

Criminological Perspectives on the Toronto 18

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ABSTRACT

Historically, research in terrorism studies has drawn from a variety of disciplines including, but not limited to, political science, psychology, and security studies. More recently, however, researchers have argued that

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criminological approaches can and should inform terrorism studies as well. In this chapter, we apply four criminological perspectives to the case of the Toronto 18: the general strain theory of terrorism, social learning theory, situational crime prevention, and situational action theory. Drawing from news media accounts and court documents as well as extensive personal and background details about the offenders, we examine what inspired members of the Toronto 18 to join the cell, as well as the internal dynamics of the cell and why they selected certain targets, all through a criminological lens. The complexities of the Toronto 18 cases clearly demonstrate why it would be unrealistic at best, and foolhardy at worst, to expect any single orientation to “explain” terrorism. But used in concert, criminological theories and perspectives clearly have a role to play in advancing our understanding of the dynamics of terrorism.

I. INTRODUCTION

In the summer of 2006, 18 individuals, inspired by al-Qaeda, were arrested for planning large-scale terrorist attacks on Canadian soil. More specifically, the individuals, known collectively as the “Toronto 18,” were arrested for two plots: one against a number of prominent buildings in southern Ontario, including Parliament Hill, the headquarters of the Canadian Security Intelligence Service (CSIS), the Toronto Stock Exchange (TSE), and the Canadian Broadcasting Centre (CBC). The group also targeted political leaders, including then-Prime Minister of Canada Stephen Harper, whom they planned to behead.¹ Although these attacks were pre-empted, the case of the Toronto 18 sparked significant national and international media attention. This notoriety, in turn, prompted a number of questions, ranging from how and why such a terrorist cell could form in Canada, to questions about where these individuals came from and how they became inspired by al-Qaeda, to questions about the internal dynamics of the cell and why they selected certain targets. The goal of this chapter is to address questions such as these through the application of criminological theories and perspectives. Space limitations preclude a thorough examination of each theories’ application to radicalization.

¹ Ian Austen, “Man Guilty in Canada Terror Plot,” *New York Times*, September 26, 2008, <https://www.nytimes.com/2008/09/26/world/americas/26canada.html>.

Rather, the objective is to identify the facets of particular theories that may be useful in understanding the Toronto 18.

Historically, research in terrorism studies has drawn from various disciplines including, but not limited to, political science, psychology, and security studies. More recently, however, researchers have convincingly argued that terrorism and political violence also fall within the realm of criminology and that criminological approaches, therefore, can and should inform terrorism studies.² Perspectives that have been extended to account for various aspects of terrorism include general strain theory,³ social learning theory,⁴ the situational crime prevention framework,⁵ and situational action theory.⁶ Thus far, these perspectives have addressed terrorism in a predominantly generalized manner. In this chapter, each of these criminological perspectives (i.e., general strain theory of terrorism, social learning theory, situational crime prevention, and situational action theory) will, first, be briefly summarized and, second, be applied specifically to the Toronto 18 case. This was accomplished by drawing from news media accounts and court documents of the case, which included trial decisions, trial transcripts, expert witness reports, and sentencing reports, amongst other records. Extensive personal and background details for whom information was available were collected for each individual, with the exception of the youth offenders because of their ages. The information

² See Gary Lafree and Joshua D. Freilich, "Bringing Criminology into the Study of Terrorism," in *The Handbook of the Criminology of Terrorism*, eds. Gary LaFree and Joshua D. Freilich (Chichester, U.K.: Wiley Blackwell, 2017), 3–14. See also Joshua D. Freilich and Gary Lafree, "Criminological Theory and Terrorism: An Introduction to the Special Issue," *Terrorism and Political Violence* 27 (2015): 1–8.

³ Robert Agnew, "A General Strain Theory of Terrorism," *Theoretical Criminology*, 14 (2010): 131–53; Robert Agnew, "General Strain Theory and Terrorism," in *The Handbook of the Criminology of Terrorism*, eds. Gary LaFree and Joshua D. Freilich (Chichester, U.K.: Wiley Blackwell, 2017), 121–32.

⁴ J. Keith Akins and L. Thomas Winfree, "Social Learning Theory and Becoming a Terrorist: New Challenges for a General Theory," in *The Handbook of the Criminology of Terrorism*, eds. Gary LaFree and Joshua D. Freilich (Chichester, U.K.: Wiley Blackwell, 2017), 133–49.

⁵ Henda Y. Hsu and Gary R. Newman, "The Situational Approach to Terrorism," in *The Handbook of the Criminology of Terrorism*, eds. Gary LaFree and Joshua D. Freilich (Chichester, U.K.: Wiley Blackwell, 2017), 150–61.

⁶ Per-Olof H. Wilkström and Noémie Bouhana, "Analyzing Radicalization and Terrorism: A Situational Action Theory," in *The Handbook of the Criminology of Terrorism*, eds. Gary LaFree and Joshua D. Freilich (Chichester, U.K.: Wiley Blackwell, 2017), 175–86.

collected included offenders' upbringing, family life, and psychiatric evaluations. In addition, extensive information was gathered on numerous aspects related to the terrorist cell. The purpose of this approach was to try to understand what inspired the members of the Toronto 18 to join the cell, as well as why the group functioned the way it did, through a criminological lens.

II. GENERAL STRAIN THEORY

A. Overview of General Strain Theory

Robert Agnew's⁷ general strain theory (GST) posits that a wide range of strains – or “stressors” – contribute to crime and delinquency. According to Agnew's GST⁸, strain may be experienced as a result of the introduction of negative stimuli (e.g., neglect or abuse), the removal of positive stimuli (e.g., the death of a loved one), or the failure to achieve positively valued goals (e.g., financial or status-related). Put simply, a strain is an unfavourable condition or event experienced by an individual; as such, GST is situated at the “social-psychological” level, which focuses on an individual's interactions with their immediate surrounding environment.⁹ When confronted with one or more strains, individuals feel a range of negative emotions, including frustration, anger, and desperation. As a result, individuals may resort to crime and delinquency to alleviate the negative emotions they experience due to strain (e.g., drug or alcohol abuse) or to escape the source(s) of strain (e.g., monetary theft).¹⁰ In particular, GST maintains that strains that are higher in magnitude, more recently encountered, longer in duration, and more clustered in time have greater influence in producing a criminal coping strategy.¹¹

⁷ Robert Agnew, *Pressured into Crime: An Overview of General Strain Theory* (New York: Oxford University Press, 2006).

⁸ Agnew, *Pressured into Crime*.

⁹ See Robert Agnew, “Foundation for a General Strain Theory of Crime and Delinquency,” *Criminology* 30 (1992): 47-88; Agnew, *Pressured into Crime*.

¹⁰ Agnew, *Pressured into Crime*.

¹¹ Agnew, “Foundation for a General Strain Theory of Crime and Delinquency,” 64-66.

B. General Strain Theory in Terrorism Studies

Agnew¹² has elaborated upon GST to provide an explanation for (1) the strains that are most likely to result in terrorism; (2) why these strains are likely to result in terrorism; and (3) why so few who experience these strains use terrorism as a coping strategy. Referred to as the general strain theory of terrorism (GSTT), this approach posits that “collective strains,” or strains that are experienced by an identifiable group based on racial, ethnic, classist, or political grounds, increase the likelihood of terrorism.¹³ The collective strains that are most likely to result in terrorism include those that are “(a) high in magnitude, with civilians affected; (b) unjust; and (c) inflicted by significantly more powerful others, including ‘complicit’ civilians, with whom members of the strained collectivity have weak ties.”¹⁴ Collective strains, according to the GSTT, contribute to terrorism because they increase negative emotions, as well as reduce social and self-controls and the ability to cope through both legal and military channels, thus fostering the social learning of terrorism by strengthening group ties and the formation of terrorist groups.¹⁵ Additionally, potential terrorists do not need to personally experience collective strains. Rather, they may be vicariously experienced through membership in a group with which they closely identify.¹⁶ Although Agnew (2010) acknowledges that collective strains do not lead to terrorism in every case, the GSTT does, however, provide a number of subjective factors that “condition” the effect of collective strains and, resultantly, influence an individual’s likelihood of engaging in terrorism.¹⁷ These factors include the extent to which they identify with the strained collectivity, personally-experienced strains associated with that collectivity, possess attitudes favourable to terrorism, or associate with those who either support or engage in terrorism themselves.¹⁸

¹² Agnew, “A General Strain Theory of Terrorism.”

¹³ See Agnew, “A General Strain Theory of Terrorism.” See also Agnew, “General Strain Theory and Terrorism.”

¹⁴ Agnew, “A General Strain Theory of Terrorism,” 132.

¹⁵ See Agnew, “A General Strain Theory of Terrorism.”

¹⁶ Agnew, “A General Strain Theory of Terrorism.”

¹⁷ Agnew, “A General Strain Theory of Terrorism.”

¹⁸ Agnew, “A General Strain Theory of Terrorism.”

III. GENERAL STRAIN THEORY AND THE TORONTO 18

The members of the Toronto 18 strongly identified themselves with the global Muslim community (the “ummah”). The wars in Afghanistan and Iraq triggered many of the youth, producing feelings of a “collective strain” for the Muslims across the globe. They perceived that Muslims were being mistreated and/or oppressed at the hands of the American military and the West more generally. To illustrate, Fahim Ahmad, for example, believed that the West was in a “global fight” with Islam and identified Canada, with its military presence in Afghanistan, as part of the problem.¹⁹ The 2004 invasion of Iraq was apparently “the straw that broke the camel’s back,” as all of Ahmad’s resentment towards the West and United States (US) for having invaded Afghanistan became manifest in intense anger with the invasion of Iraq.²⁰

Zakaria Amara was similarly affected by the wars in Afghanistan and Iraq, which seemed to precipitate within him “a roller coaster ride of conflicting emotions... including confusion, shock, sorrow, helplessness and outrage of images of conflict and barbarous stories of slaughter of Muslims.”²¹ It was further noted that Amara’s “self-concept seemed to have hyper-identified with the cause of defending the aimless Muslims against oppression.”²² Saad Khalid also was primarily concerned with Canada’s involvement in Afghanistan, particularly its combat role after 9/11. As a result, he “felt there were hypocritical and unfair policies towards Muslims in Afghanistan. He emphasized that he was not angry at and did not hate Americans. However, he was angry about the policies.”²³ As with other members, it was noted at trial that Saad Gaya’s actions were not attributable to any sort of cognitive or personality conditions, such as anti-sociality, impulsivity, or psychopathy. Instead, he was motivated by “his religious beliefs, his sympathy towards the suffering ‘limbs’ of the Muslim Nation, and his perceived sense of duty to stand up to the Canadian Government toward change in foreign policy.”²⁴

¹⁹ See Isabel Teotonio, “Toronto 18,” *Toronto Star*, July 3, 2010, <http://www3.thestar.com/static/toronto18/index.1.html>.

²⁰ Julian Gojer, “Psychiatric Report for Sentencing,” (2010): 2.

²¹ *R v. Amara*, 2010 ONSC 441 at para 62 [*Amara*].

²² Arif Syed, “Psychiatric Report Regarding Amenability to Treatment,” (2009): 7-8.

²³ *R v. Khalid*, 2009 O.J. No. 6414 at para 22 [*Khalid*].

²⁴ *R v. Gaya*, 2010 ONSC 434 at para 43 [*Gaya*].

A common topic of discussion among members of the terrorist cell, and their larger Ontario Muslim community, related to the collective strains they experienced through their Muslim brothers and sisters around the world. Notably, these strains were experienced vicariously, since most members themselves spent portions of their childhood in Canada and did not directly experience the strains associated with military occupation. Still, these strains became central to the members. For instance, within “their gatherings and conversations, the group would ‘just want to talk about grievances.’”²⁵ Ahmad spoke often about Muslims whose countries were being attacked by the U.S. and its allies, as well as how “Muslims everywhere needed to stand up for their faith.”²⁶ As noted earlier, the GSTT proposes that a collective strain, such as that experienced by members of the Toronto 18, is most likely to result in terrorist acts. In the case of Gaya, for example, religiously motivated moral outrage superseded his perceived need to abide by secular laws.²⁷ In a similar vein, Amara’s “need to attempt terrorist acts may have included his determined need to follow through on commitments of Muslim loyalty.”²⁸

IV. SOCIAL LEARNING THEORY

A. Overview of Social Learning Theory

At its core, social learning theory (SLT) posits that certain processes govern the learning of both pro-social and anti-social (criminal) behaviour.²⁹ In particular, SLT has four key theoretical elements. First, differential association refers to the direct social contact between an individual and members of their peer group, which provides the context for social learning. Second, SLT considers imitation to be the most basic form of learning, which occurs when an individual observes, and models, the behaviour of their peers. Third, the definitions element of SLT refers to an individual’s own attitudes, values, and orientations about what are and are not acceptable forms of behaviour. And fourth, differential reinforcement refers to the experienced, expected, or perceived rewards and punishments

²⁵ Arif Syed, “Psychiatric Report Regarding Amenability to Treatment,” (2009): 7.

²⁶ R v. Ahmad, 2010 ONSC 5874 at para 28 [Ahmad].

²⁷ Gaya, ONSC at para 43.

²⁸ Amara, ONSC at para 52.

²⁹ Edwin H. Sutherland, *Principles of Criminology*, 4th ed. (Philadelphia: J.B. Lippincott, 1947).

that follow the performance of a particular behaviour and functions to push an individual toward or pull them away from criminal behaviour.³⁰ Akers³¹ later elaborated upon traditional SLT by adding a structural component called social structural learning theory (SSSL). SSSL adds four structural dimensions to SLT: (1) differential social organization; (2) differential location in the social structure; (3) theoretically defined structural causes; and (4) differential social location in groups.

B. Social Learning Theory in Terrorism Studies

SLT maintains that all behaviour, including terrorism, is learned behaviour. Understandably, then, SLT has been applied to explain how individuals learn to be terrorists and understand the process by which they engage in terrorist actions, from recruitment and building kinships to suicide attacks.³² According to Akers and Silverman,³³ the “extremist subculture provides identity, ideational and physical resources, and a more or less coherent perspective on the disputes and grievances that are so important to the person in which violent struggle is an integral part of his life.” In particular, through differential association “terrorists learn an ideology that the ends justify the means; violence for political ends is accepted and rewarded.”³⁴ In Western nations, individuals or even “groups of friends” may be socialized into terrorism through friends or relatives who are “connected” to terrorist groups.³⁵ In addition, online social media platforms play a role in radicalized learning; empirical research on applying social learning theory to the radicalization of violent and non-violent

³⁰ See Ronald L. Akers, *Deviant Behavior: A Social Learning Approach* (Belmont, CA: Wadsworth, 1973).

³¹ Ronald L. Akers, *Social Learning and Social Structure: A General Theory of Crime and Deviance* (Boston: Northeastern University Press, 1998).

³² See Akins and Winfree, “Social Learning Theory and Becoming a Terrorist.”

³³ Ronald L. Akers and Adam L. Silverman, “Toward a Social Learning Model of Violence and Terrorism,” in *Violence: From Theory to Research*, eds. Margaret A. Zahn, Henry H. Brownstein, and Shelly L. Jackson (Cincinnati: LexisNexis and Andersen Publishing, 2004), 26.

³⁴ Akers and Silverman, “Toward a Social Learning Model of Violence and Terrorism,” 27.

³⁵ Marc Sageman, *Leaderless Jihad: Terror Networks in the Twenty-First Century* (Philadelphia: University of Pennsylvania Press, 2008).

extremists has concluded that the Internet offers “a source of social connections and messaging that enabled acceptance of radical ideas.”³⁶

C. Social Learning Theory and the Toronto 18

1. Evidence of Differential Association

There appear to have been multiple pathways through which differential association influenced members of the Toronto 18. One important avenue was provided by local mosques. To illustrate, the psychiatrist who performed a psychiatric evaluation of Fahim Ahmad ahead of his trial found that Ahmad’s interest in more radical Islam was, at least to some extent, initiated and supported by senior members of the Meadowvale Mosque.³⁷ Moreover, some of those sermons propagated aggression in response to Muslim persecution.³⁸ Ahmad also sought out information from other mosque attendees, but the information they offered him was oftentimes incorrect. For example, when Ahmad discussed his political grievances with other mosque attendees, some would offer him religious advice in the form of misinterpreted Koran verses such as “fight wherever you find them, wait for them at every place of ambush.”³⁹ Both Ahmad and Zakaria Amara were drawn to the mosque because they enjoyed the company and preachings of the centre’s janitor, Qayyum Abdul Jamal, who was 20 years their senior. Jamal has been characterized as a social tie that provided access to radical messaging. For instance, Jamal’s views were known to sometimes be extreme and, at one public event, he railed against Canadian soldiers raping Muslim women.⁴⁰ In addition, as Amara became “increasingly disconnected from his overworked and unhappy parents, the enigmatic Jamal became a sort of father-figure.”⁴¹

Another important trajectory of differential association was the online milieu. One member of the Toronto 18 for whom online connections

³⁶ Thomas J. Holt et al., “Examining the Utility of Social Control and Social Learning in the Radicalization of Violent and Non-Violent Extremists,” *Dynamics of Asymmetric Conflict* 11 (2018): 142. See also Akins and Winfree, “Social Learning Theory and Becoming a Terrorist.”

³⁷ Julian Gojer, “Psychiatric Report for Sentencing,” (2010), 3.

³⁸ Gojer, “Psychiatric Report for Sentencing,” 3.

³⁹ Gojer, “Psychiatric Report for Sentencing,” 4.

⁴⁰ Isabel Teotonio, “Toronto 18: The Brothers of Meadowvale,” *Toronto Star*, July 3, 2010, <http://www3.thestar.com/static/toronto18/index.1.html>.

⁴¹ Teotonio, “Toronto 18: The Brothers of Meadowvale.”

would prove crucial was Jahmaal James. Within James' "cyber-circle", for example, was "Aabid Khan, known as a Mr. Fix-It because he was a facilitator for the Pakistan-based terrorist organizations Lashkar-e-Tayyiba and Jaish-e-Mohammed."⁴² Like Jamal, Khan operated as a social tie that increased radicalization.⁴³ Khan claimed to have contacts in paramilitary training camps in Pakistan and began speaking with James and others about overseas training. After some time, "they decided to meet in Toronto for about a week in March 2005 to plan."⁴⁴ In November 2005, James travelled to Pakistan to meet with Khan and join a training camp that provided him training in both firearms use and making explosives – knowledge that James planned to share with the rest of the terrorist cell back in Canada.⁴⁵ In this way, Khan provided James with training that Holt and colleagues⁴⁶ may characterize as a "resource to offend."

2. *Social Bonds*

According to Sageman,⁴⁷ friendship and kinship ties are significant factors that drive individuals to join the global Islamist terrorist movement. As a result of the informal self-organization of "bunches of guys," according to Sageman,⁴⁸ the movement is formed from the bottom-up. Some members of the Toronto 18 described turning to their extremist peers for a sense of identity and belonging. For Saad Khalid, as an example, it was suggested that "[i]n his quest for meaning he developed a need to belong to a group, which led to his eventual involvement in a terrorist organization, culminated with the behaviour leading to his arrest."⁴⁹ It was similarly noted that Amara "turned to his practicing Muslim peer group for his source of intimacy, consistency, and loyalty."⁵⁰ For members of the Toronto 18, membership in the group served to provide them with a "more or less"

⁴² Isabel Teotonio, "Toronto 18: Soldier of Allah," *Toronto Star*, July 3, 2010, <http://www.3.thestar.com/static/toronto18/index.1.html>.

⁴³ Holt et al., "Examining the Utility of Social Control and Social Learning in the Radicalization of Violent and Non-Violent Extremists," *Dynamics of Asymmetric Conflict*, 11 (2018).

⁴⁴ Teotonio, "Toronto 18: Soldier of Allah."

⁴⁵ Teotonio, "Toronto 18: Soldier of Allah."

⁴⁶ Holt et al., "Examining the Utility of Social Control."

⁴⁷ Sageman, *Leaderless Jihad*.

⁴⁸ Sageman, *Leaderless Jihad*.

⁴⁹ Khalid, O.J. at para 31.

⁵⁰ Arif Syed, "Psychiatric Report Regarding Amenability to Treatment," (2009): 3.

coherent perspective on their grievances or the Afghanistan/Iraq wars. Amara, for example, stated that:

Ahmad began to recruit the agent by indoctrinating him with emotional arguments about the oppression of Muslims. Ahmad defined “the enemy” as the Americans, and because of the “close local connection between Canada and the United States, Canada was also the enemy.”⁵¹

Sageman⁵² has further suggested that joining a homegrown terrorist group is largely a “bottom-up” process, where groups of friends, or “bunches of guys,” informally organize to join the global terrorist movement. This was certainly the case with the Toronto 18, as members were not recruited by formal organizations. Ahmad himself declared “we’re not officially Al Qaeda but share their principles and methods.”⁵³ Instead, members came to know about the group and its objectives through friendship ties with local boys in their community. Interestingly, the foundation of the group was the bond formed between Amara and Ahmad at school, where they joined the Muslim Student Association and were drawn to other troubled or disaffected Muslim youth. This context “proved fertile for the seeds of extremism and militancy.”⁵⁴ Through joining the terrorist cell, members came to believe that violence for political ends could be rewarded.⁵⁵ Khalid declared that “Ahmad and Amara intended to show the tape to “higher up Mujahadeen people who would be impressed with us” if they could be convinced the group was “the real deal.”⁵⁶ Shareef Abdelaheem commented that the intended bombings could both prompt Parliament to reconsider its (then) recent decision to extend the military mission in Afghanistan⁵⁷ and produce a financial gain, noting that “there’s money to be made here.”⁵⁸

3. The Role of the Internet

It is increasingly understood that the Internet has played a role in the radicalization of violent extremists, functioning as what Holt et al.⁵⁹

⁵¹ Zakaria Amara, “R. v. Zakaria Amara Agreed Statement of Facts,” (2009): 1.

⁵² Sageman, *Leaderless Jihad*.

⁵³ Isabel Teotonio, “Toronto 18: The Camp,” *Toronto Star*, July 3, 2010.

⁵⁴ Teotonio, “Toronto 18: The Brothers of Meadowvale.”

⁵⁵ Akers and Silverman, “Toward a Social Learning Model of Violence and Terrorism.”

⁵⁶ Saad Khalid, “Statement of Uncontested Facts: R. v. Saad Khalid,” (2009): 1.

⁵⁷ Khalid, “Statement of Uncontested Facts,” 17.

⁵⁸ Hy Bloom, “Independent Psychiatric Evaluation: Sentencing Issues,” (2010): 38.

⁵⁹ Holt et al., “Examining the Utility of Social Control,” 142.

describe as “a source of social connections and messaging that enabled acceptance of radical ideas.” It is clear that some of the members of the Toronto 18 were also exposed to Jihadist ideology via the Internet. Ahmad, for example, spent increasing time online, including on sites dedicated to highlighting “atrocities” being committed against Muslims by Western forces overseas. He was also influenced by online lectures from the US-born Yemeni preacher Anwar al-Awlaki.⁶⁰ Ahmad “became convinced it was his duty to assist the Afghani people and his faith by becoming involved in the conflict.”⁶¹ At the same time, Toronto 18 members explored Islamic-based forums (i.e., Clear Guidance) as well as other Internet forums (i.e., Paltalk) where they were able to actively engage with like-minded peers and exchange (and come to further embrace) radical ideas.⁶² Although online interactions do not replace the importance of face-to-face social dynamics in the radicalization process,⁶³ their discussions amongst like-minded peers within these forums further entrenched members into their extremist belief system. For instance, when Ahmad was feeling lonely, he would “go on Islamic sites and forums as a means of gaining further religious knowledge and also meeting other Muslims feeling similar alienation from school and society.”⁶⁴ Ahmad met his wife on the Islamic forum Clear Guidance, which she later characterized as inciting young Muslims to hate “non-believers” and promoted violence against them.⁶⁵

V. SITUATIONAL ACTION THEORY

A. Overview of Situational Action Theory

Situational Action Theory (SAT) is often referred to as a “general,” “dynamic,” and “mechanism-based” theory of crime because it may be used to explain all forms of crime: it focuses on the “person-environment interaction,” and it identifies the basic explanatory processes behind crime

⁶⁰ See Michelle Shepherd, “What Happened to the Toronto 18 Plotters?,” *Toronto Star*, May 29, 2016.

⁶¹ Ahmad, ONSC at para 29.

⁶² Jeremy Kowalski, *Domestic Extremism and the Case of the Toronto 18* (New York: Palgrave MacMillan, 2016), 139.

⁶³ See Paul Gill et al., “Terrorist Use of the Internet by the Numbers: Quantifying Behaviors, Patterns, and Processes,” *Criminology & Public Policy* 16 (2017): 99–117.

⁶⁴ Fahim Ahmad, “Fahim Ahmad’s Letter to Justice Dawson,” (2010): 2.

⁶⁵ Ahmad, ONSC at para 30.

causation.⁶⁶ To explain the mechanisms behind criminal acts, SAT incorporates four key theoretical elements: (1) the “person” and their propensity for crime; (2) the “setting” or environmental inducements; (3) the “situation” or the “perception-choice process” that is sparked when the “person” meets the “setting”; and (4) the “action” or, more specifically, bodily movements.⁶⁷ A key underlying premise of SAT is that crime cannot be understood by solely examining the “person” and the extent to which their personal morals and lack of self-control allow them to see crime as an “action alternative,” or the “setting,” which has its own set of moral norms that may encourage an individual to break a rule of law.⁶⁸ Rather, according to SAT, it is the “situation” – i.e., the bridge between the “person” and the “setting” – that explains the “action.”⁶⁹ Simply put, SAT proposes that “[a]cts of crime are most likely to happen when crime-prone people take part in criminogenic settings (environments).”⁷⁰

B. Situational Action Theory in Terrorism Studies

According to Wilkström and Bouhana, SAT can shed light on “why some people see acts of terrorism as acceptable” or even why some people become “externally pressurized to carry out acts of terrorism.”⁷¹ To illustrate, SAT considers radicalization to terrorism as a process of moral education, where a person comes to understand what right or wrong conduct is, in a given scenario, through the sub-mechanisms of instruction, observation, and trial and error.⁷² To explain what causes a radicalized individual to participate in terrorist attacks more specifically, SAT proposes that “the direct causes of a person's involvement in acts of terrorism have to do with their morality and the moral context in which they operate.”⁷³ At the most basic level, then, a person who has the propensity to engage in

⁶⁶ Wilkström and Bouhana, “Analyzing Radicalization and Terrorism,” 178.

⁶⁷ See Per-Olof H. Wilkström, “Why Crime Happens: A Situational Action Theory,” in *Analytical Sociology: Actions and Networks*, ed. Gianluca Manzo (Chichester: John Wiley & Sons, 2014), 74-94.

⁶⁸ Wilkström, “Why Crime Happens: A Situational Action Theory,” 74-79.

⁶⁹ Wilkström and Bouhana, “Analyzing Radicalization and Terrorism.”

⁷⁰ Wilkström, “Why Crime Happens,” 76.

⁷¹ Wilkström and Bouhana, “Analyzing Radicalization and Terrorism,” 178.

⁷² Wilkström and Bouhana, “Analyzing Radicalization and Terrorism,” 178.

⁷³ Noémie Bouhana and Per-Olof H. Wilkström, “Theorizing Terrorism: Terrorism as Moral Action: A Scoping Study,” *Contemporary Readings in Law and Social Justice* 2 (2010): 60.

terrorism may commit a terrorist act if they perceived that act to be a viable “action alternative,” and if they also make the (moral) choice to commit the act.⁷⁴ Bouhana and Wilkström further argue that whether a person believes that terrorist acts are an acceptable “action alternative” is dependent upon “their moral education (their history of moral learning and moral experiences), and these experiences depend, in turn, on the individual’s history of exposure to moral contexts promoting engagement in acts of terrorism.”⁷⁵

Few empirical studies, however, have tested SAT’s general theory of crime to explain terrorism. One study that examined SAT’s notion of the “moral context” in relation to acts of eco- and animal-rights terrorism found that, following only some high-profile attacks by such groups, moral rules and their enforcement were significantly altered to produce a reduction in subsequent terrorist events.⁷⁶ Another study found empirical support for SAT’s “person-setting interaction” and violent extremism, concluding that “[a]dolescents that rank high on individual violent extremist propensity are by and large far more susceptible to exposure to violent extremist moral settings than their counterparts with low individual violent extremist propensity.”⁷⁷

C. Situational Action Theory and the Toronto 18

1. *Motivation for the Planned Terrorist Attacks*

Members of the Toronto 18 appear to have had their action processes initiated by a number of external, precipitant events.⁷⁸ First, the motivation for the attack emerged, in part, in the period following the 9/11 terrorist attacks. Following this event, members of the cell generally became more sensitive to how “Muslim people were being perceived and treated” in Canada.⁷⁹ Fahim Ahmad, in particular, perceived a climate of hatred

⁷⁴ See Wilkström and Bouhana, “Analyzing Radicalization and Terrorism.” See also Nele Schils and Lieven Pauwels, “Explaining Violent Extremism for Subgroups by Gender and Immigrant Background, using SAT as a Framework,” *Journal of Strategic Security* 7 (2014): 27-47.

⁷⁵ Bouhana and Wilkström, “Theorizing Terrorism,” 60.

⁷⁶ See Jennifer V. Carson and Brad Bartholomew, “Terrorism Outside the Proverbial Vacuum: Implications for the Moral Context,” *Deviant Behavior* 37 (2016): 557-72.

⁷⁷ Schils and Pauwels, “Explaining Violent Extremism for Subgroups,” 45.

⁷⁸ Martha Crenshaw, “The Causes of Terrorism,” *Comparative Politics* 13 (1981): 379.

⁷⁹ Julian Gojer, “Psychiatric Report for Sentencing,” (2010): 1-2.

developing in Canada against Muslims. In this post-9/11 setting, Ahmad observed how Muslims were increasingly being perceived as terrorists and, as a result of this climate, Muslim men and women were physically assaulted and harassed.⁸⁰ As an example, Muslims' religious attire was being targeted, where Muslim women had their headscarves pulled and forcibly removed.⁸¹ Ahmad himself was once stopped and questioned by the police while dressed in traditional robes.⁸² The setting in which the targeted harassment and bullying of Muslims in Canada was observed provided a grievance that drove some members of the Toronto 18 to become further affiliated with their faith.

Second, members of the terrorist cell were motivated by U.S. and Canadian foreign policy decisions. Here, members were provoked by Canada's perceived involvement in the wars in Iraq and Afghanistan.⁸³ For members of the group, the wars against Iraq and Afghanistan had the effect of bringing about an awareness of the state of the global Muslim community. For instance, the 2003 invasion of Iraq was the "straw that broke that camel's back" for Ahmad.⁸⁴ The U.S. and Canada's role in these wars, then, may have provided some degree of environmental inducement for members to be willing to prepare an attack.

However, not all those who experience such provocations will be driven to perceive terrorism as an acceptable "action alternative."⁸⁵ What drove members of the Toronto 18 to perceive terrorism as an acceptable action alternative in response to their grievances, then, was due in part to their criminal propensities. Members' criminal propensities in favour of terrorism appear to have developed, to some extent, through processes of self and social selection. These processes "are crucial to our understanding of how people come into contact with particular moral contexts... that, through their moral education, promote 'radicalization'."⁸⁶ To illustrate, members of the Toronto 18 situated themselves within radicalizing moral contexts among peers who helped to develop their propensity for terrorism.

⁸⁰ Gojer, "Psychiatric Report for Sentencing," 10.

⁸¹ Gojer, "Psychiatric Report for Sentencing," 10.

⁸² Gojer, "Psychiatric Report for Sentencing," 10.

⁸³ Gojer, "Psychiatric Report for Sentencing," 2.

⁸⁴ Gojer, "Psychiatric Report for Sentencing," 2.

⁸⁵ Wilkström and Bouhana, "Analyzing Radicalization and Terrorism."

⁸⁶ Wilkström and Bouhana, "Analyzing Radicalization and Terrorism," 181.

2. Radicalization as a Process of Moral Education

The leaders of the Toronto 18 developed their “propensities” for terrorism in a variety of settings. One radicalizing environment in which Ahmad, for example, received instruction was from radical high-level members at the local mosque. Ahmad frequently interacted with these individuals who “believed Islam was under attack” by the U.S. and its allies.⁸⁷ As a result of Islam being under attack, they argued, Muslims everywhere were instructed to stand up for their faith.⁸⁸ This form of instruction by high-level members appeared to be one of many factors that effectively influenced Ahmad’s moral education. An additional influential factor at play was the online realm. To illustrate, virtual interactions with extremists in web forums (like Clear Guidance) served as influential forms of instruction for Ahmad. There, Ahmad was frequently exposed to and influenced by Muslims imparting extremist ideology.⁸⁹

Although these on- and offline sources of instruction were effective methods of instruction for the leaders of the Toronto 18, other methods of instruction were given to the recruits that may have also been effective. For instance, the winter training camp, held by the terrorist cell, provided its members with instruction that was meant to influence attendees’ propensities to gradually favour terrorism as a morally acceptable “action alternative.” Various methods of instruction were given to attendees at the training camp, the most notable of which included both lectures (*halaqaat*) and Jihadi videos imparting extremist ideology. One video, for example, at the training camp featured the former leader of al-Qaeda in Iraq as well as “masked and armed mujahideen fighters and firing weapons” to instruct attendees on the importance of fighting for their religion.⁹⁰ Together, the lectures and videos generally sought to “encourage them [attendees] to fight for Islam.”⁹¹ As a result, those who attended the training camp (or at least those who were aware of the “true” purpose of the camp) may have come to believe that terrorism was an acceptable “action alternative” in response to the atrocities committed against Muslims. In other words, the training camp was an opportunity for the leaders of the Toronto 18 to influence

⁸⁷ Ahmad, ONSC at para 28.

⁸⁸ Ahmad, ONSC at para 28.

⁸⁹ Ahmad, ONSC at para 29.

⁹⁰ Zakaria Amara, “R. v. Zakaria Amara Agreed Statement of Facts,” (2009): p. 13.

⁹¹ Amara, “R. v. Zakaria Amara Agreed Statement of Facts,” 2.

attendees' moral education by instructing them on the appropriate moral response to the perceived oppression of Muslims.

Finally, the life histories of group members also situated them in settings where their criminal propensities may have been reinforced. Ahmad's religious background, for example, discouraged him from questioning religious authorities and prevented him from thinking critically about the nature of what was being taught to him. The elders at his mosque "challenged his loyalty to the faith and said everything just short of 'you are not going to Heaven' if he did not believe them wholly."⁹² Similarly, Amara isolated himself in a "very tight circle" of like-minded Muslim peers, where they were "sequestered from the refreshing currents of the broader Muslim and non-Muslim community."⁹³ As a result of being isolated in these radicalizing environments, Ahmad and Amara's morality was continuously pushed toward accepting violence as an acceptable "action alternative."

VI. SITUATIONAL CRIME PREVENTION

A. Overview of Situational Crime Prevention

Situational Crime Prevention (SCP) is a primary prevention orientation that is comprised of three main elements: (1) a theoretical framework, (2) a methodology, and (3) a set of "opportunity-reducing" techniques.⁹⁴ First, the theoretical frameworks associated with SCP include routine activities and rational choice approaches.⁹⁵ Second, SCP methodology is characterized by the "action research" paradigm, which provides a framework to collect and analyze data, and to implement the findings from the analysis.⁹⁶ Third, SCP seeks to inform prevention measures for specific crimes using opportunity-reducing techniques that would reduce the rewards or increase the risk and difficulties for offenders.⁹⁷

⁹² R v. Ahmad, 2010 ONSC 5874 (Evidence, Dr. Julian Gojer's psychiatric evaluation of Mr. Ahmad for sentencing), 2, Terrorismcases.ca.

⁹³ R v. Amara, 2010 ONSC 441 (Evidence, Dr. Arif Syed's psychiatric report regarding amenability to treatment for Zakaria Amara), 6-7, Terrorismcases.ca.

⁹⁴ See Ronald V. Clarke, "Situational Crime Prevention," *Crime and Justice* 19 (1995): 91-150.

⁹⁵ Hsu and Newman, "The Situational Approach to Terrorism."

⁹⁶ Clarke, "Situational Crime Prevention."

⁹⁷ Clarke, "Situational Crime Prevention."

SCP techniques were later expanded upon by Cornish and Clarke who developed 25 unique techniques, each of which falls under one of five prevention themes: (1) increasing the effort; (2) increasing the risks; (3) reducing the rewards; (4) reducing provocations; and (5) removing excuses.⁹⁸ Each technique aims to prevent an offender from reaching their target. Here, one of the most common techniques to increase the effort expended by an offender is to use “target hardening,” such as tamper-proof packaging on products.⁹⁹

B. Situational Crime Prevention in Terrorism Studies

SCP is adaptable to all forms of crime, including terrorism. In fact, terrorism, according to SCP, is not necessarily distinct from other forms of crime in that an explanation of it does not necessarily rely on an understanding of a terrorist’s political, religious, or ideological motivation.¹⁰⁰ Rather, SCP states that a more significant factor is understanding a terrorist offender’s immediate motivations or the most effective and efficient way to “reach and destroy the target.”¹⁰¹ According to Clarke and Newman, the most attractive targets to terrorists are those that lie in close proximity to their base of operations.¹⁰² Apart from this, however, Clarke and Newman argue that terrorists commonly seek out targets that are exposed, vital, iconic, legitimate, destructible, occupied, and easy. Not only can SCP help to explain the targets of terrorism, but theorists have also applied this framework to explain how terrorists choose their weapons, using the acronym MURDEROUS (multipurpose, undetectable, removable, destructive, enjoyable, reliable, obtainable, uncomplicated, and safe).¹⁰³

SCP measures have generally been supported by empirical research on terrorist attacks. Gruenewald, Allison-Gruenewald, and Klein, for example, applied Clarke and Newman’s targets framework to eco-terrorism targets,

⁹⁸ Derek B. Cornish and Ronald V. Clarke, “Opportunities, Precipitators and Criminal Decisions: A Reply to Wortley’s Critique of Situational Crime Prevention,” *Crime Prevention Studies* 16 (2003): 41-96.

⁹⁹ See Cornish and Clarke, “Opportunities, Precipitators and Criminal Decisions.”

¹⁰⁰ Hsu and Newman, “The Situational Approach to Terrorism.”

¹⁰¹ Hsu and Newman, “The Situational Approach to Terrorism,” 151.

¹⁰² Ronald V. G. Clarke and Graeme R. Newman, *Outsmarting the Terrorists* (Westport: Greenwood Publishing Group, 2006).

¹⁰³ See Clarke and Newman, *Outsmarting the Terrorists*.

finding support for exposed, easy, and legitimate measures.¹⁰⁴ Gruenewald and colleagues also found that eco-terrorists often chose non-vital, indestructible, and unoccupied targets.¹⁰⁵ A second study, which explored successful and unsuccessful assassination incidents by terrorists, found support for SCP measures in successful terrorist assassinations, including the number of fatalities, weapon type, and proximity between terrorists and their targets.¹⁰⁶ Another study explored the impact of “target hardening” techniques on airplanes and U.S. embassies, finding that such measures did not increase either the frequency or proportion of casualty attacks.¹⁰⁷ Lastly, researchers studying the situational prevention of terrorism found that the construction of the West Bank Barrier on the Palestinian-Israeli border, alongside related security activities, was effective in preventing terrorist attacks and fatalities.¹⁰⁸

C. Situational Crime and the Toronto 18

1. Target Selection

Members of the Toronto 18 placed significant value on one of the most important features of a target according to Newman and Clarke’s SCP framework: nearness. Proximity is crucial because it allows terrorists to gather detailed information on the target to aid in their attack.¹⁰⁹ To illustrate, despite naming Americans “the enemy,” members of the Toronto 18 instead chose Canadian targets located near Mississauga and Scarborough – the group’s “separate suburban Toronto satellite communities.”¹¹⁰ Here, the terrorist cell was attracted to two nearby high-

¹⁰⁴ Jeff Gruenewald, Kayla Allison-Gruenewald, and Brent R. Klein, “Assessing the Attractiveness and Vulnerability of Eco-Terrorism Targets: A Situational Crime Prevention Approach,” *Studies in Conflict & Terrorism* 38 (2015): 433–55.

¹⁰⁵ Gruenewald, Allison-Gruenewald, and Klein “Assessing the Attractiveness and Vulnerability.”

¹⁰⁶ See Marissa Mandala and Joshua D. Freilich, “Disrupting Terrorist Assassinations through Situational Crime Prevention,” *Crime & Delinquency* 64 (2018): 1515–537.

¹⁰⁷ See Henda Y. Hsu and David McDowall, “Does Target-Hardening Result in Deadlier Terrorist Attacks against Protected Targets? An Examination of Unintended Harmful Consequences,” *Journal of Research in Crime and Delinquency* 54 (2017): 930–57.

¹⁰⁸ See Simon Perry et al., “The Situational Prevention of Terrorism: An Evaluation of the Israeli West Bank Barrier,” *Journal of Quantitative Criminology* 33 (2017): 727–51.

¹⁰⁹ Hsu and Newman, “The Situational Approach to Terrorism.”

¹¹⁰ John McCoy and W. Andy Knight, “Homegrown Terrorism in Canada: Local Patterns, Global Trends,” *Studies in Conflict & Terrorism* 38 (2015): 263.

profile Canadian targets: the TSE and the CSIS headquarters on Front Street.¹¹¹ Additionally, members' less concrete plan was to target Parliament Hill in the close-by national capital of Ottawa. Members of the group carefully chose these targets because each were located "near" their groups' base of operations, despite naming Americans as "the enemy."

In deciding on specific targets located near their base of operations, members of the Toronto 18 selected the TSE and the CSIS headquarters on Front Street because they were believed to be destructible – which is another important component of target selection. For instance, during the planned attack that members referred to as the "Battle for Toronto," they envisioned that a significant amount of destruction would occur against their intended target. There would be "blood, glass, and debris everywhere" from the buildings following the attack, according to members of the terrorist cell.¹¹²

The destruction of these buildings and the surrounding area would have inevitably led to the death and injury of civilians. A high number of casualties was an important objective of the group's planned attack to demonstrate their commitment to violence and their cause. As a result, members chose targets that they knew to be "occupied" with civilians. For instance, members chose buildings in downtown Toronto because they were likely to be occupied with civilians and lead to mass casualties.¹¹³ Armed with information gathered from their "near" target, members of the Toronto 18 decided to strategically detonate the bombs during a period when the city was most likely to be densely populated with civilians. To cause as many casualties as possible, the bombs would have been detonated in the city centre at 9 a.m.¹¹⁴ Yet another site, Parliament Hill, was targeted so members could "go and kill everybody"¹¹⁵ because it would be "occupied" with government officials and politicians whom Ahmad would behead "one by one."¹¹⁶

¹¹¹ R v. Amara, 2010 ONSC 441 (Agreed Statement of Facts, R. v. Zakaria Amara), 6, Terrorismcases.ca.

¹¹² Amara, Agreed Statement of Facts, 20.

¹¹³ McCoy and Knight, "Homegrown Terrorism in Canada."

¹¹⁴ McCoy and Knight, "Homegrown Terrorism in Canada."

¹¹⁵ Isabel Teotonio, "Toronto 18: In Search of a Safe House," *Toronto Star*, July 3, 2010, <http://www3.thestar.com/static/toronto18/index.1.html>.

¹¹⁶ Isabel Teotonio, "Toronto 18: Fahim Ahmad 'The Ideologue'," *Toronto Star*, July 3, 2010, <http://www3.thestar.com/static/toronto18/index.1.html>.

Although the “occupied” characteristic of downtown Toronto proved to be an attractive feature of the targets, members of the Toronto 18 also selected these targets based on their perception that they were “iconic” and “vital” to Canada. First, the intended targets in downtown Toronto hold symbolic value to Canada. The CSIS building on Front Street, for instance, is an iconic representation of the security of the nation. Second, not only were the targets attractive because they were iconic, but they could also be considered to be “vital.” Although the SCP framework normally refers to transportation grids and electricity networks as “vital,” members of the Toronto 18 envisioned that the attack would have an impact on what they thought to be vital to Canada: its economy. For example, when the city of Toronto would be “shut down” following the attack, Shareef Abdelhaleem believed that the attack against the TSE would “close the stock exchange for days.”¹¹⁷ Abdelhaleem estimated the Canadian economy would, as a result, “lose half a trillion dollars.”¹¹⁸ Clearly, choosing destructible targets that are vital to functioning society would help to clearly send the Toronto 18’s message to Canadian and American governments while instilling fear among civilians.

2. Weapon Selection

Members of the Toronto 18 chose certain weapons to effectively reach and destroy their selected targets. First, members of the terrorist cell chose a “destructive” weapon to effectively destroy their targets in downtown Toronto. To illustrate, the powerful blast from the bombs located inside rented U-Haul vans would not only cause significant damage to the targeted buildings but also injury and death to the civilians inside the buildings – or even those simply on their way to work.¹¹⁹ Further, there is evidence that members of the Toronto 18 wanted to exploit the destructive capabilities of the bomb and maximize the destruction of “the whole building and the surrounding three blocks” of downtown Toronto.¹²⁰ Here, Abdelhaleem suggested using a two tonne, rather than one tonne, bomb outside of the

¹¹⁷ R v. Gaya, 2010 ONSC 434 (Agreed Statement of Facts, R. v. Saad Gaya), 9, Terrorismcases.ca.

¹¹⁸ Gaya, Agreed Statement of Facts, 9

¹¹⁹ Isabel Teotonio, “Toronto 18 Attack was to Mimic 9/11,” *Toronto Star*, June 23, 2009 https://www.thestar.com/news/gta/2009/06/23/toronto_18_attack_was_to_mimic_911.html.

¹²⁰ Amara, Agreed Statement of Facts, 20.

TSE.¹²¹ Explosive tests from the Royal Canadian Mounted Police (RCMP) that replicated the effects of the bomb blast only served to confirm the terrorists' cells' potential to cause considerable damage to their intended targets. In fact, the RCMP Explosives Disposal Unit determined that the blast would "have caused catastrophic damage to a multi-storey glass and steel frame building 35 metres from the bomb site, as well as killing or causing serious injuries to people in the path of the blast waves and force."¹²²

According to Clarke and Newman's¹²³ MURDEROUS framework, the Toronto 18's choice of weapon was not necessarily easy, uncomplicated, or obtainable. Although a bomb is a relatively destructive weapon, members of the group required skills to create a bomb and a detonator, rendering it relatively complicated. Since Amara wanted to create the bomb "with his own hands," it would require certain skills and materials to manufacture.¹²⁴

Having said that, the members of the group had to make sure the final product was reliable.¹²⁵ As Abdelhaleem explained, "it would be terrible if it doesn't explode because they got the concentration wrong."¹²⁶ Although there is little evidence that members of the Toronto 18 tested the actual bomb's reliability or explosivity, the bomb's detonator was tested multiple times to ensure it would be functional on the day of the attack.¹²⁷ On one occasion, Amara demonstrated the detonators functionality to Abdelhaleem by dialing his cell phone, which caused "a spark from the end of the wires that ignited matches, and burned the carpet."¹²⁸ Eventually, Amara configured the detonator so that members wouldn't have had to be so close to the bomb in order to detonate it. Amara claimed that "you could call from anywhere and it will just explode."¹²⁹

In addition, the chemicals needed to create such a powerful bomb were not easily obtainable. Amara initially wanted to create the bombs out of the more powerful material, "RDX²⁹", but since it was more difficult to obtain,

¹²¹ Amara, Agreed Statement of Facts, 20.

¹²² Gaya, Agreed Statement of Facts, 34.

¹²³ Clarke and Newman, "Outsmarting the Terrorists."

¹²⁴ Amara, Agreed Statement of Facts, 6.

¹²⁵ Clarke and Newman, "Outsmarting the Terrorists."

¹²⁶ Gaya, Agreed Statement of Facts, 10.

¹²⁷ Amara, Agreed Statement of Facts, 6.

¹²⁸ Gaya, Agreed Statement of Facts, 11.

¹²⁹ Gaya, Agreed Statement of Facts, 6.

“he ruled it out and decided to use ammonium nitrate.”¹³⁰ In effect, Amara had to sacrifice destructiveness for the sake of finding more easily obtainable materials. There was also the question of how to store the quantity of chemicals required to make the bombs. Members of the group identified a nearby storage unit to house the material; however, the potential for security cameras located near the storage unit increased the risk and difficulty of storing the illegal material in this location. Here, although “Amara had wanted to rent a storage unit for the chemicals... Abdelhaleem had told him that was a stupid idea because storage units have security cameras.”¹³¹ The security cameras, then, produced a deterrent effect on members of the group.

The Parliament Hill attack was to have taken a different approach than the Battle of Toronto. Rather than engaging their target from a safe distance like the Toronto plot, members of the group would need to be present to reach their target at Parliament Hill. To take over Parliament Hill and reach the politicians, Ahmad opted for the use of handguns. The handguns selected by Ahmad offered a number of advantages to the group. For example, they would have been relatively undetectable during the Parliament Hill attack, capable of being concealed under clothing or in bags. To obtain the handguns and ammunition required for the attack, then, Ahmad instructed Dirie to travel to the U.S. “with the intention of bringing them back to Canada illegally.”¹³² Additionally, members would need to receive weapons training and undergo military training exercises.¹³³ At a training camp, members of the group were taught how to use guns. The camp included “activities included firearms training and target practise with a black 9mm handgun... shooting with an air rifle at various targets, mock war games that involved paintball guns, marching and running through various obstacle courses.”¹³⁴ As a result of this training, the use of guns during the Parliament Hill attack was made “safer” and “uncomplicated.”

¹³⁰ *Amara*, Agreed Statement of Facts, 6.

¹³¹ *Amara*, Agreed Statement of Facts, 28.

¹³² *R v. Dirie*, [2009] O.J. No. 6526 (Agreed Statement of Facts, Ali Dirie), 1, Terrorismcases.ca.

¹³³ *Ahmad*, ONSC.

¹³⁴ *Ahmad*, ONSC at para 5.

VII. CONCLUSION

The comparatively recent application of criminological perspectives has provided useful insights into terrorism. Each of the frameworks identified in this chapter advances our understanding of key aspects of this phenomenon. General Strain Theory of Terrorism (GSTT), an extension of general strain theory, highlights the effect that “collective strain” often plays in the process of radicalization toward terrorism. Simply put, violent extremism is predominantly a group-based phenomenon. Even so-called “lone wolves” are usually connected to some broader, often online, network or community.¹³⁵ As Agnew¹³⁶ has posited, the collective strains experienced by the members of the Toronto 18, in relation to their Muslim identities and their identification with what they perceived to be oppressed Muslims around the world, increased the likelihood of terrorism by increasing negative emotions and reduced social and self-controls and their ability to cope through both legal channels. Social learning theory illustrates the importance of understanding the social context of radicalization to violence. Terrorism, like any other social behaviour, is learned behaviour.¹³⁷ The case of the Toronto 18 illustrates how the processes requisite to acts of terrorism – including recruitment, the strengthening of group ties and kinship bonds, and the learning of various terrorist techniques – led to the formation of fledgling terrorist groups. Situational action theory (SAT) further adds to the puzzle by focusing on radicalization to violence as a process of moral education. Through training camps and both offline and online discussion, group member propensities gradually came to favour terrorism as a morally acceptable “action alternative.”¹³⁸ Finally, situation crime prevention (SCP) alerts us to key facets of the commission of terrorist acts. Targets of terrorism, and the weapons used in those attacks, are chosen with a particular logic in mind,¹³⁹ and uncovering that logic would go a substantial way toward assisting with the prevention of terrorism.

¹³⁵ See Bart Schuurman et al., “End of the Lone Wolf: The Typology that Should Not Have Been,” *Studies in Conflict & Terrorism* 42 (2019): 771–78.

¹³⁶ Agnew, “A General Strain Theory of Terrorism.”

¹³⁷ See Akins and Winfree, “Social Learning Theory and Becoming a Terrorist.”

¹³⁸ See Wilkström and Bouhana, “Analyzing Radicalization and Terrorism.”

¹³⁹ See Hsu and Newman, “The Situational Approach to Terrorism.”

Given its complexity, to expect any single orientation to “explain” terrorism would be unrealistic at best, foolhardy at worst. While this exploration of the Toronto 18 clearly demonstrates that criminology has much to offer in the way of theorizing about terrorism, much work remains. First, other criminological approaches could fruitfully be applied to terrorism. To give but one example, the life course perspective is potentially relevant in this context. Second, the Toronto 18 case also points to the need to establish broader connections between various criminological perspectives. Just as theoretical integration continues to be a challenge for criminology generally, so too will it prove difficult in the realm of terrorism studies. Finally, more studies are needed to extend the application of criminology perspectives and to continue building the criminology of terrorism.