. Gary LaFree and Joshua D. Freilich (Hoboken: Wiley-Blackwell, 2016).
- 122. START, Country Reports on Terrorism, Statistical Annex,.
- 123. U.S. Government Accountability Office, Combating Terrorism: U.S. Government Strategies and Efforts to Deny Terrorists Safe Haven, GAO-11-713YT (Washington, DC, 2011).
- 124. Zack Gold, "Wilayat Sinai: The Islamic State's Egyptian Affiliate," Tel Aviv University, Institute for National Security Studies.
- 125. Holly Fletcher, "Egyptian Islamic Jihad," Council on Foreign Relations, May 29, 2008, https://www.cfr.org/backgrounder/egyptian-islamic-jihad.
- 126. Center for International Security and Cooperation (CISAC), Mapping Militant Organizations: Al-Shabaab, (2019), https://cisac.fsi.stanford.edu/mappingmilitants/profiles/al-shabaab.
- 127. Katharine Houreld, "Somali Militant Group Al-Shabaab Formally Joins Al-Qaida," *The Guardian*, February 9, 2012.
- 128. U.S. Department of State, news release, Terrorist Designations of the Al-Nusrah Front as an Alias for Al-Qa'ida in Iraq, December 11, 2012, https://2009-2017.state.gov/r/pa/prs/ps/2012/12/201759.htm.
- 129. U.S. Department of State, About Us-The Global Coalition to Defeat ISIS, https://www.state.gov/about-us-the-global-coalition-to-defeat-isis/.

- 130. "Violent Islamist Extremism: A Global Problem," *Tony Blair Institute for Global Change*, (September 13, 2018), 14.
- 131. CISAC, Mapping Militant Organizations: Lashkar-E-Taiba and Lashkar-E-Jhangvi, (2018). For comparison, JEM was founded in 2000.
- 132. Namrata Goswami, "Who Is the Indian Mujahideen?," backgrounder, *Manohar Parrikar Institute for Defence Studies and Analyses*, (February 3, 2009), https://idsa.in/backgrounder/IndianMujahideen.
- 133. U.S. DoS, Country Reports on Terrorism, (2013), 185-187.
- 134. Don Rassler, "Situating the Emergence of the Islamic State of Khorasan," CTC Sentinel 8, no 3 (March 19, 2015).
- 135. CISAC, Mapping Militant Organizations: The Islamic State in the Khorasan Province (Is-Kp), (2018).
- 136. CISAC, Mapping Militant Organizations: Abu Sayyaf Group, (2018).
- 137. CISAC, Mapping Militant Organizations: Jemaah Islamiyah, (2018).
- 138. CISAC, Mapping Militant Organizations: Jemaah Islamiyah, (2018).
- 139. U.S. DoS, "Country Reports on Terrorism" (2019, 2020).
- 140. Barbara G. Tabachnick et al., *Using Multivariate Statistics*, 7th ed. (New York: Pearson, 2019), 714-74.
- 141. Robert Nau, "Statistical Forecasting: Notes on Regression and Time Series Analysis, Introduction to Arima Nonseasonal Models," Duke University, https://people.duke.edu/~rnau/411arim.htm#arima110.
- 142. Tabachnick et al., 721.
- 143. Loertscher et al., Terrorist Lists.
- 144. Bruce Hoffman, "The Logic of Suicide Terrorism," *The Atlantic* 291, no. 5, (June 2003), https://www.theatlantic.com/magazine/archive/2003/06/the-logic-of-suicide-terrorism/302739/.
- 145. Hoffman, Inside Terrorism, 19
- 146. Loertscher et al., Terrorist Lists.
- 147. The White House, National Strategy for Combating Terrorism, 2006 and National Strategy for Counterterrorism, 2011
- 148. Central Intelligence Agency, Directorate of Intelligence, "Terrorist CBRN: Materials and Effects," CTC 2003-40058, (May 2003).
- 149. "Bomb Blasts in the North West Frontier Province-2007," Institute for Conflict Management, South Asia Terrorism Portal, https://www.satp.org/satporgtp/countries/pakistan/nwfp/datasheet/2007.htm.
- 150. CISAC, Mapping Militant Organizations: Tehrik-I-Taliban Pakistan (2018).
- 151. CISAC, Mapping Militant Organizations: Tehrik-I-Taliban Pakistan (2018).
- 152. Abdul Sayed, "The Evolution and Future of Tehrik-E Taliban Pakistan," Carnegie Endowment for International Peace (December 21, 2021).
- 153. U.S. Department of Treasury (Treas.), Office of Foreign Assets Control, Twenty-Sixth Annual Report to the Congress on Assets in the United States Relating to Terrorist Countries and International Terrorism Program Designees" (Washington DC, 2017), 10.
- 154. NIU Justice Department Material Support Database, Author's Own, by permission of Professor Christopher Bailey. Data beyond 2017 unavailable in this database.
- 155. Office of the Director of National Intelligence (ODNI), Bin Laden's Bookshelf, *Dear Brother Shaykh Mahmud*, 2010, 7-8.
- 156. ODNI, Dear Brother.
- 157. CISAC, Mapping Militant Organizations: Boko Haram (2018).
- 158. U.S. DoS, Country Reports on Terrorism (2009), 27.
- 159. Glenn Kessler, "Boko Haram: Inside the State Department Debate over the 'Terrorist' Label," *Washington Post*, May 19, 2014.

- 160. Kessler, "Boko Haram."
- 161. U.S. Department of Treasury, Office of Foreign Assests Control, Twenty-Seventh Annual Reporto the Congress on Assets in the United States Relating to Terrorist Countries and International Terrorism Program Designees," Washington, DC, 2018.
- 162. NIU Justice Department Material Support Database.
- 163. U.S. DoS, Country Reports on Terrorism (2014), 9.
- 164. "Bin Laden's Bookshelf," Office of the Director of National Intelligence, accessed February 2021, https://www.dni.gov/files/documents/ubl2017/english/Letter%20from%20Abdallah%20Abu%20Zayd%20Abd-al-Hamid%20to%20Abu%20Mus%20ab%20Abd-al-Wadud.pdf
- 165. U.S. DoS, Country Reports on Terrorism (2008).
- 166. U.S. DoS, Country Reports on Terrorism (2008).
- 167. NIU Justice Department Material Support Database.
- 168. Eastern District of New York, news release, "Malian Terrorist Leader Charged with the Death of U.S. Citizen Michael J. Riddering and Providing Material Support to Al-Qaeda in the Islamic Maghreb and Al-Murabitoun," January 16, 2020, 2020, https://www.justice.gov/usao-edny/pr/malian-terrorist-leader-charged-death-us-citizen-michael-j-riddering-and-providing-2.
- 169. NIU Justice Department Material Support Database.
- 170. "Twenty-Sixth Annual Report to the Congress on Assets in the United States Relating to Terrorist Countries and International Terrorism Program Designees," 14.
- 171. Treasury, "Twenty-Seventh Annual Report, 15.
- 172. CISAC, Mapping Militant Organizations: Haqqani Network, (2018).
- 173. U.S. DoS, Country Reports on Terrorism (2005), 153.
- 174. U.S. DoS, Country Reports on Terrorism (2007), 196.
- 175. U.S. DoS, Country Reports on Terrorism (2012-18).
- 176. ODNI, Bin Laden's Bookshelf, likely 'Atiyah, Letter Dtd 5 April 2011, Bin Laden's Bookshelf; Unknown, Gist of Conversation 11 Oct, and likely 'Atiyah, Letter to Shaykh Abu Abdallah Dtd 17 July 2010, Bin Laden's Bookshelf, (2010).
- 177. Ron Rassler and Vahid Brown, "The Haqqani Nexus and the Evolution of Al-Qa'ida," (West Point: Combating Terrorism Center, 2011), 16.
- 178. Rassler and Brown, "The Haqqani Nexus and the Evolution of Al-Qa'ida," 17.
- 179. Rassler and Brown, "The Haggani Nexus and the Evolution of Al-Qa'ida," 15.
- 180. Rassler and Brown, "The Haqqani Nexus and the Evolution of Al-Qa'ida," 2, 15.
- 181. Audrey Kurth Cronin, "How Al-Qaida Ends: The Decline and Demise of Terrorist Groups," *International Security* 31, no. 1 (2006), 18.
- 182. Cronin, How Terrorism Ends..
- 183. Hoffman, Inside Terrorism, 11.
- 184. U.S. Department of Defense, Office of the Under Secretary of Defense For Policy, Ungoverned Areas and Threats from Safe Havens, by Robert D. Lamb, (Washington D.C., 2008).
- 185. Brian Michael Jenkins, "Disrupting Terrorist Safe Havens," *The RAND Blog*, August 18, 2014, https://www.rand.org/blog/2014/08/disrupting-terrorist-safe-havens.html.
- 186. U.S. Library of Congress, Congressional Research Service, Removing Terrorist Sanctuaries: The 9/11 Commission Recommendations and U.S. Policy, by Francis T. Miko, RL32518, 2005.
- 187. Edward Newman, "Weak States, State Failure, and Terrorism," Terrorism and Political Violence 19, no. 4 (2007).
- 188. Aurélie Campana and Benjamin Ducol, "Rethinking Terrorist Safe Havens: Beyond a State-Centric Approach," *Civil Wars* 13, no. 4 (2011).

- 189. Cristiana C. Brafman Kittner, "The Role of Safe Havens in Islamist Terrorism," Terrorism and Political Violence 19, no. 3 (2007).
- 190. Rem Korteweg, "Black Holes: On Terrorist Sanctuaries and Governmental Weakness," Civil Wars 10, no. 1 (2008).
- 191. Andrew Exum, "No Place to Hide," New Republic (March 31, 2009), http://www.newrepublic.com/article/politics/ no-place-hide;
- 192. Robert I. Rotberg, State Failure and State Weakness in a Time of Terror (Washington, DC: Brookings Institution Press, 2004).
- 193. Jeffrey M. Bale, "Hiding in Plain Sight in Londonistan," in Denial of Sanctuary: Understanding Terrorist Safe Havens, ed. Michael A. Innes (Westport, CT: Praeger Security International, 2007).
- 194. Elizabeth Grimm Arsenault and Tricia Bacon, "Disaggregating and Defeating Terrorist Safe Havens," Studies in Conflict & Terrorism 38, no. 2 (2014).
- 195. Arsenault and Bacon, "Disaggregating and Defeating," 85-112.
- 196. Arsenault and Bacon, "Disaggregating and Defeating."
- 197. Public Law 108-458-DEC. 17, 2004 118 STAT. 3777
- 198. George Mason University, "2020: Terrorism Reconsidered" (paper presented at the 2020: Terrorism Reconsidered, George Mason University Cisco Webex Meeting, 2020).
- 199. Loertscher et al., Terrorist Lists, 7.
- 200. Loertscher et al., Terrorist Lists, 7.
- 201. Loertscher et al., Terrorist Lists, 10.
- 202. Loertscher et al., Terrorist Lists, 11.
- 203. Tessa Beryl Tilton, "United States Antiterror Law Is Missing the Mark: Changing the Material Support Statute to Hit the Target," William and Mary Law Review 60, no. 3 of 7 (2019).
- 204. "Terrorist Trial Report Card: September 11, 2001-September 11, 2011," Center on Law and Security, New York University School of Law, 2011, 1-6.
- 205. Loertscher et al., Terrorist Lists, vii.

