Treasury Designates Facilitation Network Supporting ISIS Members in Syria

May 9, 2022

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) designated a network of five Islamic State of Iraq and Syria (ISIS) financial facilitators operating across Indonesia, Syria, and Turkey. The five individuals, who are designated today pursuant to Executive Order (E.O.) 13224, as amended, have played a key role in facilitating the travel of extremists to Syria and other areas where ISIS operates. This network has also conducted financial transfers to support ISIS efforts in Syria-based displaced persons camps by collecting funds in Indonesia and Turkey, some of which were used to pay for smuggling children out of the camps and delivering them to ISIS foreign fighters as potential recruits.

This action coincides with the 16th meeting of the Counter ISIS Finance Group (CIFG) of the Global Coalition to Defeat ISIS. The United States, Italy, and Saudi Arabia co-lead the CIFG—comprising nearly 70 countries and international organizations—and coordinate efforts against ISIS financial support networks worldwide.

"Today, Treasury has taken action to expose and disrupt an international facilitation network that has supported ISIS recruitment, including the recruitment of vulnerable children in Syria," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "The United States, as part of the Global Coalition to Defeat ISIS, is committed to denying ISIS the ability to raise and move funds across multiple jurisdictions."

Residents of displaced persons camps in Syria include those who have been displaced by ISIS, as well as ISIS members, supporters, and their families. ISIS sympathizers in over 40 countries have sent money to ISIS-linked individuals in these camps in support of ISIS's future resurgence. Al-Hawl is the largest displaced persons camp in northeast Syria, and it holds up to 70,000 people, most of whom are women and children. In al-Hawl alone, ISIS supporters have received up to \$20,000 per month via hawala, an informal transfer mechanism; the majority of those funds transfers have originated outside Syria or passed through neighboring countries such as Turkey. Additionally, since 2019, ISIS has been smuggling its

Dwi Dahlia Susanti and Other ISIS Facilitators

Dwi Dahlia Susanti has been an ISIS financial facilitator since at least 2017 and has assisted other ISIS members with money transfers involving individuals in Indonesia, Turkey, and Syria. In late 2017, Susanti helped her husband deliver nearly \$4,000 and weapons to an ISIS leader. At that time, Susanti diverted about \$500 of these funds for ISIS supporters in her own network.

As of early 2021, Susanti has facilitated money transfers from Indonesia to Syria in order to provide funds to individuals in displaced person camps. In some cases, these funds were used to smuggle teenage children out of the camps to the desert, where they were received by ISIS foreign fighters, likely as child recruits for ISIS.

In mid-2019, **Rudi Heryadi** advised an extremist associate about potential travel to ISIS-dominated areas, including in Afghanistan, Egypt and other parts of Africa, and Yemen. Heryadi also asked for donations for travelers and their families. On June 24, 2020, Indonesian authorities convicted Heryadi on terrorism charges.

Today's action also targets ISIS facilitator **Ari Kardian**, who was previously charged by Indonesian authorities for facilitating the travel of Indonesians to Syria to join ISIS.

Dwi Dahlia Susanti, Rudi Heryadi and Ari Kardian are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, ISIS.

Susanti's Accomplices and Financial Facilitators

On numerous occasions, **Muhammad Dandi Adhiguna** provided assistance to Susanti, including for financial and operational matters. Adhiguna has advised Susanti on the use of her personal bank accounts. In late 2021, Adhiguna completed a registration form to join ISIS and sent it to Susanti.

Dini Ramadhani provided financial assistance to Susanti on multiple occasions.

Muhammad Dandi Adhiguna and Dini Ramadhani are being designated pursuant to E.O. 13224, as amended, for having materially assisted, sponsored, or provided financial, material, or technological support for, or goods or services to or in support of, Susanti.

Sanctions Implications

As a result of today's action, all property and interests in property of the individuals named above, and of any entities that are owned, directly or indirectly, 50 percent or more by them, individually, or with other blocked persons, that are in the United States or in the possession or control of U.S. persons must be blocked and reported to OFAC. Unless authorized by a general or specific license issued by OFAC or otherwise exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within the United States (including transactions transiting the United States) that involve any property or interests in property of designated or otherwise blocked persons.

Furthermore, engaging in certain transactions with the individuals designated today entails risk of secondary sanctions pursuant to E.O. 13224, as amended. Pursuant to this authority, 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 of a foreign financial institution that knowingly conducted or facilitated any significant transaction on behalf of a Specially Designated Global Terrorist.

The power and integrity of OFAC sanctions derive not only from its ability to designate and add persons to the SDN List, but also from its willingness to remove persons from the SDN List consistent with the law. The ultimate goal of sanctions is not to punish, but to bring about a positive change in behavior. For information concerning the process for seeking removal from any OFAC list, including the Specially Designated Nationals and Blocked Persons List, please refer to OFAC's Frequently Asked Question 897. Additional information regarding sanctions programs administered by OFAC can be found here.

View identifying information on the individuals designated today.

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