

Following Terrorist Attack on Israel, Treasury Sanctions Hamas Operatives and Financial Facilitators

October 18, 2023

WASHINGTON — Today, the U.S. Department of the Treasury's Office of Foreign Assets Control (OFAC) imposed sanctions on ten key Hamas terrorist group members, operatives, and financial facilitators in Gaza and elsewhere including Sudan, Türkiye, Algeria, and Qatar. This action targets members managing assets in a secret Hamas investment portfolio, a Qatar-based financial facilitator with close ties to the Iranian regime, a key Hamas commander, and a Gaza-based virtual currency exchange and its operator. Today's designations are part of a continuous effort by the United States to root out Hamas's sources of revenue in the West Bank and Gaza and across the region and is taken in close coordination with regional partners and allies. To date, Treasury has targeted nearly 1,000 individuals and entities connected to terrorism and terrorist financing by the Iranian regime and its proxies, including Hamas, Hizballah, and other Iran-aligned terrorist groups in the region.

"The United States is taking swift and decisive action to target Hamas's financiers and facilitators following its brutal and unconscionable massacre of Israeli civilians, including children," said Secretary of the Treasury Janet L. Yellen. "The U.S. Treasury has a long history of effectively disrupting terror finance and we will not hesitate to use our tools against Hamas. We will continue to take all steps necessary to deny Hamas terrorists the ability to raise and use funds to carry out atrocities and terrorize the people of Israel. That includes by imposing sanctions and coordinating with allies and partners to track, freeze, and seize any Hamas-related assets in their jurisdictions."

This action builds on OFAC's May 2022 [designation](#) of officials and companies involved in managing Hamas's secret international investment portfolio, as well as dozens of sanctions imposed on Hamas and its networks since the founding of Treasury's Office of Terrorism and Financial Intelligence in 2004. In addition to the funds Hamas receives from Iran, its global portfolio of investments generates vast sums of revenue through its assets, estimated to be worth hundreds of millions of dollars, with companies operating in Sudan, Algeria, Türkiye, the United Arab Emirates, and other countries. The companies in Hamas's portfolio have operated

under the guise of legitimate businesses and their representatives have attempted to conceal Hamas's control over their assets. This investment network is directed by the highest levels of Hamas leadership and has allowed Hamas senior officials to live in luxury while ordinary Palestinians in Gaza struggle in harsh living and economic conditions.

Today, OFAC is designating six individuals associated with Hamas's secret investment portfolio, two senior Hamas officials, and a Gaza-based virtual currency exchange and its operator. This action is taken pursuant to Executive Order (E.O.) 13224, as amended, which targets terrorist groups and their supporters. Hamas, and other Palestinian terrorist groups Palestinian Islamic Jihad (PIJ) and the Popular Front for the Liberation of Palestine (PFLP), have each been designated by the Department of State as Foreign Terrorist Organizations since October 1997. The groups have also been listed as Specially Designated Global Terrorists (SDGTs) since October 2001.

HAMAS INVESTMENT PORTFOLIO

Musa Muhammad Salim Dudin (Dudin) is a West Bank-based member of Hamas's Political Bureau and Investment Office official and is responsible for negotiations to free Hamas members in prison. Dudin has publicly represented and spoken on behalf of the terrorist organization. In 2023, following OFAC's designation of Trend GYO as an SDGT, Dudin attempted to obfuscate Trend GYO's continued affiliation with Hamas by transferring ownership to other parties. Dudin has also worked directly with designated Hamas senior leader Yahya Ibrahim Hassan Sinwar. Additionally, Dudin has previously received tens of thousands of dollars from Political Bureau Deputy Chief Salih al-Aruri. Dudin has used these funds to purchase a variety of weapons for Hamas that were subsequently used in deadly terrorist attacks that resulted in the deaths of Israeli soldiers. The Department of State designated Yahya Ibrahim Hassan Sinwar as an SDGT August 27, 2015 and OFAC designated Salih al-Aruri as a SDGT on September 10, 2015.

Abdelbasit Hamza Elhassan Mohamed Khair (Hamza) is a Sudan-based Hamas financier who has managed numerous companies in Hamas's investment portfolio and was previously involved in the transfer of almost \$20 million to Hamas, including funds sent directly to Mahir Jawad Yunis Salah, a senior Hamas financial officer, whom OFAC designated as an SDGT on September 10, 2015. Hamza has facilitated funds for Hamas through a network of large companies in Sudan. The network used by Hamza to launder money and generate revenue for Hamas includes Sudan-based Al Rowad Real Estate Development, which OFAC designated as

an SDGT in OFAC's May 24, 2022 sanctions action targeting Hamas's investment portfolio. Hamza also has longstanding ties to terrorism financing, including historic ties to al-Qa'ida and Usama bin Laden-linked companies in Sudan.

Amer Kamal Sharif Alshawa (Alshawa), **Ahmed Sadu Jahleb (Jahleb)**, **Aiman Ahmad Al-Duwaik (al-Duwaik)**, and **Walid Mohammed Mustafa Jadallah (Jadallah)** are Hamas operatives and are part of Hamas's investment network in Türkiye and Algeria. Türkiye-based Alshawa is the Chief Executive Officer (CEO) for Trend GYO and has served as a board member on several Hamas investment portfolio companies. Türkiye-based Jahleb serves as the Hamas investment portfolio secretary and coordinates various activities for Hamas-controlled companies and Hamas officials. Algeria-based al-Duwaik is a senior Hamas investment portfolio manager who, along with Türkiye-based Jadallah, also serves on the boards of several investment portfolio companies.

Dudin and Hamza are being designated pursuant to E.O. 13224, as amended, for having acted or purported to act for or on behalf of, directly or indirectly, Hamas. Alshawa, Jahleb, Al-Duwaik, and Jadallah 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, Hamas.

HAMAS OPERATIVES

Muhammad Ahmad 'Abd Al-Dayim Nasrallah (Nasrallah) is a longtime Hamas operative based in Qatar with close ties to Iranian elements. In recent years, he was involved in the transfer of tens of millions of dollars to Hamas, including Hamas's military wing, the Izz al-Din al-Qassim Brigades.

Ayman Nofal (Nofal), a member of the Izz al-Din al-Qassim Brigades who was allegedly killed in an airstrike on Tuesday, is the commander of military relations for Hamas and serves as a member of the terrorist group's General Military Council. Nofal has been involved in Hamas's coordination with separate Palestinian factions in its terrorist attacks against Israel.

Nasrallah and Nofal are being designated pursuant to E.O. 13224, as amended, for having acted or purported to act for or on behalf of, directly or indirectly, Hamas.

HAMAS VIRTUAL CURRENCY FUNDRAISING

In June 2021, Israel's National Bureau for Counter Terrorist Financing seized a number of virtual currency wallets in connection to a Hamas fundraising campaign, some of which were linked to the Izz al-Din Qassam Brigades. One of the seized wallet addresses belongs to **Buy Cash Money and Money Transfer Company (Buy Cash)**, a Gaza-based business that provides money transfer and virtual currency exchange services, including Bitcoin.

In addition to involvement in Hamas fundraising, Buy Cash has also been used to transfers funds by affiliates in other terrorist groups. In September 2019, Buy Cash's Bitcoin wallet 19D1iGzDr7FyAdiy3ZZdxMd6ttHj1kj6WW received a Bitcoin transfer equivalent to over \$2,000. The transfer was facilitated by a Türkiye-based money services business operator and al-Qa'ida affiliate. Additionally, in 2017 a Buy Cash account was registered by individuals involved in payment for procurement of large quantities of online infrastructure on behalf of the Islamic State of Iraq and Syria (ISIS). **Ahmed M. M. Alaqad (Alaqad)**, who is based in Gaza, registered Buy Cash's domain in July 2015. Alaqad has acted as Buy Cash's representative and is the owner of Buy Cash financial exchange.

Buy Cash is 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, Hamas. Alaqad is 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, Buy Cash.

Hamas often relies on small-dollar donations, including through the use of virtual currency. While individual amounts may vary, any information can help identify new investigative links for law enforcement and help disrupt planned attacks. OFAC appreciates members of the public who have tips related to Hamas fundraising, including information regarding Hamas' on-line fundraising campaigns and specific information such as account numbers, and virtual currency wallet addresses. OFAC encourages anyone with information about activities that do not comply with sanctions to contact the OFAC Compliance Hotline at OFAC_Feedback@Treasury.gov.

SANCTIONS IMPLICATIONS

As a result of today's action, all property and interests in property of the designated persons described above that are in the United States or in the possession or control of U.S. persons are blocked and must be reported to OFAC. In addition, any entities that are owned, directly or indirectly, individually or in the aggregate, 50 percent or more by one or more blocked




persons are also blocked. Unless authorized by a general or specific license issued by OFAC, or exempt, OFAC's regulations generally prohibit all transactions by U.S. persons or within (or transiting) the United States that involve any property or interests in property of designated or otherwise blocked persons.

In addition, financial institutions and other persons that engage in certain transactions or activities with sanctioned entities and individuals may expose themselves to sanctions or be subject to an enforcement action. The prohibitions include the making of any contribution or provision of funds, goods, or services by, to, or for the benefit of any designated person, or the receipt of any contribution or provision of funds, goods, or services from any such person.

The power and integrity of OFAC sanctions derive not only from OFAC's 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 an OFAC list, including the SDN List, please refer to [OFAC's Frequently Asked Question 897 here](#). For detailed information on the process to submit a request for [removal from an OFAC sanctions list, please click here](#).

Click here for more information on the [individuals and entities designated today](#).

Additional Treasury resources on countering the financing of terrorism:

- [2022 National Terrorist Financing Risk Assessment](#) 
- [National Strategy for Combatting Terrorist and Other Illicit Financing](#) 
- [Action Plan to Address Illicit Financing Risks of Digital Assets](#) 
- [FATF Report: Virtual Assets Red Flag Indicators of Money Laundering and Terrorist Financing](#)
- [Terrorist Financing Targeting Center](#)

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