



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF
INSPECTOR GENERAL

July 9, 2019

OIG-CA-19-019

MEMORANDUM FOR DEPARTMENT OF DEFENSE
LEAD INSPECTOR GENERAL

FROM: Gregory Sullivan /s/
Audit Director

SUBJECT: Operation Inherent Resolve - Summary of Work Performed by
the Department of the Treasury Related to Terrorist
Financing, ISIS, and Anti-Money Laundering for Third Quarter
Fiscal Year 2019

This summary provides an update on the Department of the Treasury's (Treasury) programs to combat terrorist financing and activities to disrupt the Islamic State of Iraq and Syria's (ISIS) financing. Per your request, we have provided this information in a question and answer format to help streamline the information.

Q1. In a publicly releasable format, provide information on individuals and organizations sanctioned for providing support to ISIS as follows:

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

Treasury continues to use the full range of its authorities to aggressively target ISIS leaders and operatives around the world. These efforts have resulted in the United States designating 77 ISIS-associated individuals and organizations since 2014.

b. Details on individuals and organizations sanctioned for providing support to ISIS during this reporting period and the reporting period: April 1 – June 30, 2019.

The following seven individuals and one entity were designated by Treasury on April 15, 2019, pursuant to Executive Order 13224,

which targets terrorists and those providing support to terrorists or acts of terrorism:

- Halima Adan Ali (Halima)
- Mushtaq Talib Zughayr al-Rawi (Mushtaq)
- Umar Talib Zughayr al-Rawi (Umar)
- Walid Talib Zughayr al-Rawi (Walid)
- Muhannad Mushtaq Talib Zughayr al-Rawi (Muhannad)
- Abd-al-Rahman 'Ali Husayn al-Ahmad al-Rawi (Abd-al-Rahman)
- Muhammad Abd-al-Qadir Mutni Assaf al-Rawi (Muhammad)
- Al-Ard Al-Jadidah Money Exchange Company (Al-Ard Al-Jadidah)

Halima, Mushtaq, Umar, Abd-al-Rahman, Muhammad, and Al-Ard Al-Jadidah were designated for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to, or in support of, ISIS. Walid and Muhannad were designated for assisting in, sponsoring, or providing financial, material, or technological support for, or financial or other services to, or in support of, Mushtaq.

Halima played an integral role in an ISIS financial facilitation network spanning Europe, the Middle East, the Americas, and Eastern Africa. She worked with Treasury-designated Waleed Ahmed Zein¹ to conduct transactions in support of ISIS fighters. Halima received large sums of money world-wide, mostly through hawalas, which she forwarded to ISIS fighters in Syria, Libya, and central Africa.

Mushtaq was a leader of the Rawi Network.² Mushtaq operated the Rawi Network with the assistance of various family members, including his son, Muhannad, his brothers, Umar and Walid, and other family members, including Abd-al-Rahman. He laundered money to facilitate ISIS operations worldwide. Walid was purportedly the brains behind the finance operation and maintained accounts and records for Mushtaq. Umar and Abd-al-Rahman performed and managed ISIS transactions. Muhannad facilitated Mushtaq's money through various exchanges. Muhammad also transferred money for Mushtaq, Walid, and other ISIS members.

¹ Waleed Ahmed Zein was designated by Treasury on September 7, 2018.

² The Rawi Network is a key ISIS financial facilitation group based out of Iraq, which was the target of a joint Treasury and Department of Defense action in October 2018.

The designated entity, Al-Ard Al-Jadidah served as a money exchange used by ISIS members in Iraq and transferred money for ISIS and delivered money to all the provinces of Iraq. It was also part of the Rawi Network and Mushtaq facilitated money transfers between the exchange company and hawalas in Iraq.

c. The number, if any, of previously sanctioned individuals and/or organizations removed from the sanctions list during the reporting period: April 1 – June 30, 2019.

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