

POLICY REPORT

Legal Mechanisms to Combat the Wagner Group: Opportunities and Challenges With the RICO Statute



Illustration / Getty Images



Legal Mechanisms to Combat the Wagner Group: Opportunities and Challenges With the RICO Statute

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COVER: Supporters of Niger’s National Council for the Safeguard of the Homeland (CNSP) wave the flags of Niger (R) and the Wagner Group during a protest outside an airbase to demand the departure of France’s military in Niamey, Niger, on Sept. 16, 2023. (AFP via Getty Images)

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Executive Summary

Despite the 2023 death of Wagner Group leader Yevgeny Prigozhin, the organization continues to expand its footprint across Africa. Wagner's criminal empire on the continent includes extensive resource extraction with its financial gains passing through its illicit network of shell companies. Wagner's money laundering through those companies has allowed the group to circumvent U.S. sanctions and continue amassing wealth and expanding its operational capacity. Thus, it is essential for the United States to consider alternative legal mechanisms to combat the group, such as the Racketeer Influenced and Corrupt Organizations (RICO) statute.

As is the case with any transnational criminal organization (TCO), money is the lifeblood of the Wagner Group. Targeting Wagner's financial assets is key to dismantling the organization and prosecuting members for crimes committed. Although bringing RICO charges against Wagner could incite Russian reprisals, this would not be a novel development. Russia has already sanctioned top U.S. officials in retaliation for U.S. sanctions, with minimal impact on the United States. The U.S. should proceed with new methods to target Wagner's financial networks and cripple the network that allows for extensive wealth accumulation across Africa.

Key Takeaways

- The Wagner Group has engaged in human rights violations and violence while expanding its financial gains in Africa through extensive mining operations and resource exportation. Wagner funnels these profits through its network of shell companies, allowing the group to circumvent traditional Western sanctions,

affirming the need for a reworking of the U.S. strategy to combat it.

- Previous U.S. attempts to target the Wagner Group have not substantially affected its operational capacity in Africa. The introduction of the Holding Accountable Russian Mercenaries Act (HARM) in Congress has raised concern over the subsequent requirement of countries employing Wagner to cut ties with the organization or face U.S. sanctions.

- A reworked U.S. strategy to target the Wagner Group could employ RICO to seize Wagner's assets and prosecute leading individuals to dismantle the organization. Previously, the United States investigated Hezbollah for RICO violations, but ultimately decided not to pursue the charges. This investigation emphasizes that effective targeting of TCOs requires support from international partners to coordinate efforts to track illicit commodities shipments, seize financial assets, and arrest perpetrators abroad.

Policy Recommendations

- The United States should not pursue a foreign terrorist organization (FTO) designation of the Wagner Group. A FTO designation of Wagner would jeopardize U.S. relations with African countries that employ Wagner, since the designation would require the U.S. to cut ties. Waning U.S. relations with African countries would be a win for Russia, which could continue spreading its strategic influence across Africa unabated. Rather, the U.S. should leverage its TCO designation and utilize the anti-racketeering law to financially dismantle Wagner's criminal empire of money laundering and seize its assets held throughout its network of shell companies.

- Collaboration within U.S. law enforcement agencies is essential in effectively investigating the Wagner Group and gathering intelligence



on its criminal network. This collaboration at the federal level would involve centralizing intelligence with participation from all appropriate law enforcement agencies and in consultation with the U.S. Justice Department to ensure evidence is carefully collected to be used if legal charges are opened against Wagner. Even if a RICO charge cannot yet be brought against Wagner, careful monitoring and tracking of its business operations would be used as evidence if the U.S.

can prove a link between Wagner’s network and U.S. domestic injury.

- Coordination between the U.S. and international partners is key to the extraterritorial application of RICO. The U.S. will need support from international governments to seize Wagner’s assets held in shell companies in the United Arab Emirates, China, and Thailand, and arrest individuals who have engaged in racketeering behavior on behalf of the Wagner Group.

Introduction

The Wagner Group is a Russian-operated private military company (PMC) previously controlled by Yevgeny Prigozhin. Under Prigozhin, the Wagner Group extracted an estimated [\\$4 billion](#) from Africa between 2017 and 2023, and despite efforts from the U.S. and its global partners to sanction the group and limit its operational capacity, it continues to expand. As a result, this continued flow of cash to Moscow has helped support Russia’s war in Ukraine. The Wagner Group has entered a period of transition due to the death of its senior leaders including Prigozhin in an August 2023 plane crash. Their deaths created a Russian scramble for Africa as Russia tries to maintain the status quo while also bringing Wagner publicly under the umbrella of the Russian state. This has involved several [trips](#) to the continent by senior Russian officials followed by official [statements of support in local media](#).



Yevgeny Prigozhin, the founder of Wagner Group, speaks from an unspecified location in Africa after his rebellion. He later died in a plane crash on Aug. 23, 2023. (Wagner Account / Anadolu Agency via Getty Images)

Despite Wagner’s leadership uncertainty, there has been little change in terms of its actions in Africa. The group continues to exploit natural resources, commit human rights violations, and provide security assistance to African regimes. The United States has taken several steps to mitigate Wagner’s influence on the continent, including labeling it a transnational criminal organization in [January 2023](#). In addition, the

Holding Accountable Russian Mercenaries Act ([HARM](#)), which would see Wagner labeled a foreign terrorist organization, has been introduced in Congress. Though those measures vary in approach, they both use sanctions as a tool for combating Wagner, a strategy that has proved ineffective because its network of shell companies allows it to circumvent sanctions and continue to gain wealth and influence.

The United States and its global partners should take advantage of Wagner’s leadership disarray to implement new strategies in addition to building upon current methods to combat the group’s influence. The Wagner Group’s operational model has pointed to the pitfalls within current U.S. government policy intended to combat illicit crime networks that operate within a spiderweb of shell companies controlled by multiple entities and individuals. The RICO statute could outline alternative mechanisms to combating Wagner that, if coupled with the current efforts, could mitigate the group’s



operational capacity and influence in Africa, as well as its pattern of gross human rights abuses and exploitation.

Understanding Wagner's Model in Africa

The Wagner Group is active in [18 African countries](#) and engaged in multiple industries including [mining](#), [counterterrorism operations](#), [smuggling](#), and [commodities trading](#). Through these varying operations, Wagner has developed a complex network of shell companies that serve as fronts for transporting goods, currency, and people. Although the Wagner Group became a household name only after the 2022 Russian full-scale invasion of Ukraine, it has been active in the region since 2014, with its first notable attack occurring during the Russian annexation of Crimea in 2014. However, some reports indicate that Wagner or precursors to Wagner such as the [Moran Security Services](#) were active in [Sudan as early as 2011](#).

Like other illicit groups, Wagner has used social media both to expand awareness of its [brand](#) and to bypass traditional media, allowing it to spread disinformation and promote its own narratives regarding Russian activities on the continent. It shapes its messages to appeal to anti-Western sentiment and lingering resentment over colonial legacies. Although Wagner is not the only Russian [PMC](#) in existence, its former leadership excelled in leveraging social media and traditional press coverage to spread misinformation and increase its African support.

Ultimately, Wagner's structure mirrors those of other [organized criminal groups](#): It is not any one group of individuals, nor is it bound by a cohesive idea, but rather it's a manifestation of a successful illicit and transnational business strategy centered on extracting valuable natural resources and offering security services. However, those activities are often coupled with gross human rights abuses and violence. Wagner has been implicated in war crimes in Mali, [Syria](#), [the Central African Republic](#), and [Ukraine](#). The group has also been linked to human trafficking that provides labor to [operate](#) illicit mineral extraction industries in which it has a stake. Beyond Wagner's direct involvement in these crimes, its role as a military trainer and counterterrorism unit for local militaries enables the [widespread](#) perpetration of abuse of civilians by local forces and embedded Wagner units.

Wagner, now a topic of U.S. national security scrutiny and at the center of a great power competition in Africa, started small. Despite its expansive geographic coverage, Wagner is estimated to consist of only 50,000 troops at a given time, with most being former members of the Russian military or convicts recruited out of Russian prisons. The rapid expansion brought on by the war in Ukraine and the need for [shtrafbat](#) units (the Russian term for suicidal shock units manned by convicted criminals) has left Wagner's numbers much smaller: An estimated [5,000 personnel](#) operate in Africa, with the largest [contingents](#) in the Central African Republic and Mali. The model Wagner uses to gain influence in

each country varies due to its highly flexible nature. A good comparison would be a franchise adapting to the tastes of a local market. Though in some cases this decentralization may be considered a disadvantage, in the case of the Wagner Group it has allowed for a unique and specialized approach in each of the countries in which it operates.

The Wagner Network

Wagner's opaque financial interests are spread across the world. In addition to its physical presence in Russia, Wagner has been linked to as many as [64](#) overseas shell companies. These companies, when identified and sanctioned, merely shift their operations to a new entity. Filtering its profits through these shell companies makes it difficult to track Wagner's financials, since the opaqueness of international financial management allows [it](#) to easily [circumvent](#) sanctions. Shell companies merely shift their portfolio to new entities faster than the U.S. government can identify and sanction them, and monies filtered through those companies filter back to those connected with Wagner and the Russian state. [Evidence](#) shows that some local beneficiaries, including corrupt politicians and officials, receive profits from Wagner's activities. These shell companies are domiciled all over the world; recent [U.S. Treasury](#) action revealed firms based in the Central African Republic, Dubai, and Russia facilitated the extraction and laundering of gold and diamonds for Wagner. Other [companies](#) linked to Prigozhin and Wagner have been identified as operating in [Thailand](#) and [Hong Kong](#). This



Protesters hold a banner reading “Thank you Wagner” during a demonstration celebrating France’s withdrawal of troops from the country in February 2022. The withdrawal followed a breakdown in France’s relations with the ruling junta. Wagner has filled the security void following the withdrawal. (Florent Vergnes / AFP via Getty Images)

global network remains in place after Prigozhin’s demise and likely continues to expand and shift to avoid punitive action.

Though still involved in Ukraine, Wagner has returned its attention to profits by expanding its network and operations in sub-Saharan Africa. Wagner has previously acted as a force multiplier in several regional and international conflicts including in Syria in [2016](#) and the Russian invasion of Ukraine in [2022](#). However, the Wagner Group has been faced with a rebranding as it can no longer operate its illicit businesses in the shadows, especially since the August 2023 plane crash illuminated Wagner’s alignment with the Kremlin. Since then, Wagner has decreased its presence in Ukraine and Syria and has been actively working to stabilize its African operations.

Those activities include running counterterrorism missions, training local forces, providing regional/ executive security, and managing extraction operations for minerals and other resources. African countries often invite Wagner to participate in security-centered missions, and upon success, it is often given more operational autonomy. It uses that opportunity to take advantage of local populations to achieve financial goals. This can include exploiting local populations for mining labor and committing human rights violations. Those actions, in turn, incite violence that reaffirms Wagner’s reason for being invited in the first place. Wagner does not have a singular operational plan for the continent of Africa; instead, it uses ad hoc methods to adapt to and exploit its surroundings. Many African nations that initially brought in Wagner to use its security

services have come to [regret](#) the decision to employ the group. Many of these operations eschew local or international laws and norms, even utilizing [forced](#) labor.

Current Efforts to Combat Wagner

The United States is using sanctions to combat the Wagner Group, with the State Department announcing penalties on key individuals, infrastructure, and front companies that are used to move Wagner assets. In 2023, the U.S. [government placed sanctions](#) on individuals said to oversee Wagner operations in Mali and the Central African Republic as well as against key shell/front companies such as [Diamville and Midas Resources](#). Despite these efforts, however, the Wagner Group continues to amass wealth and territory.

As Wagner’s role in strategic competition in Africa becomes more prominent, the United States has become more aggressive in its response. In January 2023, the U.S. government designated Wagner as a [transnational criminal organization](#) (TCO) to create a layered effect with sanctions in the hope that they become more impactful in limiting the group’s operational capacity. A TCO designation allows for the seizure of assets, including property, within the U.S. Strategically speaking, though, the TCO designation does not necessarily change how the U.S. responds to the group. A TCO designation [does increase the risk to those who work](#) with the Wagner Group by opening up its partners to sanctions. However, it does not come with an inherent



risk of prosecution. Sanctions remain the main resource for the U.S in combating Wagner's malign influence globally, but some members of Congress believe that a Foreign Terrorist Organization (FTO) designation is more fitting for the group, given the violence in which it has been implicated. However, an FTO designation as described below does carry significant consequences not only for the U.S. but for other countries involved with Wagner.

The HARM Act

Legislation dubbed the [HARM Act](#), introduced to the U.S. House of Representatives in January 2023 would require the State Department to declare Wagner an FTO and take appropriate measures against it. This legislation follows similar actions enacted by the [U.K.](#) and [EU](#) governments, both of which labeled the group an FTO based on crimes against humanity it committed in both Africa and Eastern Europe. The HARM Act would require all states employing Wagner to cut ties with the group within one year or face the potential of U.S. sanctions. The bill does allow for exemptions for countries the president deems sufficiently essential to excuse their partnership with Wagner.

Whether or not Wagner is designated an FTO, the organization does engage in terrorist activity as defined by [U.S. Code 2331](#): having the "capability, and intent to engage in terrorist activity or terrorism," and "the terrorist activity or terrorism of the organization threatens the security of United States nationals or the national security of the United States." At present, Wagner

could fit the definition of an FTO due to the broad legal definition of terrorism. [Title 18](#) of Section 2331 defines terrorism as "violent acts to intimidate or coerce a civilian population, to influence the policy of a government by intimidation or coercion; or to affect the conduct of a government by mass destruction."

Drawbacks of an FTO Designation

Other entities listed as FTOs such as al Qaeda and the Revolutionary Armed Forces of Colombia – People's Army typically ascribe to a collective ideology such as jihadist extremism, white supremacy, or anarchism. Wagner has no such unifying beliefs and is known to have members who ascribe to a gamut of extreme ideals. Therefore, Wagner more closely resembles a transnational criminal enterprise as it is designated. The primary motive of those involved with Wagner is profit, not ideology. U.S. law defines Organized Crime in Sec. 601 of Public Law [90-351](#) as "the unlawful activities of the members of a highly organized, disciplined association engaged in supplying illegal goods and services." Wagner is engaged in these activities but on a transnational rather than domestic scale.

However, designating Wagner as an FTO could be counterproductive to the U.S. goal of combatting Wagner's influence in Africa while strengthening relations with countries there. An FTO designation would require the United States to cut ties with countries that employ Wagner for security services and allow the group to extract resources.

Thus, this designation would significantly harm U.S. relations with those African nations and drive them away from partnerships with the U.S. The United States instead must designate Wagner appropriately to ensure public backing in Africa. Considering that Wagner's advanced anti-Western [disinformation](#) campaigns already threaten the generally [positive](#) image of the U.S. among Africans, an FTO designation could be expected to incentivize Wagner to intensify its messaging. As U.S. counternarcotics [campaigns](#) in Latin America since the 1980s have illustrated, effective local [cooperation](#) is paramount to the successful repression of transnational organized crime groups.

Policy Prescriptions

The RICO Statute

Congress passed the [Organized Crime Control Act of 1970](#) to combat sophisticated criminal networks whose illegal activities drained the U.S. economy of billions of dollars. Title IX of the act established the Racketeer Influenced and Corrupt Organizations (RICO) statute to eliminate the "infiltration of organized crime and racketeering into legitimate organizations operating in interstate commerce" (S.Rep. No. 617, 91st Cong., 1st Sess. 76 (1969)). Congress [determined](#) passing RICO was essential to combat the highly sophisticated criminal industry that threatened the future stability of the U.S. economic system by hindering free competition and commerce. It was expected that in the absence of



“ The [Supreme] court affirmed that money laundering and material support for terrorism both allow for extraterritorial application and thus, if these statutes are utilized to show a pattern of racketeering behavior, then RICO can be applied to foreign activity. ”

RICO, organized crime would have [increased](#) in the U.S., since existing sanctions were limited in their scope and did not effectively deter criminal activity.

U.S. prosecutors first used RICO in the 1970s to effectively prosecute members of the Mafia, whose decentralized structure had previously made it difficult to tie high-ranking members to crimes and subsequently convict them. Before RICO, the U.S. government could [prosecute](#) individual Mafia members who directly perpetrated crimes but could not use those convictions to go after the entire criminal organization. But under RICO, prosecutors could [target](#) both low-level criminals and senior leaders. Since the 1970s, the application of RICO has extended beyond the Mafia to target others involved in organized crime in the U.S., including gangs, drug cartels, and politicians. Because of RICO, the ability of domestic organized crime networks to exert high levels of political influence and state capture has been significantly reduced.

Although the initial intent of RICO was to specifically target criminal enterprises engaged in illicit U.S. interstate commerce,

it has since been [applied](#) more broadly to include illegal activities encompassing foreign commerce. Traditionally, the presumption against extraterritoriality has limited the extent to which U.S. law can be applied to foreign criminal activity, and thus, RICO was originally viewed as a tool to counter domestic criminal organizations solely. However, the debate over the extraterritorial application of RICO was settled by the Supreme Court decision in [RJR Nabisco, Inc. v. European Community](#) in 2016, when the court ruled that RICO can be applied to some foreign misconduct if the underlying predicate statute can be applied extraterritorially. The court affirmed that money laundering and material support for terrorism both allow for extraterritorial application and thus, if these statutes are utilized to show a pattern of racketeering behavior, then RICO can be applied to foreign activity.

How Does It Work?

A RICO charge requires an individual to participate in a [pattern](#) of racketeering connected to an enterprise. The enterprise is the entity for which the individual is committing crimes, demonstrating the person's connection to

the larger organization. The definition of racketeering under U.S. law [includes 35](#) federal and state crimes, including bribery, kidnapping and murder. In addition, [conspiring](#) or attempting to commit those crimes is also defined as racketeering behavior. A RICO charge requires an individual to commit two crimes within 10 years on behalf of the enterprise.

Under Section 1959, a RICO conviction imposes varying punishments on an individual depending on the crime committed, including imprisonment and financial penalties. Conviction for violent crimes including murder can result in life imprisonment or the death penalty. RICO's effective impact on disrupting criminal organizations is in its ability to allow the seizure of all of an individual's assets under [Section 1963](#), including the forfeiture of profits from the racketeering behavior, personal property, and property that is transferred from the defendant to another member of the organization. Forfeitures are not limited to assets held in the U.S., but rather encompass those held [abroad](#), with asset seizures carried out by the respective governments as requested by the United States. The ability under RICO to seize



assets dispersed abroad makes the law an effective tool through which the U.S. can substantially disrupt criminal organizations that are operating abroad and benefiting from foreign-held assets such as the Wagner Group.

By giving prosecutors the power to target a criminal enterprise's financials, RICO can effectively be used to dismantle those organizations. Historically, a major challenge in dealing with diffuse criminal enterprises is that convicting an [individual](#) involved in the enterprise does not hinder the organization's ability to function, since that person can be replaced by another member. Money, however, is crucial to criminal enterprises and thus, RICO's targeting of [laundered](#) financial assets is key in dismantling criminal organizations. RICO gives prosecutors the ability to follow the money trail and [go after](#) those involved in financial transfers and seize the funds. These seizures remove the [funds](#) criminal groups require to function, making their operations more difficult to maintain. Moreover, the threat of prosecutions, seizures, and reputational damage has a measured effect on various legitimate industries that begin to self-police by instituting fiduciary safeguards that allow them to ascertain whether funds are legitimate. Thus, RICO has made money laundering far more difficult for criminal organizations.

Historic Use of RICO to Target Hezbollah

In 1997, U.S. law enforcement agencies opened [Operation](#)

[Smokescreen](#), investigating the illicit trafficking of cigarettes in the U.S. with profits going to Hezbollah. A multiyear investigation involving numerous agencies implicated [25 individuals](#) in crimes including money laundering and support for terrorism, resulting in charges against them for RICO violations and directly connecting them to Hezbollah's criminal network. This was the first time that the U.S. government had considered bringing RICO charges against Hezbollah to target members of leadership and disrupt its global criminal network.

Since Operation Smokescreen, the U.S. government has continued to investigate domestic links to Hezbollah but has refrained from bringing RICO charges against members of the organization out of concern of reprisals. A separate initiative, [Project Cassandra](#), was created in 2008 with an investigation into Hezbollah's expansion into drug and weapons trafficking beyond the Middle East, [spreading](#) to Latin America, West Africa, and Europe. Hezbollah's money laundering scheme reached the United States through its use of the [U.S. financial system](#) to buy and export American used cars to sell in Africa, with profits sent to Hezbollah leadership in Lebanon. Despite mounting evidence of Hezbollah's money laundering in the U.S. as revealed by Project Cassandra, the Justice Department [decided](#) not to bring RICO criminal charges against Hezbollah associates, including an envoy to Iran, a Lebanese bank, and a U.S. cell of the Quds Force, [citing](#) larger geopolitical concerns over U.S.-Iranian relations.

Lessons Learned From the Hezbollah Investigations

Although the United States has not recently brought RICO charges nor gained convictions of members of Hezbollah, both Operation Smokescreen and Project Cassandra contain valuable lessons for how RICO could be utilized to target the Wagner Group's illicit operations. Operation Smokescreen was able to convict individuals using RICO because of clear evidence connecting the defendants both with Hezbollah's international criminal organization and domestic trafficking. This clear connection to domestic economic activity justified the application of RICO to Hezbollah, given that it is not a U.S. domestic entity.

Operation Smokescreen provides precedent for the use of RICO to target the Wagner Group, if U.S. domestic activity is implicated in the organization's illicit resource exportation networks. With the dismantling of Project Cassandra after the decision to not pursue RICO charges, the U.S. lost valuable [insight](#) into Hezbollah's criminal activity and leadership. Even if a RICO charge cannot yet be brought against members of Wagner, a U.S. investigation into its business operations to collect evidence for use in eventual court proceedings is essential.

Coordination between the State Department and foreign governments is also essential in arresting individuals in global criminal organizations who are in hiding abroad and seizing their assets. The United States cannot succeed in an



extraterritorial application of RICO without consistent support from international partners.

Recommendations for Using RICO Against Wagner

Wagner is involved in a multitude of criminal activities that could warrant a RICO investigation, such as resource extraction of gold, minerals, diamonds, oil, and timber, in which profits are illegally run through shell companies and brought back into the Kremlin's network. Using RICO and leveraging the current TCO designation is an essential step in limiting Wagner's operational capacity. Successfully building a RICO case would allow prosecutors to target Wagner assets in Western financial systems, including its currency, property, and shell companies. Seizing those assets would severely limit Wagner's ability to profit from commodities and resource extraction and make it harder for Wagner to find enablers. Wagner's use of shell companies is [public knowledge](#), and the continued tracking, monitoring, and tracing the web of that network will need to continue through collaboration by researchers, law enforcement, academics, and analysts. It is essential that information collected by researchers is shared with enforcement officials. Though building any case against Wagner entities and the individuals involved will take substantial time and resources, the information gathered in the process will aid in combating the group's malign influence.

The benefits of a RICO case that were laid out in Operation Smokescreen and [Project](#)



A young demonstrator holds a Russian flag in Bangui, Central African Republic, on March 22, 2023, during a march in support of Russian and Chinese presence in the country. After the departure of French troops, Russia sent military instructors in 2018, followed by hundreds of Wagner paramilitary troops in 2020. (Barbara DEBOUT / AFP via Getty Images)

[Cassandra](#) remain relevant; however, concerns over possible reprisals if a case against Wagner were pursued are also valid. In the past, Russia has responded to U.S. sanctions by placing its own sanctions on top U.S. officials. This response, however, has had [little impact on U.S.](#) policy. Regardless of sanctions imposed by Moscow, the U.S. has continued to support Ukrainian war efforts. And because of its preoccupation with Ukraine, Russia would likely have minimal capacity to aggressively target the U.S. if RICO charges were brought against Wagner entities. It is difficult to forecast how Russia would

respond to a RICO case against Wagner. There are a number of possibilities, however, including Russia imposing sanctions against U.S. officials or an outright denial of allegations against Wagner. But like many of Russia's previous tactics, its responses would have minimal impact on the U.S. Therefore, the fear of reprisal that affected the 2008 case against Hezbollah would be minimal in a case against Wagner.

Looking Forward

The RICO statute represents a unique and innovative way to target an organization deemed a



transnational criminal enterprise and unite investigative efforts to tackle the advanced networks that groups such as Wagner use to move commodities and money. In addition to RICO, the U.S. government can look to reorganize and rework the HARM Act to allow sanctions to be used against individuals employing Wagner and the companies

currently operating in its nexus without causing unintended harm to countries using the mercenary company as a last resort for security operations and resources. As the U.S. is not strategically positioned to replace Wagner in Africa, it should discourage countries from employing the group and urge them to move toward more sustainable engagements

that promote democratic values and stability. Wagner is not the first PMC – nor will it be the last – to engage in malign campaigns in Africa. Having the framework to tackle these groups by using RICO or a reworked version of the HARM Act will be essential to engaging in successful strategic competition in the region. □

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While obtaining her bachelor’s degree in International Affairs and minors in Arabic Studies and Geography at the George Washington University, Malobisky interned with Multifaith Alliance as a Policy and Advocacy Intern. In this role, she studied the conflict in Syria, conducting research on the illicit captagon trade and cross-border interdictions in Jordan and Lebanon. She also studied the migration of Syrian refugees throughout the region and the recent attempts by international governments to force unlawful refugee return, despite ongoing concerns in Syria that prevent voluntary return.

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