



DEPARTMENT OF THE TREASURY
WASHINGTON, D.C. 20220

OFFICE OF
INSPECTOR GENERAL

October 8, 2019

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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 Fourth
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 86 ISIS-associated individuals and organizations since 2014.

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

On September 10, 2019, Treasury utilized newly enhanced counterterrorism sanctions authorities under Executive Order (EO)

13244¹ to designate the following terrorist leaders, facilitators, and entities providing support to ISIS:

Marwan Mahdi Salah Al-Rawi (Al-Rawi)

Al-Rawi is identified as Redin Exchange’s Chief Executive Officer. Treasury designated Redin Exchange for materially assisting, sponsoring, or providing financial, material, or technological support for, or goods or services to, Hamas. In late January 2018, Treasury-designated ISIS financial facilitator, Walid Talib Zughayr al-Rawi, was aware of an approximately \$500,000 financial transaction of Redin Exchange administrator Marwan al-Rawi.

Saksouk Company for Exchange and Money Transfer (Saksouk)

Saksouk handled fund transfers on behalf of Syria-based ISIS members. Saksouk was sanctioned for providing financial facilitation for ISIS.

Al Haram Foreign Exchange Co. Ltd. (Al Haram Exchange)

Al Haram Exchange was involved in an ISIS financial transfer between Syria and Belgium. The exchange was sanctioned for providing financial facilitation for ISIS.

Al-Khalidi Exchange (Al-Khalidi)

Al-Khalidi is an ISIS-affiliated hawala financial exchange office. All locations were run by two individuals who knowingly assisted ISIS members in financial transfers. Al-Khalidi’s office in Mayadin, Syria also served as an internet café for ISIS members in addition to its

¹ On September 9, 2019, President Trump signed EO 13886, *Modernizing Sanctions to Combat Terrorism*, which added new amendments to EO 13224, providing the U.S. Government with new tools to better identify and designate perpetrators of terrorism worldwide. These new amendments provide additional authorities for designation of entities and individuals as Specially Designated Global Terrorists (SDGT) if they attempt to commit acts of terrorism, participate in training to commit such acts, are leaders of designated terrorist organizations, or own or control an SDGT. The EO now authorizes correspondent account or payable-through account sanctions against non-US financial institutions determined to have knowingly conducted or facilitated any significant transactions on behalf of an SDGT. This new authority serves to put all foreign financial institutions on notice that enabling terrorists and their financial backers to rely upon the international financial system to facilitate their malign activities will have consequences.

function as a hawala money transfer office. The organization was sanctioned for providing financial facilitation for ISIS.

Al-Hebo Jewelry Company (al-Hebo)

Al-Hebo was involved in an ISIS scheme to convert gold into cash to more efficiently and secretly send funds via hawalas in Turkey to ISIS sleeper cells in Iraq and Syria. The exchange was sanctioned for facilitating money laundering and financial facilitation for ISIS.

Muhamad Ali al-Hebo (Muhamad)

Muhamad, al-Hebo's owner, was involved in procuring precious metals to enable ISIS to produce its own ISIS coinage. The organization was sanctioned for providing financial facilitation to ISIS.

Mohamad Ameen (Ameen)

Ameen is an ISIS-Khorasan (ISIS-K) recruiter who encouraged people to join ISIS-K. Ameen told a Maldivian citizen and digital media member of ISIS-K to go to Afghanistan because the ISIS-K media group needed him. He was sanctioned for facilitating recruitment efforts.

Almaida Marani Salvin (Salvin)

Salvin was sanctioned for providing financial facilitation and logistical support to members of ISIS-Philippines.

Muhammad Ali Sayid Ahmad (Ahmad)

Ahmad participated in training provided by ISIS, including sniper training and reconnaissance training. He was sanctioned under the new training authorities in EO 13244.

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

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

d. Describe what is being done with Coalition partners in Iraq and Syria to disrupt ISIS financial networks.

In addition to the above designations, Treasury leverages its participation and influence in several multilateral fora to develop a shared understanding of the threat posed by ISIS, as well as encourage countries to take action within their jurisdictions and in coordination with others to disrupt ISIS financing and facilitation.

United States co-chairs, along with Saudi Arabia and Italy, the Counter ISIS Finance Group (CIFG), a working group of the Defeat ISIS Coalition, which convenes 54 members and observers, approximately twice per year, to share information and coordinate multilateral actions that target ISIS's global financial networks, including in Iraq and Syria. The next meeting of the CIFG will be November 19th and 20th, 2019 in Luxembourg.

As a Coalition Working Group co-lead, Treasury senior leadership also participated in the Political Directors Meeting of the Global Coalition to Defeat ISIS on June 25, 2019 in Paris, France. Deputy Assistant Secretary Anna Morris represented Treasury at this meeting and briefed the Global Coalition leadership on updates from the CIFG working group.