



United States Congress
Commission on Security and Cooperation in Europe
Hearing on “Countering Russia’s Terroristic Mercenaries”
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Chairman Wilson, Co-Chairman Cardin, Ranking Member Cohen, Ranking Member Wicker, and members of the Commission.

Thank you for holding this hearing. It is an honor to testify on such a critical issue.

Introduction

My name is Justyna Gudzowska, and I am the director of Illicit Finance Policy at The Sentry, a non-profit organization that follows the dirty money connected to war crimes and atrocities. I have spent my career countering financial crime. Previously, I worked for the US Department of the Treasury on sanctions against Iran and for the United Nations Security Council on countering the financing of terrorist groups such as ISIS and al-Qaida. Most recently, I was the lead sanctions attorney for the global bank Morgan Stanley.

Today’s hearing fits squarely within my work and The Sentry’s mission. But this subject is also personal for me: I spent my childhood in Poland, living behind the Iron Curtain. I know what it is like to live under Russia’s thumb, and it could not be more clear to me that the Ukrainian people are fighting not only for their own freedom but for us all.

Background on Wagner

The chief focus of my testimony today is the history and conduct of the Wagner Group, which is ostensibly a private outfit but actually functions as an armed proxy of the Kremlin. Against the backdrop of Russian expansionism and the illegal invasion of Ukraine, we have witnessed a surge in the Wagner Group’s involvement on the battlefield and an elevation of the group’s profile more generally. In fact, the group’s founder, Russian oligarch Yevgeny Prigozhin, finally [admitted](#) last September that it was he who created the group. You have likely heard about the extreme brutality practiced by Wagner in Ukraine, including human-wave attacks, mass atrocities against civilians, and extrajudicial executions, such as the recent [execution](#) of a defector with a sledgehammer, a crime that was videotaped and widely distributed on social media.

What is less well known is that for years prior to the invasion of Ukraine, Russia had been steadily expanding its influence with the help of the Wagner Group, leaving a trail of death and devastation around the world. In addition to Ukraine, Wagner has deployed to other trouble spots around the globe: Syria, Sudan, Libya, the Central African Republic, Mozambique, and Mali. It may seem that since invading Ukraine, Russia has been increasingly isolated as

a global pariah. But in Africa, the Wagner Group has continued to project Russian influence. Wagner has reportedly already laid the groundwork in [Burkina Faso](#) and has its eyes on [Cameroon](#) and [Chad](#), where, according to US intelligence, it may be trying to assassinate the country's pro-Western leader. In the Democratic Republic of Congo, a [recent poll](#) showed that Russia is the favorite foreign country among Congolese people.

Simply put, the Wagner Group has become an integral component of Russia's geopolitical strategy. Although the group tends to adjust its playbook in response to specific circumstances in country, its operations in Africa tend to follow a pattern: embed in resource-rich countries with volatile political and security environments; forge symbiotic relationships with corrupt leaders; provide training to security forces (under the guise of counter-insurgency or counter-terrorism); pursue local business opportunities; engage in elaborate pro-Russia and anti-Western propaganda; and carry out atrocities in furtherance of these aims, all while maintaining links to the Kremlin.

Wagner has been a destabilizing force since 2014, and the group's continued access to resources runs the risk of undermining the unprecedented international sanctions effort to isolate Russia. The US has responded to this pernicious threat by sanctioning the Wagner Group, its operatives, and some of its front companies under various sanctions regimes. Most recently, in January, the Biden administration labelled Wagner a transnational criminal organization (TCO). What the US government has not done is use the most powerful economic tool in its arsenal. It is time for the US to designate the Wagner Group as a foreign terrorist organization (FTO) in accordance with section 219 of the Immigration and Nationality Act, which—critically—would bring into play the extraterritorial and criminal material support statute. This move would serve as a powerful deterrent for any governments, entities, or individuals that contemplate working with Wagner, as the stakes would be raised significantly. Designating Wagner as a TCO is a step in the right direction, but it does not carry the same powerful consequences as an FTO designation. This is why the bipartisan Holding Accountable Russian Mercenaries (HARM) Act is such a vital piece of legislation.

I believe my colleagues will speak to the process and practical consequences of an FTO designation. But what I would like to do is talk to you about why Wagner fits the definition of a foreign terrorist organization, and I'm going to do it by explaining the role that the group has played in one particular country, the Central African Republic.

Wagner in the Central African Republic

The Sentry has been investigating the Wagner Group since its arrival in the Central African Republic five years ago pursuant to a cooperation agreement between the governments of Russia and CAR. In CAR, Wagner's presence is authorized by President Faustin-Archange Touadéra and his inner circle. When Wagner first arrived in CAR, the country had experienced two decades of crisis and deadly armed conflicts. Russia—through the Wagner Group—promised security to President Touadéra and his inner circle. A Wagner operative was installed as the President's national security advisor. In exchange, CAR would supply Wagner with access to precious natural resources such as gold and diamonds. The fact that Wagner also spends money in CAR on sophisticated, Hollywood-style [propaganda](#) glorifying Russia makes it clear that the group is not there just for the economic spoils but also to project Russian power abroad. Within four years of its arrival, Wagner was able to ensure President Touadéra's reelection and thus a ruling elite favorable to Russian interests. Wagner has also been increasing its control and influence over CAR's military and has taken part in joint military operations since 2018.

Wagner fighters and Wagner-trained Central African soldiers have used terror as a weapon against the civilian population in the country. They have committed mass rape, torture, forced disappearance, and dislocation, and they have killed thousands of civilians. Atrocities have intensified since a coup attempt against President Touadéra in 2021. Wagner has given orders to "cleanse" areas purportedly occupied by rebel groups, which has resulted in

atrocities committed against civilians, including women and children. A [joint investigation](#) by The Sentry and CNN of an incident in Bambari in February 2021 revealed that Wagner mercenaries indiscriminately killed civilians sheltering in and around a mosque, murdering at least a dozen people. In addition to The Sentry, other groups such as [Human Rights Watch](#) and multiple United Nations bodies have documented such atrocities, which are too numerous to list here. The bottom line is that the Wagner Group targets civilians. According to a [study](#) by the Armed Conflict Location & Event Data Project (ACLED), “[c]ivilian targeting accounts for 52% and 71% of Wagner involvement in political violence in CAR and Mali, respectively. In both cases, this exceeds the rate of civilian targeting perpetrated by allied state forces, as well as the major insurgent groups operating in each context.” In fact, according to The Sentry’s local sources, in conflict situations, Wagner mercenaries give orders to kill everyone and leave no trace.

In CAR, Wagner’s atrocities are often concentrated around mining areas. In order to effectively exploit the minerals, Wagner engages in “cleansing” operations around mines. The modus operandi is simple: the CAR government revokes licenses given to third-country companies and transfers the concession to Wagner-linked entities, while Wagner fighters come in to secure the area for themselves. They execute local residents to create a climate of fear and signal to others that the mines are off-limits.

A UN official [stated](#) with respect to Wagner atrocities in CAR: “We’re seeing some of the most serious human rights violations and humanitarian law violations. And we’re seeing them on a widespread scale. People on the ground are absolutely terrified.”

During the course of our investigations, civilians interviewed by The Sentry used the terms “terror” and “fear” repeatedly to describe Wagner’s operations in CAR.

Conclusion

The Wagner Group is a transnational threat, much like other terror organizations, and defeating this threat will require a genuinely international effort focused on the group’s financing, propaganda, and movement of foreign fighters, as we saw in the successful international effort to combat ISIS and the combined efforts of the 85-member [Global Coalition to Defeat Daesh/ISIS](#).

The US needs to take the initiative here by leveraging one of its most powerful financial tools and calling Wagner what it is: a terror group.

Before I finish, I want to leave you with one word of caution. An FTO designation is a powerful measure that can have [negative humanitarian consequences](#) by chilling the work of legitimate non-profit organizations that are afraid of running afoul of the material support statute.¹ This is especially the case when the FTO has de facto control of territory, as Wagner does in CAR. CAR is one of the poorest countries in the world and is dependent on [humanitarian aid](#). In order to prevent further harm to a vulnerable population, it is important to ensure that the humanitarian consequences of any designation are appropriately mitigated. This could be done through a humanitarian exemption in the HARM Act.

¹ Although the Treasury Department recently issued an unprecedented slate of humanitarian general licenses that mitigate the impact of sanctions, they technically do not curb the Department of Justice’s prosecutorial jurisdiction under the material support statute.

In conclusion, I urge Congress and the administration to implement the toughest economic tools the United States government has at its disposal to counter the Wagner threat and choke off the group's resources while minimizing negative impacts on civilians in the fragile countries where Wagner operates.

Thank you very much for your attention. I will be happy to answer any questions you may have.