

Fury and Void: Legal Pathways to Counter 764

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Abstract

In June 2025, a young man was arrested in Germany after an alert from the Federal Bureau of Investigation (FBI) regarding an alleged perpetrator affiliated with the international network 764 — a group operating at the destructive nexus of violent extremism, child sexual exploitation and other extreme violence often targeting vulnerable youth online. The case is noteworthy not only for the magnitude of victims, their young ages, and the severity of violence, but also for the network's transnational reach. Europol and several law enforcement and intelligence agencies, including the National Coordinator for Counterterrorisism and Security (NCTV) in the Netherlands have been warning about the growing threat posed by such online violent extremists, who manipulate, coerce and exploit minors via encrypted platforms and messaging services. This policy brief explores legal pathways of countering the 764 network through four sections: (1) an overview of 764's ideology, recruitment and violent exploitative practices; (2) examination investigations and prosecutions, and some of the law enforcement and prosecutorial hurdles and approached taken; (3) analysis of the nature of online content; and (4) a discussion of the legal and policy considerations for designating the network. The brief concludes with actionable recommendations aimed at enhancing criminal justice responses — including counter-terrorism measures — to disrupt, investigate and prosecute the crimes linked to this network.

Introduction

In June 2025, a man was arrested in Germany following reports shared by the FBI for allegedly committing multiple child sexual abuse offences, inciting suicide, and several additional crimes of extreme violence. The accused was considered a leading member of the international 764 network, which operates at the intersection of violent extremism, child sexual exploitation, and other forms of serious violence specifically targeting vulnerable youth online. While not the first arrest linked to the network, the case stands out due to the extreme violence, the number of victims, their ages, and its international dimension.

Europol warned of online violent networks that exploit, manipulate and coerce minors into producing explicit child sexual content and committing extreme violence.² Law enforcement authorities across the globe have expressed concerns about the online safety of youth regarding networks like 764.³ In its June 2025 terrorist threat assessment, the Dutch National Coordinator for Counterterrorism and Security (NCTV) also references groups like 764 and their so-called 'tactical nihilist' approach.⁴

Given the growing threat this network poses and an increasing number of associated investigations and prosecutions, this policy brief seeks to inform criminal justice approaches, including specific counter-terrorism measures. It aims to identify emerging practices and knowledge gaps that could assist policymakers and practitioners in the investigation and prosecution of crimes in connection with the 764 network. The first section provides a brief overview of the 764 network, with a focus on its ideology, recruitment methods, and the types of violence associated with it. The second section examines investigations and prosecutions, highlighting law enforcement and prosecutorial approaches and challenges in holding perpetrators accountable. The third section analyses the nature of online content linked to the network, while the final section explores the possibility of designating or proscribing this network. The brief concludes with practical recommendations for responding to the threat aimed at disrupting, investigating, and prosecuting crimes linked to this network.

Methodology

As the number of completed court cases is relatively small and many are still in the investigation stage, six semi-structured interviews with policymakers and professionals from European security agencies, law enforcement and prosecution services have been conducted to get a better insight into the challenges and practices in investigating and prosecuting crimes related to the 764 network. Sources are anonymised, and interviews are on file with the authors.

¹ German authorities were tipped by the FBI in connection with a 13-year-old American teenager who was pressured to commit suicide and livestream the act. The accused was 16 years old at the time of the alleged offences, which further included multiple online sexual child abuse offences and online grooming of minors between 2021 and 2023. He now faces over 120 charges against eight victims from Germany, Canada, the United Kingdom and the United States. See: Stefanie Dazio, "Police say a German man engaged in cyber grooming and pressured a US teen to kill himself," *AP News*, June 18, 2025, https://www.apnews.com/article/germany-us-cybergrooming-arrest-4047eec634bb2cd52c15a27 87126b8d3.

² Europol, European Union Terrorism Situation and Trend Report (Luxembourg: Publications Office of the European Union, 2025), https://www.europol.europa.eu/cms/sites/default/files/documents/EU TE-SAT 2025.pdf.

³ Counter Terrorism Policing, "Counter Terrorism Policing, MI5, and the National Crime Agency deliver summer holiday warning to parents," July 23, 2025, https://www.counterterrorism.police.uk/counter-terrorism-policing-mi5-and-the-national-crime-agency-deliver-summer-holiday-warning-to-parents/; FBI Jacksonville, "Staying One Step Ahead: How to Protect Kids from Emerging Online Threats," August 19, 2025, https://www.fbi.gov/contact-us/field-offices/jacksonville/news/staying-one-step-ahead-how-to-protect-kids-from-emerging-online-threats.

⁴ Nationaal Coördinator Terrorismebestrijding en Veiligheid (NCTV), *Dreigingsbeeld Terrorisme Nederland*, juni 2025 (The Hague: NCTV, June 17, 2025), https://www.nctv.nl/documenten/publicaties/2025/06/17/dreigingsbeeld-terrorisme-nederland-juni-2025.

What is the 764 Network?

To adequately respond to the 764 network, it is important to have a thorough understanding of its nature and tactics. The aim of this section is not to necessarily interrogate academic views on 764, but to elaborate on a general understanding of the network and to contextualise policy recommendations.⁵

764 is a transnational, decentralised network of online groups promoting Satanic and nihilistic violence, intersecting with neo-Nazism and accelerationism. It has various offshoot groups, including 676, CVLTIST, and H3II, among others.⁶ It appears that 764 is to some extent organised in cells, each maintaining an internal hierarchy.⁷ Individuals seeking membership are required to conduct online and offline violence. Status and prestige within the network are closely tied to the severity and cruelty of these acts, with more extreme violence earning greater recognition.

History, Ideology, and Aesthetics

764 traces its origins to *The Com*, an online network involved in illicit cyber activities ranging from swatting to financial fraud.⁸ It was founded by Bradley Cadenhead, a 15-year-old from Texas who was sentenced to 80 years in prison for child sexual abuse-related offences.⁹ 764's name stems from the ZIP code of Cadenhead's hometown of Stephenville. The group draws inspiration from online communities known for disseminating child sexual abuse material (CSAM) and promoting self-harm, but distinguishes itself by merging these practices with other violent extremist ideologies, particularly linked to the Order of Nine Angles (O9A).¹⁰

The Satanic component of 764 is reflected through occultist practices conducted by members of the group—such as writing signs in blood¹¹—as well as esoteric practices and beliefs that underpin its ideological components.¹² Like O9A, the group may include both true believers and others who are drawn primarily to its aesthetic of Satanic crosses and geometric symbols.¹³

764's accelerationism is reflected in its extensive connections with other online accelerationist and neo-Nazi groups. This again includes O9A, whose members engage in subversive acts known as 'Opferings' (offerings) aimed at weakening democratic values, including lynching and sexual assault. These actions are part of a broader set of rites initiates must undertake to join the

⁵ For a more in-depth exploration of 764, see, inter alia: Daveed Gartenstein-Ross and Emily Chace-Donahue, "The Order of Nine Angles: Cosmology, Practice & Movement," *Studies in Conflict & Terrorism*, published online 2023, 1–21; Ariel Koch, "The ONA Network and the Transnationalization of Neo-Nazi-Satanism," *Studies in Conflict & Terrorism* 47, no. 10 (2022): 1172–99.

⁶ Brian Krebs, "The Dark Nexus Between Harm Groups and 'The Com," KrebsOnSecurity, September 2024, https://krebsonsecurity.com/2024/09/the-dark-nexus-between-harm-groups-and-the-com/.

⁷ Interview #4

⁸ Krebs, "The Dark Nexus Between Harm Groups and 'The Com."

⁹ Shawn Boburg and Chris Dehghanpoor, "On Social Media, a Bullied Teen Found Fame Among Child Predators Worldwide," *The Washington Post*, September 9, 2024, https://www.washingtonpost.com/investigations/2024/09/09/social-media-bullied-teen-found-fame-among-child-predators-worldwide/. Texas Department of Criminal Justice, "Inmate Information Details: Bradley Chance Cadenhead," accessed July 18, 2025, https://inmate.tdcj.texas.gov/InmateSearch/viewDetail.action?sid=19984471.

¹⁰ The Order of Nine Angles (O9A) is a Satanic and neo-Nazi group thought to have been founded in the 1970s by David Myatt, a neo-Nazi and former Islamic extremist. For further information, see: AntiDefamation League, "Order Nine Angles (O9A / ONA)," *Extremism Terms*, accessed July 21, 2025, https://extremismterms.adl.org/glossary/order-nine-angles-o9a-ona.

¹¹ Anti-Defamation League, image titled 764_3_1020.jpg, June 2025, accessed July 21, 2025, https://www.adl.org/sites/default/files/images/2025-06/764_3_1020.jpg.

¹² MarcAndré Argentino, Barrett G., and M.B. Tyler, 764: The Intersection of Terrorism, Violent Extremism, and Child Sexual Exploitation, GNET Research (January 19, 2024), accessed July 21, 2025, https://gnet-research.org/2024/01/19/764-the-intersection-of-terrorism-violent-extremism-and-child-sexual-exploitation/.

¹³ Argentino, G., and Tyler, 764. The logo also contains several references to satanic symbols such as the pentagram, satanic cross and Baphomet.

organisation.¹⁴ 764 is also linked to the Maniac Murder Cult (MMC), an accelerationist neo-Nazi group from Russia that faced crackdowns by state security services over suspected terrorist plots.¹⁵

Although some reports suggest that members of 764 have clearly adopted neo-Nazi and accelerationist views, going as far as to engage in official partnerships with groups like MKY,¹⁶ others indicate that this adoption may be superficial and only relegated to neo-Nazi symbology and rhetoric.¹⁷ Instead, 764 and like-minded groups could be considered to be fascinated with and engaging in extreme violence that apparently lacks clear ideological motivation, driven by misanthropic worldviews (i.e., harbouring an extreme hatred towards people or society).¹⁸ This type of extremism is considered nihilistic in that it advocates violence for the sake of violence.¹⁹ One report even cites Cadenhead as stating that gore and CSAM are intrinsic to 764's core activities.²⁰

764's nihilism is further reflected in the aesthetics of its visual outputs through online posts, drawing heavily from online meme culture, horror tropes, and anarchic pop-culture references that combine irony, extreme violence, and apocalyptic imagery to desensitise online users to extreme violence. Other groups operating in nihilist ideological spaces include No Lives Matter (NLM) and the True Crime Community (TCC), sharing many of the pseudo-Satanic and nihilist aesthetics found across 764 and the spectrum of like-minded groups.²¹

There is an ongoing debate over whether the nihilistic violence perpetrated by 764 can be classified as an ideological form of extremism. While the network has clear intersections with explicitly neo-Nazi groups such as MKY,²² it could be contested whether this affiliation renders 764 itself neo-Nazi. Like the O9A, 764 is not a "whites-only" group, further complicating its ideological classification.²³ Importantly, whereas nihilism may carry ideological elements, it does not amount to a coherent political ideology aimed at systemic change. Unlike accelerationism, which seeks to hasten societal collapse to enable the emergence of an alternative order, nihilism is marked by a rejection of meaning altogether, with no vision for what should replace the existing system.²⁴ Some scholars argue that this distinction is ultimately irrelevant—regardless of stated beliefs, the group furthers accelerationist objectives by actively undermining democratic norms and social cohesion. However, ideological categorisation carries legal significance in jurisdictions where terrorism charges are predicated on identifiable belief systems. In several countries, individuals

¹⁴ MarcAndré Argentino, Barrett G., and Matt Bastin, "Nihilism and Terror: How M.K.Y. Is Redefining Terrorism, Recruitment, and Mass Violence", Combating Terrorism Center at West Point, September 11, 2024, https://ctc.westpoint.edu/nihilism-and-terror-how-m-k-y-is-redefining-terrorism-recruitment-and-mass-violence/.

¹⁵ In May 2025, one of MKY's leaders was extradited from Moldova to the United States amid allegations of planning to poison Jewish children with drug-laced candy while disguised as Santa Claus. See: Alexx AltmanDevilbiss, "Leader of NeoNazi 'Murder Cult' Extradited to the U.S. From Moldova," *NBC News*, May 23, 2025, https://www.nbcnews.com/news/us-news/leader-neo-nazi-murder-cult-extradited-us-moldova-rcna208936..

¹⁶ Argentino, G., and Tyler, 764.

¹⁷ Institute for Strategic Dialogue, "Terror without Ideology? The Rise of Nihilistic Violence – An ISD Investigation", *Digital Dispatches*, May 8, 2025, accessed July 21, 2025, https://www.isdglobal.org/digital_dispatches/terror-without-ideology-the-rise-of-nihilistic-violence-an-isd-investigation/; Interview #4

¹⁸ Algemene Inlichtingen- en Veiligheidsdienst (AIVD), *Jaarverslag 2024* (Den Haag: Ministerie van Binnenlandse Zaken en Koninkrijksrelaties, 24 april 2025), 19, https://www.aivd.nl/documenten/jaarverslagen/2025/04/24/jaarverslag-2024.

¹⁹ In a recent sentencing memorandum for Jack William Rocker in the United States, the presiding judge explicitly identified 764 as a nihilist violent extremism (NVE) group, stating that Rocker was a member of the group which was described as "... individuals who engage in criminal conduct within the United States and abroad, in furtherance of political, social, or religious goals that derive primarily from a hatred of society at large and a desire to bring about its collapse by sowing indiscriminate chaos, destruction, and social instability. NVEs work individually or as part of a network with these goals of destroying civilized society through the corruption and exploitation of vulnerable populations, which often include minors." See: United States v. Jack William Rocker, Case No. 8:24-cr-496-VMC-AEP, United States' Sentencing Memorandum, U.S. District Court for the Middle District of Florida, March 12, 2025, https://storage.courtlistener.com/recap/gov.uscourts.flmd.434650/gov.uscourts.flmd.434650.33.0.pdf.

²⁰ According to the report, Cadenhead is quoted as saying that "lol without gore and cp [child pornography, red.] 764 is pointless." See: Boburg and Dehghanpoor, "On Social Media, a Bullied Teen Found Fame Among Child Predators Worldwide."

²¹ NLM -unlike TCC – disseminates explicit terrorist content including tactical manuals, sometimes together with 764 and MKY. Institute for Strategic Dialogue, *Terror without Ideology?*

²² Argentino, G., and Tyler, 764.

²³ Argentino, G., and Tyler, 764.

²⁴ Interview #4

can be prosecuted for committing a terrorist offence without an ideological motive. What must be established is the intent to instil fear or to coerce a government or international organisation to act or refrain from acting. For example, Dutch counter-terrorism legislation centres on the specific purpose (i.e., intent) behind an act of violence or threat, rather than the underlying motive for committing it.²⁵ While an ideological motive is not a legal element of the offence and does not need to be proven, it may be taken into account during sentencing. Similar approaches can be found in Germany²⁶ and France.²⁷ In contrast, common law countries such as the UK²⁸, Canada,²⁹ and Australia³⁰ include motive as a defining element of terrorism. In these jurisdictions, the act must be committed in furtherance of a political, religious, or ideological cause.

The ambiguous ideological nature of 764 further raises practical questions for criminal justice and rehabilitation.³¹ From a prosecution perspective, there is uncertainty over how juveniles involved in such cases should be charged—whether under juvenile justice or as adults, given the severity of offences—and under what charges, be it terrorism, hate crimes, or specific offences such as producing CSAM, sextortion, or incitement to violence.

Tactics and Recruitment

764 and related groups utilise both online and offline tactics. Dr Marc-André Argentino, leading terrorism researcher on the topic of 764, delineates three rather fluid an sometimes overlapping spheres of the Com in which groups like 764 operate: the Cyber Com, the Sextortion Com and Offline Com.³² The Cyber Com is the pillar known for cybercriminal activities, specifically SIM swapping,³³ ransomware, data theft, doxxing³⁴ and swatting.³⁵ The members of the Sextortion Com engage in sextortion and other forms of blackmail The group leverages open-source intelligence (OSINT) techniques, social engineering, and data leaks to compile so-called *LoreBooks* compromising personal and sexually explicit information. These *LoreBooks* are used to extort and/or dox minors for further exploitation, coercing them to create and share self-generated CSAM.³⁶ Within this environment, 764 has emerged as an influential group in mainly the Sextortion and Offline Com spheres, functioning as the singularity for the broader network and producing some of the Com's most notorious members. Over time, 764 has acquired an almost mythical status, generating hundreds of copycat groups and unofficial imitations.

764 operates in spaces where at-risk and marginalised youth are present, actively targeting them for exploitation. Members are recruited in online forums, self-help communities and platforms, including in gaming-adjacent spaces like Discord, games like Roblox, and on messaging apps like

²⁵ Dutch Criminal Code (Wetboek van Strafrecht), art. 83a, BWBR0001854, version as of July 1, 2025, https://wetten.overheid.nl/BWBR0001854/2025-07-01

²⁶ Art German Criminal Code (Strafgesetzbuch), art. 129a, https://www.gesetze-im-internet.de/englisch_stgb/englisch_stgb.html.

²⁷French Penal Code (Code pénal), art. 421-1, amended by Law No. 2016-819 of June 21, 2016, https://www.legifrance.gouv.fr/codes/section_lc/LEGITEXT000006070719/LEGISCTA000006149845/#LEGISCTA000006149845.

²⁸ Terrorism Act 2000, c. 11, § 1, https://www.legislation.gov.uk/ukpga/2000/11/section/1.

²⁹ Criminal Code, RSC 1985, c. C-46, Part II.1, s. 83.01, https://laws-lois.justice.gc.ca/eng/acts/c-46/page-8.html#h-116340.

³⁰ Australian Government AttorneyGeneral's Department, "Terrorist Act Offences," *Australia's CounterTerrorism Laws*, accessed July 21, 2025, https://www.aq.gov.au/national-security/australias-counter-terrorism-laws/terrorist-act-offences.

³¹ Deradicalisation programmes traditionally address ideological beliefs, which may be less relevant for individuals drawn to nihilistic violence. 32 MarcAndré Argentino, "The Pillars of the Com Network", *From The Depths*, January 15, 2025, https://www.maargentino.com/the-pillars-of-

³³ SIM-swapping is a form of identity fraud in which an attacker deceives a mobile service provider into transferring a victim's phone number to a SIM card under the attacker's control, enabling unauthorised access to calls, messages, and authentication credentials.

³⁴Doxxing refers to sharing of personal identifiable information on the internet with the intention to intimidate or coerce a person.

³⁵ Swatting refers to the practice of falsely reporting a serious emergency such as a hostage situation or active shooter to prompt an armed police response to another person's home address.

³⁶ An increasing number of minors are accessing online pornography, which poses significant risks and heightens their vulnerability. Exposure at an early age has been linked to earlier sexual activity, the normalisation of violent sexual behaviour, the adoption of harmful gender attitudes, and desensitisation to violence. This trend has also contributed to the rise in self-generated child sexual abuse material (CSAM). While sexually explicit content may sometimes be shared intentionally and consensually, it is often the result of grooming, coercion, or sextortion. See: INHOPE, "What Is SelfGenerated CSAM?", accessed July 21, 2025, https://inhope.org/EN/articles/what-is-self-generated-csam.

Telegram.³⁷ The absence of clear ideological goals beyond setting forth a nihilist and misanthropic worldview reduces the effort it takes to groom youth, as indoctrination and intellectual engagement with ideological materials are not required. For all intents and purposes, 764 operates based on 'vibes' over ideology, with members often radicalising in loosely connected, individualised ways, in line with emerging trends toward non-coherent or fluid extremist beliefs such as 'salad bar' extremism or mixed, unclear, or unstable ideologies.³⁸ Whereas the sexual exploitation of children is often used to force minors into a broader cycle of abuse, it could also be driven by motives such as sexual gratification or the commercial distribution of CSAM via the Dark Web. However, the extent to which CSAM is being monetised for financial gain remains unclear.³⁹

In the offline realm, 764 has been linked with school shootings, stabbings, murders, and abuse of siblings, as well as the torturing and killing of animals.⁴⁰ Based on practitioner accounts, however, the predominant modus operandi includes graffiti and vandalism.⁴¹

Investigations and Prosecutions

Recognising and attributing the broad range of crimes to 764 can be challenging in practice. Law enforcement in several countries, such as Canada,⁴² the US, and the UK,⁴³ warn about the threat 764 poses to vulnerable youth. As of May 2025, 250 persons affiliated with 764 are already being investigated in the US.⁴⁴ To date, 23 affiliated individuals have been arrested across the US, Canada, the UK, Australia, and Europe.⁴⁵ In Belgium, two members of 764 have further been added to the Coordination Unit for the Threat Analysis (CUTA) terrorism database,⁴⁶ whereas in the UK, two teenagers have been convicted for distributing terrorist materials, including bomb-making manuals, content encouraging self-harm, and child exploitation material. Most of those investigated or prosecuted so far have been boys and young men, with one notable exception: a 17-year-old girl in the US who was arrested for swatting schools and places of worship.⁴⁷

A key challenge is that children below the minimum age of criminal responsibility (MACR) are being groomed to carry out unprovoked attacks. In such cases, children below the MACR cannot be prosecuted, but could be questioned. In Sweden, criminal networks have increasingly recruited minors for serious crimes and recently two minors linked to 764 and NLM are also on trial for stabbing, sparking a debate over lowering the age of criminal responsibility to 14. However, doing so may not prevent exploitation and could instead shift targeting to even younger children.

³⁷ See, for example: Angus Crawford and Tony Smith, "Child Abuse Terror Warning as 'Satanist' Teenager Jailed," *BBC News*, January 16, 2025, https://www.bbc.com/news/articles/c9w5rkzxjl4o.

³⁸ Interview #3.

³⁹ Interview #4.

⁴⁰ Institute for Strategic Dialogue, 764, ISD Explainer, March 27, 2025, https://www.isdglobal.org/explainers/764/.

⁴¹ Interview #4

⁴² Royal Canadian Mounted Police, "RCMP Reminds Canadians about Violent Online Groups Targeting Youth," news release, August 27, 2024, https://www.rcmp.ca/en/news/2024/08/rcmp-reminds-canadians-about-violent-online-groups-targeting-youth.

⁴³ Interview

⁴⁴ FBI opens inquiry into 764, online group that sexually exploits and encourages minors to selfharm, *The Guardian*, May 11, 2025, https://www.theguardian.com/us-news/2025/may/11/fbi-investigation-764-online-group.

⁴⁵ AntiDefamation League, *Backgrounder: 764*, March 2025, https://www.adl.org/resources/backgrounder/764. Although the number of cases might be much higher, MarcAndré Argentino has observed 194 arrests linked to the broader Com network. https://www.linkedin.com/posts/marcandreargentino_beyond-the-headlines-arrest-data-and-drivers-activity-7374446168443088896—fBp?utm_source=share&utm_medium=member_desktop&rcm=ACoAAAlvQE4B2ICmhEH33-Pd5lprLNj5lm_2k4o

⁴⁶ Yannick Verberckmoes, "Twee leden nihilistisch terreurnetwerk '764' staan op OCADlijst," *De Morgen*, July 16, 2025, https://www.demorgen.be/snelnieuws/twee-leden-nihilistisch-terreurnetwerk-764-staan-op-ocad-lijst~b805bca3/.

⁴⁷ NBC Connecticut, "Vernon Teen Threatens Schools, Places of Worship '764'," NBC Connecticut, September 2024, accessed July 23, 2025, https://www.nbcconnecticut.com/news/local/vernon-teen-threats-schools-places-of-worship-764/3395995/.

⁴⁸ Children below the MACR can be questioned to determine whether they have committed a crime or others have been involved in criminal activities. Hearing of children below MACR should be conducted in a child-friendly manner and by specialized trained staff. See: UNICEF, Systematic Responses to Children under the Minimum Age of Criminal Responsibility Who Have Been (Allegedly) Involved in Offending Behaviour in Europe and Central Asia, accessed July 24, 2025.

⁴⁹ Although the minors below the MACR cannot be sentenced, the court can establish their guilt. Radio Sweden, "First court proceedings in Sweden involving knife crime linked to "No Lives Matter" and "764" ", April 2, 2025, accessed October 2, 2025, https://www.sverigesradio.se/artikel/first-court-cases-in-sweden-involving-no-lives-matter-and-764

⁵⁰ Sweden Herald, "Liberals propose lowering criminal responsibility to 13 for serious crimes," January 29, 2025, accessed July 23, 2025, https://swedenherald.com/article/liberals-propose-lowering-criminal-responsibility-to-13-for-serious-crimes.

In the UK, the case of the Southport attacker highlights similar challenges to 764. The perpetrator, a young teenager with an obsession with violence but no clear ideological motivation, exhibited behavioural and online patterns similar to those seen in violent extremist contexts.⁵¹ Despite repeated contact with schools, social services, and police in the years prior to the attack, he did not meet the threshold for intervention under Prevent, the UK's programme for countering radicalisation.⁵² Following the attack, a national debate emerged over whether the UK's legal definition of terrorism should be expanded to include acts not explicitly driven by political, religious, or ideological motives—a move which has been criticised by some for its potentially adverse human rights ramifications.⁵³ The case also illustrates a broader issue faced by law enforcement and security services, namely: how to identify and intervene with individuals without a clear (singular) extremist ideology at risk before violence occurs, especially when most cases are brought to attention by schools and social services.⁵⁴

Considering the broad range of crimes, determining who should lead investigations can be difficult: counter-terrorism police, who take a perpetrator approach, or dedicated online child abuse units with a victim-centric approach.⁵⁵ A close(r) coordination and sharing of information between different law enforcement units can assist in the investigations. This decision can also determine the applicable legal framework. Under counter-terrorism legislation, police often have access to enhanced powers, such as intercepting communications.⁵⁶ Several countries also allow lower evidentiary thresholds and longer pre-trial detention in terrorism cases. For example, in the Netherlands, "mere indications" are sufficient to authorise special investigative tools.⁵⁷ In France, terrorist suspects can be held for up to six days, compared to 48 hours for ordinary offences.⁵⁸ In the UK, suspects under the Terrorism Act can be detained without charge for up to 14 days, whereas the limit is 24 hours for non-terrorism cases.⁵⁹ The main rationale for applying a counter-terrorism framework is often to unlock these expanded powers and the possibility of prosecuting for terrorist offences.

Limited awareness among frontline practitioners of groups like 764 hinders investigations, as links to such networks often surface only incidentally during probes into seemingly unrelated crimes. Practitioners have noted cases in which criminal investigations into offences such as sextortion have unexpectedly revealed connections to 764-linked groups through content found on personal devices, including material related to 764 or that glorifies other terrorist organisations and figures such as ISIS beheadings or right-wing terrorist 'Saints'. This points to a broader issue that the identification of links between online criminality and extremist ecosystems like 764 remains highly contingent on the knowledge and attentiveness of law enforcement. Without

⁵¹ Institute for Strategic Dialogue, Written Evidence Submitted by the Institute for Strategic Dialogue (COM0017), UK Parliament Home Affairs Committee, July 8, 2025, https://committees.parliament.uk/writtenevidence/142702/pdf/.

⁵² Lizzie Dearden, "A U.K. Teen Became Fixated on Extreme Violence. But Was It Terrorism?" *The New York Times*, January 30, 2025, https://www.nytimes.com/2025/01/30/world/europe/southport-terrorism-prevent-violence-rudakubana.html.

⁵³ As Jonathan Hall, the Independent Reviewer of Terrorism Legislation, pointed out that expanding the definition to include attacks which lack any substantial purpose to advance a political, religious, racial or ideological cause is not to be recommended but seriously risk undermining the human rights of individuals as mere association with, supporting, glorifies or disseminates publications that are now deemed as terrorist content could trigger the application of heavy-handed counter-terrorism response.

⁵⁴ Interview #2; Argentino, G., and Tyler, 764.

⁵⁵ Interview #1 Interview #6

⁵⁶ See, for instance, the French administrative police measures to fight terrorism: Direction Générale de la Sécurité Intérieure (DGSI), "Des mesures de police administrative pour lutter contre le terrorisme," *Ministère de l'Intérieur*, June 14, 2023, updated November 26, 2024, https://www.dgsi.interieur.gouv.fr/la-dgsi-a-vos-cotes/lutte-contre-terrorisme/des-mesures-de-police-administrative-pour-lutter-contre.

⁵⁷ Tweede Kamer der StatenGeneraal, *Naar een integrale evaluatie van antiterrorismemaatregelen* (The Hague: House of Representatives, 2009), 29, https://www.parlementairemonitor.nl/9353000/1/j4nvgs5kjg27kof_j9vvij5epmj1ey0/vi6v1ktsk9y2/f=/blg20673.pdf.

⁵⁸ According to Article 706-88 of the French Code of Criminal Procedure, the police custody for terrorist offenses can be extended for two periods of 24 hours with the approval of the liberty and detention judge. Article 706-88-1 stipulates that two additional renewals can be authorised, under conditions arising from matters of international cooperation or where there is a threat of an imminent terrorist attack. See: Code of Criminal Procedure (Code de procédure pénale), art. 706-24, accessed July 22, 2025, https://www.legifrance.gouv.fr/codes/texte_lc/LEGITEXT00006671154/2023-12-13/.

⁵⁹ For serious crimes, such as murder, the pre-trial detention can go up to 36 or 96 hours: UK Government, "How long you can be held in custody," last modified June 4, 2024, accessed July 22, 2025, https://www.gov.uk/arrested-your-rights/how-long-you-can-be-held-in-custody. 60 Interview #6

⁶¹ Interview #3; additionally, 'Saints' refers to individuals who have committed acts of mass violence and are subsequently glorified within extremist communities as heroic or inspirational figures.

specialised training or clear referral protocols, such connections risk being overlooked. Existing coordinating bodies, either at the national (e.g. fusion centres) or regional level (e.g., Europol), could be uniquely suited to coordinate efforts and information-sharing between services. This challenge, however, extends beyond law enforcement to frontline actors in education, youth services, and social work. It concerns sectors that may encounter early behavioural indicators of involvement in extremist subcultures but who are not able to recognise the signs, and why awareness campaigns and warnings have been issued in the US, UK, and Canada.

Swatting and doxxing are common tactics but are not always recognised as separate offences. However, various components of the criminal activities can be charged through other criminal offences. ⁶² In the Netherlands ⁶³ and France, ⁶⁴ doxxing has been criminalised, while in other countries, compensation or criminal proceedings may be possible under different laws related to (online) intimidation or harassment or data protection laws. A possible additional barrier may be the difficulty to obtain mutual legal assistance or extradition because under the double criminality principle, which requires that the same offence has to be criminalised in both countries. Although the elements of the offence do not need to be identical, it could be a problem if in one country the activities are regulated in criminal law and in the other in civil law.

While police can monitor and collect publicly available information, many activities related to 764 occur in closed online communities, making investigations challenging. Technical issues such as data volume and end-to-end encryption further complicate access. Collecting online information also raises legal and ethical concerns, affecting the right to privacy, freedom of expression, and the principle of non-discrimination, making robust procedural safeguards essential.⁶⁵

Finally, members, perpetrators, and victims of 764 can be found across the globe, evidencing a strong need for international cooperation, including from platforms located in another country from where the on- or offline crimes are being committed. Relying on existing forms of international cooperation in countering terrorism and organised crime can be utilised in these cases.⁶⁶

Distinguishing Different Types of Online Content

Teenagers are increasingly exposed to harmful content online, including through gaming platforms. Such exposure can contribute to the desensitisation and normalisation of violence among youth.⁶⁷ Teens are furthermore recruited and groomed online to engage in criminal activities, and it is important to distinguish between different types of content. The distinction between terrorist content, illegal content, and harmful content is relevant for both criminal justice responses and content moderation efforts. However, CSAM, terrorist content, and extreme gore are increasingly being shared within the same online ecosystems, complicating efforts to tackle

⁶² For example through harassment laws, see: AUDRi, Doxing, *Digital Abuse and the Law*, February 2024, https://audri.org/wp-content/uploads/2024/02/EN-AUDRi-Briefing-paper-doxing-04.pdf.

⁶³ Articles 285d and 298c of the Dutch Criminal Code: Wetboek van Strafrecht (Dutch Penal Code), BWBR0001854, as amended July 1, 2025, https://wetten.overheid.nl/BWBR0001854/2025-07-01.

⁶⁴ Article 223-1-1 of the French Criminal Code: French Criminal Code (Code penal), art. 223-1-1, version in force as of July 1, 2025, accessed October 2, 2025, https://www.legifrance.gouv.fr/codes/article_lc/LEGIARTI000043974282.

⁶⁵ The legal concerns are often perceived as hurdles, although in the long-term these procedural safeguards ensure legitimacy and enhance public trust in the police. European Commission, Regulation (EU) 2021/784 of 29 April 2021 on addressing the dissemination of terrorist content online, Official Journal of the European Union, L 172/79, April 29, 2021, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32021R0784

⁶⁶ Interview #1, Interview #6

⁶⁷Jeanne Funk Brockmyer, "Desensitization and Violent Video Games: Mechanisms and Neural Correlates," Child and Adolescent Psychiatric Clinics of North America 31, no. 1 (2022): 121–32, https://pubmed.ncbi.nlm.nih.gov/34801150/.

these different types of content.⁶⁸ Several countries, such as Australia, the UK, and France, have adopted mandatory age-verification methods to limit the exposure of minors to harmful content.⁶⁹ Further, in July 2025, the EU has adopted specific guidelines to protect the privacy, safety, and security of minors.⁷⁰ The unintended consequences of such age-estimation methods could restrict the freedom of speech but also access to information, which are vital aspects of the rights of a child in a digital age.⁷¹

The production, possession, and dissemination of the CSAM is illegal in most countries, even if definitions and penalties vary.⁷² Considering the seriousness of the offence, platforms are obligated to remove CSAM, report it to relevant authorities, and preserve any evidence. Under a forthcoming proposal in the EU, platforms will be further required to detect CSAM.⁷³ Most major platforms already have CSAM policies in place and are proactively engaging in detection and removal. However, investigating and prosecuting self-generated CSAM remains a challenge; with teenagers sharing explicitly sexual content voluntarily, it is becoming more difficult to draw a line between when such behaviour is part of developing sexual identities and content qualified as CSAM requiring a criminal justice response.⁷⁴

Even though producing and sharing terrorist content is illegal, possession of terrorist content is generally not, though there are notable exceptions. For example, in the UK, possessing information likely to be used in a terrorist offence—such as bomb- or weapon-making manuals—is criminalised.⁷⁵ The scope of this offence has been further widened under the Online Safety Act (OSA),⁷⁶ raising concerns about overstretching prosecutorial capacities and significant expansion of criminal offences. In the EU, the Terrorist Content Online (TCO) Regulation requires platforms and service providers with significant numbers of users to remove terrorist content upon receiving a removal order from a national competent authority. Under the TCO, platforms must retain the removed content for six months, contrary to the UK, which does not impose a mandatory retention.

⁶⁸ This does not only pose a challenge to platforms, but also to regulatory bodies. In each country, the approach and mandate of these regulatory bodies may differ. The regulatory body in the Netherlands, the Authority for the prevention of online Terrorist Content and Child Sexual Abuse Material (ATKM) is unique as it is mandated to detect and send mandatory removal orders for both CSAM and online terrorist content. Arda Gerkens, "Blootstelling aan extreemgewelddadige online content leidt tot radicalisering van jongeren," *De Volkskrant*, 18 June 2025, https://www.volkskrant.nl/columns-opinie/opinie-blootstelling-aan-extreem-gewelddadige-online-content-leidt-tot-radicalisering-van-jongeren~be35d136/.

⁶⁹ Other countries included are Denmark, Greece, Spain and Italy. Gus Mallett, "Countries That Have Introduced Social Media Age Restrictions," *Tech.co*, December 12, 2024, https://tech.co/news/countries-age-restrictions-social-media.

⁷⁰ European Commission, "Commission Publishes Guidelines on the Protection of Minors," *Digital Strategy*, July 14, 2025, https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-protection-minors; European Commission, "Commission Publishes Guidelines on the Protection of Minors," *Digital Strategy*, July 14, 2025, https://digital-strategy.ec.europa.eu/en/library/commission-publishes-guidelines-protection-minors

⁷¹ United Nations Committee on the Rights of the Child, *General Comment No. 25 (2021) on Children's Rights in Relation to the Digital Environment*, CRC/C/GC/25 (Geneva: United Nations, 2021), 9, https://www.ohchr.org/en/documents/general-comments-and-recommendations/general-comment-no-25-2021-childrens-rights-relation.

⁷² INHOPE, Global CSAM Legislative Overview 2024: An Overview of National CSAM Legislations in INHOPE Member Countries and the Lanzarote Convention State Parties, 2nd ed. (Amsterdam: INHOPE, August 2024), https://inhope.org/media/site/e3bb326ed7-1729001643/global-csam-legislative-overview-2024-full-report.pdf.

⁷³ Under the EU Directive 2011/93/EU Combatting the Sexual Abuse and Exploitation of Children explicitly criminalises production, possession, dissemination and access to the CSAM and imposes an obligation to report and remove CSAM. Furthermore, under the Digital Service Act platforms imposing duties on platforms to act against illegal content, conduct risk assessments and enhance cooperation with national authorities. See: European Commission, *Proposal for a Regulation of the European Parliament and of the Council Laying Down Rules to Prevent and Combat Child Sexual Abuse*, COM/2022/209 final, May 11, 2022, https://eur-lex.europa.eu/legal-content/NL/TXT/?uri=CELEX%3A52022PC0209; European Parliament and Council of the European Union, *Directive 2011/93/EU of 13 December 2011 on Combating the Sexual Abuse and Sexual Exploitation of Children and Child Pornography*, Official Journal of the European Union, L 335/1, December 17, 2011, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32011L0093; European Parliament and Council of the European Union, *Regulation (EU) 2022/2065 of 19 October 2022 on a Single Market for Digital Services and Amending Directive 2000/31/EC (Digital Services Act)*, Official Journal of the European Union, L 277/1, October 27, 2022, https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32022R2065.

⁷⁴ Boglárka Meggyesfalvi, "Challenges in Investigating Self-Generated Online Child Sexual Abuse Material," *Belügyi Szemle* 72, no. 2 (2024): 329–39, https://doi.org/10.38146/BSZ.2024.2.8.

⁷⁵ Article 57 of the Terrorism Act 2000.

⁷⁶ Online Safety Act 2023, c. 50, https://www.legislation.gov.uk/ukpga/2023/50/contents. To establish individual criminal responsibility, the material element referring to conduct, and the mental element referring to intent, need to be proven. Possession of terrorist content is rather a passive activity than conduct and criminalises behaviour in the pre-crime space.

Under the Digital Service Act (DSA), large platforms are obligated to take measures to prevent the spread of content that promotes self-harm and suicide—material often associated with 764. Similar obligations exist under the UK's OSA, which also criminalises encouraging or online assisted suicide and self-harm.

Finally, while there is no specific legal obligation to remove or report gore content such as torture, extreme violence, and animal cruelty, research indicates that gore websites are being used to share terrorist content.⁷⁷ Moderation of gore content currently falls under the discretion of individual platforms.

According to data made available by YouTube (Alphabet) and Facebook/Instagram (Meta), there is no discernible trend across online platforms indicating that CSAM is removed more frequently than gore or violent extremist content. 78 At the same time, gaming(-adjacent) platforms Discord and Roblox report taking down CSAM more frequently than either gore or violent extremist content. 79

Designating the 764 Network

Another possible option is to designate the 764 network as a terrorist organisation. Whilst there are significant differences between designating in the US, proscribing in the UK, and listing in the EU, this section examines briefly the criteria, implications, and effectiveness of terrorist designations.

A key advantage is that membership to a designated or proscribed organisation in both the UK and the US constitutes a criminal offence. Designation also enables prosecuting for terrorist offences, including those of a precursor nature, such as receiving or giving (online) training and the glorification of terrorism through the dissemination of terrorist content. In the Netherlands, a draft bill currently under consideration criminalises this exact offence, citing explicitly how teenagers are susceptible to extremist ideologies online and the growing fascination for extreme violence among right-wing extremist groups.⁸⁰

A potential challenge with respect to designations is timing. Policymakers often feel urgency to designate groups quickly, whereas law enforcement prefers to wait and gather additional evidence to better understand a network's operations and potentially pursue more serious charges. Once a group has been designated as terrorist, there is a real risk that its members may fragment into undetected channels, lay low temporarily, or go offline altogether, potentially complicating efforts to monitor activities and gather evidence. ⁸¹

⁷⁷ Human Digital, Ali Fisher, and Arthur Bradley, *Gore Extremism*, July 4, 2025, https://voxpol.eu/wp-content/uploads/2025/07/DCUPN0751-Gore-Extremism-WEB-250704.pdf.

⁷⁸ In the first quarter of 2025, Meta removed more content for being extremist or terrorist in nature than for child sexual exploitation: 7.5 million posts on Facebook were taken down for terrorism/extremism, compared to 4.6 million for child sexual exploitation; on Instagram, the figures were 4.3 million versus 1.5 million, respectively. Conversely, on YouTube, child endangerment—a broader category that includes but is not limited to child sexual exploitation—accounted for 54.0% of videos and 4.3% of channels removed, compared to just 3.5% of videos and 1.1% of channels removed for terrorism-related community guidelines violations. As for gore and graphic violence, Facebook removed 0.09% of posts for violating violent and graphic content policies, and Instagram 0.06%; on YouTube, 8.7% of videos and 0.4% of channels were taken down for similar violations. See: Meta, Community Standards Enforcement Report, Transparency Center, accessed July 23, 2025, https://transparency.meta.com/policies/improving/community-standards-enforcement-report; Google, YouTube policy removals, Transparency Report, accessed July 23, 2025, https://transparencyreport.google.com/youtube-policy/removals.

⁷⁹ In 2024, Discord undertook nearly 42 000 actions to take down terrorist content, while some 320 000 actions were taken against CSAM violations. Roblox received roughly 105 000 notices from users regarding CSAM and some 36 000 regarding terrorist and extremist content, while it undertook nearly 43 000 actions against CSAM and some 99 000 actions against terrorist and extremist content on its own initiative. See: Discord, *Transparency Hub*, accessed July 23, 2025, https://discord.com/safety-transparency; Roblox, *Transparency Hub*, accessed July 23, 2025, https://corp.roblox.com/transparency.

⁸⁰ Other countries, notably the UK, France, and Spain have also criminalised glorification of terrorism. When the terms terrorism and glorification are defined in broad terms it can infringe on the freedom of expression.
81 Interview #3.

One of the key elements for designation is whether an online network meets the criteria of an *organisation*, has clearly identifiable members, and is engaged in terrorist activities. In 2024, for example, the UK proscribed the Terrorgram Collective, a loosely connected and nebulous neo-Nazi network operating online. Under UK terrorism legislation, the term organisation is broadly defined and "includes any association or combination of persons" that is "concerned with terrorism". The Terrorgram Collective incites and encourages terrorism and glorifies attacks. Yet it is questionable whether the Terrorism Collective truly constitutes an organisation with clearly defined members, and how to distinguish those who create and spread harmful content from those who merely 'consume' it.

The 764 network is made up of fluid and constantly changing constellation of splinter groups and offshoots making it difficult to determine whether newly identified groups are rebranded offshoots, alliances, or simply subgroups operating under the 764.⁸⁴ It is an online network that operates on the basis of prestige, with several intelligence practitioners interviewed indicating that the more extreme violence is used by a member, the higher standing they enjoy within their respective (sub)groups.⁸⁵ One practitioner even noted that 764 communities are more hierarchical and organised than other online communities, such as Terrorgram.⁸⁶ Research seems to support that 764's members can advance within the network based on demonstrated commitment and the production of violent, extreme content.⁸⁷ This indicates that 764 might meet organisational criteria despite operating in a wide network, although it remains unclear whether formal hierarchies exist at all. In addition, questions remain whether (all of) its activities can be qualified as terrorist offences; 764 operates at the intersection of violent extremism, child exploitation, and other forms of serious violence which constitute criminal offences, but not necessarily terrorist offences.

To be listed in the EU, terrorist acts must be committed with the *aim* to seriously intimidate a population, compel a government or an international organisation to act (or refrain from acting), or to seriously destabilise or destroy a country's fundamental structures. No matter how disturbing and cruel the crimes by 764's members are, it is debatable whether they are committed with the intent to seriously intimidate a population or if this is merely a consequence of their actions. There is no indication that 764 seeks to compel a government or international organisation to act in a certain way, nor clear signs (yet) that 764 has the intention to disrupt political processes or the democratic legal order. Nevertheless, as the number of investigations rises, both the scale and severity of detected activities could be indicative of whether 764 could pose a terrorist threat to a country. Groups like 764 are a growing threat to the well-being of minors and thus a societal harm, but do not necessarily pose a threat to national security, which is at the heart of designations.

In the UK, the ideological aspect is a requirement for proscription; ideology may be inferred, and the target and method used to serve as useful indicators.⁸⁸ Whether extreme violence or committing violence for the sake of control or notoriety in 764 are reliable indicators is questionable and would risk labelling someone for terrorism, while there is only personal pleasure in committing

⁸² This includes committing or participating in acts of terrorism, preparing for terrorism, promoting or encouraging terrorism. The latter also includes unlawful glorification: Terrorism Act 2000, c. 11, \S 3. https://www.legislation.gov.uk/ukpga/2000/11/section/3.

⁸³ As stated by the Home Secretary, "[i]ts core leadership provides direction to the preparation of propaganda campaigns and coordinates activity between participants to disseminate terrorist content to advance accelerationist ideology." *Home Office, Explanatory Memorandum to the Terrorism Act 2000 (Proscribed Organisations) (Amendment) (No. 2)* Order 2024, 2024, https://www.legislation.gov.uk/ukdsi/2024/9780348260656/pdfs/ukdsiem_9780348260656_en_001.pdf.

⁸⁴ To give an example, NLM has produced a series of terror guides, one of them was jointly released with 764, the so-called "NLM x 764 Classified", yet NLM has formally stated it has not formed any alliance with 764. The two minors in Sweden who have allegedly stabbed people have links to both 764 and NLM, illustrating that a "mix and match" approach from different ideologies is common at individual level. 85 Interviews #4 & #5.

⁸⁶ Interview #4

⁸⁷ Marc-André Argentino, "Blood, Betrayal, and Branding: Inside 764's Hierarchy of Horrors," *From The Depths*, March 7, 2025, https://www.maargentino.com/blood-betrayal-and-branding-inside-764s-hierarchy-of-horrors/.

88 Interview #1.

extreme violence, no matter how deplorable.⁸⁹ Furthermore, proving whether minors–including those who have been groomed—are even capable of adhering to an ideology is doubtful.

Assessing the *effectiveness* of the designation or proscription of an online network remains challenging, including in the US, where Terrorgram has recently been designated as a Specially Designated Terrorist Group (SDTG). This classification differs from that of a Foreign Terrorist Organisation (FTO).⁹⁰ The main difference is that knowingly providing material support or resources to an FTO constitutes a criminal offence.⁹¹ Membership in an FTO can also result in a ban from entering the US for non-US citizens. Conversely, an SDTG designation primarily targets the financial activities of the group, disrupting access to funds in the US and international financial systems. It allows for sanctions against individuals and entities transacting with the designated group. Unlike previous designations of far-right organisations—such as the Russian Imperial Movement (SDTG) and the Nordic Resistance Movement (FTO)—Terrorgram has a significantly larger number of US-affiliated individuals implicated in its activities. As such, the designation of Terrorgram is expected to have a comparatively greater impact.⁹²

However, in the UK, Terrorgram has been designated for more than a year. One of the main powers granted to law enforcement is the ability to compel social media platforms to remove the content or block access to their users in the UK. In the absence of proscription, the removal of such content remains at the discretion of platforms and is governed by their own terms of service. Proscription offers clearer legal guidance to platforms and has been cited as one of the reasons for the designation of another online white supremacist group, the Maniac Murder Cult. Yet, it is difficult to assess whether the proscription has yielded results. Several of the group's leaders had already been arrested and prosecuted in Canada and the UK prior to designation and may have disrupted the network independently of the proscription.

The lack of financial assets and online presence of organisations engaged in terrorist activities could also limit the effectiveness of a terrorist designation, in particular in the EU. The sanctions consist of an asset freeze and a travel ban, and EU citizens and companies may not finance or make funding available to those listed. So far, little is known regarding the financial assets of the 764 network. Designation is a powerful tool if a group has a physical presence in a country. The impact of designating an online decentralised entity, with potential influencers, creators and users, abroad limits its effect of taking action against the group, but could deter individuals from joining the group online. In contrast to Terrorgram, 764 utilises several social media and gaming platforms such as Discord, Roblox and Telegram. Another counter-productive implication of designating terrorist groups that are driven by notoriety, such as 764, is that the designation could have an amplifying effect.

⁸⁹ The UK extremism policy has undergone many changes and over the years recalibrated and expanded the definition of extremism which could also be used to proscribe apologists of terrorism such as Hizb ut-Tahrir or more recently pro-Palestina groups such as Palestine Action, thus not only targeting those that commit or incite criminal action, but also those that peacefully demonstrate. See, for example: Clive Walker, "Extremism and the UK Policy Spiral," *International Centre for Counter-Terrorism*, 2024, accessed July 24, 2025, https://icct.nl/publication/extremism-and-uk-policy-spiral.

⁹⁰ U.S. Department of State, *Executive Order 13224*, accessed July 23, 2025, https://www.state.gov/executive-order-13224/#state.
91 The term "material support or resources" means any property, tangible or intangible, or service, including currency or monetary instruments or financial securities, financial services, lodging, training, expert advice or assistance, safehouses, false documentation or identification, communications equipment, facilities, weapons, lethal substances, explosives, personnel (1 or more individuals who may be or include oneself), and transportation, except medicine or religious materials. See: 18 U.S. Code § 2339A - *Providing material support to terrorists, Legal Information Institute*, accessed July 24, 2025, https://www.law.cornell.edu/uscode/text/18/2339A.

⁹² Colin P. Clarke, Camden Carmichael, and Seamus Hughes, "Why the Terrorgram Collective Designation Matters," *Lawfare*, January 15, 2025, https://www.lawfaremedia.org/article/why-the-terrorgram-collective-designation-matters.

⁹³ Interview #2.

⁹⁴ Home Office, Explanatory Memorandum to the Terrorism Act 2000.

⁹⁵ Interview #2. One of the steps that needs to be taken after proscription is raising awareness amongst frontline practitioners that Terrorgram Collective is listed and its implications. At the time of writing, no members of Terrorgram Collective have been prosecuted for membership of a proscribed organization.

⁹⁶ Australia initially imposed financial sanctions on Terrorgram and later, in February 2025, listed the group. The implications of listing in Australia are more far-reaching as a broad range activities such as membership, recruitment, training and providing support are criminalised with severe penalties up to 25 years' imprisonment. Tony Burke, "Terrorgram Listed as Terrorist Organisation," *Australian Government Minister for Home Affairs*, June 27, 2025, https://minister.homeaffairs.gov.au/TonyBurke/Pages/terrorgram-listed-as-terrorist-organisation.aspx.

Conclusions and Policy Recommendations

While the focus of this policy brief is on 764, this is just one of the most prolific and heinous groups operating within the larger com-network that should also be addressed.

The 764 network comprises a multi-layered ecosystem of varying offshots and subgroups engaged in criminal behaviours. Its members—often teenagers—compete for recognition and encourage one another to commit heinous acts of violence. Their motivations appear to stem less from coherent, singular ideological commitments and more from personal drivers such as clout-chasing or a desire for notoriety.

Authorities in several countries have begun to signal the growing threat posed by 764. However, the extent to which the network constitutes a threat to national security remains unclear. The difficulty in identifying and delineating the 764 network from other extremist groups complicates detection efforts, hinders appropriate criminal justice responses, and challenges the engagement of relevant stakeholders. A more comprehensive understanding of the network's financial ecosystem could support targeted interventions, including disrupting any potential funding streams.

Some of the challenges are not unique to 764 and fit in a broader terrorism trend, such as the lack of a strong ideological commitment, the rise of teenagers in terrorism-related activities, the normalisation of violence and the online radicalisation. The last several years we have seen a trend of ideological fluidity or ideological window-shopping, also referred to as the hybridisation of ideologies. ⁹⁷ The same trend can be observed within 764, where satanic aesthetics meet neo-Nazi, accelerationist, or otherwise right-wing extremist viewpoints.

The perpetrators (and victims) of 764 are predominantly minors, reflecting a broader trend of an increasing number of youth involved in terrorist activities, whether linked to jihadism or right-wing extremism. In a rare public statement, the Five Eyes security and law enforcement agencies expressed concern about minors being drawn into terrorism and violent extremism. ⁹⁸ The online dimension of youth radicalisation and the use of technology is not unique to 764, but is also observed within jihadism and right-wing extremism. Although different social media platforms and online tactics—such as signposting to lure minors into closed chat groups—are employed, youth are increasingly being radicalised, including by other young people. A similar trend can be seen in South and Southeast Asia, where youth are also being radicalised online.⁹⁹

Finally, the normalisation of violence among youth is a major concern. Platform algorithms can amplify violent content, contributing to the normalisation of violence among young people.¹⁰⁰

Placing 764 in this broader context can help provide a better understanding of the phenomenon. Based on interviews and research, the recommendations below are intended to assist policymakers and practitioners in the detection, investigation, prosecution, and potential designation of 764.

⁹⁷ Alexander Meleagrou-Hitchens, *The Age of Incoherence? Understanding Mixed and Unclear Ideology Extremism* (Washington, DC: Program on Extremism, George Washington University, June 15, 2023), https://extremism.gwu.edu/sites/g/files/zaxdzs5746/files/2023-06/the-age-of-incoherence-final.pdf; D. Gartenstein-Ross, "Composite Violent Extremism: Conceptualizing Attackers with Mixed and Unclear Ideologies," *Studies in Conflict & Terrorism*, 2023, https://www.tandfonline.com/doi/full/10.1080/1057610X.2023.2194133.

⁹⁸ Australian Security Intelligence Organisation (ASIO), Young People and Violent Extremism: A Call for Collective Action (Canberra: ASIO, December 2024), https://www.asio.gov.au/system/files/2024-12/Young%20people%20and%20violent%20extremism%20-%20a%20call%20 for%20collective%20action.pdf.

⁹⁹ The Soufan Center, "The Online Radicalization of Youth Remains a Growing Problem Worldwide," *IntelBrief*, September 9, 2025, https://thesoufancenter.org/intelbrief-2025-september-9/.

¹⁰⁰ Kaitlyn Regehr, Caitlin Shaughnessy, Minzhu Zhao, and Nicola Shaughnessy, *Safer Scrolling: How Algorithms Popularise and Gamify Online Hate and Misogyny for Young People* (Association of School and College Leaders, February 2024), https://www.ascl.org.uk/ASCL/media/ASCL/Help%20and%20advice/Inclusion/Safer-scrolling.pdf.

Raise awareness amongst law enforcement and frontline practitioners

Targeted training, the development of a list of behavioural and digital indicators, and clear referral protocols will improve detection and identification of links between online criminality and the linkages with 764 network. Liaising or coordinating with Europol regarding ongoing investigations can also be helpful in identifying potential links to other victims, perpetrators or related cases.

Strengthen international cooperation

Considering the transnational nature of the 764 network, international cooperation is crucial. This can be achieved by leveraging Interpol's International Child Sexual Exploitation database or seeking assistance from Europol's European Cybercrime Centre to detect CSAM, identify victims, and share information amongst law enforcement.

Use the full extent of criminal law

As a more complete picture of 764 emerges, prosecutors could already charge members of the group for a range of criminal offences, including utilising different modes of liability. Committing violence for the sake of violence and causing extreme harm could be taken into account as aggravating circumstances. Policymakers could also explore whether certain online activities, such as doxxing, swatting, or online assisting suicide, could be criminalised in national contexts where such actions are not yet illegal.

Develop coherent platform policies tailored to extremism that intersects with CSAM

764 creates content that sits at the intersection of different categories of content and is regulated by different policies of hosting platforms. As a result, certain linkages can be overlooked. By sharing data—albeit anonymised—tools and practices across different categories of content and across platforms, certain patterns and trends could be detected and lead to more effective moderation. Furthermore, platforms should consider reinforcing algorithmic safeguards to prevent the sharing of both extremist and CSAM-related materials and to adopt age-specific filters.

Carefully consider whether the designation is suitable

Finally, a thorough assessment is needed to determine if 764 qualifies as a terrorist organisation. States should carefully consider the effectiveness of designating a decentralised online network, rather than using designation solely to unlock special investigative tools and the possibility of pursuing terrorist offences. A purely symbolic designation risks undermining the purpose and credibility of terrorist listings long-term.

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