

Treasury Targets Wide Range of Terrorists and Their Supporters Using Enhanced Counterterrorism Sanctions Authorities

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President Trump's Updated E.O. 13224 Provides New Tools to Deter Evolving Threats

Washington – Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) utilized newly enhanced counterterrorism sanctions authorities to designate a series of terrorist leaders, facilitators, and entities. Equipped with new tools from President Trump's recently updated Executive Order (E.O.) 13224, which became effective today, Treasury designated 15 leaders, individuals, and entities affiliated with terror groups. Today's action targets a wide array of groups, including entities affiliated with HAMAS, the Islamic State of Iraq and Syria (ISIS), al-Qa'ida, and the Islamic Revolutionary Guard Corps Qods-Force (IRGC-QF), and combined with actions taken by the State Department amounts to some of the furthest reaching designations of terrorists and their supporters in the past 15 years.

"Since the horrific attacks of 9/11, the U.S. government has refocused its counterterrorism efforts to constantly adapt to emerging threats. President Trump's modernized counterterrorism Executive Order enhances the authorities we use to target the finances of terror groups and their leaders to ensure they are as robust as possible," said Secretary Steven T. Mnuchin. "These new authorities will allow the U.S. Government to starve terrorists of resources they need to attack the United States and our allies, and will hold foreign financial institutions who continue to do business with them accountable. These new tools aid our unrelenting efforts to cut off terrorists from their sources of support and deprive them of the funds required to carry out their destructive activities. They serve as a powerful deterrent to radical terror groups and those seeking to aid their nefarious goals."

HISTORY OF POST-9/11 TERRORISM AUTHORITIES

Twelve days after the attacks of September 11, 2001, the President signed the original E.O. 13224 to disrupt the financial infrastructure of terrorist groups worldwide. Since then, this authority has become a cornerstone of Treasury's efforts to prevent terrorist attacks by cutting off sources of funding and denying access to the international financial system. Yet terrorists

and their supporters are constantly seeking to test and evade our counterterrorism measures. As the U.S. Government confronts evolving threats of worldwide terrorism, the President has significantly enhanced E.O. 13224 to strengthen the U.S. Government's ability to disrupt terrorist activity by depriving terrorist supporters of financial, material, and logistical backing worldwide. The U.S. Government has leveraged E.O. 13224 to dismantle networks supporting a broad range of terrorist groups from al-Qa'ida and ISIS to Iranian-backed groups like Hizballah and HAMAS. E.O. 13224 also serves as an important tool in our efforts to drain the financial resources of the Iranian regime's malign actors including the IRGC, and its foreign expeditionary arm, the Qods Force (IRGC-QF).

ENHANCED E.O. 13224 PROVIDES NEW COUNTERTERRORISM TOOLS

E.O. 13224, as amended, provides the Treasury and State Departments with new tools that allow the U.S. Government to better identify and designate perpetrators of terrorism worldwide.

Specifically, the E.O.:

- Contains new designation criteria that allows the U.S. Government to more efficiently target leaders or officials of terrorists groups as well as individuals who participate in terrorist training;
- Provides for secondary sanctions against foreign financial institutions that have knowingly conducted or facilitated significant financial transactions on behalf of any person sanctioned pursuant to E.O. 13224;
- Authorizes Treasury to prohibit a foreign financial institution that has knowingly conducted or facilitated a significant transaction with any Specially Designated Global Terrorist (SDGT) from opening or maintaining a correspondent or payable-through account in the United States;
- Consolidates U.S. counterterrorism authorities under a single sanctions program by eliminating E.O. 12947 and combining that authority's goal of defending the Middle East Peace Process with E.O. 13224's global remit and expanded authorities.

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. This Administration remains committed to facilitating the peace process in the Middle East and will use this amended authority to sanction those who stand in the way of progress.

ENHANCED AUTHORITIES ALLOW TREASURY TO TARGET BROADER RANGE OF TERRORISTS AND ACTIVITIES

These new authorities allow Treasury to target a broad range of new terrorist leaders, supporters, entities, and activities. Below are the terrorists and sympathizers targeted today under these new authorities:

Muhammad Sa'id Izadi (Izadi)

Izadi is a leader or official of the IRGC-QF.

Lebanon-based Izadi is the chief of the Palestinian Office of the IRGCQF Lebanon Corp.

Izadi has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, HAMAS.

As of late 2016, Izadi required a HAMAS Political Officer member to get permission from three senior HAMAS leaders in order to receive money directly from him. The HAMAS Political Office member stated Izadi would be sending \$1 million dollars in addition to Izadi's regular allocation, and an additional \$1 million dollars earmarked for the HAMAS Political Office member.

Zaher Jabarin (Jabarin)

Jabarin is a leader or official of HAMAS.

Turkey-based Jabarin is the head of HAMAS's Finance Office. In this capacity, he manages HAMAS's yearly budget amounting to tens of millions of dollars, is in charge of all HAMAS's income from various elements around the world, and seeks to obtain additional sources of funding for HAMAS.

Jabarin has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, HAMAS.

In his capacity as head of HAMAS's Finance Department, Jabarin was focused on developing a financial network in Turkey that would allow HAMAS to raise, invest, and launder money prior to transferring it to Gaza and the West Bank.

In recent years, Jabarin has promoted HAMAS's terrorist activities in the West Bank and Gaza targeting Israel by transferring hundreds of thousands of U.S. dollars in the West Bank to finance

HAMAS's terrorist activity. In addition, Jabarin tries to promote business activity and investments to generate revenue for HAMAS.

Jabarin has served as the primary point of contact between HAMAS and the IRGC-QF. Since 2017, there was growing contact between IRGC-QF and HAMAS officials focused on increased funding from Iran.

Jabarin was involved in the transfer of millions of dollars to HAMAS via Redin Exchange, also sanctioned today and detailed immediately below.

Redin Exchange

Redin Exchange has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, HAMAS.

As of March 2019, the Turkey-based Redin Exchange and Treasury-designated financial facilitator Muhammad Sarur were involved in a \$10 million dollar transfer to HAMAS's operational arm, the Izz-Al-Din Al-Qassam Brigades.

As of mid-2018, Redin Exchange was identified as a key part of the infrastructure used to transfer money to HAMAS. Throughout 2017, tens of millions of dollars was transferred to HAMAS with the assistance of Redin Exchange.

In July 2018, Redin Exchange assisted in the transfer of \$4 million from the IRGC-QF to HAMAS.

In May 2018, Redin Exchange assisted in the transfer of \$2 million from the IRGC-QF and Hizballah to HAMAS.

In July 2017, a senior HAMAS leader transferred \$5.5 million to HAMAS finance chief Zaher Jabarin via Redin Exchange.

Marwan Mahdi Salah Al-Rawi (Al-Rawi)

Al-Rawi is a leader or official of Redin Exchange.

Al-Rawi is identified as Redin Exchange's Chief Executive Officer (CEO).

In late January 2018, OFAC-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.

Ismael Tash (Tash)

Ismael Tash is a leader or official of Redin Exchange.

Tash is Redin Exchange's Deputy CEO and is in charge of Redin Exchange's foreign relations.

As of January 2019, Tash was a key player in many financial transfers from Iran to HAMAS, and was highly involved with HAMAS facilitators.

Since at least 2017, Tash has had ongoing contact with a money transfer channel managed by Treasury-designated HAMAS financial facilitator Muhammad Sarur. This channel has transferred IRGC-QF money to Hamas and in particular HAMAS's operational arm in the Gaza Strip.

SMART Ithalat Ihracat Dis Ticaret Limited Sirketi (SMART)

SMART is owned or controlled by Ismael Tash.

Tash is the owner of SMART.

SMART is an import/export limited company and possible front company associated with Redin Exchange. Both SMART and Redin Exchange share the same Istanbul-based address.

Saksouk Company for Exchange and Money Transfer (Saksouk)

Saksouk has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, ISIS.

In late 2018, Saksouk handled fund transfers on behalf of Syria-based ISIS members.

In mid-2017, an ISIS financial facilitator and U.S. Treasury-designated Fawaz Muhammad Jubayr al-Rawi (Fawaz) and an ISIS commander utilized Saksouk to conduct financial operations throughout the Middle East. ISIS financial facilitators and affiliates were listed as points of contact for Saksouk branch locations in Syria, Lebanon, and Turkey.

In July 2017, the Syria-based ISIS Immigration Logistics Committee (ILC) attempted to transfer money to an ISIS ILC affiliate via Saksouk Company.

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

Al Haram Exchange has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS.

As of April 2019, ISIS members in Syria received instruction to conduct all financial transactions with Al Haram Exchange.

As of early 2017, Al Haram Exchange was involved in an ISIS financial transfer between Syria and Belgium.

As of mid-2017, a Syrian-based ISIS facilitator coordinated a money transfer between the Al-Haram Exchange and Fawaz, the owner of the Hanifa Currency Exchange, an entity designated in December 2016 for being owned or controlled by Fawaz.

Al-Khalidi Exchange (Al-Khalidi)

Al-Khalidi has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, ISIS.

As of September 2017, ISIS-affiliated al-Khalidi served as a 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 function as a hawala money transfer office.

As of early 2017, al-Khalidi in al-Raqqah, Syria, and Gaziantep, Turkey were involved in ISIS's transfer of funds from Iraq through al-Raqqah, Syria, to Gaziantep, Turkey, in support of ISIS. As of 2017, ISIS also transferred money into Syria via al-Khalidi.

As of late 2016, Al-Khalidi was the most important financial transfer office in the region used to move money to fund ISIS-held areas. Al-Khalidi was the largest financial exchange office that dealt with ISIS. Hundreds of thousands of dollars per day passed through the office in Sanliurfa, Turkey.

As of mid-2016, Fawaz al-Rawi, who was subsequently designated in late 2016 as an ISIS financier, arranged for cash shipments to Iraq and Turkey. Fawaz al-Rawi was the owner and operator of Hanifa Currency Exchange in Albu Kamal, Syria, a designated entity, which he used to store ISIS external funds. Fawaz al-Rawi conducted financial transactions with agents and transfer currency-exchanges throughout the region, including al-Khalidi exchanges in Sanliurfa, Turkey.

As of mid-2015, al-Khalidi's Istanbul, Izmir, and Sanliurfa branches facilitated money transfers and transactions for ISIS. During this same timeframe, ISIS maintained a telephone directory of associates and managers of various ISIS offices, which included Syria-based locations for al-Khalidi Exchange and al-Hebo Jewelry Company, also sanctioned today

Al-Hebo Jewelry Company (al-Hebo)

Al-Hebo has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, ISIS.

As of late 2017, al-Hebo's location in Gaziantep, Turkey 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.

As of early 2017, Raqqah-based al-Hebo was a cash transfer business used by ISIS members.

In September 2016, an employee of Raqqah-based al-Hebo likely coordinated a money transfer on behalf of a now-deceased, Syria-based, ISIS senior operations official.

Muhamad Ali al-Hebo (Muhamad)

Muhamad has acted or purported to act for or on behalf of, directly or indirectly, al-Hebo.

As of late 2016, Turkey-based al-Hebo owner, Muhamad, was involved in procuring precious metals to enable ISIS to produce its own ISIS coinage.

As of late 2016, Muhamad was the General Manager of an al-Hebo location in Raqqah, Syria.

As of early 2016, Muhamad managed the Sanliurfa-based al-Hebo location.

Muhamad has acted or purported to act for or on behalf of, directly or indirectly, al-Khalidi.

As of early 2017, al-Hebo and al-Khalidi were both under the control and management of Muhamad. During this same timeframe, Muhamad was involved in operating jewelry stores and money exchange/transfer businesses in Istanbul, Urfa, and Gaziantep, Turkey. These businesses operated under the name al-Khalidi.

As of late 2016, Muhamad worked at the Raqqah-based al-Khalidi location.

As of early 2016, Muhamad managed the Sanliurfa-based al-Khalidi location.

Mohamad Ameen (Ameen)

Ameen has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS-Khorasan (ISIS-K).

Ameen is an ISIS-K recruiter who encouraged people to join ISIS-Khorasan (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. The ISIS-K digital media member was told he would receive \$700 monthly in salary and was responsible for translating material for Ameen.

Additionally, as of April 2019, Maldives-based Ameen was actively engaged in leading ISIS recruitment through his close lieutenants. Ameen's subordinates were holding roughly 10 recruitment sessions per week under the guise of Islamic classes at several Malé, Maldives-based locations, including Ameen's home. Ameen and his group continued to recruit on behalf of ISIS from various Maldivian criminal gangs.

Additionally, Ameen is a recruiter and key leader for ISIS in Syria, Afghanistan, and the Maldives. Ameen used to direct terrorist fighters to Syria, but now sends them to Afghanistan.

Mohamed Ahmed Elsayed Ahmed Ibrahim (Ibrahim)

Ibrahim has acted or purported to act for or on behalf of, directly or indirectly, al-Qa'ida.

Ibrahim, a Brazil-based member of al-Qa'ida, provided facilitation support to al-Qa'ida members and material support to al-Qa'ida.

Almaida Marani Salvin (Salvin)

Salvin has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to, ISIS-Philippines.

In April 2019, Salvin was arrested in Zamboanga City, Philippines, based on her suspected unlawful manufacture, sale, acquisition, disposition, importation, or possession of an explosive or incendiary device. During the raid, the Philippine authorities recovered improvised explosive device components, as well as bank accounts and passbooks for Salvin linked to ISIS-Philippines (ISIS-P) funding.

As of early 2019, Philippine authorities determined Salvin, who was the wife of an ISIS-P leader, conducted financial transactions, procurement, transportation of firearms and explosives, and facilitated the recruitment and travel of foreign fighters to the Philippines.

Muhammad Ali Sayid Ahmad (Ahmad)

Ahmad has participated in training related to terrorism that was provided by ISIS.

In an October 2018 public interview, Ahmad recounted his journey to join ISIS. He stated that he left Toronto to join ISIS in April 2014 and attended basic training as a new ISIS recruit. In basic training, he learned how to use small arms. Later he joined a sniper and reconnaissance unit where he received advanced sniper and reconnaissance training.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of these targets that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. OFAC's regulations generally prohibit all dealings by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of blocked or designated persons. In addition, persons that engage in certain transactions with the individual designated today may themselves be exposed to sanctions or subject to an enforcement action.

Furthermore, pursuant to E.O. 13224, as amended today, all SDGTs are now subject to secondary sanctions. OFAC can prohibit or impose strict conditions on the opening or maintaining in the United States of a correspondent account or a payable-through account by a foreign financial institution that knowingly facilitates a significant transaction for any SDGT, or a person acting on behalf of or at the direction of, or owned or controlled by, a SDGT.

[Identifying information related to today's action .](#)

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