



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF
INSPECTOR GENERAL

May 17, 2022

OIG-CA-22-015

MEMORANDUM FOR DEPARTMENT OF DEFENSE
LEAD INSPECTOR GENERAL

FROM: Gregory Sullivan /s/
Audit Director

SUBJECT: Overseas Contingency Operations - Summary of Work
Performed by the Department of the Treasury Related to
Terrorist Financing and Anti-Money Laundering for Second
Quarter Fiscal Year 2022

This summary provides an update on the Department of the Treasury's (Treasury) programs to combat terrorist financing. Per your request, we provided this information in a question and answer format to help streamline the information. This information is provided by Treasury management and is not audited by Treasury Office of Inspector General.

Q1. In an unclassified, publicly releasable format, provide information on individuals and organizations sanctioned for providing support to the Islamic State of Iraq and Syria (ISIS) as follows:

- a. **Reasonable estimate of the cumulative number of individuals and organizations sanctioned (by Treasury, not cumulative with State) for providing support to ISIS since 2014.**

Treasury told us it uses the full range of its authorities to aggressively target ISIS leaders, operatives, and associated organizations around the world. These efforts resulted in Treasury designating 104 ISIS-associated individuals and organizations since 2014.

b. Details on individuals and organizations sanctioned for providing support to ISIS during the reporting period: January 1, 2022 – March 31, 2022.

On March 1, 2022, Treasury sanctioned four South Africa-based ISIS financial facilitators pursuant to Executive Order (EO) 13224.¹

Farhad Hooper was sanctioned for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS. Between 2017 and 2018, Hooper helped organize and begin the operations of a Durban, South Africa-based ISIS cell. Hooper, the leader of the Durban-based ISIS cell, provided some of his known residential properties and vehicles registered in his name to sponsor the cell's meetings and operational activities. In his role, Hooper claimed to have recruited and trained cell members and was in contact with members of ISIS-Democratic Republic of the Congo and ISIS supporters throughout South Africa. Hooper raised funds through kidnap-for-ransom operations and extortion of major businesses, which provided more than one million South African rand in revenue for his cell. In 2018, South African authorities arrested Hooper, along with his associates, for their involvement in a plan to deploy improvised incendiary devices near a mosque and commercial and retail buildings.

Siraj Miller was sanctioned for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS. Miller, who leads a Cape Town-based group of ISIS supporters, provided financial assistance to ISIS by training members to conduct robberies to raise funds for ISIS. In 2018, Miller also aided in acquiring temporary safe houses for ISIS.

Abdella Hussein Abadigga was sanctioned for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS. Abadigga recruited young men in South Africa and sent them to a weapons training camp. Abadigga, who controlled two mosques in South Africa, used his position to extort money from

¹ EO 13224, "Blocking Property and Prohibiting Transactions With Persons Who Commit, Threaten To Commit, or Support Terrorism," (September 23, 2001) targets terrorists and those who have materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of terrorists.

members of the mosques. Abadigga sent these funds via a hawala² to ISIS supporters elsewhere in Africa. Bilal al-Sudani, a U.S.-designated ISIS leader in Somalia, considered Abadigga a trusted supporter who could help ISIS supporters in South Africa become better organized and recruit new members.

Peter Charles Mbaga was sanctioned for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS-Mozambique (ISIS-M). Mbaga facilitated funds transfers from South Africa. Mbaga sought to provide support to ISIS-M by helping the group procure equipment from South Africa. Mbaga also sought to procure weapons from Mozambique.

- c. The number, if any, of previously sanctioned individuals and/or organizations removed from the sanctions list during the reporting period: January 1, 2022 – March 31, 2022.**

No sanctioned individuals or organizations were removed from the sanctions list this reporting period.

Q2. In an unclassified, publicly releasable format, describe what was done this quarter with Coalition partners in Iraq and Syria to disrupt ISIS financial networks.

Treasury told us it continues to work with interagency and Coalition partners, including the Government of Iraq, to prioritize identifying ISIS's financial reserves and financial leaders, and disrupting ISIS's financial facilitation networks in the Middle East. In addition, Treasury is working to designate ISIS facilitators, front companies, and fundraisers in various countries. Treasury also takes a leadership role in the Global Coalition to Defeat ISIS, serving as a co-lead of the Counter ISIS Finance Group along with its counterparts from Italy and Saudi Arabia.

² Hawala is an alternative or parallel remittance system. It exists and operates outside of, or parallel to, traditional banking or financial channels. The components of a hawala that distinguish it from other remittance systems are trust and the extensive use of connections such as family relationships or regional affiliations.

Q3. In an unclassified, publicly releasable format, describe ISIS funding in Iraq and Syria, to include what has changed since last quarter, the estimated amount of funds at its disposal, how funds are generated and distributed, and any shortfalls in the amount or distribution of funds this quarter.

Treasury told us ISIS's financial situation remains largely unchanged since the previous quarter. ISIS continued to raise funds through extortion of oil smuggling networks in eastern Syria, kidnapping for ransom targeting civilian businesses and populations, extortion, looting, and the possible operation of front companies. The group relied on money services businesses (MSB), including hawalas, throughout Iraq, Syria, and Turkey, to transfer funds internationally. ISIS probably has tens of millions of U.S. dollars available in cash reserves dispersed across the region, but Treasury does not know the amount of money ISIS distributed during this quarter.

Q4. In an unclassified, publicly releasable format, describe ISIS-core's³ methods and ability to move funds into and out of Syria and Iraq.

Treasury told us ISIS's financial situation remains largely unchanged compared to the previous quarter. ISIS continued to use MSBs, including hawalas, to move funds in and out of Iraq and Syria, often relying on ISIS facilitators in Turkey and in other financial centers. ISIS also continued to use networks of couriers to smuggle cash between Iraq and Syria. In addition, ISIS supporters also use virtual currencies and online fundraising platforms to transfer funds, including to Internally Displaced Persons camps, such as al-Hawl.⁴ The group's supporters gathered and sent funds to intermediaries in Turkey who then smuggled the cash into Syria or sent the funds to hawalas operating in the camp.

³ ISIS-core refers to the main portion of ISIS in Iraq and Syria, along with the key leaders of the global organization. The term is mainly used to differentiate the main ISIS leadership from the regional ISIS affiliates, such as ISIS-K in the Khorasan region and ISIS-Philippines.

⁴ Al-Hawl is an Internally Displaced Persons camp in northern Syria housing upwards of 70,000 refugees. It holds one of the largest concentrations of current and former ISIS members who continue to receive donations from ISIS supporters internationally. The Tawasul hawala in al-Hawl served ISIS members and transferred payments for ISIS from outside Syria.

Q5. In an unclassified, publicly releasable format, describe Treasury's actions to unfreeze Afghan government assets held in U.S. bank accounts, to include Da Afghanistan Bank's (DAB) assets inside the United States. Additionally, describe Treasury's role in transferring \$3.5 billion to Afghans in the form of humanitarian aid.

Treasury told us EO 14064⁵ blocks⁶ roughly \$7 billion DAB assets held in the United States. The Administration seeks to facilitate access to \$3.5 billion of those assets for the benefit of the Afghan people, while leaving in place more than \$3.5 billion in light of ongoing litigation by U.S. victims of terrorism and their relatives.⁷

The transfer of funds from DAB's accounts in the United States for the benefit of the Afghan people will be a multi-step process. None of these funds will go to the Taliban, which remains subject to U.S. sanctions. Treasury is currently working with third parties to create and oversee a trust fund that will direct resources to implementers and multilateral organizations who have significant experience in delivering effective aid to Afghanistan while minimizing touchpoints with the Taliban and maintaining appropriate controls to prevent diversion and illicit activity.

Q6. In an unclassified, publicly releasable format, describe Treasury's role in (1) issuance of licenses to facilitate the continued delivery of humanitarian assistance to Afghanistan; and (2) placing Taliban officials on the Specially Designated Nationals list, and its impact on Treasury's ongoing sanctions against the Taliban regime.

The Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals. An OFAC general license authorizes a

⁵ EO 14064, "Protecting Certain Property of Da Afghanistan Bank for the Benefit of the People of Afghanistan," (February 11, 2022) was issued as part of the U.S. Government's ongoing efforts to address the humanitarian and economic crisis in Afghanistan.

⁶ Blocking (also known as freezing) assets is a way of controlling targeted property and immediately imposes an across-the-board prohibition against transfers or dealings of any kind with regard to the property. EO 14064 also requires U.S. financial institutions to transfer the blocked property into a consolidated account held at the Federal Reserve Bank of New York.

⁷ The White House Briefing Room, "FACT SHEET: Executive Order to Preserve Certain Afghanistan Central Bank Assets for the People of Afghanistan" (February 11, 2022).

particular type of transaction for a class of persons under OFAC sanctions without the need to apply for a specific license.⁸

Most recently, on February 25, 2022, OFAC issued General License No. 20,⁹ which authorizes transactions involving Afghanistan or governing institutions in Afghanistan, subject to certain conditions. This includes humanitarian assistance as well as other commercial activity in or involving Afghanistan. OFAC has issued a total of seven Afghanistan-related general licenses to authorize certain transactions involving the Taliban, the Haqqani Network,¹⁰ and, in the case of General License No. 20, blocked individuals who are in leadership roles of governing institutions in Afghanistan.

⁸ A license is an authorization from OFAC to engage in a transaction(s) that otherwise would be prohibited. There are two types of licenses: general licenses and specific licenses. General licenses allow all U.S. persons to engage in the activity described in the general license without needing to apply for a specific license. A specific license is a written document issued by OFAC to a particular person or entity, authorizing a particular transaction in response to a written license application.

⁹ OFAC General License No. 20, "Authorizing Transactions Involving Afghanistan or Governing Institutions in Afghanistan" (February 25, 2022).

¹⁰ The Haqqani Network is a Sunni Islamist militant organization primarily based in North Waziristan, Pakistan. It conducts cross-border operations into eastern Afghanistan and Kabul.