

Treasury Designates ISIS Financial, Procurement, and Recruitment Networks in the Middle East and South Asia

November 18, 2019

Washington – Today, the U.S. Department of the Treasury’s Office of Foreign Assets Control (OFAC) designated two Turkey-based Islamic State of Iraq and Syria (ISIS) procurement agents and four ISIS-linked companies operating in Syria, Turkey, and across the Gulf and Europe for providing critical financial and logistical support to ISIS. Additionally, Treasury is acting against an Afghanistan-based organization, Nejaat Social Welfare Organization, for using false charitable pretenses as a cover to facilitate the transfer of funds and support the activities of the terrorist group’s branch in Afghanistan, ISIS – Khorasan (ISIS-K). Treasury also took action against two senior officials affiliated with this organization.

“Following the highly successful operation against al-Baghdadi, the Trump Administration is resolved to completely destroy ISIS’s remaining network of terror cells,” said Treasury Secretary Steven T. Mnuchin. “The Treasury Department contributes to this effort in several ways, including by degrading ISIS’s ability to recruit and arm fighters globally by stamping out its financial footholds.”

These targets have been designated pursuant to Executive Order (E.O.) 13224, as amended, which 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 terrorists. This action further coincides with the twelfth meeting of the Counter ISIS Finance Group (CIFG), which includes 56 countries and international organizations. As a working group of the Global Coalition to Defeat ISIS, the CIFG plays a fundamental role in coordinating efforts to isolate ISIS from the international financial system and eliminate its sources of revenue. The CIFG is co-chaired by Treasury’s Assistant Secretary for Terrorist Financing, Marshall Billingslea.

The United States plans to work with our United Nations and CIFG partners to nominate these targets to the United Nations ISIL (Da’esh) and al-Qa’ida Sanctions List and will continue to work with our United States and CIFG partners to further target ISIS and dismantle their financial networks. The Treasury Department remains committed to safeguarding charities from terrorist

abuse and will continue to identify and disrupt the operations of sham organizations that undermine the integrity of the charitable sector.

Sahloul Money Exchange Company (Sahloul)

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

In late 2017, Sahloul held deposits from ISIS-linked individuals seeking transport out of Syria to Turkey.

In late 2016, Sahloul facilitated the transfer of foreign donations to ISIS's then-headquarters in Mosul, Iraq.

Additionally, Sahloul transferred thousands of dollars to ISIS operatives in Turkey in 2016.

Al-Sultan Money Transfer Company (Al-Sultan)

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

Al-Sultan has been involved in transferring ISIS money.

In mid-2019, an ISIS associate identified Al-Sultan as an exchange that could be used avoid scrutiny when transferring funds.

Tawasul Company (Tawasul)

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

As of mid-2018, a Syria-based ISIS financial facilitator had transferred funds via Tawasul's office in Harim, Syria.

As of 2018, ISIS allegedly had used Tawasul, as well as multiple other companies in Syria and Western Europe, to transfer money among ISIS fighters.

Ismail Bayaltun

Ismail Bayaltun has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS.

Turkey-based Ismail Bayaltun and his brother Ahmet Bayaltun—through a company they owned in Sanliurfa, Turkey—have provided support to ISIS fighters.

As of late 2018, Ismail Bayaltun and his siblings provided material support to ISIS through ACL Ithalat Ihracat. The company supplied ISIS with equipment in 2015 and 2017.

Ahmet Bayaltun

Ahmet Bayaltun has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS.

As of early 2017, Turkey-based Ahmet Bayaltun was identified as an ISIS procurement agent.

ACL Ithalat Ihracat

ACL Ithalat Ihracat is owned, controlled, or directed by Ismail Bayaltun, a person whose property and interests in property are blocked pursuant to E.O. 13224, as amended.

As of 2018, Ismail Bayaltun was the Chairman of the Board of Directors of ACL Ithalat Ihracat and operated ACL Ithalat Ihracat with his siblings.

Nejaat Social Welfare Organization (Nejaat)

The Nejaat Social Welfare Organization has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS-K.

Nejaat was used as a cover company to facilitate the transfer of funds and support the activities of ISIS-K.

In late 2016, Afghan leaders of ISIS-K held planning meetings under the cover of a Salafi solidarity meeting sponsored by Nejaat. Executive members of Nejaat and prominent Salafi leaders in Afghanistan led the meeting, some of whom were financial supporters of Nejaat. Rohullah Wakil, also designated today, was one of the executive members of Nejaat who co-led the meeting.

In mid-2016, an ISIS-K facilitator managed a non-governmental organization called Nejaat. An ISIS-K recruiter worked at Nejaat and recruited ISIS-K fighters in Kabul and arranged for their travel to Nangarhar Province.

Nejaat collected donations on behalf of ISIS-K from individuals in Qatar, the United Arab Emirates, Iraq, and other Middle Eastern countries. Money was then transferred from the Gulf to Asia—via the banking system—where an ISIS-K coordinator would collect the transferred funds. Nejaat's offices in Kabul and Jalalabad distributed the funds to ISIS-K commanders.

Sayed Habib Ahmad Khan

Sayed Habib Ahmad Khan is a leader or official of the Nejaat Social Welfare Organization, an entity whose property and interests in property are blocked pursuant to E.O. 13224, as amended.

As of 2019, Sayed Habib Ahmad Khan was identified as the director of Nejaat. He is located in Kuwait.

Additionally, Sayed Habib Ahmad Khan has been identified as an ISIS-K facilitator.

Rohullah Wakil

Rohullah Wakil has materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS-K.

Rohullah Wakil is an executive member of Nejaat who co-led a 2016 Nejaat Salafi solidarity meeting which served as a cover for ISIS-K planning.

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 by E.O. 13886, all Specially Designated Global Terrorists ("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.

View identifying information related to today's action [here](#).

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