



**I N T E R N A T I O N A L
E N F O R C E M E N T
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R E P O R T E R**

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equivalent of forty-seven days of continuous listening. The operation targeted terrorist audio propaganda employed by groups across the ideological spectrum, including jihadist and violent right-wing extremist networks.¹⁴

III. INTERPOL

Commission for the Control of INTERPOL's Files Acknowledges and Addresses Delays

By Dr. Ted R. Bromund, Sandra Grossman Esq., and Charlie Magri Esq.

Over the past months, the Commission for the Control of INTERPOL's Files (CCF), INTERPOL's appellate body, has published its *Annual Activity Report* for 2024 and announced changes in its procedures that will affect how attorneys make submissions to the CCF.

The CCF noted in its *Report* that submissions continue to increase, with 2,586 admissible submissions received in 2024. The rate of increase over 2023 slowed to only 4 percent, offering some hope that future increases may be limited.

The CCF noted that this increase was caused in part by “the increased attention focused on international cooperation and data-protection standards,” suggesting that the growth of a specialized legal community focused in part on INTERPOL has helped to drive the CCF's caseload. Whatever the cause, the increase since 2018, when 1,265 admissible requests were received, has been both steady and significant.

The CCF closed 1,077 deletion requests in 2024. It is important to note that these closed requests bear no necessary relationship to the 2,586 admissible submissions received in 2024, as it is likely that most of the requests closed in 2024 were received in 2023, or even earlier. It is therefore not possible to make meaningful inferences about levels of compliance in INTERPOL's 2024 publications by examining the CCF *Report* for that year.

Of the 539 deletion requests decided by the CCF, the data in 272 requests were found to be non-compliant. The CCF decided another 50 requests in favor of the applicant on the grounds of a “total lack of cooperation” by the requesting states. That left 217 requests – roughly 40 percent of those examined – in which the data was found to be compliant with INTERPOL's rules.

40 percent sounds low, but it is an increase over the 26 percent of data found compliant in 2022 and the 32 percent found compliant in 2023. This increase has been driven in part by improved rates of cooperation by member states, and thus a reduction in the number of cases decided against requesting states because of a lack of cooperation, a fact remarked upon by CCF Chairperson Teresa McHenry in her address to the INTERPOL General Assembly in Marrakech, Morocco, on November 24-27, 2025.

In spite of the improvement in both member state cooperation and the rate of compliance, the CCF continues to face challenges in meeting the deadlines imposed by its Statute for completing its cases: 30 percent of deletion requests in 2024 – up from 15 percent in 2023 – were not completed within nine months.

These delays have many causes, which the CCF sets out in its *Report*, but a fundamental issue is that cases have grown in number and complexity, and CCF resources have not kept pace. The additional resources that the 2024

¹⁴ Europol, *Europol coordinates largest referral action targeting terrorist audio propaganda*, Mar. 18, 2026

INTERPOL General Assembly allocated to the CCF may improve the situation, but it is too soon to know if those resources will be sufficient.

The CCF is clearly acutely aware of the significance of these delays, and Chairperson McHenry stated in her address that reducing them was “among the highest priorities” of the CCF. Unfortunately, she added that the time required to train new staff and develop new technologies means that the delays are likely to worsen in 2026.

Since the publication of the *CCF Report* and Chairperson McHenry’s address, the CCF has made several significant announcements, all of which are intended to help reduce these delays. In late January, the CCF announced that it would run a pilot project in 2026 that is aimed at “ensuring the decision-making process is more evenly managed across the year.” The pilot project will feature more online case reviews by CCF members, expanded delegation of authority to the Rapporteur and Chairperson to decide non-complex cases, longer two-week sessions, and the possibility of a fourth session in December if necessary.

Then, in late February, the CCF announced the impending launch in the first quarter of 2026 of a new online portal for submissions, which, on March 18, the CCF confirmed would go live on March 26 at 10:00 am CET. Once launched, the portal will be the only avenue for submissions to the CCF: emails and submissions by post will not be accepted. The CCF states that the portal will allow applicants to make and track all aspects of a submission, and it promises to offer guidance for ongoing requests in due course.

The CCF portal is clearly a CCF effort to address the challenge of the amount of email it receives annually: Chairperson McHenry stated in her address that the CCF received over 82,000 pieces of email in 2024. The growing complexity of many CCF submissions – which results in longer submissions and more attached documents – can only add to the problem. The portal is an ambitious and important initiative for the future of the CCF and the applicants who rely on it.

But 2026 will be an important year for the CCF for other reasons. The five-year terms of all current CCF members expire on March 11, 2027. The CCF has announced that all seven positions will be filled at the next meeting of the General Assembly, to be held in Hong Kong on November 17-20, 2026. Some or all of the current CCF members could be re-elected for an additional three-year term, or the General Assembly could elect new members.

The CCF’s openness in announcing this process well in advance is new and commendable. The CCF portal is important, but it does not compare in significance to the CCF elections. The current members have overseen a substantial increase in the professionalism of the CCF, and the election could put that progress at risk. It is important that the democratic member states of INTERPOL work together to ensure that this does not happen.

Finally, the CCF is also in the middle of a review of the CCF Statute, its governing document. This process has already resulted in three public calls for input – one of which included a request for input on the CCF selection process itself. Some of the results of this review were implemented by the 2025 General Assembly, as summarized by the current authors in Volume 42, Issue 2 of this publication. The third call for input, in Articles 3, 34, and 35 of the Statute, was due on March 11, 2026.

This Statute review will certainly continue to the 2026 General Assembly in Hong Kong, and may well last to the 2027 meeting in Qatar, or even the 2028 meeting in Ethiopia. In her 2025 address, Chairperson McHenry noted the tensions inherent in the Statute review process by commenting that “I believe that everyone agrees with the overall goals to improve the Statute without compromising CCF independence...[but] these are hard issues, and there may not always be agreement, including regarding what independence means in practice.” As the CCF is well aware, it is vitally important that the CCF maintain that independence both by rule and in practice.

The CCF’s 2024 Report paints a picture of a CCF that is seeking to meet the challenge of the steady increase in the number and complexity of the cases before it. In 2026, the ability of the CCF to bring new resources online, to come through the election process, and to navigate the Statute review will face important tests that will determine whether it can fulfill its functions.

IV. CRIMES AGAINST HUMANITY AND WAR CRIMES

U.S. Mercenaries Face Lawsuit for War Crimes in Yemen

By Gavin Neff¹

Anssaf Ali Mayo, a Yemeni citizen, parliamentarian, and prominent member of the al-Islah party, brought a lawsuit against Hungarian-Israeli Abraham Golan and Americans Isaac Gilmore and Dale Comstock, all former executives or employees of Spear Operations Group, a private military company incorporated in Delaware.² The lawsuit, which was filed in December 2025 but only recently unsealed in the United States (U.S.) District Court for the Southern District of California alleges that the United Arab Emirates (UAE) hired Spear to conduct assassinations across Yemen, targeting political enemies of the nation.³ At the time of the complaint, Gilmore and Golan resided in San Diego, California.⁴ Comstock was flown out by Golan to San Diego to join Spear as well.⁵

The UAE intervened as part of a regional coalition in the Yemeni civil war and, under the guise of counterterrorism, targeted groups opposed to its interests in Yemen.⁶ In the complaint, the UAE paid Spear \$1.5 million per month, plus bonuses for successful targeted killings.⁷ On December 14, 2015, Golan, Gilmore, and Comstock, along with a dozen other men, met to discuss the assassination program in Yemen.⁸

The complaint alleges that, when Spear arrived in Yemen, they were given a kill list from an Emirati officer that had the names and faces of twenty-three targets.⁹ Mayo was at the top of that list. On December 29, 2015, Spear tracked Mayo to his political party headquarters and attempted to assassinate him by detonating an explosive device at the building's front door.¹⁰ Mayo survived the attempt and fled into exile in Saudi Arabia.¹¹ Spear members have publicly acknowledged the assassination program in Yemen, as well as the attempt on Mayo’s life.¹²

Mayo is represented by lawyers from the Center for Justice and Accountability (CJA), a U.S.-based human rights organization.¹³ CJA prepared the complaint, as well as several press releases to explain the legal situation. Despite

¹ Gavin is a recent graduate of the College of Wooster in the Global and International Studies Program. His undergraduate areas of focus included Latin America, water rights, and geopolitics.

² *Mayo v. Golan et al*, U.S. District Court Southern District of California, No. 3:25-cv-3651.

³ *Id.*

⁴ *Id.*

⁵ *Id.*

⁶ Ela Matthews, “U.S. Mercenaries Sued For Carrying Out Emirati Assassination Program in Yemen” CJA, March 30, 2026. <https://cja.org/u-s-mercenaries-sued-for-carrying-out-emirati-assassination-program-in-yemen/>.

⁷ *Id.*§6.

⁸ *Id.*§2.

⁹ *Id.*§2.

¹⁰ *Id.*§2.

¹¹ Ryan Lucas, *Yemeni Politician Says Former U.S. Soldiers Tried to Kill Him. Now He’s Suing in U.S. Court*, NPR, March 30, 2026.

<https://www.npr.org/2026/03/30/nx-s1-5707305/yemen-politician-assassination-us-soldiers-lawsuit>.

¹² Vivian Nereim, *Lawsuit Accuses Americans of Political Killings for Hire Overseas* THE NEW YORK TIMES, March 30, 2026.

<https://www.nytimes.com/2026/03/30/world/middleeast/yemen-assassination-lawsuit-americans.html>.

¹³ *Id.*§2.

address issues developed in the current report. Comprehensive recommendations relating to violations and crimes targeting children can be found in the Commission’s conference room paper of March 2026.

In 2023, the International Criminal Court (ICC) issued an arrest warrant for President Putin, accusing him and Lvova-Belova of the unlawful deportation of Ukrainian children.

Ukraine says it has so far recovered 2,000 children.

United States (U.S.) First Lady Melania Trump has reportedly been involved in facilitating the reunification of children. Last year, she said she had an "open channel of communication" with Putin after he responded to her letter of concern about the child victims of the Russia-Ukraine war.²³

V. TRANSNATIONAL ORGANIZED CRIME AND NARCOTICS ENFORCEMENT

The Shield of the Americas Summit and American Involvement in Ecuador

By Dimitris Konstantopoulos¹

In early March 2026, Ecuador and the United States (U.S.) began coordinated military operations against various criminal gangs across the Andean nation.² Currently, Washington is mainly focusing on advising Ecuadorian forces and police in anti-narcotics operations and assisting with intelligence and logistical oversight. Previously, U.S. Secretary of State Marco Rubio suggested that the U.S. may begin to conduct airstrikes against gangs and narcotics traffickers across Ecuador.³ A recent increase in cocaine trafficking transformed Ecuador from one of Latin America’s safest countries into one of its most dangerous as rival gangs, guerrilla groups, and cartels began fighting one another for control of the country’s ports and lucrative trafficking routes.⁴

Though U.S. special operations forces are deployed in Ecuador, they are not directly involved in the military operations. Instead, U.S. military forces on the ground in Ecuador are helping Ecuadorian soldiers prepare for various raids across the country.⁵ In the American national security strategy for the current Trump administration, the government stated that one of its main priorities was to stop the flow of drugs into the U.S. from Latin America and shift “its global military presence towards the area.”⁶

Quito’s cooperation with Washington is likely the first step in the administration’s plan for international law enforcement operations in the region. In March 2026, the Trump administration hosted the inaugural Shield of the Americas Summit, where various right-wing leaders from across Latin America and the Caribbean arrived in Florida to discuss international cooperation and enforcement strategies against armed insurgents and drug traffickers.⁷ The event sought to mimic the international cooperation between the U.S. and its Middle Eastern allies during their fight against the

²³ *Russia’s deportation of Ukrainian children amounts to crime against humanity*, UN says, March 10, 2026, AP.

¹ Dimitris is a recent graduate of The George Washington University’s Elliott School of International Affairs. His undergraduate areas of focus included national security, counterterrorism, geopolitics, and Latin America.

² Eric Schmitt and Luis Ferre-Sadurni, *U.S. Takes Military Action in Ecuador against Terrorist Organizations*, NEW YORK TIMES, March 3, 2026, <https://www.nytimes.com/2026/03/03/us/politics/us-ecuador-trump-military-operations.html>.

³ *Id.*

⁴ Maria Abi-Habib, *How the U.S. Focus on Fentanyl Helped Fuel the Cocaine Trade’s Resurgence*, NEW YORK TIMES, December 5, 2025, <https://www.nytimes.com/2025/12/05/world/americas/ecuador-cocaine-trafficking.html>.

⁵ Chantelle Lee, *Why Is the US Launching Military Operations in Ecuador?*, MSN, March 5, 2026, <https://www.msn.com/en-us/news/world/why-is-the-us-launching-military-operations-in-ecuador/ar-AA1XCAUMPocid=BingNewsSerp>.

⁶ *Id.*

⁷ Amer Madhani, Joshua Goodman, and Alanna Durkin Richer, *Trump Encourages Latin American Leaders to Use Military Action to Help Us Fight Cartels*, AP NEWS, March 8, 2026, <https://apnews.com/article/trump-iran-latin-america-china-d1cbf9af62f10e0644770f2e2b2bd791>.