U.S. DEPARTMENT OF THE TREASURY

Treasury Designates Terrorist Financing Facilitators Jointly With Türkiye

May 2, 2023

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC), in a joint action with authorities in the Republic of Türkiye, designated two financial facilitators of Syria-based terrorist groups Hay'at Tahrir al-Sham (HTS) and Katibat al-Tawhid wal-Jihad (KTJ), both of which are sanctioned by the United States and the United Nations. This action continues the cooperation between the United States and Türkiye to counter the financing of terrorist groups that perpetuate violence and instability throughout the region. Concurrently, the Turkish Ministry of Treasury and Finance and the Turkish Ministry of Interior have implemented an asset freeze against these terrorist facilitators.

"As terrorist groups continue to seek access to the international financial system, collaboration with our partners increases our ability to more effectively disrupt these facilitation networks," said Under Secretary of the Treasury for Terrorism and Financial Intelligence Brian E. Nelson. "Treasury remains committed to working with Türkiye and others in the region to disrupt the flow of funds to terrorist groups and to degrade their capacity to operate."

Today's designations follow the joint U.S.-Turkish action on January 5, 2023 that disrupted critical nodes of a key financial facilitation network of the Islamic State of Iraq and Syria (ISIS). These individuals are being designated pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorist groups, their supporters, and associated assets.

OMAR ALSHEAK

Omar Alsheak, more commonly known as Abu Ahmed Zakour, has been a leader or official of HTS and its predecessor terrorist group al-Nusrah Front in various roles since at least 2003. Omar Alsheak continues to occupy a position of leadership in HTS as a Shura council member, emir of the Aleppo army, and supervisor of the HTS economic portfolio abroad under the umbrella of the financial arm of HTS. As of March 2022, Omar Alsheak served as the HTS security department emir, and as of February 2019, as the financial leader of HTS's predecessor terrorist

group, al-Nusrah Front. As of October 2022, Omar Alsheak functioned as the General Relations Office chief and received situational updates from HTS military commanders.

Presently, HTS is a coalition of northern Syria-based religious extremist groups that evolved from al-Nusrah Front, al-Qa'ida's former branch in Syria. During the initial years of Syria's civil war, infighting among al-Nusrah Front, ISIS, and other factions aligned with these terrorist groups led some leaders to shift allegiances. Most notably, U.S.- and UN-designated al-Nusrah Front leader Abu Muhammad al-Jawlani broke with al-Qa'ida in 2016 because of strategic disagreements, and in 2017, al-Nusrah Front merged with other groups opposing the Syrian regime of Bashar al-Assad in northwestern Syria to form HTS. On May 14, 2014, the U.S. Department of State designated al-Nusrah Front pursuant to E.O. 13224, and on May 31, 2018, HTS was added as an alias of al-Nusrah Front. On June 5, 2018, the UN Security Council (UNSC) 1267 ISIL and al-Qa'ida Sanctions Committee amended the al-Nusrah Front listing to include HTS as an alias.

Omar Alsheak is being designated for having acted for or on behalf of, directly or indirectly, al-Nusrah Front, a person whose property and interests are blocked pursuant to E.O. 13224.

KUBILAY SARI

Since early 2018, Istanbul-based **Kubilay Sari** has received funds in Türkiye from donors on behalf of KTJ fundraisers for the purchase of weapons systems such as firearms and mortars. Multiple Syria-based members of KTJ have identified Kubilay Sari and his bank accounts as their conduit for financial transfers for terrorist operations, including for purchasing military equipment, such as motorcycles and night vision. A member of HTS also identified Kubilay Sari as a trusted contact for funds transfers.

KTJ is a predominantly Uzbek jihadist group affiliated with al-Qa'ida; it operates primarily in Idlib Province, Syria, and cooperates with other designated terrorist groups active in Idlib, including HTS. In addition to engaging in terrorist activities in Syria, KTJ has been responsible for conducting external attacks, such as the April 2017 Saint Petersburg, Russia, metro bombing in April 2017 and the August 2016 suicide car bombing of the Embassy of the People's Republic of China in Bishkek, Kyrgyzstan. KTJ remains loyal to al-Qa'ida; in 2019, the group renewed its loyalty pledge to al-Qa'ida's now deceased leader Ayman al-Zawahiri. On March 7, 2022, the U.S. Department of State designated KTJ pursuant to E.O. 13224, as amended, and the UNSC 1267 ISIL/AQ Sanctions Committee listed KTJ.

Kubilay Sari is being designated for having materially assisted, sponsored, or provided financial, material, or technological support for, goods or services to or in support of, KTJ, a person whose property and interests in property are blocked pursuant to E.O. 13224, as amended.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the individuals and entities 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 Specially Designated Nationals and Blocked Persons List (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 an OFAC list, including the SDN List, please refer to OFAC's Frequently Asked Question 897. For detailed information on the process to submit a request for removal from an OFAC sanctions list, please refer to OFAC's website.

View identifying information on the individuals designated today.

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