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UNDERGROUND MONEY

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Shortly after September 11, 2001, it became clear that the war on terrorist finance was to occupy a central place in the war on terror. The Terrorist Financing Executive Order enacted by George W. Bush on September 24, 2001, made it legally possible to pursue financial supporters of terrorism *as terrorists*. The Executive Order dramatically expanded the U.S. government's powers to indict those providing funds and infrastructural support to alleged terrorists, and to freeze and block assets. The order also published a blacklist of terrorist organizations and individuals whose assets were to be frozen globally. The order was heralded as "the first strike on the global terror network." In the accompanying press release, President Bush said: "We will starve the terrorists of funding, turn them against each other, rout them out of their safe hiding places, and bring them to justice."¹

The executive order was a first step in what the U.S. government calls "the war on terrorist finance," which entails, among other measures, freezing assets, compiling blacklists, designing new financial regulation, pursuing informal money transmitters, and engaging in a global diplomatic offensive.² In its imagination of terrorist finance as an underground sphere, the war on terrorist finance employs the "discourse of civilization versus barbarism" that, according to Jodi Dean and Paul Passavant, pervades politics since 9/11.³ For example, when the U.S. Treasury closed down a number of informal money transmitters in the name of fighting terrorist finance on November 7, 2001, President Bush stated, "The entry points to these networks may be a small storefront operation, but follow the network to its center, and you discover wealthy banks and sophisticated technology, all at the service of mass murderers. By shutting these networks down, we disrupt their murderous work." Bush continued, "We find an enemy who hides in caves in Afghanistan and in the shadows in our own society. It's an enemy who can only survive in darkness."⁴

This paper examines practices of governing in the war on terrorist finance and shows them to be dependent on articulations of an underground world of terrorist money and suspicious transactions on the one hand, and a legitimate global world of financial normality on the other. As such, the war on terrorist finance is part of the everyday “legitimation work” of globalization post-9/11, producing the world of legitimate global finance simultaneously with the world of the illegitimate underground. For Bill Maurer, Susan Bibler Coutin, and Barbara Yngvesson, *globalization* is not something that exists unproblematically but is a discursively produced phenomenon that performatively creates the categories it assumes to transcend (e.g., nations and sovereignty). They write:

scholarly debates about globalization . . . assume that there is a coherent field (of subjects, nations, and so forth) that “flows” of people, capital, and images threaten to destroy or to open up. And yet this field is inherently fractured and is always in jeopardy. It takes work to stitch it together, and abject figures such as the illegal alien or the money-laundering tax haven have a key ideological place in this process.⁵

They call the everyday work of producing the coherent worlds and subjectivities that belie globalization “the legitimation work of globalization,” which “includes issuing and denying documents, sealing and opening records, regulating and criminalizing transactions, and repudiating and claiming countries and persons.”⁶ Since 9/11, questions regarding the resurrection of borders in finance and security have dominated the media as well as academic literature, and legitimating globalization has taken on new urgency. To some extent, the processes that enable the continued legitimation of globalization work through inscriptions of the livable/legitimate/licit and the unlivable/illegitimate/illicit in the context of the war on terror.

While questioning the world of underground money as imaged by policymakers in the war on terrorist finance, this article also problematizes the coherent world of global finance as imagined not just by policymakers but also by academics writing on international finance and international political economy. This latter move is necessary precisely because the two discursive “sides” *produce* each other. As Dean and Passavant write, “The hegemonization of September 11 has established new binaries, a new self, a new enemy. And precisely because

of the power and the enjoyment that these certainties provide, democratic response must turn to politics, ideology, and representation, lest we concede the field to its presently dominant formation.”⁷ This essay evaluates the financial fetishism evinced in a discourse that projects a clearly bounded and rationally organized space for global finance on the one side, and a clearly bounded and centrally organized space for underground money on the other. The debate on finance and *Empire* surrounding the work of Michael Hardt and Antonio Negri facilitates analysis of the fetishism inherent in the rational global financial sphere by positing a conceptualization of financial power as a diffuse set of practices without clear origin or source. This article does not accept Hardt and Negri’s thesis unconditionally but assesses how certain elements of their delineation of *Empire* facilitate a critique of rationally organized spheres of legitimate and illegitimate money in order to explore more closely how the particular practices of financial governing in the twenty-first century depend upon questionable cultural constructions of “good” and “bad” money.

The article is organized as follows. First, it explores the debate on finance and *Empire* in order to draw out which elements of Hardt and Negri’s work help to think through cultures of financial governing. It then proceeds to interrogate the boundaries between the legitimate and underground worlds of finance as one way in which the power of *Empire* is at work in the everyday life of global finance, governing financial access and opportunity.⁸ Finally, as a way of thinking through practices of dissent, the paper discusses the politics of ambiguity that inevitably confound the imagined borders between above-ground and underground money.

FINANCE AND EMPIRE

In a sense, the conceptualization of the centrally organized world of underground money in the war on terror *mirrors* the established conceptualization of the world of global finance as a centrally organized space with clear structures and boundaries that can be found in much literature on international finance. The “global financial architecture” is perhaps the most current metaphor that reinforces this established representation of global finance. This architecture metaphor, which

has come to dominate debate over reform of financial governance since the Asian Crisis, imagines the world of global finance to be coherent, clearly bounded, and centrally organized. For example, for Louis Pauly, the international financial architecture is like a building, for which proper regulation and policy coordination provide “foundations and plumbing.”⁹ By comparison, in a 1998 speech to the New York Stock Exchange, Tony Blair said, “Together, we must design a new international financial architecture for a new international financial age.”¹⁰ The architecture metaphor focuses financial politics on technical and regulatory questions, implying that the sphere of finance can be rationally managed and designed. It represents an attempt to “freeze the contradictions” in financial practice and financial authority.¹¹ It erases the doubts and confusions concerning what does and does not legitimately belong to political debate in the sphere of finance. It enables, as Paul Langley has written, a “common-sense closure that serves to settle the focus of enquiry on the institutional character of global financial governance. The result has been a neglect of the discursive dynamics of authority relations.”¹²

An exploration of the politics of modern finance, then, has to remain critical of the architecture metaphor in which the discourse of policymakers and academic analysts converge, in order to look more closely at the contingent and contradictory practices of governing produced in modern financial markets. In the words of Gibson-Graham, “Through its architectural or organismic depiction as an edifice or body, Capitalism becomes not an uncentred aggregate of practices but a structural and systemic unity. . . . As a large, durable and self-sustaining formation, it is relatively impervious to ordinary political and cultural interventions.”¹³ The representation of global finance as a coherent and centrally directed domain is flawed, as it is both inadequate for understanding the diffuse power of financial practice, and it may work to make resistance seem like a hopeless task.

Recent work in cultural studies offers an alternative representation of finance as a practice of governmentality that, as Rita Raley puts it, reconceptualizes “capitalism in terms of heterogeneity, fragmentation, and permeability, rather than organic unity . . . and . . . allows for a more widely integrative notion of revolutionary praxis.”¹⁴ Raley’s reformulation of capitalism and the power of financial markets appropriates elements from Hardt and Negri’s influential *Empire*,

which argues that national territorial sovereignty has given way to “a *decentred* and *deterritorializing* apparatus of rule that progressively incorporates the entire global realm within its open, expanding frontiers.”¹⁵ This imperial apparatus of rule is conceptualized through Michel Foucault’s work on disciplinary power and is seen to operate through “structuring the parameters and limits of thought and practice, sanctioning and prescribing normal and/or deviant behaviors.”¹⁶ The work of money and financial markets is central to the operation of Empire’s disciplinary power in Hardt and Negri’s formulation: financial power does not just produce contracts and commodities but, more importantly, produces subjectivities, “needs, social relations, bodies, and minds.”¹⁷ Following Hardt and Negri, Raley regards modern finance not as a clear structure with a sovereign center but as a networked grid characterized by “flexibility, functionality, mobility, programmability, and automation.”¹⁸ In short, appropriating *Empire* to conceptualize finance enables it to be seen no longer as a hegemonic project firmly gripped by the United States but as a decentered practice of rule that operates through the disciplinary delineation of financial standards and good financial citizenship.¹⁹

Critics of *Empire* have highlighted various significant inconsistencies and exaggerations that vex its logic and key terms. Most importantly, Hardt and Negri overstate the consistency and reach of the operation of imperial power, and so misappropriate some of the post-structuralist thinkers on which they base their account.²⁰ Moreover, despite their foregrounding of discursive disciplinary constitution of subjectivity through biopower, Hardt and Negri’s project remains curiously modernist as it fails to reflect on its own performative constitution of the categories it employs.²¹ However, a number of points are worth salvaging from *Empire*, including the dispersed and porous nature of Empire’s power. As Bill Maurer concludes, “*Empire* . . . forecloses both global triumphalism and metaphors of global or capitalist totality by excavating the potentiality of the multitude.”²²

Reading the power of modern capital through a critical appropriation of the conceptual apparatus of *Empire*, then, offers important reconceptualizations that make it possible to understand financial power as both diffuse *and* porous, while shattering the secure boundaries of finance implied by the architecture metaphor to show that culture, media, art, and religion are at the heart of financial practices

and concepts.²³ The power at work in financial practice now comes to be understood as a disciplinary power—or more precisely, a matter of *governmentality*: a diffuse, mobile regulatory site that governs through definitions of financial normality and responsibility. For Judith Butler, drawing on Foucault, governmentality supplements sovereignty as the form of political power in late modernity:

Marked by a diffuse set of strategies and tactics, governmentality gains its meaning and purpose from no single source, no unified sovereign subject. Rather, the tactics characteristic of governmentality operate diffusely, to dispose and order populations, and to produce and reproduce subjects, their practices and beliefs, in relation to specific policy aims.²⁴

Governmentality differs from existing conceptualizations of global governance in its emphasis on the demands placed upon subjects' self-regulating capacities through definitions of normality and responsibility.²⁵ It thus cuts through the distinction between public and private power (or state and market) in order to enable an analysis of how regulative prescriptions for individual behavior are articulated through a constellation of state agencies, international institutions, NGOs, and private organizations. As we will see, such complex techniques of governmentality, pivoting on definitions of normality and operating through risk-assessment technology, provide a better understanding of the war on terrorist finance than a definite shift from public to private power (and back again).

It is through these techniques of governmentality, moreover, that the new *borders* of Empire are articulated. Against Hardt and Negri's overstatement of Empire's progressive incorporation of the entire global realm and "its open expanding frontiers," emphasis must be placed on the simultaneous work of new borders, borders that are not (just) located geographically but that work through the distinctions between livable/unlivable life, legitimate/illegal being, and above-ground/underground money. Martin Coward's reading of *Empire* emphasizes precisely the analysis of new hierarchizations through which imperial power distinguishes its barbarian others. Coward's reading addresses the question of whether the post-9/11 era has seen a resurrection of national borders (for example in financial regulation), by offering an understanding of territorial expansiveness that dislocates geographically understood sovereign power while enabling analysis

of new operations of borders. The normative regime of Empire, according to Coward, “differentiates between imperial, defensible life and barbaric, indefensible life. It is on the basis of this distinction that the new hierarchies of Empire are established: hierarchies that rank Empire’s barbarians according to their potential for integration into the imperial domain.”²⁶ For example, the Sphere project, under the auspices of the United Nations, defines minimal standards and thresholds for humanitarian response in famines, and consequently “these agencies are at the forefront establishing what it is to be fully human.”²⁷

For Butler, moreover, the question of the return of borders post-9/11 entails the emergence of sovereign power *within* the field of governmentality. Particularly worrying for Butler is that these new forms of sovereignty take the form of decisions made by unaccountable bureaucratic officials and military tribunals—or what she calls “petty sovereigns.” Writes Butler,

Petty sovereigns abound, reigning in the midst of bureaucratic army institutions mobilized by aims and tactics of power they do not inaugurate or fully control. And yet such figures are delegated with the power to render unilateral decisions, accountable to no law and without any legitimate authority.²⁸

With the war on terror, these new spaces of sovereignty as the exercise of prerogative and discretionary power emerge *inside* practices of governmentality. The discretionary power of immigration officials, border patrols, banking counter staff, and financial middle managers, determines and regulates mobility, (financial) access, and opportunity. For example, it is the objective of the U.S. VISIT program to establish risk assessment ratings for air travelers through which passengers may be granted faster customs checks or, alternatively, denied access.²⁹ According to Butler, petty sovereigns are “unknowing, to some degree, about what work they do, but [they perform] their acts unilaterally and with enormous consequence.”³⁰

The constitution of Empire’s borders, then, is to be understood as a “boundary-producing political performance”³¹ that does not just delineate the illegitimate but simultaneously produces the mirror worlds of the legitimate and the illegitimate (traveler), defensible and indefensible (life) and aboveground and underground (money). The notion

of risk is central to the performance of Empire's borders as it enables a calculative, technological and depoliticized operation of processes of inclusion and exclusion in relation to, for example, banking, health, or legal services. For Coward, "complex algorithms of risk" are the basis of the "biopolitical hierarchy on which Empire's interventions in the risky barbarian margins of the imperial domain are predicated."³² The importance of the notion of risk is that the unaccountable decisions of Butler's "petty sovereigns" are made not just by bureaucratic officials but by the software developers and risk specialists who design classifications of riskiness and (financial) suspicion. Thus, the politics of Empire's borders become buried deep within complex technology and, in the case of algorithmic modeling, may even be constituted through the technology itself.

UNDERGROUND MONEY AND THE WAR ON TERROR

According to James Der Derian, both sides in the war on terror are "intent on establishing a world that brooks no ambiguity."³³ Accordingly, it is considered of prime importance in the war on terrorist finance to define and profile terrorist money so as to separate it clearly from the legitimate world of global finance. The assumption that terrorist money is remarkable, traceable, and underground seems to run counter to dominant financial conceptualizations of money as a neutral and rational economic mechanism.³⁴

One of the most vocal and influential persons to portray a vast underground world of terrorist money is the Italian economist and journalist Loretta Napoleoni. Napoleoni's 2003 *Modern Jihad: Tracing the Dollars behind the Terror Networks* conducts what she calls an economic analysis of terror, and aims, in part, to demonstrate Western financial involvement in the historical emergence of Islamic terror networks. Because of this standpoint, sections of the North American and European left have embraced Napoleoni; however, to the extent that she produces the aboveground, legitimate economy and the underground, terror economy as mirror images, she can also be said to engage in the legitimation work of globalization. The "New Economy of Terror," for Napoleoni, is "a fast-growing international economic system, with a turnover of about \$1.5 trillion, twice the GDP of the

United Kingdom, and is challenging Western hegemony. What we are facing today is *the global clash between two economic systems*, one dominant—Western capitalism, the other insurgent—the New Economy of Terror.³⁵ The parallel system of the new economy of terror incorporates trafficking in drugs, arms, precious stones, and humans, loosely affiliated in Napoleoni's account to Islamic states, networks of mosques, and the practices of Islamic finance. It is worth questioning the usefulness of an analysis that indiscriminately treats drug smuggling, human trafficking, and other contemporary political problematics.³⁶ Here it is important to emphasize that Napoleoni's portrayal of a vast, underground financial system at the disposal of terrorists, connected through mosques, Islamic banks, and *hawala*, has been extremely influential not just in media but also in policy discourse.³⁷

To be more precise, there are three discursive axes along which the boundaries of terrorist money are constituted in the war on terrorist finance, all of which intersect with Napoleoni's analysis but do not originate there. First, *hawala*, or informal money remittance networks, are seen as a major, if not the main, conduit for terrorist finance. Second, terrorists are supposed to use the banking system in unusual ways that are to be traced through risk profiling and data mining for suspicious transactions. Third, Islamic finance and Middle Eastern financial hubs are regarded as especially suspect and vulnerable to terrorist financing. These axes are overlapping and, at times, contradictory, and thus demonstrate fractures within the policy community. Still, insofar as they delineate legitimate and illegitimate monetary means, methods, and channels, they work to govern financial behavior in daily life and constitute the grounds upon which decisions are made concerning the freezing of assets and the barring of banking customers.

First, *hawala*, or informal remittance networks, have been portrayed in press and policy discourse as underground terrorist financial systems, which, as I have argued, has led to their needless criminalization and has made it more difficult and expensive for migrants working in the West to send remittances.³⁸ More recently, the importance of informal remittance networks has been widely acknowledged, and most governments, including that of the United States, have not actually outlawed the practice. At the same time, however, the portrayal of *hawala* as a vast underground "banking system built for

terrorism” continues.³⁹ The U.S. Treasury’s National Money Laundering Strategy identifies alternative remittance systems as “particularly vulnerable or attractive to terrorist financiers and money launderers.”⁴⁰ In her turn, Napoleoni conflates *hawala* and Islamic finance, and argues that *hawala* is particularly popular among Muslims and is “mostly used by Islamic terror groups.”⁴¹ The criminal prosecution of *hawaladars* is intensifying in the United States and beyond, despite the governmental rhetoric acknowledging the importance of remittances. Under the USA PATRIOT Act, informal transmitters have become subject to expensive new licensing requirements and are harshly pursued if they do not comply. The U.S. Immigration and Customs Enforcement (ICE), part of the Department of Homeland Security, in early 2005 arrested 140 *hawaladars* for operating without a license and seized \$25 million. The ICE press release stated: “ICE targets these illegal operations because we know that terrorist and other criminal organizations *can use* these underground businesses to move illicit funds anywhere in the world with no questions asked.”⁴² By implication but not by demonstration, it becomes clear from this press release, the money seized is “illicit” and terrorist. The policy discourse that casts *hawala* as part of the shady underworld of terrorist finance simultaneously produces the legitimate world of “normal” banking that escapes implication in terrorist financing.

At the same time, the monitoring of suspicious transactions, which is the second axis that constitutes the boundaries of terrorist money, is increasingly required for “normal” high street banks. The war on terrorist finance assumes that terrorists use the financial system in particular, unusual, and detectable ways, and expends considerable effort in profiling terrorist financial behavior in order to identify and prohibit it. For example, John Byrne of the American Banking Association outlines the financial profile of the 9/11 hijackers to be as follows:

- Accounts were checking accounts of around \$3,000.
- Applications indicated that the accountholders were “students.”
- Identification used were visas issued by United Arab Emirates, Saudi Arabia, and Germany.
- Accounts were opened within 30 days of entering the country.
- Account holders checked their balances at ATMs several times a day.⁴³

On the basis of such profiling, categories and classifications of riskiness are being defined by the various regulatory bodies participating in the war on terrorist finance, identifying, for example, transients, students, those who send wire transfers in small amounts, and, generally, people without regular income and expenditure (for example salary and mortgage) as possibly suspect.⁴⁴ Banks are increasingly turning to commercial data-mining companies to purchase software programs that ensure regulatory compliance and that promise to monitor financial transactions for suspicious behavior and linkages that may raise “red flags.” These software programs build financial profiles of diverse lines of business and monitor account use in relation to the expected account profiles. They go hand-in-hand with more stringent account-opening procedures and sharpened identification requirements for both new and existing banking clients, and evidence is emerging that these new rules lead to increasing financial exclusion.⁴⁵ Suspicious transactions data mining depends on normative constructions of financial “normality” that are hidden deep inside complex technology.

The third axis along which the (financial) borders of Empire are constituted in the war on terrorist finance is that of the designation of Islamic finance and Islamic charitable giving as major hubs of terrorist financing. Along with *hawala*, Islamic charities were quickly identified post-9/11 as channels for terrorist money, and a number of them have been closed down and their directors prosecuted, most famously the Global Relief Foundation (GRF) and Benevolence International Foundation (BIF).⁴⁶ As Kenneth Dam of the U.S. Treasury said in a testimony before the U.S. Senate, “Our fight against terrorist financing has expanded to the abuse of charities. . . Few actions are more reprehensible than diverting money intended for charity and using it to support hatred and cruelty.”⁴⁷ However, questions concerning *what exactly* constitutes “support for hatred and cruelty” are mounting. Although I do not wish to argue that these particular charitable institutions were, in fact, innocent, it is important to know that the criminal case against GRF has since collapsed, and, although the criminal case against BIF was successful, it has been charged not with financing al-Qaeda but with funding Bosnian and Chechen fighters. BIF’s director Enaam Arnaout has been sentenced for racketeering, but his convicting court stated, “Arnaout does *not* stand convicted of a terrorism

offence. Nor does the record reflect that he attempted, participated in, or conspired to commit any act of terrorism."⁴⁸ More importantly, the definition of what exactly constitutes terrorist support remains a subject of significant debate. Most importantly, disagreement exists over whether medical support and financial benefit to families and/or communities that produce suicide bombers are to be defined as terrorist financing, and, as a result, a transatlantic row is developing as the European Union refuses, against U.S. political will, to designate Hezbollah as a terrorist group.⁴⁹

More broadly, the investigative trails of *hawala* and Islamic charities have led U.S. policymakers to conclude that, although terrorist financing is a global problem, the "Middle East is ground zero for much of the money raised and moved in support of terrorist activities."⁵⁰ Considerable diplomatic pressure is being exercised on Middle Eastern countries, including Saudi Arabia, Qatar, the United Arab Emirates, Oman, and others, to implement new anti-money laundering and anti-terrorist financing regulation, under the auspices of international bodies such as the Financial Action Task Force (FATF).⁵¹ The conflation of markers of danger, including Islamic money, charitable giving, and the dangers of cash, have led to implementation of U.S.-pushed policy in the Middle East, including, for example, restrictions on charitable giving in Saudi Arabia. As E. Anthony Wayne, assistant secretary of state, testified before the U.S. Senate in July 2005,

Saudi Arabia has also ordered an end to the collection of donations at mosques and instructed retail establishments to remove charity collection boxes from their premises. These steps have been extremely challenging for the Saudi government, but they have been ordered because it understands that terrorists are more likely to use funds collected anonymously and without an audit trail than those that move through regular banking channels. We believe that Saudi actions have, in fact, significantly reduced the flow of cash from Saudi Arabia to al Qaida and other terrorist groups in the region.⁵²

In a culture where charitable giving (*zakat*) is religiously required, the severity of such measures cannot be overstated.⁵³ However, those countries not participating in the war on terrorist finance are designated as Empire's barbarian others. As Stuart Levey of the U.S. Treasury puts it, "We will not accept the protest that ideological differences or bureaucratic obstacles excuse nations from the obligation to comply

with global standards. . . . All civilized nations must meet their basic responsibilities to prevent the financing and *support* of terrorism.”⁵⁴

The global dimensions of the war on terrorist finance and the U.S. pressure on FATF members in general and Middle Eastern countries in particular to accept anti-terrorist finance measures can partly be understood as an instance of global “neutral”-standard setting driven by powerful interests.⁵⁵ At the same time, however, it is not so easy to identify clear beneficiaries driving this process. I have argued previously that the disproportionate focus on *hawala* in post-9/11 discourses diverted calls for regulation of the “legitimate” banking sphere in the war on terrorist finance.⁵⁶ However, it is certainly not possible to say that private (banking) interests are driving the war on terrorist finance: generally, the banking industry is unhappy about new regulation, even if it is careful not to say so publicly, out of fear of being perceived to be “with the terrorists.” The real beneficiaries, so far, of the war on terrorist finance are an unexpected collection of public/private institutions and companies: formal money transmitting businesses (for example Western Union) who were able to appropriate business from pursued *hawalas*; software developers and data-mining companies who are able to sell their products by promising regulatory compliance; the U.S. Treasury, especially its financial intelligence arm FinCen, and FATF, who have gained global standard-setting power. Of further interest here is the boom in the business of education and information concerning the new regulatory requirements. For example, there is a proliferation of money-laundering conferences and Webcasts that educate financial and government officials in the implementation of new regulation for substantial fees.⁵⁷

The power at work in the war on terrorist finance is therefore best understood in terms of governmentality: a diffuse and contingent regulatory site that governs through (automated) definitions of normal versus suspicious financial behavior and financial education. The three intersecting axes along which terrorist money is constituted in policy discourse—*hawala*, suspicious transactions, and Islamic money—work to externalize terrorist financing beyond the borders of Empire. Put simply, terrorist money is seen as a *foreign* problem, even if *hawaladars* and Islamic charities are acknowledged to exist inside the United States and Europe.⁵⁸ In fact, it is the externalizing of danger that makes the disciplining of domestic elements possible, according to David

Campbell's analysis: "Policy thus incorporates an ethical power of segregation in its performance of identity/difference. While this produces a geography of 'foreign' (even 'evil') others in conventional terms, it also requires a disciplining of 'domestic' elements on the inside that challenge this state identity."⁵⁹ Within the three, interrelated ways that the boundaries between "good" and "bad" money are constituted, petty sovereigns—banking staff, immigration officials, ICE bureaucrats, software developers—make unaccountable and discretionary decisions that can have enormous consequences for financial access and opportunity, and that, in the case of frozen assets and arrested money transmitters, may lead to impoverishment and imprisonment.

AMBIGUITIES

I have argued that the war on terrorist finance projects a divided world where the boundaries between normal and suspicious money can be clearly drawn and technologically monitored. In this sense, it resonates with the wider discourse of the war on terror that pits "civilization" against its "barbarian" other.⁶⁰ This politics of "either-or," according to Mark C. Taylor, cannot offer redemption, not just because it "leads to closed systems in which negotiation and compromise are unacceptable" but also because it is "finally self-contradictory." Writes Taylor: "Opposites need each other in order to be themselves. The effort to affirm one by negating the other eventually reverses itself by affirming the other without which it cannot be itself. If identity is oppositional, the negation of the other necessarily results in self-negation. In a Manichean universe, victory is defeat."⁶¹ An alternative "theology of culture" for Taylor is to acknowledge our constitutive relationality and embrace connectivity, uncertainty, and complexity. According to Taylor, the challenge is to learn to live "in a world where the interplay of light and darkness creates infinite shades of difference, which are inescapably disruptive, overwhelmingly beautiful, and infinitely complex."⁶²

It is politically important, then, to disrupt the cleanly divided world of policymakers in order to emphasize the ambiguities, complexities, and uncertainties of the war on terrorist finance. The remainder of this essay attempts to disrupt the clear boundaries that constitute

underground money, first, by emphasizing the connections and mutual dependence of aboveground and underground money; then, by exploring how cultural praxis may contribute to confounding the comprehensible struggles of the war on terrorist finance. This effort should not be read as an attempt to confound policy itself: on the contrary, it argues that accepting the connectivity of aboveground and underground money leads to alternative and arguably more effective policy choices in the war on terrorist finance.

First, Bill Maurer's delineation of an "anthropology of entanglement" can be employed to problematize the securely divided categories proposed by policymakers in the war on terrorist finance.⁶³ Maurer's exploration of Islamic finance as an alternative economic practice leads him to emphasize the close connections between Islamic finance and Western investment instruments. In fact, as he traces the debates between Islamic economists themselves, Maurer demonstrates the dividing line between Islamic finance and "normal" finance to be elusive and disputed. Debates around the permissibility of financial instruments like derivatives illustrate this complex dividing line. According to Maurer, "Alcohol, in fact, comes up a lot in discussions like this. . . . Are derivatives, for example, like alcohol taken for medicinal purposes, because they can mitigate risk? Or, since they can also lead to frenzied speculation, are they more like alcohol drunk for the sake of getting drunk? If the former, they may be permissible. If the latter, they are not."⁶⁴ The point is, of course, that if the boundary between "Islamic" finance and "normal" finance is unstable and uncertain, singling it out as especially conducive for terrorist finance becomes meaningless, except as a move originating in cultural prejudice.

Moreover, a closer examination of the financial dealings of the 9/11 hijackers reveals the relationality of aboveground and underground banking, and challenges the idea that terrorists use the financial system in particular and unusual ways. According to the 9/11 Commission's *Monograph on Terrorist Financing*, the financial transactions of the 9/11 hijackers "were entirely normal": "the hijackers opened bank accounts in their real names at U.S. banks, which they used just as millions of other people do to conduct the routine transactions necessary to their plan. . . . Their transactions were routine and caused no alarm."⁶⁵ The Commission concludes that, all effort to

the contrary, “no valid financial profile of terrorist financing exists” and warns that financial profiling may easily lead to financial exclusion on the basis of “ethnic or geographic generalizations.”⁶⁶ Instead, the Commission pleads for more and better intelligence gathering, to be provided by close cooperation between financial institutions and law enforcement, while respecting existing privacy legislation. The Commission’s findings thus support the conclusion that simple dichotomies between the licit and the illicit in finance do not recognize the complexity of the task of fighting terrorist financing. That task is more complex, and more in need of detailed, empirical, case-by-case knowledge, than standardized money-laundering typologies and terrorist risk profiles can convey.⁶⁷

However, evidence of the “normal” banking practice of the 9/11 hijackers is only one way in which the relationality between underground and aboveground money can be explored. According to Louise Amoore, cultural praxis offers important ways through which the dichotomies of the war on terror can be politicized, and the sharp distinction between “us” and “them” is confounded. Amoore reads the recent UK play *Talking to the Terrorists* as “motivated by a desire to capture the ambivalence at the heart of the discourse of the war on terror.”⁶⁸ The play, based on interviews with people involved in armed struggle across the world, enquires into “what it is that makes ordinary people do extraordinary things.”⁶⁹ Through humanizing terrorists, the play conveys the sense that “the difference between the terrorists and the rest of us is not that great,” and, for Amoore, it exposes us, “even if only momentarily, . . . to our culpability in, and vulnerability to, the experiences of others.”⁷⁰

A parallel may be drawn with Salman Rushdie’s comments about his novel *Shalimar the Clown*, in which, as Rushdie himself puts it, “a very nice guy, a clown even,” “because of everything that goes wrong in his life, comes on the path of radical Islam and becomes a murderer.” Hailed in the Dutch press as Rushdie’s explicit condemnation of Islam, the author felt compelled in an interview to make explicit the more nuanced message of *Shalimar*: “It is easy to say: ‘Islamic terrorists are evil.’ It is much harder to say: ‘let’s see how a human being can become that way, how a normal, nice guy, can change into something terrifying.’ What does that say about him and about the world

in which we live?"⁷¹ Humanizing those capable of extreme violence is both controversial and indispensable, as it cuts through assumptions about "barbarian" or "psychopathic" perpetrators to inquire more precisely into how contemporary society and politics are entangled with such violence. These moves thereby open up avenues for reflection on exclusionary policy and enable alternative policy choices.

Another example of the ways in which cultural praxis can politicize the war on terrorist finance can be found in the art of John Klima, which critically reflects on the promise of security inscribed in statistical profiling and data mining. Klima's work on the war in Afghanistan, *The Great Game* (2001), animates real Department of Defense statistics in the Enduring Freedom campaign in Afghanistan as if it were an arcade computer game. Viewers-players can navigate through the electronic game to view the action from different perspectives.⁷² According to Raley's analysis of *The Great Game*, the artist's (selective) use of "real" defense data illustrates the "mediated quality" of statistical material and comments on the way in which the underlying reality of bodies lost in Afghanistan is "evacuated by figures and data streams."⁷³ While mainstream U.S. representation of the wars in Afghanistan and Iraq partly rely on gaming and sporting metaphors that, according to Richard Johnson, provide "the cultural forms in which victories against terrorism are celebrated," Klima's blatant animation of Enduring Freedom as a computer game can be seen as taking this metaphor to the extreme.⁷⁴ It can moreover be seen to fit with a strategy of political dissent that does not turn against technology itself but seeks to reappropriate and subvert surveillance and military technologies by using them imaginatively.⁷⁵ Klima's *The Great Game* and its *Iraq Extension Pack* take an established representation to absurdity and so turn metaphor *and* technology back on itself. Raley concludes that *The Great Game* demonstrates the connectivity and complicity between the player and the game and so rethinks political responsibility on an everyday level:

The game reminds us that be we cannot be removed from our position of responsibility . . . and for our participation in the "old" empire of America. We are its audience, recipients of the communicative messages embodied in the movement of the icons around the game board. We are, then, fundamentally part of the game—and not, as we may initially be inclined to believe, mere bystanders.⁷⁶

CONCLUSIONS

The war on terrorist finance has created new international financial organizations, and has changed the power relations between existing ones. It has curtailed the opportunities that migrants have to send money to their countries of origin and has opened debate on the regulation of remittances and charities. It is transforming retail banking and how banks monitor and assess their clients. This new paradigm extends financial governmentality into the realm of everyday, mundane transactions. Here, as elsewhere in Empire, governing and commerce go hand-in-hand: customer information collected for regulatory compliance may also be used for targeted sales or for excluding less profitable groups of customers. This essay has argued that understanding financial power through the conceptual apparatus of Empire sheds light on these intimate linkages between regulation and commerce in which the division between public and private authority is increasingly blurred.

In cultural praxis we find important starting points for critically questioning the apparently secure world of policymakers and for reflecting on the mutual constitution of aboveground and underground money. Indeed, the figure of the terrorist underground is a discursive *condition* for the post-9/11 maintenance of the legitimate world of global finance. The disruptive examples discussed at the end of this paper are not thought to add up to a unified revolutionary force, in the figure of, for example, the “multitude.” Instead, they open up imaginative political spaces that recognize the mutual constitutiveness of terrorist practice and security discourse. If the war on terrorist finance encompasses some of the most far-reaching but most depoliticized aspects of the war on terror more broadly, then art and culture can be important sites of challenging, disrupting, making strange—in effect *repoliticizing*—these practices.

Notes

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1. White House Press Release, *Fact Sheet on Terrorist Financing Executive Order*, September 24, 2001, <http://www.whitehouse.gov/news/releases/2001/09/print/20010924-2.html>.
2. See, for example, Thomas J. Biersteker, "Targeting Terrorist Finances: The New Challenges of Financial Market Globalisation," in *Worlds in Collision: Terror and the Future of Global Order*, ed. Ken Booth and Tim Dunne (Basingstoke, UK: Palgrave, 2004); Marieke de Goede, "Financial Regulation in the War on Terror," in *After Deregulation: Global Finance in the New Century*, ed. Libby Assassi, Duncan Wigan, and Anastasia Nesvetailova (Basingstoke, Palgrave, 2006).
3. Paul A. Passavant and Jodi Dean, "Representation and the Event," in *Empire's New Clothes: Reading Hardt and Negri*, ed. Paul A. Passavant and Jodi Dean, 315–28 (New York: Routledge, 2004), 316. See also Richard Johnson, "Defending Ways of Life: The (Anti) Terrorist Rhetorics of Bush and Blair," *Theory, Culture & Society* 19, no. 4 (2002): 211–31; Annita Lazar and Michelle M. Lazar, "The Discourse of the New World Order," *Discourse & Society* 15, nos. 2–3 (2004): 223–42.
4. George W. Bush, "President Announces Crackdown on Terrorist Financial Network," November 7, 2001, Webcast available at <http://www.whitehouse.gov/news/releases/2001/11/#>.
5. Susan Bibler Coutin, Bill Maurer, and Barbara Yngvesson, "In the Mirror: The Legitimation Work of Globalization," *Law and Social Inquiry* 27 (Fall 2002): 801–43 at 804.
6. *Ibid.*
7. Passavant and Dean, "Representation and the Event," 320.
8. The term "everyday life of global finance" is from Paul Langley, "The Everyday Life of Global Finance," IPEG paper in *Global Political Economy* 5 (2002), <http://www.bisa.ac.uk/groups/ipeg/papers/PaulLangley.pdf>.
9. Louis Pauly, *Who Elected the Bankers?* (Ithaca, N.Y.: Cornell University Press, 1997), 142.
10. Paul Langley, "(Re)politicizing Global Financial Governance: What's 'New' about the 'New Financial Architecture'?" *Global Networks* 4 (January 2004): 69–87 at 69.
11. Susanne Soederberg, *The Politics of the New Financial Architecture* (London: Zed Books, 2004), 83.
12. Langley, "(Re)politicizing Global Financial Governance," 70; see also J. K. Gibson-Graham, *The End of Capitalism (As We Knew It)* (1996; repr., Minneapolis: University of Minnesota Press, 2006), 253–56; Marieke de Goede, *Virtue, Fortune, and Faith* (Minneapolis: University of Minnesota Press, 2005), 3–5; for a critical reflection on the new financial architecture see also Jacqueline Best, "Moralizing Finance: The New Financial Architecture as Ethical Discourse," *Review of International Political Economy* 10 (August 2003): 579–603.
13. Gibson-Graham, *The End of Capitalism*, 255–56.
14. Rita Riley, "eEmpires," *Cultural Critique* 57 (Spring 2004): 111–50 at 120.
15. Michael Hardt and Antonion Negri, *Empire* (Cambridge, Mass.: Harvard University Press, 2000), xii; emphases in original.

16. *Ibid.*, 23.
17. *Ibid.*, 32.
18. Raley, "eEmpires," 132.
19. On good financial citizenship, see also Paul Langley, "Uncertain Subjects of Anglo-American Financialization," in this volume.
20. Julian Reid, "The Biopolitics of the War on Terror," *Third World Quarterly* 26, no. 2 (2005): 237–52.
21. Bill Maurer, "On Divine Markets and the Problem of Justice: *Empire* as Theodicy," in *Empire's New Clothes: Reading Hardt and Negri*, ed. Paul A. Passavant and Jodi Dean, 57–72 (New York: Routledge, 2004); see also, for example, Timothy Brennan, "The Empire's New Clothes," *Critical Inquiry* 29 (Winter 2003): 337–67.
22. Maurer, "On Divine Markets," 69; compare with Raley, "eEmpires," 126.
23. On the cultural history of modern finance see de Goede, *Virtue, Fortune, and Faith*; on finance and *Empire*, see Raley, "eEmpires"; see also Mark C. Taylor, *Confidence Games: Money and Markets in a World without Redemption* (Chicago: University of Chicago Press, 2004). Taylor does not draw upon *Empire*; still, his conceptualization of financial markets as "complex adaptive systems" rather than an omnipotent mechanism is similar to the reconceptualization of finance effected through Raley's reading.
24. Judith Butler, *Precarious Life: The Powers of Mourning and Violence* (London: Verso, 2004), 52; on governmentality, see also Michel Foucault, "Governmentality," in *The Foucault Effect*, ed. Graham Burchell, Colin Gordon, and Peter Miller, 87–104 (Chicago: University of Chicago Press, 1991); Wendy Larner and William Walters, eds., *Global Governmentality: Governing International Spaces* (London: Routledge, 2004).
25. On global governance, see for example, *Approaches to Global Governance Theory*, ed. Martin Hewson and Timothy J. Sinclair (New York: State University of New York Press, 1999); and A. Claire Cutler, Virginia Haufler, and Tony Porter, eds., *Private Authority in International Affairs* (New York: State University of New York Press, 1999).
26. Martin Coward, "Securing the Global (Bio)Political Economy," in *International Political Economy and Poststructural Politics*, ed. Marieke de Goede, 60–76 (Basingstoke, UK: Palgrave, 2006), 67; see also Martin Coward, "The Imperial Character of the Contemporary World Order," *Theory & Event* 8, no. 1 (2005): §29.
27. Coward, "Securing the Global," 67–68.
28. Butler, *Precarious Life*, 56.
29. See Louise Amoore and Marieke de Goede, "Governance, Risk, and Data-veillance in the War on Terror," *Crime, Law, and Social Change* 43, nos. 2/3 (2005): 149–73 at 167.
30. Butler, *Precarious Life*, 65.
31. David Campbell, "The Biopolitics of Security: Oil, Empire, and the Sports Utility Vehicle," *American Quarterly* 57 (September 2005), 943–72 at 948; see also David Campbell, *Writing Security: United States Foreign Policy and the Politics of Identity* (Minneapolis: University of Minnesota Press, 1992).

32. Coward, "Securing the Global," 67.

33. James Der Derian, "The Question of Information Technology in International Relations," *Millennium* 32, no. 3 (2003), 441–56 at 443.

34. Many thanks to Urs Staeheli for pointing this out. For a critique of money as a neutral, rational mechanism, see Viviana Zelizer, *The Social Meaning of Money: Pinmoney, Poor Relief, and Other Currencies* (Princeton, N.J.: Princeton University Press, 1997).

35. Loretta Napoleoni, *Modern Jihad: Tracing the Dollars behind the Terror Networks* (London: Pluto Press, 2003), xv; emphasis added.

36. In addition, the suggested amount of \$1.5 trillion, based on the estimated amount of U.S. dollars that circulate outside the United States, is highly questionable. However, it is problematic to assume that all U.S. dollars circulating globally are used for criminal purposes, especially as entire countries, including Ecuador and El Salvador, now have adopted the dollar as legal domestic tender.

37. Napoleoni's influence in the policy community is growing, and she was, for example, the coordinator of the terrorist finance working group at the International Summit on Democracy, Terrorism, and Security in Madrid in March 2005. See <http://english.safe-democracy.org>.

38. Marieke de Goede, "Hawala Discourses and the War on Terrorist Finance," *Environment and Planning D: Society and Space* 21, no. 5 (2003): 513–32. For other critiques of the ways in which *hawala* has been portrayed and targeted, see Jammaz Al-Suhaimi, "Demystifying Hawala Business," *The Banker* 152, no. 914 (2002): 76–78; Cindy Horst and Nick van Hear, "Counting the Cost: Refugees, Remittances, and the 'War against Terrorism,'" *Forced Migration Review* 14 (2002): 32–34.

39. Meenakshi Ganguly, "A Banking System Built for Terrorism," *Time Magazine*, October 5, 2001, <http://www.time.com/time/world/printout/0,8816,178227,00.html>.

40. U.S. Department of the Treasury, *2003 National Money Laundering Strategy*, 13, <http://www.treas.gov/offices/enforcement/publications/ml2003.pdf>.

41. Napoleoni, *Modern Jihad*, chapter 10. The quote is taken from the Dutch version of the book, which appeared in 2004 and has an eighteenth chapter added in light of the 2003 Madrid bombing: Loretta Napoleoni, *NV Terreur: De Nieuwe Economie van de Terreur* (Amsterdam: Arbeiderspers, 2004), 286; translation mine.

42. ICE (U.S. Immigration and Customs Enforcement), "ICE Campaign against Illegal Money Transmitters and Underground 'Hawalas' Yields 140 Arrests and 138 Indictments Nationwide," News Release, May 23, 2005; emphasis added, <http://www.ice.gov/graphics/news/newsreleases/articles/hawalas052305.htm>.

43. John J. Byrne, "Banks and the USA Patriot Act," *E-Journal USA: The Global War on Terrorist Finance*, U.S. Department of State, September 2004, 19. Byrne bases this profile on the report of the 9/11 Commission. It is, however, a very contestable interpretation of this report, because the 9/11 Commission is particularly critical of the uses of financial profiling in the war on terror, as will be discussed below.

44. See for example, Financial Action Task Force on Money Laundering, "Guidance for Financial Institutions in Detecting Terrorist Financing," April 24, 2002, Annex 1, <http://www.fatf-gafi.org/dataoecd/39/21/34033955.pdf>.

45. For more detail on suspicious profiles, see Amoores and de Goede, "Governance, Risk," 153–54. For evidence of increasing financial exclusion, see, for example, John A. Herrera's testimony for the hearing entitled "PATRIOT Act Oversight: Investigating Patterns of Terrorist Financing," for the House Committee on Financial Services, February 12, 2002, <http://financialservices.house.gov/media/pdf/021202jh.pdf>; Toynbee Hall, SAFE, *Banking the Unbanked: A Snapshot*, November 2005; Tony Levene, "Why Rules Won't Wash on Money Laundering," *The Guardian Jobs and Money*, June 28, 2003, 2–3.

46. For details of these cases, see pages 87–130 of John Roth, Douglas Greenberg, and Serena Wille for the National Commission on Terrorist Attack upon the United States, *Monograph on Terrorist Financing*, 2003 http://www.9-11commission.gov/staff_statements/911_TerrFin_Monograph.pdf.

47. Kenneth Dam, prepared statement for hearing on *The Role of Charities and NGOs in the Financing of Terrorist Activities*, August 1, 2002, http://www.banking.senate.gov/02_08hr/080102/dam.htm.

48. Quoted in Roth, Greenberg, and Wille, "Monograph," 108–9; emphasis added.

49. This debate is ongoing and illustrates well the ambiguous dividing line between financing of terrorism and financial support to families and public services in combat zones, including Chechnya, Bosnia, and Palestinian territories. See Steven R. Weisman, "Allies Resisting as U.S. Pushes Terror Label for Hezbollah," *New York Times*, online edition, February 17, 2005; for a U.S. perspective on the issue, see also page 7 of Dennis M. Lormel's testimony on July 13, 2005, before the Senate Committee on Banking, Housing and Urban Affairs on *Money Laundering and Terrorist Finance Issues in the Middle East*, http://banking.senate.gov/_files/lormel.pdf.

50. Richard Shelby, statement before the Senate Committee on Banking, Housing, and Urban Affairs, July 13, 2005, on *Money Laundering and Terrorist Finance Issues in the Middle East*, <http://banking.senate.gov/index.cfm?Fuseaction=Hearings.Testimony&TestimonyID=927&HearingID=153>.

51. FATF is the leading international regulatory body dealing with anti-money laundering and anti-terrorist financing issues. In the wake of 9/11, it released eight special recommendations on terrorist financing (now nine). See http://www.fatf-gafi.org/document/9/0,2340,en_32250379_32236920_34032073_1_1_1_1,00.html. For an overview of diplomatic pressure on the Middle East regarding terrorist financing, see E. Anthony Wayne's testimony before the Senate Committee on Banking, Housing, and Urban Affairs, July 13, 2005, on *Money Laundering and Terrorist Finance Issues in the Middle East*, http://banking.senate.gov/_files/ACFAA.pdf.

52. Wayne, testimony, 14. On the assumption that cash itself is suspicious, see Amoores and de Goede, "Governance, Risk," 158–59.

53. For example, the 9/11 Commission report notes that “funding charitable work is ingrained into Saudi Arabia’s culture, and Saudi zakat has long provided much-needed humanitarian relief in the Islamic world,” Roth, Greenberg, and Wille, “Monograph,” 21.

54. Stuart Levey, testimony before the Senate Committee on Banking, Housing and Urban Affairs, July 13, 2005, on *Money Laundering and Terrorist Finance Issues in the Middle East*, 2; http://banking.senate.gov/_files/ACFA8.pdf.

55. For example, see Susanne Soederberg, “The Promotion of ‘Anglo-American’ Corporate Governance in the South,” *Third World Quarterly* 24, no. 1 (2003): 7–27; also Soederberg, *The Politics of the New Financial Architecture*.

56. De Goede, “Hawala Discourses.”

57. See for example the offering of international conferences and Webcasts on by MoneyLaundering.com: <http://www.moneylaundering.com>.

58. The idea that terrorist money is *foreign* money is sometimes expressed very explicitly, for example by Treasury Department Undersecretary Jimmy Gurule, who said in a press release: “international terrorism is financed by money sent to terrorists from sources around the world.” See Jimmy Gurule, “Press Statement,” *Terrorist Financing Rewards Programme*, U.S. Treasury, undated, <http://www.ustreas.gov/rewards/gurule.shtml>.

59. Campbell, “The Biopolitics of Security,” 948.

60. Passavant and Dean, “Representation and the Event.”

61. Taylor, *Confidence Games*, 321.

62. *Ibid.*, 331. Louise Amoore makes a similar point in different terms. For her, the politics of relationality and complexity are necessary “lest . . . we inadvertently reproduce the certainties and assurances of the technical matrix that has become the mainstay of homeland security programmes.” See Louise Amoore, “Biometric Borders: Governing Mobilities in the War on Terror,” *Political Geography* 25 (2006): 336–51.

63. Bill Maurer, *Mutual Life, Limited: Islamic Banking, Alternative Currencies, Lateral Reason* (Princeton, N.J.: Princeton University Press, 2005), 41. Maurer borrows this term from Michel Callon.

64. *Ibid.*, 73. Quite clearly there is a parallel here with debates on the relation between gambling and finance and the moral legitimacy of complex financial instruments, including futures and options, that pervade the history of modern financial markets, see de Goede, *Virtue, Fortune, and Faith*, especially chapter 3.

65. Roth, Greenberg, and Wille, “Monograph,” 53.

66. *Ibid.*, 50.

67. See also Michael Levi, “Following the Criminal and Terrorist Money Trails,” in *Criminal Finances and Organising Crime in Europe*, ed. Petrus C. van Duyne, Klaus von Lampe, and James L. Newell (Nijmegen, The Netherlands: Wolf Legal Publishers, 2003).

68. Louise Amoore, “There Is No Locus of Great Refusal,” in *International Political Economy and Poststructural Politics*, ed. Marieke de Goede (Basingstoke, UK: Palgrave, 2006), 263. For cultural praxis as a site of financial resistance, see also

Marieke de Goede, "Carnival of Money: Politics of Dissent in an Era of Globalizing Finance," in *The Global Resistance Reader*, ed. Louise Amoore (London: Routledge, 2005).

69. Quote from Heather Oliver, "Talking to the Terrorists," Cherwell Online, http://www.cherwell.org/show_article.php?id=2976.

70. Amoore, "There Is No Locus," 263.

71. Salman Rushdie, interviewed by Chris Kijne, "Zo Schrijf je een Boek," ["How to Write a Book"], Zaterdag Etcetera, *NRC Handelsblad*, August 20, 2005, 8; my translation.

72. See the work / play the game online at <http://www.cityarts.com/greatgame/>.

73. Raley, "Statistical Material," 82, 83.

74. Johnson, "Ways of Life," 225. See also Joyce Goggin, "Metaphor and Madness: Stacking the Deck on Iraq," *Bad Subjects*, 2005, <http://bad.eserver.org/reviews/2005/goggin.html>.

75. Der Derian, "The Question of Information Technology," 452–54.

76. Raley, "Statistical Material," 81.